

1. Summary & Purpose

The objective of this policy is to provide clarity on Signify's Website and Cookie Privacy Policy. Signify is committed to compliance with the Protection of the Personal Information Act (POPIA), Act No. 4 of 2013.

The purpose of this privacy and cookie policy is to protect Signify from the compliance risks associated with the protection of personally identifiable information (PII) collected via the Company's website: <https://www.signify.co.za>. The policy demonstrates Signify's commitment to protecting the privacy rights of its clients, customers and partners using Signify's website.

The focus of this Website and Cookie Privacy Policy is to ensure that you, the website visitor, and user, are at all times informed about how our website and any other media form, media channel, mobile website or mobile application related, linked, or otherwise connected to it (collectively, the "site") uses and protects any PII that you give us while using the website.

This Website and Cookie Privacy Policy explains how we obtain, use, and disclose your PII, as is required by the POPI Act. At Signify, we are committed to protecting your privacy and to ensuring that your PII is collected and used properly and lawfully.

We recommend that you read this Website and Cookie Privacy Policy so that you understand our approach towards the use of your PII collected via the website. By using the website and by submitting your PII, you acknowledge that you have reviewed the terms of the Website and Cookie Privacy Policy and agree and consent that we may collect, use, transfer and process your PII in accordance with the policy.

2. Definitions

2.1 Cookies: The term "cookies" refers to cookies and other similar technologies covered by the POPI Act on privacy in electronic communications. A web cookie is a small file that requests permission to be placed on a user's computer hard drive. Cookies help the user's browser to navigate a website. The cookies themselves cannot collect any information stored on the user's computer or files. When a server uses a web browser to read cookies, they can help a website to deliver a more user-friendly service.

Once the user agrees, the file is added, and the cookie helps to analyse web traffic or lets the user know when they visit a particular site. Cookies allow web applications to respond to a user as an individual. The web application can tailor its operations to an individual user's needs, likes and dislikes by gathering and remembering information about the user's preferences, creating a type of user profile.

Traffic log cookies are used to identify the pages that are being used. The cookies are used to learn more about the way a user interacts with the website content and to help to improve the user's experience when visiting websites by compiling statistical data.

A cookie in no way gives us access to a user's computer or any information about them, other than the data the user chooses to share.

In some cases, users can choose to accept or decline cookies.

Most web browsers automatically accept cookies, but users can usually modify their browser settings to decline cookies if they prefer. The downside is that it can prevent users from taking full advantage of websites' functionality.

2.2 Consent: This is any voluntary, specific, and informed expression of will in terms of which permission is given for the processing of PII.

***Simply put,** consent means informed permission to process or use PII.

2.3 Data subject: This refers to the natural or juristic person to whom the PII relates, such as an individual client, customer or organisation that supplies a company with products or other goods such as:

- information, online identifier or other particular assignment to the person;
- the biometric information of the person;
- the personal opinions, views, or preferences of the person; or
- correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence.

***Simply put,** the data subject refers to an individual or legal entity to whom the PII relates.

2.4 Direct marketing: This is the approach to the data subject, either in person or by mail or electronic communication, for the direct or indirect purpose of:

- promoting or offering to supply, in the ordinary course of business, any goods or services to the data subject; or
- requesting the data subject to make a donation of any kind for any reason.

***Simply put,** direct marketing means you need consent from the data subject to use their PII for marketing purposes.

2.5 Information officer: The information officer (IO) is responsible for ensuring the organisation's compliance with the POPI Act.

- Where no IO is appointed, the head of the organisation is responsible for performing the IO's duties.
- Once appointed, the IO must be registered with the South African Information Regulator established under the POPI Act prior to performing their duties. Deputy IOs can also be appointed to assist the IO.

2.6 Information privacy: Information privacy focuses on the use and governance of PII – things like putting policies in place to ensure that the data subject's PII is collected, shared, and used in appropriate ways. Information privacy is mostly dependent on organisational measures and people's behaviours.

2.7 Information security: Information security focuses more on protecting PII from malicious attacks and the exploitation of stolen data for profit. Information security is mostly dependent on operational measures such as technology systems, access protocols, passwords, etc.

3. Policy Scope

All employees, subsidiaries, business units, departments and individuals directly associated with Signify are responsible for adhering to this policy and for reporting any security breaches or incidents to the IO.

Any third-party service provider responsible for providing and managing the website platform must adhere to the same information security principles contained in this policy to ensure security measures are in place when processing PII.

This policy and its guiding principles apply to:

- Signify's governing committee/team;
- all branches, business units and divisions of Signify;
- all employees and volunteers; and
- all contractors, suppliers and other persons acting on behalf of Signify.

The policy's guiding principles find application in all situations and must be read in conjunction with the provisions of the POPI Act.

4. Policy Function and the Conditions of the POPI Act

In terms of the POPI Act, "process" and "processing" of PII is defined as any operation or activity or any set of operations, whether or not by automatic means, concerning PII, including:

- a) the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;
- b) dissemination by means of transmission, distribution or making available in any other form; and

c) the merging, linking, restriction, degradation, erasure, or destruction of information.

Signify is therefore committed to ensuring that the PII collected via the Company's website will only be processed and used in accordance with this Website and Cookie Privacy Policy.

5. Policy Statements

5.1 Collection of PII: Section 9 of the POPI Act states that "Personal information may only be processed if, given the purpose for which it is processed, it is adequate, relevant and not excessive."

Signify therefore collects and processes your PII via our website mainly to provide you with access to our services and products. The type of PII we collect will depend on the purpose for which it is collected and used. We will only collect PII that we need for that purpose.

We collect/can collect your PII via our website when you provide us with your personal details by completing the Information Form on the *Contact Us* page, including:

- Your first name and surname
- Your company name
- Your email address
- Your mobile number
- Your interest in our products

We also collect your PII indirectly from you via website-based electronic cookies in order to:

- monitor website usage metrics via the cookies;
- improve the website's performance; and
- automate and improve services via the cookie analytical data collected on the web server.

5.2 Processing of PII: We will use your PII that is collected via our Information Form and/or our automated cookies only for the purposes for which it was collected or agreed to by you.

We will not keep the PII collected via the website's Information Form or website cookies for longer than is necessary to fulfil that purpose unless we need to keep it for legitimate business or legal reasons.

Any direct marketing communications that we send to you, after your initial engagement with us via the website Information Form, will include the means necessary to opt out (as effortlessly as possible).

5.3 Security safeguards: We are committed to ensuring that your PII is secure, and we are legally obliged to provide adequate protection for the PII we hold and to stop unauthorised access and use of this PII.

To prevent unauthorised access or disclosure, we have put in place suitable physical, electronic, and managerial procedures to safeguard and secure the information we collect online via our Information Form and automated website cookies.

The PII collected via cookies is currently managed and stored on the web servers of our third-party domain suppliers; we therefore cannot be responsible or liable for any third-party's actions or their security controls on the information they may collect or process.

To ensure the security of your PII when we contract with third parties, we do impose appropriate security, privacy and confidentiality obligations on them to ensure that the PII we remain responsible for is kept secure. Our undertaking is also to ensure that anyone we pass your PII on to agrees to treat your information with the same level of protection as we are obliged to provide.

5.4 Use of third-party websites: Our website may contain links to other websites of interest. However, once you have used these links to leave our website, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information that you provide while visiting such sites, which are not governed by this Website and Cookie Privacy Policy.

5.5 Your rights – access to your PII: You have the right to request a copy of the PII we hold about you. To do this, simply contact us at the numbers/addresses listed on our *Contact Us* page and specify what information you would like.

5.6 Your rights – correction of and controlling your PII: You may choose to restrict the collection of or use of your PII in the following ways:

- You can delete, disable, or block cookies through your web browser. **Please note:** This may limit certain features on our site.

You have the right to ask us to update, correct or delete your PII. If you believe that any PII we are holding or have collected relating to you is incorrect or incomplete, please inform us as soon as possible so that we can correct this.

5.7 Your rights – processing your PII for a specific purpose: We will process and use your PII only for the specific purpose for which it was collected. We will not sell, distribute, or lease your PII (collected via our website form or cookies) to third parties unless we have your permission or are required by any applicable law, subpoena, order of court or legal process served on us or to protect and defend our rights or property.

5.8 Your rights – disclosure of your PII: We may share the PII collected via our website with:

- our employees and/or business partners that require the information to fulfil their work duties;
- our suppliers and/or vendors that require the information to assist with fulfilling your order;
- law enforcement (if required to do so); and
- our business partners and other third parties who are involved in the delivery of products or services to you, on the basis of informed consent only.