

# SHOPRITE CLIENT/SUPPLIER INFORMATION PROCESSING POLICY

## 1. Making your Confidential Information Available

The Shoprite group of companies is committed to protecting your privacy.

To make use of certain of our products and services you will be asked to provide us with certain of your personal and financial information. We recognise, however, that you may consider this information to be “confidential” and do not want it disclosed to or used by others.

The choice of providing us with this information is, however, always yours. If you choose to disclose your information, we accept that it is our duty to respect and protect its confidentiality. This means that we will not use or disclose it without your permission, unless we have some legal duty to do so. If, however, you choose not to provide this information to us, we may not be able to render the products or services you wish to select.

## 2. Protecting your Confidential Information

This policy determines what we will do with your confidential information after you have disclosed it.

Please read and consider this document carefully as you will be required to accept its terms before we can provide any products and services to you.

## 3. Who We Are

When we refer to “we”, “us” or “our” in this document we are referring to –

- (a) Shoprite Checkers (Pty) Ltd (Registration Number 1929/001817/07);
- (b) Its affiliates within the Shoprite group of companies;
- (c) Anyone to whom we may assign (i.e. give) our rights and duties under this policy, and
- (d) Anyone who takes our place (i.e. our successor).

Please note that how we use “we”, “us” or “our” in this policy, depends on the context.

## 4. Information we may Hold

We may record and hold the following types of information about you:

- (a) All information contained in the forms or other documentation you submit to us and any other details you provide afterwards. This may include your name, contact details, age, identity number, assets, liabilities, income, payment records, etc.;
- (b) Information we use to process any application you submit and which we use to determine whether you qualify for certain goods and services. This may include information received after we’ve made enquiries with public registers, credit bureaus, money laundering, fraud prevention and law enforcement agencies or your current or previous insurance companies. Please note that the information received from these entities may be linked to other people with whom you have financial associations, for example, members of your family and your business partners and associates;
- (c) Details of your preferences concerning our products and services;
- (d) Other demographic and lifestyle information;
- (e) Details of the accounts you and the members of your family hold and any transactions you and the members of your family have previously concluded with or through us; and

# SHOPRITE CLIENT/SUPPLIER INFORMATION PROCESSING POLICY

- (f) Details of when you contact us and when we contact you. This includes for example, IP addresses, electronic mail addresses, telephone numbers you contact us from and the content of the communications between us (which may be recorded).

## 5. Why we need Your Information

Your information is needed for the following purposes:

- (a) To process applications and decide whether you qualify for our products or services and for making related decisions (such as whether to extend credit to you). This may include confirming your identity, credit status, contact details, financial track record, etc from time to time;
- (b) To take such actions as may be required to enable and improve your use of our services;
- (c) To exercise our rights and comply with our duties in respect of any products or services we may provide to you. This may include processing and recording your requests and transactions, managing your accounts and policies, delivering our products and services to you, communicating with you concerning your use of our products and services and collecting payments you may owe us;
- (d) To make sure that the information we receive and hold about you is and remains accurate, complete and up to date;
- (e) To prevent, investigate and prosecute any unlawful activities;
- (f) To comply with legal and regulatory requirements;
- (g) To conduct market research and business analysis, understand your preferences, learn more about the products and services that you are interested in and improve the products and services we offer you;
- (h) To inform and provide you with the chance to use products, services and benefits we offer and that we believe may be of interest to you (to the extent that we are legally permitted to do so); and
- (i) For such other purposes as you may agree to or as may otherwise be legally permitted, whether to protect our or your interests or those of our suppliers and other customers.

## 6. How we Collect Information

We may collect information about you as follows:

- (a) From you when you make use of any of our services when, for example you fill in an application or other form, submit a request, conduct a transaction (which may include buying our products) or use our web sites, etc.;
- (b) From public or private registers or institutions such as credit bureaus, money laundering, fraud prevention and law enforcement agencies, your current and previous insurance companies, etc. This information may be used to process your application for credit or services and to reassess your status from time to time;
- (c) From people and entities we use to provide services to us. This may be debt collection services, cheque verification services, communication and data hosting services, processing and management services;
- (d) From persons you use to provide services to you. This may include communications and data hosting services and processing and management services;
- (e) From any other persons you have permitted to provide information to us; and
- (f) From any other persons who may otherwise be legally permitted to provide us with information about you.

## 7. Confirming your Information

# SHOPRITE CLIENT/SUPPLIER INFORMATION PROCESSING POLICY

It may be necessary for us to confirm the accuracy of your information from time to time using the above and other sources of information.

# SHOPRITE CLIENT/SUPPLIER INFORMATION PROCESSING POLICY

## 8. Protecting your Information

We will try at all times to make sure that your information is protected against unauthorised or accidental access, processing or loss and will implement reasonable technical and organisational controls to do so.

In the same way, where we use any other person or organisation to host, manage or process your data on our behalf, we will require them to implement the same or similar controls to protect your information.

As soon as reasonably possible (provided that we are not prevented from doing so by any law enforcement or regulatory agency), we will notify you in writing and at your registered postal or email address if we believe that an unauthorised access to your information may have occurred. In such instance we will provide you with such information as you may reasonably require in order to protect your interests.

## 9. Sharing your Information

You agree that we may transfer or make your information available to the following persons and organisations (whether they are located in our outside of South Africa) in order to achieve the data processing purposes set out in this policy:

- (a) To the divisions and entities in the Shoprite group. This includes the directors, employees, contractors, agents, auditors, legal and other professional advisors of the divisions and entities in the Shoprite group;
- (b) To banks, credit bureaus and fraud prevention agencies, who may link your information with those of your family members and business associates. We will, however, notify you before we provide any negative information about you to a credit bureau and, should you so request, we will, to the extent required by law, provide you with a copy of such information;
- (c) To your bank and to the other issuers of payment cards issued to you at your request;
- (d) To any other person that supplies, supports or underwrites any products or services we provide to you, but only to the extent to which it relates to your subscription to and use of our products and services;
- (e) To governmental, judicial, regulatory and law enforcement bodies and agencies. This includes the South African Revenue Services and the National Credit Regulator;
- (f) To persons who provide services to ourselves in relation to the products and services you are obtaining from us. This may include services such as delivery, debt collection, data hosting and processing and management services;
- (g) To any person to whom we cede, delegate, transfer or assign any of our rights or obligations relating to the products or services provided to you or relating to any contracts we may conclude with you;
- (h) To any person that acts as your legal guardian, executor of your estate, curator or who acts in a similar capacity;
- (i) To any person that provides a guarantee or security for the performance of your obligations to us, but only to the extent to which it relates to the guarantee or security provided;
- (j) To such other persons as may be permitted by law or to whom you may have given permission to receive your information from us. This may include persons and entities requesting information to evaluate your creditworthiness.

Please note that at all times, we will ensure that the persons to whom your information is transferred or made available, undertake to protect the confidentiality of your information in a manner similar to that set out in this policy.

# SHOPRITE CLIENT/SUPPLIER INFORMATION PROCESSING POLICY

## 10. How long we may Hold your Information

We may hold your information collected in terms of this policy for as long as you are registered to use our services and for at least five years after you stop doing so, or for such longer period as may be required or permitted by law.

## 11. Web Site Use

When you access any of our web sites we will collect certain information such as your IP address (the unique number which your machine uses when it is connected to the Internet), what you looked at, whether the page you requested was successful or not, and which browser you used to view the pages. Your web browser will automatically store this information in a "cookie" on your computer's hard drive. "Cookies" are there to improve the way you use our web sites. Most browsers accept cookies automatically, but you can usually change the settings of your browser to prevent this. Please note that, if you choose not to receive cookies, you may not be able to use all the features of our websites.

Please note that the information collected in this way is used strictly for statistical and personalisation purposes only as it helps us understand which areas of our sites are of particular interest and also which pages are not being requested. It also tells us how many hits and page requests we get.

## 12. Your Rights regarding your Information

You have a right to know what information we hold about you and to whom we have disclosed such information.

You also have the right to ask us to correct or delete any information we hold about you. This may be because we are no longer allowed to keep such information or it's inaccurate, irrelevant, excessive, out of date, incomplete, misleading or because the information was illegally obtained.

## 13. Exercising Your Rights

To exercise your rights as indicated above, you will need to do the following:

- (a) Submit a written request in the prescribed form to our Information Compliance Office at our principal place of business situated at the corner of William Dabs and Old Paarl Roads, Brackenfell, South Africa;
- (b) Provide suitable proof of your identity, and
- (c) Pay the prescribed fee, if applicable. Where a fee needs to be paid, we will notify of the amount before we process your application.

We will process your request as soon as reasonably possible.

Please note that we are only able to fulfil your request where permitted to do so by law and provided that doing so does not unreasonably prejudice our legitimate interests or those of any third party.

# SHOPRITE CLIENT/SUPPLIER INFORMATION PROCESSING POLICY

## 14. Unsolicited Marketing Communications

Please note that, unless you give your permission, we will not contact you (whether telephonically or by mail, facsimile, SMS or electronic mail) with marketing information.

You may object to receiving such information either when you first subscribe to our goods or services or afterwards, when we send you additional communications. You may also object using a legally recognised public register which is used for such purpose, or by formal notice to us using the prescribed procedure or in any other manner prescribed by law.