



## PLUS 94 RESEARCH PRIVACY POLICY

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<sup>1</sup> Date on which the approved document takes effect.

**ABSTRACT**

The purpose of this policy is to promote the protection of personal information that is processed by Plus 94 Research, pursuant to compliance with data privacy legislation.

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## ABBREVIATIONS

This list contains the abbreviations used in this document.

Abbreviation or Acronym	Definition
HR	Human Resources Office
CM	Compliance Manager
POPI	Protection of Personal Information Act, 2013
PAIA	Promotion of Access to Information Act 2 of 2000

## 1. POLICY INTRODUCTION

### 1.1 PURPOSE OF THE POPI ACT

- a. The POPI Act (“the Act” or “POPI”) gives effect to the constitutional right to privacy, by safeguarding personal information processed by Plus 94 Research, subject to justifiable limitations that are aimed at:
  - i) Balancing the right to privacy against other rights, particularly the right of access to information; and
  - ii) Protecting important interests, including the free flowing of information within the Republic and across international borders.
- b) The Act will regulate the manner in which personal information may be processed by establishing conditions, in harmony with international standards that prescribe the minimum threshold requirements for the lawful processing of personal information.
- c) The Act provides persons with the rights and remedies to protect their personal information from processing that is not in accordance with this Act; and
- d) The Act will establish voluntary and compulsory measures, including the establishment of an Information Regulator, to ensure respect for and to promote, enforce and fulfil the rights protected by this Act.

### 1.2 APPLICATION AND INTERPRETATION

This Policy applies to data privacy in general and use of Plus 94 Research systems and websites and the processing of personal information, particularly:

- a) Entered in a record by or for a responsible party by making use of automated or non-automated means; provided that when the recorded personal information is processed by non-automated means, it forms part of a filing system or is intended to form part thereof; and
- b) Where the responsible party is:
  - i. Domiciled in the Republic,
  - ii. Not domiciled in the Republic but makes use of automated or non-automated means in the Republic, unless those means are used only to forward personal information through the Republic.

### 1.3 APPLICABILITY/LIMITATIONS

This Company policy applies to all Plus 94 Research employees; full-time, part-time and its Directors, who are responsible for processing collected and personal information of data subjects.

### 1.4 ROLES AND RESPONSIBILITIES

- a. The Compliance Manager will be responsible for enforcing and monitoring compliance to this policy.
- b. The Human Resources Department will be responsible for managing disciplinary actions that may be needed if this policy is not adhered to.

## 2. PROTECTION OF PERSONAL INFORMATION POLICY

By agreeing to participate in a general field market research conducted by Plus 94 Research on platforms such as face-to-face, observations, mobile, website and telephonic, the data subject / user consents to the processing of their personal information by Plus 94 Research, on the basis set out in this privacy policy. If the user does not consent, the user must immediately stop accessing and/or using the website or refuse to be interviewed.

### 2.1 INTRODUCTION

Plus 94 Research from time to time collects, uses and, in some circumstances, shares the personal information of Users / data subjects in and through its website and other platforms.

Plus 94 Research respects the rights of data subjects and Users, whose personal information is collected and used by it, including their right to protection against the unlawful collection, retention, sharing and use of such personal information.

The purpose of this Policy is to provide Users with information about the information processing activities of Plus 94 Research and the manner in which their rights are protected.

This Policy shall serve as a blanket notification to data subjects / Users of Plus 94 Research's processing activities. Users / data subjects will not be notified separately, on each visit to the website, that Plus 94 Research processes the same personal information or that data is being collected for a specific purpose in accordance with an operator's mandate received from its client(s).

Plus 94 Research may amend the provisions of this Policy to comply with any changes in the law, and/or pursuant to any changes to its information processing activities or privacy practices. Such amendments will be published on the website and will become operable from the date of such publication.

The provisions of this Policy must, as far as possible, be incorporated into the agreement between Plus 94 Research and Users of its website and other platforms.

### 2.2 DEFINITIONS AND INTERPRETATION

In this Policy, the following words bear the following meanings:

- 1) **"consent"** means any voluntary, specific and informed expression of will in terms of which permission is given by, or on behalf of a User for the processing of their personal information;
- 2) **"direct marketing"** means to approach a data subject, either in person or by mail or electronic communication, for the direct or indirect purpose of promoting or offering to supply any goods or services to the User;
- 3) **"data subject"** means any person whose personal and/or special personal data, preferences, online habits or other data is

collected by Plus 94 Research out of own motion or by virtue of an agreement with a third-party client;

- 4) **"information officer"** means Mr. Thapelo Hoguane (Compliance Officer, Plus 94 Research, his duties being delegated to him by the CEO);
- 5) **"operator"** means an outside, third-party who processes personal information for or on behalf of Plus 94 Research in terms of a contract or mandate;
- 6) **"personal information"** means any information linked to a User or information that can identify a User, including but not limited to:
  - a) Information relating to a User's race, gender, sex, pregnancy status, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief system, culture, language and birth;
  - b) Information relating to a User's education or their medical, financial, criminal or employment history;
  - c) A User's identity number, e-mail address, physical address, telephone number, location information or online identifier;
  - d) A User's biometric information, including fingerprints, DNA or retina scans;
  - e) A User's personal opinions, views or preferences;
  - f) Correspondence sent by a User which is of a private or confidential nature;
  - g) The views or opinions of others about a User;
  - h) The User's name, if it appears with other personal information relating to that User, or if the disclosure of their name on its own would reveal further personal information about that User;
- 7) **"POPI"** means the Protection of Personal Information Act, including any regulations or codes of conduct promulgated under it;
- 8) **"PAIA"** means the Promotion of Access to Information Act 2 of 2000;
- 9) **"process or processing"** means, in relation to personal information, any operation or activity or any set of operations, whether or not by automatic means, including:
  - a. the collection, receipt, recording, organisation, collation, storage, updating or modification,

retrieval, alteration, consultation or use of that information;

- b. dissemination by means of transmission, distribution or making available in any other form;
  - c. merging, linking, as well as restriction, degradation, erasure or destruction of that information;
- 10) **“special personal information”** means information relating to a User’s religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health, sex life, biometric information or criminal record;
- 11) **“User”** means a visitor or user of this website, or any of the content or services associated with this website and/or a participant in any research activity and may refer to a data subject as defined herein where mentioned in the data privacy provisions contained herein;
- 12) **“the website”** means the website or any part thereof which is accessible from [www.plus94.co.za](http://www.plus94.co.za).

### 2.3 ANY REFERENCE IN THIS PRIVACY POLICY TO:

- 1) The singular includes the plural and *vice versa*.
- 2) Any one gender includes the other gender, as the case may be.
- 3) An act, regulation or other law is to the version of that law in force at the effective date of this notice and includes any amendment or re-enactment made to that law after the effective date of this notice.
- 4) When calculating any number of days for the purposes hereof, the first day must be excluded and the last day of the relevant interval included, unless the last day is not a business day, then the last day will be the next succeeding business day.
- 5) The word "include" means "include without limitation". Use of the word "include" or "in particular" is for illustration or emphasis only and where followed by specific examples must not be interpreted as limiting the meaning of the general wording preceding it.
- 6) A requirement that any notice, request, demand or other communication made in terms of this Privacy Policy must be in writing will be met in the form of a data message, as defined in the Electronic Communications and Transactions Act, No. 25 of 2002, and is accessible in a manner usable for subsequent reference.

### 2.4 RESPONSIBLE PARTY

Plus 94 Research will be the party collecting and processing a User’s personal information and as such is designated as the “responsible party” for the purposes of this Policy, unless mandated by a third-party Client to collect information on its behalf, in which case Plus 94 Research will act as an Operator and the Client’s data privacy laws will apply.

### 2.5 CONTACT DETAILS:

- 1) **Physical address:** 2 Albury Road, Hyde west Building, Dunkeld West, 2196, Johannesburg, Gauteng, South Africa.
- 2) **Telephone number:** 011 327 2020
- 3) **Email address:** [info@plus94.co.za](mailto:info@plus94.co.za)
- 4) **Website address:** [www.plus94.co.za](http://www.plus94.co.za)
- 5) **Contact person:** Thapelo Hogueane

Plus 94 Research may instruct third-party operators from time to time to undertake certain processing activities relating to the User’s personal information, unless Plus 94 Research itself acts in the capacity of Operator.

### 2.6 NATURE OF PERSONAL INFORMATION IS COLLECTED

- 1) Plus 94 Research may collect the following personal information from the data subject / User:
  - a. Initials, first name, surname;
  - b. Physical address;
  - c. Postal address;
  - d. Email address;
  - e. Telephone and cellphone numbers;
  - f. User’s personal opinions, views or preferences; and
  - g. Correspondence sent by a data subject / User which is of a private or confidential nature; and
  - h. Any other information that is of a personal and/or special personal nature with the consent of the subject;
- 2) The supply of personal information by the data subject / User to Plus 94 Research is voluntary and not mandatory. However, if the data subject / User refuses to supply any personal information, certain consequences may naturally flow from such a refusal, such as preventing Plus 94 Research from providing access to the website and/or any information or services offered to Users via the website and other platforms, or from concluding or performing any contract with the data subject / User or preventing Plus 94 Research from complying with one or more of its obligations in law.

- 3) There is no applicable law that directly requires or authorises Plus 94 Research to collect a data subject's / User's personal information.

## 2.7 PURPOSE SPECIFICATION

Plus 94 Research shall only collect a data subject's / User's personal information for a specific, explicitly defined and lawful purpose relating to a function or activity of Plus 94 Research's business, primarily market research on behalf of third parties. Such purposes may include the following:

- 1) To process data subject's / User's personal information during general field market research on such platforms such as face-to-face, observations, mobile, website and telephonic;
- 2) To offer a data subject / User information and/or services offered via the website and other platforms;
- 3) To enter into a contract with a User;
- 4) To perform any obligations under a contract with a User;
- 5) To comply with a legal obligation;
- 6) To protect a legitimate interest of a User (unless the User has specifically objected in writing to all or some of the processing activities on reasonable grounds);
- 7) To pursue its own legitimate interests or the legitimate interests of a third-party who it is sharing the information with (unless the User has specifically objected in writing to all or some of the processing activities on reasonable grounds);
- 8) To present content to the User in the most effective way for them and their viewing device and browser;
- 9) To customise and display to the User content including, but not limited to: information, images, products, services, articles, and advertisement to the User in a way that Plus 94 Research feels may interest the User or be most beneficial to them;
- 10) To send content including, but not limited to: information, images, products, articles, and advertising content to the User via email or other electronic media, where the User has consented to be contacted by Plus 94 Research with such content;
- 11) To enable the User to voluntarily participate in interactive features on the website and other platforms;
- 12) To notify the User about changes to the website; and
- 13) To contact the data subject / User regarding online and other surveys with the User's consent.

If Plus 94 Research intends to process a User's personal information for any other purpose not listed in clause 2.7, or which otherwise is not automatically

permitted by law, it shall ensure that it obtains the User's written consent to do so in accordance with the POPI.

## 2.8 COLLECTION DIRECTLY FROM USER

Plus 94 Research shall, as far as possible, always collect personal information about a User or data subject directly from the User or data subject, except in the following circumstances:

- 1) Where personal information is collected from a public record, or from another source if the information has already been made public by the User / data subject;
- 2) Where the User / data subject has given their written consent to Plus 94 Research to collect their information from another source;
- 3) Where the collection of a data subject or User's personal information from another source will not prejudice any of the data subject or User's legitimate interests;
- 4) Where the collection of personal information from another source is necessary to maintain Plus 94 Research's legitimate interests or those of any third-party it intends sharing the information with;
- 5) Where the collection of personal information directly from the data subject / User would prejudice the purposes of the collection;
- 6) Where the collection of personal information directly from the data subject / User is not reasonably practicable in the circumstances; and
- 7) Where a third-party has supplied Plus 94 Research with the data subject or User's personal information for research purposes in accordance with an existing agreement between the User or data subject and Plus 94 Research's own client.

## 2.9 OPENNESS

If Plus 94 Research collects personal information from a source other than the User, it shall record, in writing, or relay verbally, the details of that source; including the full names and contact details of that source where applicable and practicable.

## 2.10 DATA SUBJECT PARTICIPATION

Personal information may be collected from or supplied by the User in any of the following ways:

- 1) During participation in general market research on such platforms such as face-to-face, observations, mobile, website and telephonic;
- 2) During the process of registering as a member on the website;
- 3) Provided by the User as part of their profile pages on the website;

- 4) When subscribing to a service, entering into a competition or promotion, or participating in a survey offered on the website;
- 5) When posting a comment, review, reply or recommendation on the website;
- 6) When requesting further services or information from Plus 94 Research;
- 7) When contacting Plus 94 Research to report a problem with the website or for any other reason;
- 8) When completing any forms on the website.

The User may visit the website without providing any personal information. However, the website's servers may still collect technical information regarding the use of the website, which is aggregated for analytical purposes, technical maintenance and for improving the content offered on the website. Such information may include details of the User's visit, information about the User's computer, including IP (Internet Protocol) address, operating system and browser type, the User's location, and usage information. An individual User will not be identified from or by this information and Plus 94 Research is entitled to copy, distribute or otherwise use such information without limitation.

Any data subject / User may refuse consent for the collection of their personal or special personal information at any point in time in accordance with the provisions of the POPI, once the aforementioned is fully enacted and compliance therewith is required.

### 2.11 COOKIES

- 1) "Cookies" are small text files transferred by a webserver to a User's hard drive and thereafter stored on their computer. The types of information that a Cookie collects includes a User's username, the date and time of their visits to the website, their browsing history and preferences.
- 2) Plus 94 Research's website may from time to time use Cookies to:
  - (a) distinguish one User from another on the website;
  - (b) remember the User's last session when they return to the website;
  - (c) estimate the website's audience size and usage patterns; and
  - (d) store information about the User's preferences, which allows Plus 94 Research to customise the website and content according to the User's individual preferences.
- 3) The provisions of this clause are only applicable to Cookies used by Plus 94 Research. In some instances, third-party service providers may use Cookies on the website. Plus 94 Research cannot and does not control or access Cookies used by third-party service providers and takes no

responsibility for same. In the event that cookies are collected, the User will be informed thereof by way of a pop-up and opt-in notification.

- 4) The User has the right and ability to either accept or decline the use of Cookies on their computer's web browser, whether they are logged in as a member, or simply casually visiting the website. However, declining the use of Cookies may limit a User's access to certain features on the website.

### 2.12 GENERAL CONDITIONS FOR PROCESSING PERSONAL INFORMATION

- 1) Plus 94 Research shall comply with all laws, contracts or regulations when it processes a User's personal information.
- 2) Plus 94 Research shall not act unreasonably when processing a User's personal information. This means that it will collect and process a User's personal information in a way that the User can reasonably expect and in a way that is fair.
- 3) Plus 94 Research shall respect the User's right to privacy at all times. If there is another way in which it can achieve the same goal without posing any risk or harm to the privacy rights of the User, then it will choose that option.
- 4) Similarly, if Plus 94 Research needs to process personal information but there are less privacy-invasive methods of collecting, using and sharing that information, then it will use those methods.
- 5) Plus 94 Research shall ensure that the personal information that is collected and processed is and remains relevant to the identified purpose/s for such processing, and that such information is and remains adequate, but not excessive, for achieving the identified purpose/s.
- 6) If there are any alternative ways to achieve the identified purpose/s without processing personal information, Plus 94 Research shall not process that personal information.
- 7) Plus 94 Research shall ensure that the processing activities it chooses to apply are proportionate to achieving the identified purpose/s and that no less privacy invasive measures are available to achieve the same purpose/s.
- 8) Plus 94 Research shall ensure that, regardless of the stated purpose/s for processing personal information, the rights and interests of Users will not be unnecessarily prejudiced or infringed, unless it cannot be avoided, and then in such cases, it shall ensure that its own rights and/or interests justify such prejudice or infringement taking place.
- 9) Once Plus 94 Research has achieved the purpose for the collection of the User's personal information, it will destroy or delete

such information, unless the User has directed otherwise in writing, or Plus 94 Research is required by law to retain the information for a longer period of time.

- 10) If Plus 94 Research no longer needs to process personal information to achieve the purpose originally specified, it will stop using that information.

### 2.13 USERS' RIGHTS IN RELATION TO THE PROCESSING OF THEIR PERSONAL INFORMATION

- 1) Users shall have the following rights in relation to the processing of their personal information:
  - a) To access and correct any personal information held by Plus 94 Research about them;
  - b) To object to the processing of their information; and
  - c) To lodge a complaint with the Information Regulator.
- 2) Users may make a request in terms of clause 2.15 (2) by following the processes for making such a request, as set out in Plus 94 Research's Promotion of Access to Information (PAIA) manual until such a time as the POPI is fully enacted and Plus 94 Research becomes obligated to comply, in which case the forms and templates pertaining to the aforesaid act will apply.

### 2.14 FURTHER PROCESSING LIMITATION

- 1) Plus 94 Research shall not process a User's personal information for any purpose not previously specified except in the following circumstances:
  - a) Where the User has consented to such further processing;
  - b) Where further processing is necessary for the exercise of any contractual rights or the fulfillment of any obligations between Plus 94 Research and the User;
  - c) Where further processing activities are linked to or compatible with the original purpose;
  - d) Where further processing is necessary for the prevention, detection, investigation, prosecution and punishment of an offence;
  - e) Where further processing is necessary to enforce any law;
  - f) Where further processing is necessary for the conduct of legal proceedings in any court or tribunal that has commenced or is reasonably contemplated;
  - g) Where further processing is necessary to prevent or mitigate a

serious and imminent threat to the life or health of the User or another individual; and

- h) Where further processing is necessary for historical, statistical or research purposes.
- 2) Plus 94 Research shall ensure that if it intends on processing personal information for other purposes not previously specified, it shall notify the User of such further purposes and the possible consequences of the intended further processing to the User.

### 2.15 ACCURACY, CORRECTNESS AND COMPLETENESS OF PERSONAL INFORMATION

- 1) Plus 94 Research shall take reasonably practicable steps to ensure that the personal information kept by it about Users is complete, accurate, not misleading and is updated when necessary.
- 2) However, if a User is aware of any personal information in Plus 94 Research's custody that is incorrect, inaccurate or which needs to be updated, the User must make a written request to Plus 94 Research's Information officer at [info@plus94.co.za](mailto:info@plus94.co.za) to update or correct the relevant information.
- 3) If a User has contested the accuracy of any personal information being used by Plus 94 Research, it shall immediately stop using that information until its accuracy has been verified.
- 4) Plus 94 Research reserves its right to only adhere to a request from a User in terms of clause 2.15 if the correction or updating of that information will result in the personal information being correct and accurate.
- 5) Where personal information that has been shared by Plus 94 Research with a third party is subsequently updated or corrected, Plus 94 Research shall ensure that all third parties, with whom that information was shared, receives the updated and/or corrected version of the information as soon as it has been updated and/or corrected.

### 2.16 SECURITY SAFEGUARDS

- 1) Plus 94 Research is committed to protecting the personal information in its custody against any loss of, damage to or unauthorised destruction of that information, and to prevent any unauthorised parties from accessing that information.
- 2) Plus 94 Research takes steps to continually identify and document any risks to the personal information that it has in its possession or under its control and that appropriate security safeguards are in place against those risks.

- 3) Plus 94 Research shall ensure that in any contracts entered into with third-party operators who process personal information on Plus 94 Research's behalf, include the following obligations:
  - a) The operator shall not process any personal information without Plus 94 Research's knowledge and authority;
  - b) The operator shall treat all personal information given to it as confidential and shall not disclose it to any unauthorised third parties;
  - c) The operator shall establish and maintain adequate security measures that are the same or offer similar protection over the personal information as that employed by Plus 94 Research;
  - d) The operator shall notify Plus 94 Research immediately where there are reasonable grounds to believe that any personal information has been leaked to or accessed by any unauthorised person;
  - e) If the operator is situated in another country, it must comply with the data protection laws in that country and be able to provide verification that it is so compliant; and
  - f) If an operator is legally obliged to disclose any personal information processed by them on Plus 94 Research's behalf to other parties, it must notify Plus 94 Research beforehand to enable Plus 94 Research and/or individual Users to protect their rights, if necessary.
- 4) Users must maintain the secrecy of any passwords used to gain access to this website and should change such passwords regularly.
- 5) Plus 94 Research shall ensure that all personal information on its systems is properly backed-up and that back-up copies are stored separately from the live files.

#### 2.17 NOTIFICATION OF BREACH OF SECURITY

- 1) If personal information about a User is inadvertently leaked or Plus 94 Research's security has been unlawfully breached by any unauthorised party, Plus 94 Research shall immediately identify the relevant Users who may be affected by the security breach, and shall contact them at their last known

email address or contact details or by the quickest means possible.

- 2) Plus 94 Research shall provide sufficient information to the User to allow him or her to take the necessary protective measures against the potential consequences of the compromise, or shall advise Users of the steps to be taken by them and the possible consequences that may ensue from the breach for them.

#### 2.18 DECISIONS BASED ON PERSONAL INFORMATION PROCESSED

- 1) If Plus 94 Research is required to make a decision about a User using any personal information that has been obtained, it shall ensure that a record of such information and the decision made is kept for a reasonable period of time to give the User an opportunity to request access to that record.
- 2) Plus 94 Research shall allow a User a reasonable opportunity to make representations before any decision is made solely on the basis of the personal information processed, if that decision will affect the legal position of the User, or will otherwise adversely affect them in some manner or form.
- 3) Plus 94 Research shall always ensure that the underlying logic behind any decision made pursuant to the automated processing of personal information is sound and that this underlying logic can be communicated to the User to enable them to make representations.
- 4) If Plus 94 Research has made any decisions based on incorrect personal information, it shall immediately revisit that decision as soon as it receives notice or becomes aware of the error or inaccuracy of that information.

#### 2.19 LINKED THIRD PARTY WEBSITES

- 1) The Plus 94 Research website may contain links or references to other websites, which are not under Plus 94 Research's control.
- 2) The provisions of this POPI Policy are not applicable to third party websites and Plus 94 Research shall not be responsible for the information processing practices and/or privacy policies of those third-party websites, or the cookies that those websites may use.

#### 2.20 CHILDREN'S PERSONAL INFORMATION

Plus 94 Research shall not process any personal information relating to a person under the age of 18, unless it has obtained consent from that person's parent or legal guardian. If this information is processed during general field market research on platforms such as face to face, observations, mobile, website and telephonic from the parent or guardian of a child under the age of 18, and personal

information pertaining to that child is being provided by the parent or guardian, then they hereby expressly consent to Plus 94 Research processing such information according to the further provisions of this Privacy Notice.

### 2.21 CROSS BORDER TRANSFERS OF PERSONAL INFORMATION

- 1) Plus 94 Research does not intend sharing a User's personal information with a third party in another country.
- 2) Plus 94 Research may transfer personal information to another country in the following circumstances:
  - a) The transfer is necessary for the performance of a contract that Plus 94 Research has with the User;
  - b) The transfer is necessary for the implementation of pre-contractual measures taken in response to the User's request;
  - c) The transfer is necessary for the conclusion or performance of a contract with a third party, which is for the benefit of or in the interest of the User;
  - d) The transfer is otherwise for the benefit of the User; or
  - e) The User has consented to the transfer of their information.
- 3) If Plus 94 Research is required to transfer personal information from South Africa to a third party in a foreign country, it shall ensure that the third party is subject to a law, binding code of conduct or contract that effectively upholds principles for the reasonable processing of personal information, which are substantially similar to the data protection offered in the Republic of South Africa.

### 2.22 RETENTION OF INFORMATION

- 1) Plus 94 Research will keep a record of any personal information collected for no longer than is necessary to achieve the specific purpose for which it collected such information in the first place, unless:
  - a) It is required by law to keep a record of such information for a longer period of time;
  - b) It needs to keep a record of such information for another lawful purpose;

- c) It has a contractual obligation to keep a record of such information; or
- d) The User has consented to their information being kept for a longer period.

- 2) Plus 94 Research may, if it has de-identified personal information, keep such information for historical, statistical or research purposes. Plus 94 Research shall ensure that appropriate safeguards are in place to prevent those records from being used for any other purposes, or against the information being re-identified.

### 2.23 RETURNING, DESTROYING OR DELETING PERSONAL INFORMATION

Where Plus 94 Research is no longer authorised to retain a record of any personal information, it shall either:

- a) Ensure that the information is permanently destroyed or deleted as soon as reasonably practicable; or
- b) Return the information to the User or transfer it to a third party, if requested by the User in writing to do so.

### 2.24 CONSENT

- 1) The User hereby consents to the processing of their personal information in terms of the provisions of this Protection of Personal Information Policy.
- 2) The User acknowledges and agrees that such consent has been given voluntarily after the User has read and understood the provisions of this Protection of Personal Information Policy, in particular, regarding the following:
  - a) The types of personal information to be processed;
  - b) The specific processing activities to be undertaken;
  - c) The specific purpose/s for such processing; and
  - d) The possible consequences for the User that may arise from such processing.
- 3) Should a User wish to withdraw any consent previously given by the User, they must notify Plus 94 Research's Information Officer in writing.

**2.25 LODGING AN OBJECTION**

- 1) A User may, on reasonable grounds, object to the processing of their personal information at any time after that processing has started.
- 2) If a User wishes to object to the processing of their personal information, they must send written notice of their objection to Plus 94 Research's Information Officer, together with their reasons for doing so.

**2.26 CHOICE OF LAW**

This Policy shall be governed and interpreted in accordance with the laws of the Republic of South Africa.

**2.27 AMENDMENT OF THIS PRIVACY POLICY**

Plus 94 Research reserves the right to change, update, add, remove and/or amend any of the provisions of this Privacy Policy from time to time. Such changes, updates, additions, removals or amendments will become effective from the date of their publication on its website.

**3. REFERENCE INFORMATION**

**3.1 INDUSTRY CODES AND STANDARDS**

The industry codes and standards listed in Table 1 shall be used when working with this policy.

The latest approved revision of each document applies unless specifically stated.

**Table 1: Industry Codes and Standards**

Document Number	Rev.	Title
1		Protection of Personal Information Act of 2013
2		Promotion of Access to Information Act of 2000
3		Electronic Communications and Transactions Act, 2002