

THE PROTECTION OF PERSONAL INFORMATION ACT

CUSTOMER PRIVACY NOTICE

This Notice explains how we obtain, use, and disclose Your personal information, in accordance with the requirements of the Protection of Personal Information Act ("POPIA").

At **PIE CITY PTY LTD** (and including this website, POPI Act-Compliance) we are committed to protecting Your privacy and to ensure that Your personal information is collected and used properly, lawfully, and transparently.

DEFINITIONS

- **Account** means a unique account created for You to access our Service or parts of our Service.
- **Company** (referred to as either "the Company", "We", "Us" or "Our" in this Agreement) refers to **PIE CITY (PTY) LTD**, with current place of business situated at **12 Director Road, Spartan, Kempton Park, Gauteng, South Africa, 1619**.
- **Cookies** are small files that are placed on Your computer, mobile device, or any other device by a website, containing the details of Your browsing history on that website among its many uses.
- **Country** refers to: South Africa
- **Device** means any device that can access the Service such as a computer, a cell phone, or a digital tablet.
- **Personal Data** is any information that relates to an identified or identifiable individual.
- **Service** refers to the Website.
- **Service Provider** means any natural or legal person who processes the data on behalf of the Company. It refers to third-party companies or individuals employed by the Company to facilitate the Service, to provide the Service on behalf of the Company, to perform Services related to the Service or to assist the Company in analysing how the Service is used.
- **Third-party Social Media Service** refers to any website or any social network website through which a User can log in or create an account to use the Service.
- **Usage Data** refers to data collected automatically, either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).
- **Website** refers to **www.piecity.co.za**
- **You** (referred to as either "You", "Your", or "Yours" in this Agreement) means, the individual accessing or using the Service, or the company, or other legal entity on behalf of which such individual is accessing or using the Service, as applicable.

THE INFORMATION WE COLLECT

We collect and process Your personal information mainly to contact You for the purposes of understanding Your requirements and delivering Services accordingly. For this purpose, We will collect contact details including but not limited to Your name, address, and country, falling under the special personal information as provided for in the POPI Act.

We collect information directly from You where You provide Us with Your personal details through Our website or coming in direct contact with one of Our personnel. Where possible, We will inform You what information You are required to provide to Us, and what information is optional.

Website usage information may be collected using "cookies" which allows Us to collect standard internet visitor usage information:

- **Cookies or Browser Cookies.** A Cookie is a small file placed on Your Device. You can instruct Your browser to refuse all Cookies or to indicate when a Cookie is being sent. However, if You do not accept Cookies, You may not be able to use some parts of our Service. Unless You have adjusted Your browser setting so that it will refuse Cookies, however, please note that our Service may require the use of Cookies.

- **Flash Cookies.** Certain features of our Service may use local stored objects (or Flash Cookies) to collect and store information about Your preferences, or Your activity on our Service. Flash Cookies are not managed by the same browser settings as those used for Browser Cookies.
- **Web Beacons.** Certain sections of our Service and our emails may contain small electronic files known as Web Beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages, or opened an email and for other related website statistics (for example, recording the popularity of a certain section and verifying system and server integrity).
- Please take note that, on their own, Cookies or Web Beacons do not contain or reveal any Personal Information, however, should You elect to provide Us with Personal Information, same can be linked to the anonymous data stored in the Cookies and/or Web Beacons. Most browsers are initially set to accept Cookies, however, should You so prefer, You may adjust Your browser settings accordingly, whereby it may reject Cookies from Us or from any other website.
- Furthermore, and in addition to the above, by setting Your web browser to display HTML email(s) as text only, You may be able to prevent the use of some Web Beacons as well, however, please take note that certain areas of our Website or Service can only be accessed, in conjunction with Cookies or similar devices.
- You herewith acknowledge, accept, and agree that We may (where and if applicable), passively collect some of Your Personal Information from Your Device used in order to access and navigate through our Website, by way of various technological means, for instance (but not limited to) using server logs to collect and maintain our/such applicable log information.
- In line with the above, such Personal Information, which We may passively collect from Your Device may include (but not be limited to) Your identifying information, contact details, Device and Device event information, site activity information, log information, telephonic log information, location information, unique application number(s) and/or any other information which You permit Us, from time to time, to passively collect from Your device(s) accordingly, and in terms hereof.

We may ask You to provide Us with certain personally identifiable information which may be used to contact or identify You. Personally, identifiable information may include, but is not limited to:

- Email address
- First name and last name
- Phone number
- Address, State, Province, ZIP/Postal code, City
- Usage Data

HOW WE USE YOUR INFORMATION

We will use Your personal information only for the purposes for which it was collected and agreed with You. In addition, where necessary Your information may be retained for legal or research purposes.

For example:

- To gather contact information.
- To confirm and verify Your identity or to verify that You are an authorised user for security purposes.
- For the detection and prevention of fraud, crime, money laundering or other malpractice.
- To conduct market or customer satisfaction research, or for statistical analysis.
- For audit and record keeping purposes.
- In connection with legal proceedings.
- To build our client data base.

DISCLOSURE OF INFORMATION

We may disclose Your personal information to Our service providers who are involved in the delivery of products or Services to You. We have agreements in place to ensure that they comply with the privacy requirements as required by the Protection of Personal Information Act.

We may share Your personal information in the following situations:

- **With Service Providers:** We may share Your personal information with Service Providers to monitor and analyze the use of Our Service, to contact You.
- **For business transfers:** We may share or transfer Your personal information in connection with, or during negotiations of, any merger, sale of Company assets, financing, or acquisition of all or a portion of Our business to another company.
- **With Affiliates:** We may share Your information with Our affiliates, in which case we will require those affiliates to honor this Privacy Policy. Affiliates include Our holding company and any other subsidiaries, joint venture partners or other companies that We control or that are under common control with Us or in association with Us.
- **With business partners:** We may share Your information with Our business partners to offer You certain products, services, or promotions.
- **With other users:** when You share personal information or otherwise interact in the public areas with other users, such information may be viewed by all users and may be publicly distributed outside. If You interact with other users or register through a Third-Party Social Media Service, Your contacts on the Third-Party Social Media Service may see Your name, profile, pictures, and description of Your activity. Similarly, other users will be able to view descriptions of Your activity, communicate with You and view Your profile.
- **With Your consent:** We may disclose Your personal information for any other purpose with Your consent.

We may also disclose Your information:

- Where we have a duty or a right to disclose in terms of law or industry codes.
- Where we believe it is necessary to protect our rights.

INFORMATION SECURITY

We are legally obliged to provide adequate protection for the personal information we hold and to stop unauthorized access and use of personal information. We will, on an on-going basis, continue to review our security controls and related processes to ensure that Your personal information remains secure.

Our security policies and procedures include but are not limited to:

- Physical security.
- Computer and network security.
- Access to personal information.
- Secure communications.
- Security in contracting out activities or functions.
- Retention and disposal of information.
- Acceptable usage of personal information.
- Governance and regulatory issues.
- Monitoring access and usage of private information.
- Investigating and reacting to security incidents.

When We contract with third parties, We impose appropriate security, privacy, and confidentiality obligations on them to ensure that personal information that We remain responsible for, is kept secure.

We will ensure that anyone to whom We pass Your personal information agrees to treat Your information with the same level of protection as We are obliged to.

YOUR RIGHTS: ACCESS TO INFORMATION

You have the right to request a copy of the personal information We hold about You. To do this, simply contact Us at the numbers/addresses as provided on Our website and specify what information You require. We will need a copy of Your ID document to confirm Your identity before providing details of Your personal information.

Please note that any such access request may be subject to a payment of a legally allowable fee.

CORRECTION OF YOUR INFORMATION

You have the right to ask Us to update, correct, or delete Your personal information. We will require a copy of Your ID document to confirm Your identity before making changes to personal information We may hold about You. We would appreciate it if You would keep Your personal information accurate.

DEFINITION OF PERSONAL INFORMATION

According to the Act “personal information” means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person. Further to the POPI Act, Quinta Essentia also includes the following items as personal information:

- All addresses including residential, postal, and email addresses.
- Change of name – for which We require copies of the marriage certificate or official change of name document issued by the state department.

HOW TO CONTACT US

If You have any queries about this notice, You need further information about our privacy practices, wish to withdraw consent, exercise preferences or access or correct Your personal information, please contact Us at the numbers/addresses listed on Our website.

Compliance to the Protection of Personal Information Act (POPIA), also known as the POPI Act, will be mandatory for most organisations in South Africa. As the Information Regulator develops the POPI Regulations further, so the dates and requirements will become clearer.

Whilst the focus of the POPI Act is on compliance, our approach is to implement compliance in such a way that it delivers business value, so that it does not become a cost center, or overhead, but rather allows for improvements in efficiencies and effectiveness, done in such a way as to meet the compliance requirements.

The site contains useful guidance and implementation tools to equip You to be POPI Act compliant. It will evolve over time as the Regulations are published. It will contain information about:

Applicable immediately: 1 July 2021:

Sections 2 to 38; sections 55 to 109; section 111; and section 114 (1), (2) and (3).

The sections which will commence on 1 July 2021 are essential parts of the Act and comprise sections which pertain to, amongst others, the conditions for the lawful processing of personal information, the regulation of the processing of special personal information, Codes of Conduct issued by the Information Regulator, procedures for dealing with complaints, provisions regulating direct marketing by means of unsolicited electronic communication, and general enforcement of the Act.

This is the main body of the Act, and although Section 114 (1) (see below) gives a year, in principle, the time to act is now, and all organisations need to become compliant as soon as possible.

HOW TO COMPLY TO POPIA

The Act applies to any person or organisation who keeps any type of records relating to the personal information of anyone, unless those records are subject to other legislation which protects such information more stringently.

1. Store personal data securely and minimize access to this data.
2. Remove personal data where it is not required and where there is no current user consent.
3. Respond to Subject Access Requests.
4. Report any breaches or loss of personal data both to regulators and individuals.

THE GENERAL DATA PROTECTION REGULATIONS (GDPR)

The General Data Protection Regulation (GDPR) is a legal framework that sets guidelines for the collection and processing of personal information from individuals who live in the European Union (EU).

OTHER RELATED INFORMATION

This site is proudly sponsored by **PIE CITY PTY LTD.**

The information published on this Website is provided for general purposes only and does not constitute legal advice. We make every effort to ensure that the content is up to date and accurate. Please consult with a legal representative for legal advice. During Our implementation We can, upon request from You, engage with privacy lawyers on Your behalf. We accept no responsibility for any loss or damage, whether direct or consequential, which may arise from reliance on the information contained in these pages.

Join our mailing list to keep up to date with latest POPIA developments and information around our business.