

Privacy Policy	
Document No: UNC-POL-004	
Version No: 1	
Date: 7 June 2021	

PRIVACY POLICY

1. Purpose:

UNICA Iron & Steel (Pty) Ltd (UNICA) is responsible for deciding how we hold and use Personal Information. UNICA respects the privacy and confidentiality of our potential and existing client's personal information. UNICA is committed to protecting the information you share in accordance with applicable privacy laws referenced herein.

The purpose of this policy therefore is to ensure compliance with the Protection of Personal Information Act 4 of 2013 (POPIA) and the Electronic Communications and Transaction Act 25 of 2002 (ECT), by stipulating UNICA's commitment to uphold the rights to privacy and confidentiality of your personal information; and to notify data subjects how we will handle such personal information which we obtain on our website.

2. Scope:

This policy extends to all entities and divisions that form part of UNICA.

3. Reference:

- Electronic Communications and Transaction Act 25 of 2002 (ECT).
- Protection of Personal Information Act 4 of 2013 (POPIA).
- General Data Protection Regulations.
- EU General Data Protection Regulation (GDPR): Regulation (EU) 2016/679.
- Promotion of Access to Information Act 2 of 2000 (PAIA).

4. Policy application:

4.1. Consent:

By using and/or interacting with the UNICA websites and/or providing your personal data to UNICA, you are consenting to the collection, holding, use and disclosure of your personal information as set out in this Client Privacy Policy

4.2. The information we collect:

We collect and process your personal information mainly to provide you with access to our services, to help us improve our offerings to you and for certain other purposes explained in this policy. The type of information we collect will depend on the purpose for which it is collected and used. We will only collect information that we need for that purpose. We collect information directly from you where you provide us with your personal details, for example when you purchase services from us or when you submit enquiries to us or contact us. Where possible, we will inform you what information you are required to provide to us and what information is optional.

4.3. Personal information about children:

We do not knowingly collect personal information from children (under 18 years of age) without the permission of their parent or guardian.

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4.4. Use of information collected:

We commit to ensuring that use of your personal information is only for the purposes for which it was collected or agreed with you.

This includes the following:

- To provide our services to you.
- To carry out the transaction you requested.
- For the detection and prevention of fraud, crime, money laundering or other malpractice.
- To confirm and verify your identity or to verify that you are an authorised user for security purposes.
- To conduct market or customer satisfaction research or for statistical analysis.
- For audit and record keeping purposes; and
- To comply with legal and regulatory requirements and industry codes to which we subscribe, or which apply to us, or when it is otherwise allowed by law.

Note that, as permitted by the ECT Act, this website may use personal information collected to compile profiles for statistical purposes and trade in these profiles. No information contained in the profiles or statistics will be able to be linked to any specific user.

Furthermore, UNICA may share your personal information with third parties for purposes of management and administration of our websites.

4.5. Disclosure of personal information:

We may share the personal information you submit or that we collect with third parties involved in the process of providing the products and services you may request. We have agreements in place to ensure that they comply with these privacy terms.

Such disclosures may occur:

- Where we have a duty or a right to disclose by law or by court order.
- Where we have a duty or a right to disclose in line with industry codes.
- Where it is in public interest; or
- Where we believe it is necessary to protect our rights.

4.6. Security and Confidentiality:

To ensure that we have taken all reasonable steps to protect your personal information from loss, misuse or unauthorised alteration, access, or disclosure, we have an ISO 27001:2013 Information Security Management System in place. We maintain appropriate physical, electronic, and procedural safeguards in connection with the collection, storage, and disclosure of personally identifiable information. Additionally, 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 may need to transfer your personal information to another country for processing or storage. We will ensure that anyone to whom we pass your

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personal information agrees to treat your information with the same level of protection as protection as we are obliged to.

4.7. Storage of Data:

Personal information will only be retained for as long as necessary for the purpose it was collected and in line with regulations governing the duration information should be kept.

4.8. Data Collection:

In addition to personal information you submit, UNICA may collect information about your computer including, where available, your IP address, operating system, and browser type for system administration.

Furthermore, we may collect aggregated site-visitation statistics using cookies. We do not track individuals' use of the site. When someone visits the site, a cookie is placed on the customer's machine (if the customer accepts cookies) or is read if the customer has visited the site previously.

4.9. Your Rights:

You have the right to request a copy of the personal information we hold about you.

You have the right to object to the processing of personal information held about you.

You have the right to ask us to update, correct or delete your personal information. You may do this by contacting us at the numbers/addresses provided earlier.

To do this, contact us at the numbers/addresses listed below and specify what information you would like. We will take all reasonable steps to confirm your identity before providing details of your personal information.

4.10. Changes to this Policy:

We reserve the right, in our sole and absolute discretion, to update, modify or amend (including without limitation, by the addition of new terms and conditions) this policy from time to time with or without notice or justification. You therefore agree to review the policy whenever you visit the website for any such change. Save as expressly provided to the contrary in this policy, the amended version of the policy shall supersede and replace all previous versions thereof.

4.11. Contact us:

The physical, telephonic, and electronic addresses for our office are as follows:

The Information Officer
 UNICA Iron & Steel (Pty) Ltd (UNICA)
 9th Street
 ERF 87
 Babelegi
 Pretoria
 Tel: +27 (0) 12 719 9736
 Email: info@unica.co.za

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4.12 Information Regulator

You have the right to complain to the Information Regulator, whose contact details are:

Information Regulator
JD House
27 Stiemens Street
Braamfontein
Johannesburg

PO Box 31533
Braamfontein
2017

Email: infoereg@justice.gov.za
Email: complaints.IR@justice.gov.za