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## Supplier Privacy Policy

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## 1. SCHEDULE

1.1 The Company Trafalgar Property Management (Pty) Ltd

1.2 Registration number 1989/003678/07

1.3 Email address popia@trafalgar.co.za

## 2. INTRODUCTION

This is our plan of action when it comes to protecting your privacy as our supplier. We respect your privacy and take it very seriously. This policy explains how we handle your personal information, including how we collect, use, disclose, store, and secure it.

## 3. AUDIENCE

This policy applies to you if you are:

- a person that is responding to a request for goods or services such as a Request for Proposal (RFP) or a Request for Quote (RFQ) that we have issued;
- a person who agrees to be a supplier of goods or services to us.

For the privacy policy that applies when you use our website in other instances (such as when you visit for other purposes), you can view our general privacy policy. The general privacy policy also applies to our general processing of personal information when it is not unique to you as a supplier.

## 4. PERSONAL INFORMATION

### Personal information includes:

- certain information that we collect automatically when you visit our website;
- certain information collected when you interact with us as part of responding to a RFP or RFQ;
- certain information collected as part an agreement with us to provide goods or services; and
- optional information that you provide to us voluntarily (see below);

### but excludes:

- information that has been made anonymous so that it does not identify a specific person;
- permanently de-identified information that does not relate or cannot be traced back to you specifically;
- non-personal statistical information collected and compiled by us; and
- information that you have provided voluntarily in an open, public environment or forum including any blog, chat room, community, classifieds, or discussion board (because the information has been disclosed in a public forum, it is no longer confidential and does not constitute personal information subject to protection under this policy).

Where you are a juristic person, any reference to personal information will include the personal information of your data subject.

### Common examples

Common examples of the types of personal information which we may collect and process include your:

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- **identifying information** – such as your name, date of birth, or identification number of any kind;
- **contact information** – such as your phone number or email address;
- **address information** – such as your physical or postal address; or
- **demographic information** – such as your gender or marital status
- **financial information** – such as your banking details for processing payments.

**Special personal information**

Depending on the goods or services that you supply, we may also collect special personal information including your:

- **sensitive demographic information** – such as your race or ethnicity (BBBEE);
- **medical information** – such as information about your physical or mental health;
- **criminal information** – such as information about your commission or alleged commission of any offence or about any related legal proceedings;
- **employment information** – including your membership of a trade union, such as a list of the employees you would use to deliver goods or services to us; and
- **beliefs** – including your political or religious beliefs.

5. ACCEPTANCE
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**Acceptance required**

You must accept all the terms of this policy when you offer or supply goods and services to us. If you do not agree with anything in this policy, then you may not supply goods and services to us.

**Legal capacity**

You may not offer or supply goods and services to us if you are younger than 18 years old or do not have legal capacity to conclude legally binding contracts.

**Deemed acceptance**

By accepting this policy or continuing to offer to supply goods or services to us, you are deemed to have read, understood, accepted, and agreed to be bound by all of its terms.

**Your obligations**

You may only send us your own personal information or the information of another data subject where you have their permission to do so.

6. CHANGES
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We may change the terms of this policy at any time. We will notify you of any changes by placing a notice in a prominent place on our website or by sending you an email detailing the changes that we have made and indicating the date that they were last updated. If you do not agree with the changes, then you must stop supplying or offering to supply goods or services to us. If you continue to offer to supply or supply goods or services following notification of a change to the terms, the changed terms will apply to you and you will be deemed to have accepted those updated terms.

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## 7. COLLECTION

### On your response to a RFP or RFQ

When you respond to a RFP/RFQ or when we award the work to you, you will be asked to provide us with additional information on a voluntary basis (**goods or services information**).

### Recording calls

We may monitor and record any telephone calls that you make to us, unless you specifically request us not to.

### Purpose for collection

We may use or process any goods or services information, or optional information that you provide to us for the purposes that you indicated when you agreed to provide it to us. Processing includes gathering your personal information, disclosing it, and combining it with other personal information. We generally collect and process your personal information for various purposes, including:

- **procurement of goods or services** – such as when we issue the RFP or RFQ that you respond to;
- **business purposes** – such as internal audit, accounting, business planning, and joint ventures, disposals of business, or other proposed and actual transactions; and
- **legal purposes** – such as handling claims, complying with regulations, or pursuing good governance such as confirming your banking details on a platform provided by our company bankers prior to processing payments.

We may use your usage information for the purposes described above and to:

- remember your information so that you will not have to re-enter it during your visit or the next time you access the website or respond to a tender; and
- monitor website usage metrics such as total number of visitors and pages accessed.

### Consent to collection

We will obtain your consent to collect personal information:

- in accordance with applicable law;
- when you provide us with any registration information or optional information.

## 8. USE

### Our obligations

We may use your personal information to fulfil our obligations to you.

### Messages and updates

We may send administrative messages and email updates to you in relation to a RFP or RFQ that you responded to or your supply of goods or services to us. (In some cases, we may also send you primarily promotional messages. You can choose to opt-out of promotional messages).

## 9. DISCLOSURE

### Sharing

We may share your personal information with:

- other divisions or companies within the group of companies to which we belong so as to provide joint content and services like registration, and to help detect and prevent potentially illegal acts and violations of our policies;

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- an affiliate, in which case we will seek to require the affiliates to honour this privacy policy;
- our goods or services providers under contract who help provide certain goods or services or help with parts of our business operations, including fraud prevention, bill collection, marketing, technology services (our contracts dictate that these goods or services providers only use your information in connection with the goods or services they supply or services they perform for us and not for their own benefit);
- credit bureaus to report account information, as permitted by law; and
- other third parties who provide us with relevant services where appropriate.

**Regulators**

We may disclose your personal information as required by law or governmental audit.

**Law enforcement**

We may disclose personal information if required:

- by a subpoena or court order;
- to comply with any law;
- to protect the safety of any individual or the general public; and
- to prevent violation of our customer relationship terms.

**No selling**

We will not sell personal information. No personal information will be disclosed to anyone except as provided in this privacy policy.

**Employees**

We may need to disclose personal information to our employees that require the personal information to do their jobs. These include our responsible management, human resources, accounting, audit, compliance, information technology, or other personnel.

**Change of ownership**

If we undergo a change in ownership, or a merger with, acquisition by, or sale of assets to, another entity, we may assign our rights to the personal information we process to a successor, purchaser, or separate entity. We will communicate the transfer to you via email. If you are concerned about your personal information migrating to a new owner, you may request us to delete your personal information.

10. SECURITY

**Employees**

We may need to disclose personal information to our employees that require the personal information to do their jobs. These include our responsible management, human resources, accounting, audit, compliance, information technology, or other personnel.

11. ACCURATE AND UP TO DATE

We will try to keep the personal information we collect as accurate, complete and up to date as is necessary for the purposes defined in this policy. From time to time we may request you to update your personal information via email. You are able to review or update any personal information that we hold on you by emailing us, or phoning us. Please note that in order to better protect you and safeguard your personal information, we take steps to verify your identity before granting making any corrections to your personal information.

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## 12. RETENTION

We will only retain your personal information for as long as it is necessary to fulfil the purposes explicitly set out in this policy, unless:

- retention of the record is required or authorised by law; or
- you have consented to the retention of the record.

During the period of retention, we will continue to abide by our non-disclosure obligations and will not share or sell your personal information.

We may retain your personal information in physical or electronic records at our discretion.

## 13. TRANSFER TO ANOTHER COUNTRY

We will not transfer any personal information across a country border without your prior written consent **OR** we may transmit or transfer personal information outside of the country in which it was collected to a foreign country and process it in that country. Personal information may be stored on servers located outside the country in which it was collected in a foreign country whose laws protecting personal information may not be as stringent as the laws in the country in which it was collected. You consent to us processing your personal information in a foreign country whose laws regarding processing of personal information may be less stringent.

## 14. LIMITATION

We are not responsible for, give no warranties, nor make any representations in respect of the privacy policies or practices of linked or any third-party websites.

## 15. ENQUIRIES

If you have any questions or concerns arising from this privacy policy or the way in which we handle personal information, please contact us.

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