

INTERWASTE PRIVACY POLICY

Introduction

- 1.1 Interwaste is committed to safeguarding the privacy of visitors to our website.
- 1.2 Please read the following privacy policy to understand how your information will be treated. This policy may vary from time to time so please check it regularly.
- 1.3 We recognise the importance of protecting your privacy in respect of your personal information (as defined in Protection of Personal Information Act 4 of 2013) collected by us when you use this website.
- 1.4 In adopting this privacy policy, we wish to balance our legitimate business interests and your reasonable expectation of privacy. Accordingly, we will take appropriate and reasonable technical and organisational steps to prevent unauthorised access to, or disclosure of your personal information.
- 1.5 By continuing to use this website you agree that we may "collect, collate, process and/or store" your personal information (as defined in POPI) ("process") for, amongst other things, (i) the purposes of providing you with access to the website and the website content; and (ii) for any of the purposes provided for herein.
- 1.6 Where there are reasonable grounds to believe that your personal information has been accessed or acquired by any unauthorised person, we will notify the relevant regulator and you, unless a public body responsible for detection, prevention or investigation of offences or the relevant regulator informs us that notifying you will impede a criminal investigation. When we notify you that your personal information has been accessed or acquired, we will provide you with sufficient information to allow you to take protective measures against the potential consequences of the compromise.

2. What types of personal information do we process?

2.1 The types of personal information that we may process includes information necessary for our legitimate business interest and the categories of personal information defined in POPI. This may include (amongst other things):

2.1.1 personally identifiable information about you if you voluntarily submit such information to Interwaste. Personally identifiable information, may include your name, email address, physical address and other information that specifically identifies you and the pages of the website viewed by you;

2.1.2 automatically collected data and information (through cookies, described below, and other methods). Interwaste may store aggregate or anonymous information about user contact with and use of the Site. Examples of this type of information include demographic information, the type of internet browser you are using, the type of computer operating system application software and peripherals you are using, the domain name of the web site from which you linked to our Site and your browsing habits on and usage of the Site; and

2.1.3 non-personally identifiable information may also include personally identifiable information that has been aggregated so that no one individual is specifically identifiable (such as, how many users in a particular city access the Site).

2.2 We will limit the types of personal information we process to only that to which you consent, and which is necessary for our legitimate business interests.

3. When will we process your personal information?

3.1 Personal information may be processed when:

3.1.1 You fill in a contact form, or submit any information via the website, email or via a call to our tracking number; and

3.1.2 You browse the website.

3.2 You acknowledge that all personal information processed by us may be stored by us and used for any of the purposes listed below.

4. How do we use your personal information?

4.1 We will only use the information you provide for our legitimate business purpose.

4.2 We may share your personally identifiable information with companies that are holding companies and affiliates of Interwaste, technical consultants and other third parties who make our Site available, enhance its functionality, or provide associated services (but only for the purpose of providing such services to Interwaste).

4.3 Information obtained in connection with the Site may be intermingled with and used by us in conjunction with information obtained through sources other than the Site, including both offline and online sources.

4.4 We reserve the right to transfer any information to our successors in business and purchasers of Site assets or a particular division or line of business.

5. Sharing of your personal information

5.1 You consent that we may disclose your personal information to firm approved third party providers (as referred to below in 5.2.1) where necessary;

5.2 You agree that once your information has been de-identified, i.e.: delete any information that identifies you, personal information may be shared under the following circumstances:

5.2.1 To our agents, advisers, service providers and suppliers (our SEO agency, creative, brand, digital and media agencies) Microsoft, Google and other research agents);

- 5.2.2 To monitor web traffic: web servers serving the website automatically collect information about pages you visit. This information is used for internal review, to tailor information to individual visitors and for traffic audits;
- 5.2.3 For statistics purposes: we may perform statistical analyses in order to measure interest in the various areas of the website (for product development purposes);
- 5.2.4 We may share non-personally identifiable information with third parties for any number of reasons, including advertising, promotional and/or other purposes; and
- 5.2.5 To government and law enforcement agencies, where the law requires that we disclose your personal information to a party, and where we have reason to believe that a disclosure of personal information is necessary to identify, contact or bring legal action against a party who may be in breach of the Privacy Policy or may be causing injury to or interference with (either intentionally or unintentionally) our rights or property, other users, or anyone else that could be harmed by such activities.

6. Your rights

- 6.1 You have the right to request that we correct, destroy or delete any of your personal information that we have processed in accordance with this policy. The personal information that you may request us to correct, destroy or delete is personal information that has been processed that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, obtained unlawfully or that we are no longer authorised to retain.

6.2 You have the right to withdraw your consent for us to process your personal information at any time. The withdrawal of your consent can only be made by you on the condition that:

6.2.1 The withdrawal of your consent does not affect the processing of your personal information before the withdrawal of your consent; or

6.2.2 The withdrawal of your consent does not affect the processing of your personal information if the processing is in compliance with an obligation imposed by law on us; or

6.2.3 The withdrawal of your consent does not affect the processing of your personal information where such processing is necessary for the proper performance of a public law duty by a public body;

6.2.4 The withdrawal of your consent does not affect the processing of your personal information as required to finalise the performance of a contract in which you are a party; or

6.2.5 The withdrawal of your consent does not affect the processing of your personal information as required to protect your legitimate interests or our own legitimate interests or the legitimate interests of a third party to whom the information is supplied.

6.3 You have the right to object to the processing of your personal information at any time, on reasonable grounds relating to your particular situation, unless the processing is required by law.

6.4 You can make the objection if the processing of your personal information is not necessary for the proper performance of a public law duty by a public body; or if the processing of your personal information is not necessary to pursue your legitimate interests; our legitimate interests or the legitimate interests of a third party to which the information is supplied.

- 6.5 You have the right to object to the processing of your personal information, at any time, if the processing is for purposes of direct marketing other than direct marketing by means of unsolicited electronic communications and you have not given your consent for that processing.
- 6.6 You have the right not to have your personal information processed for purposes of direct marketing by means of unsolicited electronic communications from third parties unknown to you.
- 6.7 You have the right not to be subjected to a decision which is based solely on the basis of the automated processing of your personal information intended to provide a profile of you.
- 6.8 Decisions that you may not be subjected to are decisions that result in legal consequences for you or affect you to a substantial degree:
- 6.8.1 Without being for the execution of a contract that you have received performance for; or
- 6.8.2 Decisions made that are not in terms of law or of a code of conduct that specifies what appropriate measure must be taken to protect your legitimate interests.
- 6.9 You have the right to submit a complaint to the Information Regulator regarding an alleged interference with the protection of personal information processed in accordance with this policy. The Information Regulator's contact details will be published by the Government in due course in terms of POPI.
- 6.10 You have the right to institute civil proceedings regarding an alleged interference with the protection of your personal information processed in accordance with these Terms.

7. Use of cookies

- 7.1 Cookies are pieces of information a website transfers to a user's hard drive for record-keeping purposes. Cookies make surfing the web easier for you by saving your preferences and tracking your online habits, traffic patterns, and making sure you do not see the same advertisement too often. The use of cookies is an industry standard.
- 7.2 We may place a cookie on your browser to store and sometimes track information about you.
- 7.3 While most browsers are initially set up to accept cookies, you can reset your browser to refuse all cookies or indicate when a cookie is being sent. Please note that some parts of the website will not function properly if you refuse cookies.

8. Use of IP address

- 8.1 An IP address is a number that is automatically assigned to a computer whenever it is connected to the Internet. We log IP addresses or the location of computers on the Internet.
- 8.2 We collect IP addresses for the purposes of system administration and to audit the use of the website. We do not ordinarily link IP addresses to personal information, which means that your session may remain anonymous. However, we cannot guarantee that this will always be the case, as it may be necessary to identify a particular user when it is necessary to enforce compliance with the Privacy Policy or to protect our website, its users or other interests.

9. Links to other sites

- 9.1 When you are using the website, you could be directed to other sites that are beyond our control. These other web sites may send their own cookies to you

collect data or solicit personal information. We do not control the privacy policies of those third party web sites.

9.2 Interwaste is not responsible for the privacy practices of such sites. You should carefully read their own privacy policies before providing any information to such websites.

10. Reviewing or changing your information

10.1 In order to ensure that the information we maintain is accurate, Interwaste gives users the option to change or modify their information previously provided. If you would like to change your information currently in our database, please contact us.

10.2 Interwaste is not responsible for updating information contained in third party lists or databases.

11. Security

11.1 We are committed to taking reasonable and responsible steps to ensure the security of your information.

11.2 To prevent unauthorised access, maintain data accuracy, and ensure the appropriate use of information, we have put into place physical, electronic, and managerial procedures to help safeguard and secure the information we collect online.

11.3 However, due to the inherent open nature of the Internet, and subject to the provisions of sections 43(5) and 43(6) of the Electronic Communications and Transactions Act, we shall not be liable for any damage, loss or liability of whatsoever nature arising from the use or inability to use this website or the services or content provided from and through this website. Furthermore, Interwaste makes no representations or warranties, implied or otherwise, that, amongst others,

the content and technology available from this website are free from errors or omissions or that the service will be 100% uninterrupted and error free.

12. Contact Information

If you have any questions in relation to this Privacy Policy please contact us at:

dataprotection@interwaste.co.za

13. Effective Date

This privacy policy was last updated on January 24, 2019.