

**CONFIDENTIAL**

# **ADRS PRIVACY POLICY**

**Compiled By: Human Resources**

**Date: 04 August 2021**

**Status: Final**

**Review Period: Annually**

**Directed At: All staff employed at ADRS,  
contractors, collectors, service providers,  
clients, customers and personal**

## Contents

<b>1. INTRODUCTION</b>	<b>3</b>
<b>2. AUDIENCE</b>	<b>3</b>
<b>3. PERSONAL INFORMATION</b>	<b>3</b>
<b>4. ACCEPTANCE</b>	<b>4</b>
<b>5. CHANGES</b>	<b>5</b>
<b>6. COLLECTION</b>	<b>5</b>
<b>7. USAGE</b>	<b>7</b>
<b>8. DISCLOSURE</b>	<b>8</b>
<b>9. SECURITY</b>	<b>10</b>
<b>10. ACCURATE AND UP TO DATE</b>	<b>10</b>
<b>11. RETENTION</b>	<b>10</b>
<b>12. TRANSFER</b>	<b>10</b>
<b>13. UPDATING OF INFORMATION</b>	<b>11</b>
<b>14. LIMITATION</b>	<b>11</b>
<b>15. ENQUIRIES</b>	<b>11</b>

## **1. INTRODUCTION**

ADRS Diversified Services is committed to the adherence of the Protection of Personal Information Act, No 4. of 2013, this policy underlines key measures that ADRS Diversified Services will implement in protecting an individual's privacy. ADRS Diversified Services respects privacy and takes the protection of personal information very seriously in compliance with the Protection of Personal Information Act, No 4. of 2013 and in line with industry standards. The purpose of this policy is to describe the way that ADRS Diversified Services collects, stores, uses, and protects information that can be associated with the data subject or another specific natural or juristic person and can be used to identify the data subject or that individual's personal information.

## **2. AUDIENCE**

This policy applies if an individual is:

- A visitor to the ADRS Diversified Services website; or
- A customer who has requested services that ADRS Diversified Services provide.

## **3. PERSONAL INFORMATION**

Personal information includes:

- Certain information that ADRS Diversified Services collects automatically when a person visits the Company website;
- Certain information collected on submission; and
- Optional information that a person provides to ADRS Diversified Services voluntarily but excludes: (see below)
- 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 a person/s specifically;
- Non-personal statistical information collected and compiled by ADRS Diversified Services;
- Information that a person/persons have provided voluntarily in an open, public environment or forum including any blog, chat room, community, classifieds, or discussion board (since 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).

Examples of the types of personal information which ADRS Diversified Services may collect, and process include:

- Identifying information, such as a person's name, date of birth, or identification number of any kind;
- Contact information, such as a person's phone number or email address;
- Address information, such as a person's physical or postal address.

### **Sensitive personal information**

Depending on the services that a person requires, ADRS Diversified Services may also collect sensitive personal information including a person's:

- Financial information, such as bank account details.

## **4. ACCEPTANCE**

### **Acceptance Required**

A person must accept all the terms and conditions of this policy when requesting to use the services of the Company. If a person does not agree with this policy, then the request for use of services may be denied.

### **Legal Capacity**

A person may not access the Company website or request the services of the Company if the person is younger than 18 years old or do not have legal capacity to conclude legally binding contracts.

### **Deemed Acceptance**

By accepting this policy, the person has deemed to have read, understood, accepted, and agreed to be bound by all terms and conditions as set out herein.

### **Obligations**

A person may only send the Company their own personal information or the information of another data subject where consent has been obtained.

## **5. CHANGES**

ADRS Diversified Services may change the terms of this policy at any time by updating this web page. The Company will notify the public of any changes by placing a notice in a prominent place on the website or by sending an email detailing the changes that has been made and indicating the date that the changes were last updated. If a person does not agree with the changes, then the person must stop using the website and services. If a person continues to use the website and services following the notification of a change to the terms, the changed terms will apply and the person will be deemed to have accepted those updated terms and conditions.

## **6. COLLECTION**

### **Contact Us**

Once a person has contacted ADRS Diversified Services via the website, the person will no longer be anonymous to the Company. The person will provide the Company with certain personal information when they register on the website.

This personal information of the person will include:

- Name and surname;
- Email address;
- Telephone number;
- Company name, company registration number and VAT number;
- The persons postal address or street address;
- Account number; and
- ID number.

ADRS Diversified Services will use this personal information to fulfil the person's account, provide additional services and information to the person as the Company sees as reasonably appropriate and for any other purposes set out in this policy.

### **Browser**

ADRS Diversified Services automatically receive and record internet usage information on the Company's server logs from a person's browser, such as internet protocol address (IP address), browsing habits, click patterns, version of software installed, system type, screen resolutions, colour capabilities, plug-ins, language settings, cookie preferences, search engine keywords, JavaScript enablement, the content and pages that a person access on the website,

and the dates and times that a person visits the website, paths taken and time spent on sites and pages within the website (usage information). Please note that other websites visited before entering the Company website might place personal information within the persons URL during a visit to it and ADRS Diversified Services have no control over such websites. Accordingly, a subsequent website that collects URL information may log some personal information.

### **Cookies**

ADRS Diversified Services may place small text files called 'cookies' on a person's device when visiting the Company's website. These files do not contain personal information, but they do contain a personal identifier allowing the Company to associate a person's personal information with a certain device. These files serve several useful purposes for a person, including:

- Granting access to age restricted content;
- Tailoring the Company's website's functionality personally by informing the Company to remember a person's preferences;
- Improving website performance;
- Allowing third parties to provide services to the Company's website; and
- Assisting ADRS Diversified Services to deliver targeted advertising where appropriate in compliance with the applicable laws.

The internet browser generally accepts cookies automatically, but a person can change this setting to stop accepting them. A person can also delete cookies manually, however, no longer accepting cookies or deleting them will prevent a person from accessing certain aspects of the Company's website where cookies are necessary. Many websites use cookies, and a person can find out more at [www.allaboutcookies.org](http://www.allaboutcookies.org).

### **Recording Calls**

ADRS Diversified Services may monitor and record any telephone calls that a person makes to the Company unless a person specifically requests the Company not to do so.

### **Purpose for Collection**

ADRS Diversified Services may use or process any information, or optional information that a person provides to the Company for the purposes that the person indicated when they agreed

to provide it. Processing includes gathering personal information, disclosing it, and combining it with other personal information. The Company generally collect and process personal information for various purposes, including:

- Services purposes, to be able to vendor the Company services to a person;
- Marketing purposes, such as pursuing lawful related marketing activities;
- Business purposes, such as internal audit, accounting, business planning and joint ventures, disposal of business or other proposed and actual transactions; and
- Legal purposes, such as debt collections, complying with regulations, or pursuing good governance.

The Company may use a person's usage information for the purposes described above and to:

- Remember the person's information so that the person will not have to re-enter it during their visit or the next time they access the website;
- Monitor website usage metrics such as total number of visitors and pages accessed; and
- Track entries, submissions, and status in any promotions or other activities in connection with a person's usage of the website.

### **Consent to Collection**

ADRS Diversified Services will obtain a person's consent to collect personal information:

- In accordance with applicable law;
- When a person provides the Company with any registration information or optional information.

## **7. USAGE**

### **Obligations**

ADRS Diversified Services may use a person's personal information to fulfil the Company's obligations to a person

## **Messages and Updates**

ADRS Diversified Services may send administrative messages and email updates to a person about the Company's services. ADRS Diversified Services may wish to provide a person with information about additional services in which the Company feels that a person may be interested.

## **8. DISCLOSURE**

### **Sharing**

ADRS Diversified Services may share personal information the Company will process and share a person's personal information with third parties where:

- A person has agreed to it;
- The Company is permitted or required to do so by law;
- Processing is necessary to protect the legitimate rights or interests of ADRS Diversified Services or a third party; and
- Processing is necessary to conclude a contract with a person.

The Company may also share a person's personal information with third party service providers, agents, contractors, employees, law enforcement agencies or business affiliates.

If ADRS Diversified Services makes use of third-party service providers to provide products or services to a person or to provide products or services on the Company's behalf, the Company will regulate these relationships contractually to ensure that they process a person's personal information according to the law. Third party service providers may only use a person's personal information directly for the purposes for which the Company provided it to them.

ADRS Diversified Services may also share a person's personal information for the following purposes:

- Within the group for legitimate business purposes;
- Credit bureaus and fraud agencies;
- Any third party to whom the Company sell any part of the business or rights in law;
- Any other third party if the law allows or requires the Company to share the information;



- The Payment Association of South Africa (PASA) to process any payment on a person's behalf; and
- Other third parties who provide the Company with relevant services where appropriate.

### **Regulators**

ADRS Diversified Services may disclose a person's personal information as required by law or governmental audit.

### **Law Enforcement**

ADRS Diversified Services 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 public; and
- To prevent violation of customer relationship terms.

### **No Selling**

The Company commits to not sell any personal information. No personal information will be disclosed to anyone except as provided for in this privacy policy.

### **Marketing Purposes**

ADRS Diversified Services may disclose aggregate statistics (information about the customer population in general terms) about the personal information to advertisers or business partners

### **Employees**

ADRS Diversified Services may need to disclose personal information to the Company's employees that require the personal information to perform their jobs. These include management, human resources, accounting, audit, compliance, information technology, or other personnel as the Company may deem fit.

### **Change of Ownership**

If ADRS Diversified Services undergoes a change in ownership, or a merger with, acquisition by, or sale of assets to, another entity, the Company may assign its rights to the personal information it processes to a successor, purchaser, or separate entity. The Company will disclose the transfer on the website. If a person is concerned about their personal information migrating to a new owner, the person may request the Company to delete their personal information.

## **9. SECURITY**

ADRS Diversified Services take the security of personal information very seriously and always ensures adherence with applicable data protection laws. The hosting Company will host ADRS Diversified Services' website in a secure server environment that uses a firewall and other advanced security measures to prevent interference or access from outside intruders. The Company authorizes access to personal information only for those employees who require it to fulfil their job responsibilities. The Company further implements disaster recovery procedures where appropriate and applicable.

In the event of a security breach, the Company will inform a person by contacting them on the contact details available, by press release, or by any other reasonably suitable method. The Company will also report a breach to the Information Regulator.

## **10. ACCURATE AND UP TO DATE**

ADRS Diversified Services will aim to keep the personal information collected as accurate, complete and up to date as is necessary for the purposes defined in this policy. The Company may from time to time, request a person to update their personal information on the website. A person can review or update any personal information that the Company possess by accessing their account online, emailing or phoning the Company. Please note that to better protect and safeguard personal information, the Company will take the necessary steps to verify a person's identity before granting them access to their account or making any amendments to their personal information.

## **11. RETENTION**

ADRS Diversified Services will only retain 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 authorized by law; or
- A person has consented to the retention of the record.

During the period of retention, the Company will continue to abide by the non-disclosure obligations and will not share or sell a person's personal information.

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

## **12. TRANSFER**

A person agrees that the Company may transfer their personal information across borders if the Company's business interests require trans-border flow of information. This may typically

happen where the Company has decided to store information with a trusted third party in another country or where a service provider makes use of cross border systems or processes.

### **13. UPDATING OF INFORMATION**

A person may choose to correct or update the personal information that has been submitted to the Company, by clicking the relevant menu in any of the pages on the website or contacting the Company by phone or sending an email to [info@adrs.co.za](mailto:info@adrs.co.za)

### **14. LIMITATION**

ADRS Diversified Services is not responsible for, gives no warranties, nor makes any representations in respect of the privacy policies or practices linked, or any third-party websites.

### **15. ENQUIRIES**

If a person has any questions or concerns arising from this privacy policy or the way in which ADRS Diversified Services handles personal information, please contact the Information Officer or Deputy Information Officer of ADRS:

**Email:** [info@adrs.co.za](mailto:info@adrs.co.za)

**Phone:** +27(0)10 591 3100

**Address:** Ground Floor, First House, 262 Main Avenue (Corner Republic Road and Main Avenue) Ferndale, Randburg