



Jasco Electronics Holdings Limited Privacy Statement

1. Introduction

1.1. Purpose

The purpose of this document (“Privacy Statement”) is to inform the reader of how Jasco Electronics Holdings Limited (JEHL) and its subsidiaries manage and process (any operation or set of operations performed on data by any means such as collecting, recording, organisation, storage, adaptation, or alteration of personal information, etc.) personal information.

The manner in which JEHL manages Personal Information (personal data, as defined in the data protection laws, includes, but is not limited to, names, postal address, email address, telephone number, date of birth etc.), is subject to the Electronic Communications and Transactions Act 25 of 2002; Protection of Personal Information Act 4 of 2013 and the European Union General Data Protection Regulations (“Data Protection Laws”).

When users (individuals who make use of any JEHL websites and/or applications) interact with JEHL, submit information to JEHL, or sign up for any products, solutions and/or services offered by JEHL, all personal information, which may be collected through our website or other channels, is treated as confidential and private.

JEHL manages the user’s personal information in the following ways:

- a. By collecting personal information;
- b. Using such personal information;
- c. Sharing (amongst ourselves) the users' personal information; and
- d. Disclosing such personal information to JEHL’s authorised Service Providers as well as relevant third parties in the manner set forth in this Privacy Statement.

JEHL may from time to time update this document to ensure that it is consistent with future developments, industry trends and/or any changes in legal or regulatory requirements.

1.2. Abbreviations and Acronyms

Data	means all information in any form that is owned or processed; it includes but is not limited to facts, numbers, letters and symbols collected by various means and processed to produce information.
GDPR	General Data Protection Regulation
IT	Information Technology
JEHL	Jasco Electronics Holdings Limited and its subsidiaries, affiliates and business employees (i.e. employees, directors, senior managers, executives, temporary staff members, agents, consultants, seconded, home-based, casual and agency staff, volunteers and interns), JEHL business associates and partners..

Personal Information	<p>Means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person for example a company including, but not limited to:</p> <ol style="list-style-type: none"> a. Information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person; b. Information relating to the education or the medical, financial, criminal or employment history of the person; c. any identifying number, symbol, email address, physical address, telephone number, location information, online identifier or other particular assignment to the person; d. the biometric information of the person; e. the personal opinions, views or preferences of the person; f. correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence; g. the views or opinions of another individual about the person; h. the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person; i. Name, address, contact details, tax number, registration number, price lists, director details, quotes, invoices, sales order, etc. of companies.
JEHL Service Providers	<p>A service provider is an individual or entity that provides services to JEHL. JEHL Suppliers are also seen as JEHL Service Providers.</p>
Special Personal Information	<p>Means the following information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person for example a company:</p> <ol style="list-style-type: none"> a. the religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life or biometric information of a data subject; or b. the criminal behaviour of a data subject to the extent that such information relates to <ol style="list-style-type: none"> i. the alleged commission by a data subject of any offence; or ii. any proceedings in respect of an offence allegedly committed by a data subject or the disposal of such proceedings.
User	<p>Individual and/or Company (SA only) that shares information of personal and/or confidential nature.</p>

1.3. Version Information

Version	Reason for Change	Date
1.0	First Approved Document	27 May 2021

2. Collection of Personal Information

Generally, JEHL collects user Personal Information in the following ways:

- a. Upon submission of an application form or other forms relating to any of JEHL's products/solutions and services;
 - i. When interacting with JEHL's employees (via telephone calls, letters, face-to-face meetings, and emails);
 - ii. When making use of any JEHL service i.e. web sites and/or applications;
 - iii. Upon submission of a request for JEHL to contact them, or request to be included in an email or other mailing lists;
 - iv. When there is a response to JEHL promotions, initiatives or to any request for additional Personal Data;
 - v. When contacted by or respond to JEHL marketing representatives and employees;
 - vi. When JEHL receives references from business partners and third parties;
 - vii. When JEHL seeks information from third parties in connection with the products/solutions and services applied for; and
 - viii. Upon submitting Personal Information to JEHL for any other reason.
- b. When a user browses JEHL's web sites, it is generally done anonymously. JEHL does not automatically collect Personal Information unless such information is provided, or login credentials are used.
- c. If JEHL is provided with any Personal Information relating to a third party (e.g. information about a spouse, children, parents and/or employees), by submitting such information, a user confirms that the consent of the third party to provide JEHL with such personal information has been obtained.
- d. Users must ensure that all Personal information submitted to JEHL is complete, accurate, true, and correct. Failure to do so may result in JEHL's inability to provide users with the products and services requested.

3. Purposes for Collection, Use and Disclosure

The purpose for the collection, use and disclosure of personal information is as follows:

- a. Generally, JEHL collects, uses, and discloses Personal Information of users for the following purposes:
 - i. To respond to queries and requests;
 - ii. To manage the administrative and business operations of JEHL and comply with internal policies and procedures;

- iii. To facilitate business asset transactions (which may extend to any mergers, acquisitions, or asset sales) involving any of the Companies;
 - iv. To match any Personal Information held, relating to any of the purposes listed herein;
 - v. To resolve complaints and handle requests and/or enquiries;
 - vi. To prevent, detect, investigate a crime, analyse, and manage commercial risks;
 - vii. To provide media announcements and responses;
 - viii. To monitor or record phone calls and customer-facing interactions for quality assurance, employee training and performance evaluation and identity verification purposes;
 - ix. For legal purposes (including but not limited to obtaining legal advice and dispute resolution);
 - x. To conduct investigations relating to disputes, billing, suspected illegal activities or fraud;
 - xi. To meet or comply with any applicable rules, laws, regulations, codes of practice or guidelines issued by any legal or regulatory bodies which are binding on JEHL (including but not limited to responding to regulatory complaints, reporting to regulatory bodies, and conducting audit checks, due diligence, and investigations); and
 - xii. For purposes which are reasonably related to the aforementioned.
- b. In addition to the above, JEHL collects, uses, and discloses Personal Information of a customer or an employee of an organisation which is a customer of JEHL for the following purposes:
- i. Opening or continuation of accounts and establishing or providing users with the products and services subscribed to;
 - ii. Facilitating the continuation or termination of user subscription to JEHL products/solutions and services;
 - iii. Facilitating the daily operation of the products/solutions and services (including but not limited to billing, customer service, customer verification, technical support, network maintenance and troubleshooting);
 - iv. Facilitating third party services if purchased, obtained, administered, or processed through JEHL;
 - v. Managing and executing JEHL service level agreements with users;
 - vi. Processing of payment instructions, direct debit facilities and/or credit facilities requested by users;
 - vii. Enforcement of repayment obligations (including but not limited to debt collection, filing of claims and retrieval of payments from losses made by service partners);
 - viii. Administering and processing any insurance claims and payments arising under the respective policies;
 - ix. Credit and internal risk management (including but not limited to performing credit checks and disclosures to law enforcement agencies);
 - x. Generation of internal reports (including but not limited to annual, operational and management reports);
 - xi. Processing referral payments and commission fees to JEHL's external partners;
 - xii. Administering fee adjustments, refunds, and waivers;

- xiii. Analysing user experience with JEHL products/solutions and services so as to help us improve, review, develop and efficiently manage the products and services offered; and
- xiv. For purposes which are reasonably related to the aforementioned.
- c. Furthermore, where permitted under the Data Protection Laws, JEHL may also collect, use, and disclose Personal Information of users for the following additional purposes:
 - i. For analytics and tracking, including facilitating the sale of analytical data;
 - ii. To conduct market research and surveys to enable JEHL to understand and determine customer location, preferences, and demographics in order to develop special offers and marketing programmes in relation to JEHL products and services, and to improve our service delivery and customer experience;
 - iii. To provide additional products, services, and benefits to users, which include promotions, loyalty, and reward programmes from JEHL;
 - iv. To match Personal Information with other data collected for other purposes and from other sources (including third parties) in connection with the provision, marketing or offering of products and services by JEHL;
 - v. For leads generation and management of marketing JEHL's products/solutions and services;
 - vi. To administer contests, competitions, and marketing campaigns, and personalise user experience;
 - vii. To communicate advertisements involving details of JEHL's products and services, special offers and rewards, either to general customers, or to communicate advertisements which JEHL has identified as being of interest to specific users (this includes but is not limited to upselling, cross selling, and telemarketing);
 - viii. To organise promotional events and corporate social responsibility projects; and
 - ix. For purposes which are reasonably related to the aforementioned.
- d. In relation to particular products/solutions and services or user interactions, JEHL may also specifically notify users of other purposes for which personal information is collected, used, or disclosed.
- e. Users have a choice to withdraw consent for receiving marketing or promotional materials/communication. Users may contact JEHL using the Head Office contact details found on the main website, at jasco.co.za.
- f. Once JEHL receives confirmation that a user wishes to withdraw consent for marketing or promotional materials/communication, it may take up to 30 (thirty) working days for the withdrawal to be reflected on the system. Therefore, users may continue to receive marketing or promotional materials/communication during that period of time. It may be noted that even upon withdrawal of consent for the receipt of marketing or promotional materials, JEHL may still contact users for other purposes in relation to the products and services held by users or subscriptions to JEHL.

4. Processing of Personal Information

- a. By providing Personal Information to JEHL, users acknowledge that the information has been collected from them directly and there is consent for JEHL to process such information.

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- b. Where users submit Personal Information (such as name, address, telephone number and email address) via the JEHL Website (e.g., through completing any online form) the following principles are observed in the processing of such information:
- i. JEHL will only collect Personal Information for a purpose consistent with the purpose for which it is required. The specific purpose for which information is collected will be apparent from the context in which it is requested.
 - ii. JEHL will only process Personal Information in a manner that is adequate, relevant, and not excessive in the context of the purpose for which it is processed.
 - iii. Personal Information will only be processed for a purpose compatible with that for which it was collected unless the user has agreed to an alternative purpose in writing or JEHL is permitted in terms of national legislation of general application dealing primarily with the protection of Personal Information.
 - iv. JEHL will keep a record of all Personal Information collected and the specific purpose for which it was collected for a period of 1 (one) year from the date on which it was last used.
 - v. JEHL will not disclose user Personal Information relating to any third party, unless prior written consent from the user is obtained, or where JEHL is required to do so by law.
 - vi. If Personal Information is released to a third party with the consent of the user, JEHL will retain a record of the information released, the third party to which it was released, the reason for the release and the date of release, for a period of 1 (one) year from the date on which it was last used.
 - vii. JEHL will destroy or delete any Personal Information that is no longer needed by JEHL for the purpose it was initially collected, or subsequently processed.

5. Disclosure of Personal Information

JEHL will take reasonable steps to protect Personal Information of users against unauthorised disclosures. Subject to the provisions of any applicable law, Personal Information may be disclosed for the purposes listed above (where applicable) to the following:

- a. JEHL's related corporations and employees to provide content, products, solutions and services to address user questions and requests in relation to customer accounts, subscription, and billing arrangements with JEHL as well as products and services;
- b. Companies providing services relating to insurance and consultancy to JEHL;
- c. Agents, contractors, or third-party Service Providers who provide operational services to JEHL, such as courier services, telecommunications, information technology, payment, printing, billing, payroll, processing, technical services, training, market research, call centre, security, or other services to JEHL;
- d. Vendors or third-party Service Providers in connection with marketing promotions and services offered by JEHL;
- e. Other telecommunications, content, or other Service Providers to facilitate their provision of content or services, or for interconnection, interoperability, system operation and maintenance and billing between Service Providers;
- f. Collection and repossession agencies in relation to the enforcement of repayment obligations for debts;

- g. Credit bureaus for the purpose of preparing credit reports or evaluation of creditworthiness;
- h. External banks, credit card companies and their respective Service Providers;
- i. JEHL's professional advisers such as auditors and lawyers;
- j. Relevant government regulators, statutory boards or authorities or law enforcement agencies to comply with any laws, rules, guidelines and regulations or schemes imposed by any governmental authority; and
- k. Any other party to whom users authorise JEHL to disclose Personal Information to.

6. Use Of Cookies

- a. JEHL uses cookies (a small piece of information that is placed on a user's computer when visiting certain websites) for the following purposes:
 - i. To enable certain features and functions on websites, e.g., remembering user-id, favourite channel selections, browsing and other service preferences;
 - ii. To build up a profile of how users experience the website;
 - iii. To improve the efficiency of JEHL's web sites;
 - iv. To administer services to users and advertisers; and
 - v. To establish usage statistics.
- b. Most Internet browsers provide users with the option of turning off the processing of cookies (please see the "help" section of the browser), but this may result in the loss of functionality, restrict use of the website and/or delay or affect the way in which it operates.
- c. Advertisements on the JEHL website may be provided by third party advertisers and their agencies. These may generate cookies to track how many people have seen a particular advertisement (or use the services of third parties to do this), and to track how many people have seen it more than once. JEHL does not control these third parties and their cookie policies. Should users have any questions about JEHL's Data Privacy Policy, they may contact JEHL.
- d. JEHL is not responsible for the Personal Information policies (including Personal Information protection and cookies), content or security of any third-party websites linked to the Website.

7. Transfers of information outside the South Africa Area

- a. In certain circumstances, JEHL will transfer users' personal information outside of the South Africa Area, including to the United States of America and European Union.
- b. When this is done, JEHL will ensure appropriate safeguards are in place, including, for example, that the third parties who transfer the information outside the South Africa Area have self-certified themselves as compliant with the EU-U.S. Privacy Shield or European Union General Data Protection Regulation (GDPR).

8. Queries

- a. If a user:
 - i. Would like to withdraw consent to any use of their Personal Information as set out in this Privacy Statement, they may contact the business unit executive or manager that manages their account.
 - ii. Would like to obtain access and make corrections to their Personal Information records, they may contact the business unit executive that manages their account.
- b. If your Personal Information has been provided to JEHL by a third party (e.g. a referrer), users should contact that organisation or individual to make such queries, complaints, and access correction requests to JEHL on their behalf.
- c. If a user withdraws their consent to any or all use of Personal Information, depending on the nature of such a request, JEHL may not be in a position to continue to provide its products and services to users. In addition, JEHL may not administer any contractual relationship in place, which in turn may also result in the termination of any agreements with JEHL and may result in the user being in breach of contractual obligations or undertakings. JEHL's legal rights and remedies in such events are expressly reserved.

9. Governing Law

This Privacy Statement and use of the Website shall be governed in all respects by the laws of South Africa.

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