



NPC PRIVACY POLICY

1. Introduction

- 1.1 Natal Portland Cement Company (Pty) Ltd (“NPC”) is a cement manufacturer company based at 29 Richefond Circle, Ridgeside Office Park, Umhlanga Rocks, Kwa-Zulu Natal, 4319, South Africa.
- 1.2 For purposes of this privacy policy (**‘Privacy Policy’**) **‘we’, ‘us’, ‘our’** refers to NPC, and **‘you’, ‘your’, ‘user’** refers to the data subject.
- 1.3 NPC is committed to respecting your privacy and to processing all Personal Information lawfully, transparently, securely, and in accordance with the Protection of Personal Information Act 4 of 2013 (**‘POPIA’**) and applicable South African legislation.
- 1.4 This Privacy Policy sets out the manner in which NPC processes Personal Information, whether provided by you to us, or collected by us through other means in the course of our providing our services or in your accessing our website and social media platforms.
- 1.5 This Privacy Policy applies to all external parties with whom we interact, including but not limited to individual clients, representatives of client organisations, suppliers, visitors to our offices, visitors to our website and social media platforms, for employees, job applicants, and other users of our marketing and related services.
- 1.6 This Privacy Policy must, as is appropriate, be read in conjunction with our website <https://npc.co.za/>, and any other documents or agreements between you and NPC.
- 1.7 By providing us with your Personal Information you:
 - 1.7.1 agree to this Privacy Policy and authorise us to process such information as set out herein;
and
 - 1.7.2 authorise NPC and our service providers to process your Personal Information for the purposes stated in this Privacy Policy.



If you are concerned about any aspect of this Privacy Policy as it relates to your Personal Information, then you must immediately refrain from engaging with us and using our website and/or our services. Alternatively, contact us for clarity on the matter that concerns you at marketing@huaxincem.com

2 What is Personal Information?

2.1 **'Personal Information'** means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to—

- 2.1.1 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;
- 2.1.2 information relating to the education or the medical, financial, criminal or employment history of the person;
- 2.1.3 any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
- 2.1.4 the biometric information of the person;
- 2.1.5 the personal opinions, views or preferences of the person;
- 2.1.6 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;
- 2.1.7 the views or opinions of another individual about the person; and
- 2.1.8 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.

2.2 **'Special Personal Information'** means any information concerning:

- 2.2.1 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
- 2.2.2 the criminal behaviour of a data subject to the extent that such information relates to—
 - the alleged commission by a data subject of any offence; or
 - any proceedings in respect of any offence allegedly committed by a data subject or the disposal of such proceedings.

3 Collection of Personal Information

3.1 We may collect or obtain Personal Information about you, directly from you:



- 3.1.1 in the course of our business relationship with you;
 - 3.1.2 in the course of providing advertising and marketing services to you or your organisation;
 - 3.1.3 when you make your Personal Information public;
 - 3.1.4 when you submit a job application;
 - 3.1.5 when you participate in a marketing survey;
 - 3.1.6 when you visit and/or interact with our website or our social media platforms; and
 - 3.1.7 when you visit our offices.
- 3.2 We may also receive Personal Information from third-parties (e.g. from suppliers, clients whom we conduct business with, recruitment agencies and suppliers of background check services).
- 3.3 We use third party services that collect, analyse and monitor log data pertaining to our website.
- 3.4 In addition to the above, we may create Personal Information about you such as records of communications, mailings and interactions with us during the course of us conducting business together.

4 Collection and Processing of Special Personal Information

- 4.1 We hereby notify you that, in certain circumstances, by engaging with NPC, we may collect Special Personal Information about you.
- 4.2 NPC has implemented appropriate policies and safeguards, which we are required by law to maintain, to process Special Personal Information.
- 4.3 Where we need to process your Special Personal Information, we will do so in the ordinary course of our business and in accordance with POPIA. The situation in which we may process your Special Personal Information include the following:
 - 4.3.1 as part of our recruitment and hiring process, we may process information relating to your ethnicity and your criminal behavior; and



4.3.2 as part of our wishing to conduct market research to inform product development or marketing strategies.

4.4 NPC does not knowingly process Personal Information of children.

5 How does NPC use Personal Information?

5.1 Personal information collected by NPC will be used for administrative purposes, security purposes, marketing purposes and for the enhancement of our current service offering. Specifically, we will use Personal information for the following purposes:

5.1.1 to operate and manage your agreement with us or correspondence you may have with us;

5.1.2 to provide our clients with information, products, or services which our clients may request from us;

5.1.3 to provide products and services for our clients;

5.1.4 to communicate with our clients;

5.1.5 to provide our clients with support;

5.1.6 to refer our clients to an appropriate third party service provider;

5.1.7 for market research surveys;

5.1.8 for marketing activities in order to establish, maintain and improve our relationship with you;

5.1.9 to comply with our regulatory reporting obligations;

5.1.10 to conduct the recruitment and hiring processes, which includes but is not limited to conducting criminal record and credit checks (where appropriate), the capturing of applicants details and providing status updates to job applicants;

5.1.11 in relation to supplier information, to create supplier profiles on our systems, to pay suppliers, for general supplier administration and supplier database maintenance;

5.1.12 in relation to client information, to create client profiles on our systems, to invoice clients, for general client administration and client database maintenance;

5.1.13 to carry out any other reasonable business operation considering our business and the relationship between the parties;

5.1.14 to maintain and improve our website performance and functionality, to optimize, improve and audit the products we offer on our website;



5.1.15 to create user profiles about you and your access to our website, including browsing habits, click-patterns, preferences, frequency and times of use, trends and demographic information including recommendations to users, to perform statistical analyses, and to offer you information and content which is more appropriately tailored for you;

5.1.16 to inform you about any changes to our website, this Privacy Policy or other changes that are relevant to you; and

5.1.17 for safety and security purposes.

5.2 Your Personal Information may also be used for other purposes for which you give your permission or where we are permitted to do so in terms of POPIA.

6 Personal Information you give NPC

6.1 This includes any information that you provide to us directly:

6.1.1 when you sign-up to utilise our services;

6.1.2 by filling in forms on our websites, or those provided to you;

6.1.3 when you enter a competition, promotion or complete a survey;

6.1.4 by posting comments or content on our social media pages; or

6.1.5 when you contact us or we contact you and you provide information directly to us.

7 Information we collect or receive when you use our website or social media platforms

7.1 We collect information when you use websites or social media platforms by using cookies, web beacons and other technologies. Depending on how you access and use websites, we may receive:

7.1.1 log information;

7.1.2 information we infer about you based on your interaction with products and services;

7.1.3 device information (for example the type of device you're using, how you access platforms, your browser or operating system and your Internet Protocol ("IP") address); and

7.1.4 location information.

8 Information from third party sources



We may receive additional information about you that is publicly or commercially available and combine that with the information we have collected or received about you in other ways.

9 What Personal Information is Collected by NPC?

9.1 The Personal Information NPC may process will include, without limitation:

- 9.1.1 **identity information**, which includes information concerning your name, marital status, title, occupation, nationality, interests, qualifications, date of birth, gender, race and legal status, as well as copies of your identity documents, photographs, identity number and registration number;
- 9.1.2 **contact details**, which includes your billing address, delivery address, e-mail address, telephone numbers and details of your public social media profile(s);
- 9.1.3 **financial information**, which includes bank account details, payment records, payment amounts, payment dates, tax clearance certificates and VAT registration numbers;
- 9.1.4 **browsing and device information**, which includes your internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access our website or to use our services or engage with us; and
- 9.1.5 **website usage information**, which includes information as to your access to and use of our website, such as what links you went to, what content you accessed, the amount of content viewed and the order of that content, as well as the amount of time spent on specific content and what services you access and use when engaging with NPC.

10 Where is my Personal Information Processed?

- 10.1 Usually, your Personal Information will be processed within the borders of South Africa on secure NPC servers using reasonable technical and organisational measures to manage, secure and process Personal Information.
- 10.2 From time-to-time, given the nature of cloud technology and global operations, your Personal Information may, in addition to 7.1 above, be processed outside the borders of South Africa to *inter alia* help us offer more efficient and cost-effective solutions.



10.3 Your use of our website, followed by your submission of information to us, represents your consent to such transfer your Personal Information.

10.4 We will take reasonable technical and organisational measures to ensure that your Personal Information is treated securely and in accordance with this Privacy Policy.

11 Disclosure of Personal Information to Third Parties

11.1 We don't sell your Personal Information to third parties for their marketing purposes.

11.2 We will only share your information with third parties that we have trusted relationships with, and selected third parties who perform services on our behalf. All service providers are bound by contract with us to maintain the security of your Personal Information and to use it only as permitted by us, in accordance with this Privacy Policy and in accordance with POPIA and applicable law.

11.3 In addition, we may disclose your Personal Information:

11.3.1 to comply with the law or with any legal process or regulatory body;

11.3.2 to protect and defend the rights, property or safety of NPC, or our clients, employees, contractors, suppliers, or any third party;

11.3.3 where we have lawful grounds to do so as permitted by POPIA; and

11.3.4 to any relevant third-party provider, where our website uses third party advertising, plugins or content.

11.4 We may share information with:

11.4.1 our affiliates, in other words, other companies in our group;

11.4.2 we may disclose your personal information to a limited number of our employees and third party service providers (other than those who we refer you to), who we assist you to interact with;

11.4.3 our business partners. We may share non-personally identifiable information with select business partners;



- 11.4.4 other parties in response to legal process or when necessary to conduct or protect our legal rights;
- 11.4.5 companies that provide services to us. Companies that provide services to us or act on our behalf may have access to information about you. These companies are limited in their ability to use information they receive in the course of providing services to us or you; and
- 11.4.6 third-parties where you provide consent. In some cases, third-parties (often advertisers) may wish to attain information about you in order to promote their products to you, or for whatever other reason. We may share information with third-parties where you provide consent in the form of an explicit opt-in. Before we ask you to opt-in, we will endeavour to provide you with a clear description of what Personal Information would be shared with the third-party. Remember that once you have opted in to allow us to send your information to the third-party, we cannot control what they do with your Personal Information; therefore, be sure to investigate their privacy policies before providing permission for us to share your information.

12 Cookies and Similar Technologies

- 12.1 Cookies are files with small amounts of data, which may include an anonymous unique identifier. Cookies are sent to your browser from a web site and stored on your computer's hard drive.
- 12.2 Like many sites, we use "cookies" to collect information. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our website. You may ask for a full list of the cookies we collect by sending us an email to marketing@huaxincem.com
- 12.3 Our website may contain electronic image requests (sometimes referred to as "web beacon" requests) that allow us to count page views and to access cookies. Any electronic image viewed as part of a web page (including an ad banner) can act as a web beacon. Our web beacons do not collect, gather, monitor or share any of your Personal Information. We merely use them to compile anonymous information about our website and/or the Service.

13 Your rights in relation to Personal Information (Access, Deletion and Correction of Personal Information)

- 13.1 The provision of Personal Information by any data subject to NPC is entirely voluntary – you may withdraw your consent at any time, or you may contact us at [cdavid@huaxincem.com](mailto:c david@huaxincem.com) to:



13.1.1 enquire about what Personal Information we hold of yours; and/or

13.1.2 request us to delete and/or correct your Personal Information.

13.2 You have the right to ask us not to contact you for marketing purposes. You can exercise this right at any time by using any of the various "opt-out" options that we will always provide to you when we communicate with you. We won't send you marketing messages if you tell us not to but we will still need to send you service-related messages.

13.3 You may at any time request:

13.3.1 confirmation that we hold your records;

13.3.2 access to your records;

13.3.3 the identities or categories of third parties to whom we have disclosed your records; or

13.3.4 that we correct or delete any records that is incomplete, misleading, inaccurate, excessive or out of date.

13.4 Requests may be made in writing to our Information Officer, the details of which are contained in our PAIA Manual.

13.5 NPC will only retain Personal Information for as long as it is required to serve its primary purpose, or a legitimate interest, or to enforce our legal agreements and policies, or for the period required to comply with an applicable legal requirement, whichever is the longer.

14 Information Officer and Responsible Party

14.1 If you have any requests or queries regarding NPC's use of Personal Information in terms of any applicable laws, please contact cdavid@huaxincem.com.

14.2 NPC's Information Officer and responsible party is Christopher David and can be contacted at cdavid@huaxincem.com.

14.3 If you feel that the attempts by NPC to resolve the matter have been inadequate, you may lodge a complaint with the South African Information Regulator by accessing their website at



www.justice.gov.za/inforeg.

15 Safeguarding Personal Information

- 15.1 The security of your Personal Information is important to us. While we strive to use commercially acceptable means to protect your Personal Information, we cannot guarantee its absolute security. However, we do employ a number of reasonable technical and organisational safeguards intended to mitigate the risk of unauthorized access or disclosure of your Personal Information. We will at all times comply with our obligations to secure your Personal Information as set forth under applicable law.
- 15.2 NPC will take reasonable steps to ensure your Personal Information is accurate, reliable and up-to-date.
- 15.3 NPC will take reasonable steps to ensure that safeguards such as firewalls and data encryption are implemented to protect Personal Information and will enforce physical access controls to our buildings and files.
- 15.4 We authorise access to Personal Information only for employees, consultants and contractors who necessarily require the Personal Information to fulfil job responsibilities.

16 Links to other websites

Our website or social media platforms may contain links to and from websites, mobile applications or services of third parties, advertisers or affiliates. Please note that we are not responsible for the privacy practices of such other parties and advise you to read the privacy statements of each website you visit which collects Personal Information.

17 Incident Response

- 17.1 We have appointed an incident response team to manage any data breach.
- 17.2 In the event any Personal Information is compromised as a result of a cyber-attack or some form of data incident, we will notify you of this as soon as is reasonably possible.



18 Other important privacy information

18.1 This Privacy Policy is subject to change.

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