

# PRIVACY POLICY

FOR



(hereinafter referred to as “ADL”)

AND



(hereinafter referred to as “ADLC”)

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## 1. DEFINITIONS

As per the context of the Protection of Personal Information Act (POPIA) and the Promotion of Access to Information Act (PAIA), the following definitions are applicable:

“Cookies” are small data files sent from a server to your web browser or mobile device that is stored on your browser cache or mobile device.

“Data Subject” means the person to whom personal information relates.

“Information Officer” means the person acting on behalf of the Company and discharging the duties and responsibilities assigned to the “head” of the Company by the Acts; The Information Officer is duly authorised to act as such, and such authorisation has been confirmed by the “head” of the Company in writing;

“Personal Information” means information about an identifiable individual, including, but not limited to-

- 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 individual;
- b) information relating to the education or the medical, criminal or employment history of the individual or information relating to financial transactions in which the individual has been involved;
- c) any identifying number, symbol or other particular assigned to the individual;
- d) the address, fingerprints or blood type of the individual;
- e) the personal opinions, views or preferences of the individual, except where they are about another individual or about a proposal for a grant, an award or a prize to be made to another individual;
- f) correspondence sent by the individual 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 individual;
- h) the views or opinions of another individual about a proposal for a grant, an award or a prize to be made

to the individual, but excluding the name of the other individual where it appears with the views or opinions of the other individual; and

- i) the name of the individual where it appears with other personal information relating to the individual or where the disclosure of the name itself would reveal information about the individual but excludes information about an individual who has been dead for more than 20 years.

“Personnel” means any person who works for or provides services to or on behalf of the Company and receives or is entitled to receive any remuneration. This includes, without limitation, directors (both executive and non-executive), all permanent, temporary, and part-time staff as well as contract workers.

“Processing” means any operation or activity or any set of operations, whether or not by automatic means, concerning personal information, including –

- a) The collection, receipt, recording, organisation, collation, storage, updating, or modification, retrieval, alteration, consultation or use;
- b) Dissemination by means of transmission, distribution or making available in any other form; or
- c) Merging, linking, as well as restriction, degradation, erasure, or destruction of information.

“Record” means any recorded information, regardless of form or medium, which is in the possession or under the control of the Company, irrespective of whether it was created by the Company.

“Request” means a request for access to a record of the Company.

“Requestor” means any person, including a public body or an official thereof, making a request for access to a record of the Company and includes any person acting on behalf of that person.

“Responsible Party” means a public or private body or any other person which, alone or in conjunction with others, determines the purpose and means for processing personal information.

“Unique Identifier” means any identifier that is assigned to a data subject and is used by a responsible party for the purposes of the operations of that responsible party and that uniquely

identifies that data subject in relation to that responsible party.

## 2. INTRODUCTION

As part of our commitment to protect personal information, while providing a professional service to our staff and clients, this policy provides information regarding information privacy at ADL & ADLC.

## 3. PROTECTION OF PERSONAL INFORMATION

ADL & ADLC is capturing, processing, storing, and communicating Personal Identifiable Information (PII) to perform its business functions. For a full list of the records, please refer to the POPIA & PAIA Manual, available on request at [info@adlc.co.za](mailto:info@adlc.co.za).

It is accountable and a responsible party in ensuring that the PII of a Data Subject

- a. is processed lawfully, fairly, and transparently.
- b. is processed only for the purposes for which it was collected for.
- c. will not be processed for a secondary purpose unless consent is provided.
- d. is accurate and kept up to date;
- e. will not be kept for longer than necessary;
- f. is processed in accordance with integrity and confidentiality principles; this includes physical and organisational measures to ensure that Personal Information, in both physical and electronic form, are subject to an appropriate level of security when stored, processed, and communicated.
- g. is processed in accordance with the rights of Data Subjects, where applicable.

## 4. DATA COLLECTION

Data is only collected and processed as per the specifications in POPIA and the process is outlined within our POPIA and PAIA manual.

Data are processed for the following purpose:

1. To administer our services to you;
2. To respond to your requests;
3. To distribute communications relevant to your use of our services, such as updates or information about your use of our services;
4. As may be necessary to support the operation of our services, such as for billing, account maintenance, and record-keeping purposes;
5. to send to you ADL & ADLC solicitations, product announcements, and the like that we feel may be of interest to you. **Please note that you may “opt out” of receiving these marketing materials.**
6. In other manners after subsequent notice is provided to you and/or your consent is obtained, if necessary.

## **5. COOKIE POLICY**

We only use functional (or required) cookies that are necessary for this site to function, including those that are necessary for Google Analytics to work. We do analyse the use of this website to measure the audience, but it is de-identified data. In other words, we do not know who you are.

Cookies and tracking technologies are used to provide the following usability features via our website:

1. Required for the website to function correctly, and provide you with an optimal experience.
2. Enhance and customize functionality, so that for example, details are only entered on the first visit to the site.
3. To gain understanding on how our visitors are using the site to improve functionality and the services on offer.

In the instances where we partner with third-party services that may use various tracking technologies to provide certain services or features on our sites, such as advertising, interactive content, analytics and on-site messaging, cookies are used to anonymously collect data. No personally identifiable information is collected by these cookies, and this data is kept separate from the personal information about you as a user that we collect.

Note that in the event that cookies are disabled or rejected, it may affect the website and the services may not work as it is supposed to.

## **6. CONTACT US**

If you have any questions about our privacy policy, please contact us via email at [info@adlc.co.za](mailto:info@adlc.co.za).