



## **PRIVACY POLICY**

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## 1 INTRODUCTION

The right to privacy is an integral human right recognised and protected in the South African Constitution. The Protection of Personal Information Act (POPIA) aims to promote the protection of privacy through providing guiding principles that are intended to be applied to the processing of personal information in a context-sensitive manner. Through the provision of goods and services, Dynamdre is involved in the collection, use and disclosure of certain aspects of personal information of customers, employees and other stakeholders.

Given the importance of privacy, Dynamdre is committed to effectively managing personal information in accordance with POPIA's provisions. POPIA requires Dynamdre to inform the consumer as to the manner in which their personal information is used, protected, disclosed and destroyed. Dynamdre guarantees its commitment to protecting a data subject's privacy and ensuring that their personal information is used appropriately, transparently, securely and in accordance with applicable laws.

## 2 SCOPE

This Policy sets out the manner in which Dynamdre deals with the data subject's personal information. The purpose of this policy is to protect Dynamdre from *inter alia*, the compliance risks associated with the protection of personal information which include:

- Breaches of confidentiality. For instance, Dynamdre could suffer loss in revenue where it is found that the personal information of data subjects has been shared or disclosed inappropriately.
- Reputational damage. For instance, Dynamdre could suffer a decline in shareholder value following an adverse event such as a computer hacker deleting the personal information held by Dynamdre.

This policy demonstrates Dynamdre's commitment to protecting the privacy rights of the data subjects and cultivating an organisational culture that recognises privacy as a valuable human right.

## 3 DEFINITIONS

<b>"Biometrics"</b>	means a technique of personal identification that is based on physical, physiological or behavioural characterisation including blood typing, fingerprinting, DNA analysis, retinal scanning and voice recognition;
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<b>"Consent"</b>	means any voluntary, specific and informed expression of will in terms of which permission is given for the Processing of Personal Information;
<b>"Data Subject"</b>	means the person to whom the Personal Information relates;
<b>"Information Officer"</b>	means the information officer who is registered with the South African Information Regulator established under POPIA prior to performing his or her duties;
<b>"Operator"</b>	means a person who Processes Personal Information for a Responsible Party in terms of a contract or mandate, without coming under the direct authority of that party;
<b>"POPIA"</b>	means the Protection of Personal Information Act 4 of 2013;
<b>"Personal Information"</b>	<p>means any information that can be used to reveal a person's identity. Personal Information relates to an identifiable, living, natural person, and where applicable, an identifiable, existing juristic person (such as a company), including, but not limited to information concerning:</p> <ul style="list-style-type: none"> <li>• race, gender, sex, pregnancy, marital status, national or ethnic origin, colour, sexual orientation, age, physical or mental health, disability, religion, conscience, belief, culture, language and birth of a person;</li> <li>• information relating to the education or the medical, financial, criminal or employment history of the person;</li> <li>• any identifying number, symbol, email address, physical address, telephone number, location information, online identifier or other particular assignment to the person;</li> <li>• the biometric information of the person;</li> <li>• the personal opinions, views or preferences of the person;</li> </ul>

- 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;
- the views or opinions of another individual about the person;
- 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;

but excludes:

- information of a deceased person;
- information that has been provided anonymously so that it does not identify a specific person;
- permanently de-identified information that does not relate or cannot be traced back to the Data Subject specifically;
- non-personal statistical information collected and compiled by Dynamdre;
- information that the Data Subject has provided voluntarily in an open, public environment or forum including any blog, chat room, community, classifieds, or discussion board (because 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).

<p><b>“Process” or “Processing”</b></p>	<p>means any operation or activity or any set of operations, whether or not by automatic means, concerning Personal Information, including:</p> <ul style="list-style-type: none"> <li>• the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;</li> <li>• dissemination by means of transmission, distribution or making available in any other form; or</li> <li>• merging, linking, as well as restriction, degradation, erasure or destruction of information.</li> </ul>
<p><b>“Record”</b></p>	<p>means any recorded information, regardless of form or medium, including:</p> <ul style="list-style-type: none"> <li>• writing on any material;</li> <li>• information produced, recorded or stored by means of any tape-recorder, computer equipment, whether hardware or software or both, or other device, and any material subsequently derived from information so produced, recorded or stored;</li> <li>• label, marking or other writing that identifies or describes anything of which it forms part, or to which it is attached by any means;</li> <li>• book, map, plan, graph or drawing;</li> <li>• photograph, film, negative, tape or other device in which one or more visual images are embodied so as to be capable, with or without the aid of some other equipment, of being reproduced.</li> </ul>

<b>“Responsible Party”</b>	means the responsible party is the entity that needs the Personal Information for a particular reason and determines the purpose of and means for Processing the Personal Information. In this case, Dynamdre is the responsible party;
<b>“Special Personal Information”</b>	means information relating to religious or philosophical beliefs, race and ethnic origin, trade union membership, political persuasion, health or sec life or the biometric information of a data subject, criminal behaviour of a Data Subject regarding the alleged commission of an offence or any proceedings in respect of ny offence allegedly committed by a Data Subject or the disposal of such proceedings

#### 4 COLLECTION OF PERSONAL INFORMATION

Dynamdre may collect personal information:

- directly from you (e.g., when we contact you, when you contact us, when you visit us or when we visit your premises, or when you participate in a research project, complete a survey or enter a competition)
- from third parties whom you have authorised to provide us with information.
- from third parties who provide services to us or organisations of which we are a members of.
- from publicly available sources, such as public web pages and published databases.
- via routine monitoring of our information technology and telephone networks.
- from audio and video recordings in public locations and other spaces identified as being subject to recording devices.
- where generated by us in the course of our business activities (supplier registration).

We do not collect or retain sensitive information, unless it is supplied by you, you consent to its collection and the information is reasonably necessary for our business or activities. By supplying us with sensitive information, you consent to our use of that information in any of the ways and for any of the purposes described in this policy.

## **5 THE PURPOSE FOR COLLECTING PERSONAL INFORMATION**

Dynamdre may use or process any goods or services information, or optional information that the data subject provides to Dynamdre, for the purposes that the data subject indicates, when the data subject agrees to provide such.

Processing includes gathering the data subject's personal information, recording it, and combining it with other personal information. Dynamdre generally collects and processes the data subject's personal information for various purposes, including:

- goods or services purposes – such as collecting orders or requests for and providing Dynamdre's goods or services.
- marketing purposes – such as pursuing lawful related marketing activities.
- business purposes – such as internal audit, accounting, business planning, and joint ventures, disposals of business, or other proposed and actual transactions; and
- legal purposes – such as handling claims, complying with regulations, or pursuing good governance.

Dynamdre may use the data subject's website usage information for the purposes described above and to:

- store the data subject's information so that the data subject will not have to re-enter it during the data subject's next visit to the website.
- monitor website usage metrics such as total number of visitors and pages accessed; and
- track the Data Subject's entries, submissions, and status in any promotions or other activities relating to the Data Subject's usage of the website.

## **6 CONSENT TO THE COLLECTION OF PERSONAL INFORMATION**

Dynamdre will obtain the data subject's consent to collect Personal Information:

- in accordance with applicable law.
- when the data subject provides Dynamdre with any registration information or optional information.

## **7 THE USE OF PERSONAL INFORMATION**

- Dynamdre may use the data subject's personal information to fulfil Dynamdre'S obligations to the data subject.
- Dynamdre may send administrative messages and email updates to the data subject about the website. Dynamdre may wish to provide the data subject with information about new goods or



services in which Dynamdre thinks the data subject may be interested. Accordingly, Dynamdre may also send the data subject promotional messages.

- The data subject will have the option to select / opt-out of promotional messages.

## **8 SHARING OF PERSONAL INFORMATION**

Dynamdre may share the data subject's personal information:

- with other divisions or companies within Dynamdre group so as to provide joint content and services like registration, for transactions and customer/employee support, to help detect and prevent potentially illegal acts and violations of Dynamdre's policies, and to guide decisions about Dynamdre's products, services, and communications (Dynamdre will only use this information to send the data subject marketing communications if the data subject has requested so).
- with credit bureaus to report account information, as permitted by law.
- a regulator or governmental department as required by law.
- by a subpoena or court order.
- to comply with any law.
- to protect the safety of any individual or the public.

Dynamdre may need to disclose the data subject's personal information to Dynamdre's employees that require such personal information to perform their duties (do their jobs). These employees include Dynamdre management, human resources, accounting, audit, compliance, information technology, or other personnel.

## **9 SECURITY SAFEGUARDS SURROUNDING PERSONAL INFORMATION**

- Dynamdre is committed to implementing the required information security measures to safeguard personal information and always endeavor to comply with applicable data protection laws.
- Dynamdre will store information assets and personal information in a secure server / datacenter environment that uses a firewall and other advanced security measures to prevent interference or access from outside intruders.
- Dynamdre will only grant access to personal information, for those employees who require it to fulfil their job responsibilities.

## **10 ACCURACY AND CORRECTNESS OF PERSONAL INFORMATION**

- Dynamdre will endeavor to keep the data subject's personal information as accurate, complete and up to date as is necessary for the purposes defined in this policy.
- From time-to-time Dynamdre may request the data subject to update his/her/its personal information. the data subject can review or update his/her/its personal information that Dynamdre holds by accessing the data subject's online account, emailing, or phoning Dynamdre.
- please note that to better protect the data subject and safeguard the data subject's personal information, Dynamdre will take additional steps to verify the data subject's identity before granting the data subject access to his/her/its account or making any corrections his/her/its personal information.

## **11 RETENTION OF PERSONAL INFORMATION**

Dynamdre will only retain the data subject's 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 authorised by law; or
- the data subject has consented to the retention of the record.

During the period of retention, Dynamdre will continue to abide to non-disclosure obligations and will not share or sell the data subject's personal information. Dynamdre may retain the data subject's personal information in physical or electronic records at Dynamdre's discretion.

## **12 CROSS-BORDER TRANSFER OF PERSONAL INFORMATION**

- Dynamdre may transmit or transfer personal information from the country in which it was collected to a foreign country and process it in that country.
- Personal information may be stored on servers located outside of the country in which it was collected and that in a foreign country's laws protecting personal information may not be as stringent / specific as the laws of the country in which it was collected.
- The data subject's consent to Dynamdre processing his /her/its personal information in a foreign country whose laws regarding processing of personal information may be less stringent.

### 13 POLICY VALIDITY AND APPROVAL

The owner / custodian of this document is the Chief Executive Officer who must validate and if necessary, update the document at least once a year.

**DATE APPROVED:**

*Date* Day of *Month*

2021

**APPROVER DETAIL:**

**Title:**

**Name:**

**Position:**

**Signature:**