



POPIA Client Privacy Policy

S A Cash Register Group of Companies

Part of providing customer service includes making sure that we're creating a relationship of trust with our clients. Our way of doing that is to let you know in a clear, prominent, and easily accessible way how we collect, use, share, and protect your personal information. In this document the S A Cash Register Group of Companies includes the following companies:

S A Cash Register Natal (Pty) LTD
S A Cash Register (Pty) LTD trading as Towa Data Systems
Almex Transport Solutions (Pty) LTD
SACR Properties CC
RSL Properties CC
Meadowbrook Properties 43 CC
Swaziland and Botswana Peripherals.

We will only collect personal information that is required and will only process personal information in compliance with applicable laws, including the protection of Personal Information Act (POPIA) and in ways that are fair, or compatible with, the business purposes for which the personal information was collected or that are authorised by you.

Every Software Engineer and software support staff have signed a NON DISCLOSURE AGREEMENT which is an annexure to their Employment Contract.

This Document outlines:

How and why we collect your personal information.

How your personal information is used and protected.

When and with whom we share your personal information.

What choices you can make about how we collect, use, and share your personal information.

The S A Cash Register Group of Companies takes steps to ensure that we manage your personal information properly to maintain your trust in us.

We may collect the following categories of personal information.

- Personal information, such as names and addresses age and date of birth;
- Telephone number and email address;
- Your biometric information.
- Internet, application, and network activity, such as cookie IDs and browser visits;
- CIPC registration numbers, ID numbers
- Financial statements, bank statements and credit and debit card numbers.
- Purchase history information, such as products you have purchased, rented, and hired.
- Geographical information.
- Your online identifiers such as social media profiles
- Your company name, company registration number, and VAT number;
- Your postal address or street address
- Your username and password depending on the software solution you have from us.
- Credit reference searches or verification documents

Collection of Personal Information

We collect information from you in a variety of ways. It may be:

- Provided directly by you;
- Collected through in-store technology;
- Collected from another company within our Group of companies; or
- Collected from an external third-party source.
- The company collects information either directly from the data subject, or through financial services intermediaries. We may collect information from third parties and partners on its behalf across all channels.
- Criminal information.

Information Collected From your personal Devices owned or rented by yourself.

Device Information: We collect certain pertinent information when you visit our websites or use our mobile applications or services.

Browsing Information: We use our own and third-party technologies such as cookies, web beacons, and mobile device identifiers to collect information about the use of our websites and mobile services. We use these tools to provide an integrated and more personalized experience for you.

Cookies allow us to provide you relevant information as you use or return to our sites; web beacons allow us to know if a certain page was visited, an email was opened, or if ad banners on our websites and other sites were effective. Under certain circumstances, we permit third parties to collect information on our websites for their own business purposes using cookies, web beacons, iframes and similar technologies.

You agree that we will be entitled to send cookies from this website to your computer. We use the word cookie to refer to information that is sent from this website to your hard drive, where it is saved. It contains information to personalise your experience on the various websites. In this way, the next time you use these websites we will know who you are and that you have visited this website before

Precise Device Location Information: We may collect information about your location when your device is set to provide location information.

Information We Collect Through our Store

We may collect your personal information from technology we use in our stores, such as our cameras.

Information We Collect From External Third-Party Sources

We may collect personal information from consumer reporting agencies in conjunction with products or services that involve financial risk to our Group of Companies such as rental and hire purchase transactions in which we extend financing to you.

Information Provided by Yourself

You actively share information with us in various ways in our stores and online. You share information when you:

- Make an in-store or online purchase with us;
- Create an account on one of our websites or mobile services;
- Conduct a transaction or request a service where we collect information when required by law
- Post a review or comment on one of our social media pages

All personal information that is supplied to the S A Cash register Group of Companies must be accurate, up-to-date, and complete in all respects. You undertake to immediately advise the appropriate Company of any changes to your personal information should any of these details change.

Purpose for Collection of Personal Information

The information collected and processed by the S A Cash Register Group of Companies can be used for the following purposes:

- To fulfill your order or requests for services and provide customer service;
- To create and maintain your account;
- To conduct marketing, personalisation, and third-party advertising, subject always to your right at any time to opt out of such communication. If you want to remove your contact information from all lists and newsletters, please visit unsubscribe on the website at (www.towa.co.za).
- To protect the security and integrity of our websites, mobile services and our business
- To update our operational and technical functionality.
- To conduct business analysis, and analytics.
- To conduct research and development.
- To fulfill our legal functions or obligations.

All Personal Information which you provide to the S A Cash Register Group of Companies will be used and retained only for the purposes for which it is collected, whereafter it will be permanently destroyed. We will only retain personal information for longer than the purpose for which it was collected if it is required by law or where you have given consent for us to retain such information for an extended period.

Since we have always practiced strict non-disclosure of client data in any form, we undertake to only retain your data with your consent for testing and support purposes. Should your data need be sent for investigation or repair we shall request your consent prior such collection of data or request that you do this yourselves. Your data will be stored securely in the cloud by our hosted service providers.

Sharing of Personal Information

All of the categories of personal information that we collect may be shared with other companies, including those within our corporate family. We will never sell or rent your personal information.

We will not share your personal information outside of the S A Cash Register Group of Companies, except in the following circumstances:

- We do not allow our service providers to use or share your personal information for any purpose other than providing services on our behalf
- Legal Requirements and Protection of our Group of Companies.
- Protecting the safety of customers.
- Addressing crimes committed on any of our properties.
- Identifying fraud or financial risk.
- Responding to a search warrant or other valid legal inquiry.
- Responding to an investigative body in the case of a breach of an agreement or violation of law.
- We will use reasonable measures to help ensure that any successor in a business transfer treats your information in accordance with this Policy document.
- We use data collection devices such as "cookies" on certain pages of the Website and other software programs to help analyse our web page flows and measure promotional effectiveness.. Cookies assist us in providing our services. You are always free to decline our cookies if your browser permits, although in that case you may not be able to use certain features on the Website or other Software programs. These cookies do not contain any of your personally identifiable information.

We may share information which includes things like: device identifier, type of device, IP addresses, cookies and other information associated with your browsing and app usage with other companies, such as publishers, advertisers, measurement analytics providers, and others. We do not share information that directly identifies your name or email address with these companies.

We also allow companies that show advertisements on our webpages or our apps to collect information from your browsers or devices via the use of cookies or other technologies. Other companies' use of cookies and other data collection technologies are subject to their own privacy policies, not this one. Like many companies, we may allow cookie matching with select partners. However, these parties are not authorised to access information from the S A Cash Register Group of Companies cookies.

Before transferring personal information to a third-party contractor, such as an authorised service provider, the Company will obtain assurances from the third party that it will process personal information in a manner consistent with this policy document. Where we learn that a third party contractor is using or disclosing personal information in a manner contrary to this policy, we will take reasonable steps to prevent such use or disclosure.

Email Messages

We may wish to provide you with information about your product repairs or software upgrades. These emails may include some of the products or services that we think you may be interested in.

Your consent

In circumstances other than those described above, we will ask for your affirmative consent before we share your personal information outside of our corporate family of companies, and we also will not sell or rent your personal information.

Websites

By using our websites, mobile applications, software programs, Wi-Fi and or by providing your information to us at any of our physical stores, you expressly consent to our collection and use of the

information you disclose to us in accordance with this policy, including but not limited to your consent for us to share your information as set out in this privacy policy. If you disclose any personal information relating to other people to us, you warrant that you have the authority to do so and to permit us to use the information in accordance with this policy.

By using our websites, mobile applications, Wi-Fi or by providing your information to us, you agree to the practices described in this document and you agree to S A Cash Register Group of Companies its directors, officers, employees, servants, agents and/or contractors and/or other third parties to process (which will include collecting, using and disclosing) your personal information for the purposes stated in this document.

If you do not agree to this policy, please do not use our websites, mobile applications, Wi-Fi and/ or provide your information to us. Any use by you of our websites, mobile applications, Wi-Fi and/ or any provision by you of your information will be deemed to constitute your acceptance of the terms in this policy.

Security

The security and confidentiality of your personal information is important to us. We have implemented technical, administrative, and physical security measures to protect your personal information from unauthorised access or disclosure and improper use.

Access to your personal information is restricted to only to those employees who need the personal information to perform a specific task. All employees with access to Personal Information are kept up-to-date on our security and privacy practices and we have signed Non Disclosure Agreements in place with each of these employees.

It is important for you to protect yourself against unauthorised access to your software passwords. Be sure to log out of your account or to close your browser after you have completed your visit to the website or mobile application.

Whilst we will do all things reasonably necessary to protect your personal information, we cannot guarantee nor do we accept any liability of whatsoever nature for any unauthorised or unlawful disclosure and or use of your personal information, either by employees and or made by any third parties who are not subject to our control.

Cross-border flows of Personal Information

Section 72 of POPIA provides that Personal Information may only be transferred out of the Republic of South Africa if the: a. recipient country can offer such data an “adequate level” of protection. This means that its data privacy laws must be substantially similar to the Conditions for Lawful Processing as contained in POPI;

The Data Subject consents to the transfer of their Personal Information; or transfer is necessary for the performance of a contractual obligation between the Data Subject and the Responsible Party;

Transfer is necessary for the performance of a contractual obligation between the Responsible Party and a third party, in the interests of the Data Subject;

The transfer is for the benefit of the Data Subject, and it is not reasonably practicable to obtain the consent of the Data Subject, and if it were, the Data Subject, would in all likelihood provide such consent.

Client Rights

Upon reasonable request and in accordance with POPIA, we will grant customers reasonable access to their personal information and will permit them to correct, amend or delete personal information that is incomplete or inaccurate.

We expect that you will notify us from time to time in writing of any updates required in respect of your personal information.

In addition, you may cancel or modify the email communications you have chosen to receive from us by following the instructions contained on our website. If you have any questions concerning your personal information or how to exercise these rights, please contact us.

This Privacy Policy will be governed by and construed and interpreted in accordance with the laws of South Africa. To the extent that a court has jurisdiction over any dispute which may arise out of or in connection with this Policy document that we both submit to the jurisdiction of the South African courts.

Acceptance

You must accept all the terms of this policy when you order our goods or request our services. If you do not agree with anything in this policy, then do not order our goods or request our services.

By accepting this policy, you are deemed to have read, understood, accepted, and agreed to be bound by all of its terms.

The S A Cash Register Group of Companies reserves the right to amend this policy at any time. All amendments to this policy will be posted on the various websites.