

**TOSHIBA BUSINESS SERVICES
PRIVACY POLICY**

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1. OVERVIEW

Your privacy is important to us. We strive to ensure that our use of your personal information or personal data is lawful, reasonable, and relevant to our business activities, with the goal of improving our services and your experience.

This privacy notice sets out what personal information we collect from you when you purchase or rent equipment from us or use our website, how we collect your personal information, why we collect it, how we use it and related matters.

Please read this privacy notice carefully to understand our views and practices regarding your personal information and how we will treat it (even if you are a long-standing client). Please do not hesitate to contact us if you require any clarity or assistance by using the contact details set out at the end of this policy.

This privacy notice is applicable to Corprint CC t/a Toshiba Business Systems (TBS) and should be applied with due consideration and compliance with applicable South African privacy, protection and other consumer laws.

2. APPLICATION OF THIS NOTICE

Personal data may either be collected directly from you as the data subject, or it may be collected from other sources such as:

- a. Legislative or company documents
- b. Entity representatives

This privacy notice applies to you as a client or as a person who accesses our website, regardless of the device which you use to access it (e.g. a computer, mobile phone, tablet etc.).

This privacy notice does not apply to other parties' sites, products or services, such as sites linked to, from or advertised on our site, or sites which link to or advertise our site.

3. WHAT IS PERSONAL INFORMATION?

POPIA defines it to mean “information relating to an **identifiable, living, natural** person, and where it is applicable, an identifiable, existing **juristic** person, 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 person;
- b. information relating to the education or the medical, financial, criminal or employment history of the person;
- c. any identifying number, symbol, e-mail 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; and
- 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”.

Personal information of a juristic person is “information relating to ... where it is applicable, an identifiable, existing juristic person”. A juristic person includes a company, trust, CC, NPO or SOC. Personal information of a juristic person includes:

- a. information relating to the ownership (for example black owned) and age (for example been registered for ten years);
- b. information relating to the financial or criminal history of the person;

- c. any identifying number (for example, its registration number), symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
- d. the personal opinions, views or preferences of the person;
- e. 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;
- f. the views or opinions of another individual about the person;
- g. 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”; and

POPIA also needs to be complied with when they process the personal information of juristic persons is processed. Juristic persons can be customers, suppliers or partners. For example, BBBEE credentials could relate to ownership. How much a responsible party has paid an identifiable supplier over the years could be its financial history.

Other information which might be “personal” information may include:

- “device and device event information”: IP address, unique device identifier, the nature of the device which you used to access our website, the geographic location of your device, hardware model and settings, operating system details, browser type and version, browser language, system activity and crashes;
- “log information”: such as details of how, when and for how long you accessed and used our site and other site traffic and used information, landing pages, which pages you accessed and viewed, the amount of time spent and what you did on those pages;
- “location information”: We may use various technologies to determine your actual location, such as geographical data from your device (which is usually based on the GPS or IP location).

4. HOW WE COLLECT YOUR PERSONAL INFORMATION

We collect your personal information in two ways, namely

- actively from you
- passively from your device when you use our website

4.1. Active collection of personal information

Some areas of our site may require you to submit certain information in order for you to register for certain services or benefit from specified features, such as when you log a service call on our website, request to receive any newsletters or similar subscriptions, or participate in a particular activity, such as a promotional competition or other promotion (collectively referred to as the “value added services”). If you contact us, we may keep a record of that correspondence.

Our site may also collect personal information from you by asking you specific questions and by permitting you to communicate directly with us, for example via the completion of the ‘Log a Service Call’ form.

In these situations, we will

- ask you for specific information;
- inform you at each information point what information is required and what information is optional; and
- indicate the consequences if you do not give us the relevant information (you will generally need to provide us with the relevant information in order to take full advantage of our platform features).

The information we may actively collect from you may include your:

- identifying information (e.g. your name, surname, company’s name)
- contact details (e.g. email address and telephone number)

4.2. Passive collection of personal information from your device

We passively collect some of your personal information from the device which you use to access and navigate our website using various technological means.

One of the key ways in which we collect information passively is using server logs to collect and maintain log information.

We also use cookies and anonymous identifiers which enable our computer system to recognise you when you next visit our site, to distinguish you from other site users and to improve our service to you. Please refer to our Cookie Policy below (clause 22).

5. WHY WE COLLECT YOUR INFORMATION AND HOW WE USE IT

We use the information we collect to provide, maintain, and improve our services, to develop new ones, and to protect us, our services and our users.

We may collect and use your personal information to:

- establish and verify your identity;
- make application to financial institutions for financing for the purchase of equipment purchased by our clients;
- maintain and update our databases;
- communicate with you in various ways, such as e-mail, post, telephonically or other notifications to your device (e.g. on-screen pop-up messages);
- request feedback on our products and services, address any issues and liaise with clients in that regard;
- keep a record of our communications with you and your communications with us;
- fulfil any contractual obligations we may have to you or any third party;
- provide you with value added services;
- to identify and inform you of points of interest or goods and services of interest;
- improve our products and services and the content of our site;
- allow you to participate in any interactive features and sharing features that may be active on our site;
- improve your user experience and the overall quality of our services;
- inform you about our products and services which we think may interest you (if you have consented to this);
- inform you about competitions, promotions and special offers from us (if you have consented to this);
- inform you about any changes to our site, our products and services, our terms of use, this privacy notice or other changes which are relevant to you;

- carry out marketing, product research and development;
- to tailor general advertising on our platforms more appropriately for user groups;
- to compile and use statistical information about you and other users and their access to and use of our site, browsing habits, click-patterns, preferences, demographics etc which we may use to develop, provide and improve our platforms and our products and services, including recommendations to users and tailoring information and content for users;
- to compile, use, disclose and trade with non-personal statistical information about our users and their access to and use of our site, browsing habits, click-patterns, preferences, demographics etc. which we and our advertisers may use to develop, provide and improve our platforms and our products and services, including targeted advertising to user groups. Please note that the information referred to in this paragraph is aggregate information about our users which has de-identified users' personal information such that it cannot be linked back to identify you. We will not disclose your identifiable personal information to anyone without your express permission;
- diagnose and deal with technical issues and customer support queries and other user queries, such as problems with our server, determine the optimal and fastest route for your device to use in connecting with our site, and administer, maintain and secure our platform;
- detect, prevent or deal with actual or alleged fraud, security or the abuse, misuse or unauthorised use of our site and contravention of this privacy notice;
- comply with the law or with any legal process; and
- other activities not specifically mentioned which are lawful, reasonable and relevant to our business activities.

We will obtain your permission before collecting or using your personal information for any other purpose.

6. INDIVIDUALS SCREENED FOR COVID-19

The personal information collected is necessary in order for us to comply with the Covid-19 screening which is required by the Disaster Management Act and related regulations and directives. This information will be stored and thereafter destroyed once it is no longer needed. If you do not provide us with the required information, your access to our premises may be refused.

7. CCTV MONITORING

Our premises are monitored by CCTV cameras. This footage is processed for security purposes only and is not shared with any person or entity outside of the company.

8. HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION?

We retain all personal information which we collect from you unless there is a valid technical, legal or business reason for us to delete, destroy or de identify it ("retained information").

We may keep all retained information for as long as you continue to be a client of ours or access our site and for five years thereafter. If you do not access our site for a consecutive period of three and a half years, we will delete, destroy or de-identify all your personal information from our records except for information which we store for historical, statistical or research purposes.

Notwithstanding the above, and any other provision of this privacy notice, we may keep some or all your personal information if and for as long as:

- we are required by law, a code of conduct or a contract with you to keep it;
- we reasonably need it for lawful purposes related to our functions and activities;
- we reasonably need it for evidentiary purposes; or
- you agree to us keeping it for a specified further period.

9. DISCLOSURE OF YOUR PERSONAL INFORMATION

We will not disclose, for commercial gain or otherwise, your personal information other than as set out in this privacy notice or with your permission.

We may disclose or share your personal information to or with:

- our employees, contractors and agents if and to the extent that they need to know that information in order to process it for us and to provide services for or to us, such as technical support, financial services such as processing of payments, delivery services, site hosting, development and administration, marketing services (only in respect of our site, products and services) and other support services;
- in order to enforce or apply our terms of use or any other contract between you and us;

- in order to protect our rights, property or safety or that of our customers, employees, contractors, agents and any other third party;
- in order to mitigate any actual or reasonably perceived risk to us, our customers, employees, contractors, agents or any other third party;
- any third party who acquires (or proposes to acquire) ownership or control of our assets, shares or management, or that of our affiliates, and our site, whether by sale, merger, acquisition or otherwise, and to any third party from who we acquire (or propose to acquire) ownership or control of assets, shares or management, whether by purchase, merger, acquisition or otherwise;
- governmental agencies, exchanges and other regulatory or self-regulatory bodies if we are required to do so by law or if we reasonably believe that such action is necessary to:
 - comply with the law or with any legal process;
 - protect and defend the rights, property or safety of us, our affiliates or our customers, employees, contractors and agents or any third party;
 - detect, prevent or deal with actual or alleged fraud, security or technical issues or the abuse, misuse or unauthorised use of our site and/or contravention of this privacy notice;
 - protect the rights, property or safety of members of the public (if you provide false or deceptive information about yourself or misrepresent yourself as being someone else, we may proactively disclose such information to the appropriate regulatory bodies and/or commercial entities).

We may use your personal information to compile profiles for statistical purposes and may freely trade with such profiles and statistical data, provided that the profiles or statistical data cannot be linked back to you by a third party.

We will get your permission before disclosing your personal information to any third party for any other purpose.

10. DIRECT MARKETING

When you register on our website you may choose whether to receive marketing communications from us.

You may refuse to accept, require us to discontinue, or pre-emptively block any approach or communications from us if that approach or communication is primarily for the purpose of direct marketing (“marketing preference”).

You may opt out of receiving direct marketing communications from us:

- at the time of registering on our platforms by ticking the relevant “opt-out” box; and
- at any time by requesting us (in any manner, whether telephonically, electronically, in writing or in person) to desist from initiating any direct marketing to you.

If you have opted out in accordance with the above, we will:

- send you written (which may include electronic writing) confirmation of receipt of your opt out request; and
- not send you any further direct marketing communications.

11. SECURITY

All information you provide to us is stored on our secure servers.

We implement appropriate, generally accepted technical and organisational measures to protect your personal data against unauthorised or unlawful processing, accidental loss, destruction or damage, including encryption where appropriate.

Unfortunately, the transmission of information via the Internet is not completely secure. We will do our best to protect your personal information, but we cannot guarantee 100% security of your data transmitted to our servers using the internet and any transmission is at your own risk.

We take reasonable technical and organisational measures to secure the integrity of information we collect about you, using accepted technological standards to –

- prevent unauthorised access to or disclosure of your personal information; and
- protect your personal information from misuse, loss, alteration or destruction.

In particular:

- We do not require your credit card details, Internet banking details or PIN numbers for any purpose. We will keep the payment records (for finance, record keeping and audit purposes) on secure servers. We will not disclose your banking details to any third party except to the extent necessary to process and record payments.
- In order for us to effect our monthly debit orders, we store your bank account details on our secure server.
- From time-to-time we review our information collection, storage and processing practices, including physical security measures, to keep up to date with best practice.
- We create a secure back-up for operational and safety purposes.

12. LINKING TO THIRD PARTY SITES

We are not responsible for the privacy practices of a third-party site to which there may be a link on our site or to which you may access from our site.

We advise you to read the privacy notice of each site which you visit and to determine your privacy settings in accordance with your personal preferences.

13. YOUR RIGHTS AS A DATA SUBJECT

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

13.1. Right of access

You have the right to request a copy of the information that we hold about you. Access to this information may be subject to an administrative fee if your request is manifestly unfounded, excessive or repetitive.

13.2. Right to rectification

You have a right to insist that we correct data that we hold about you that is inaccurate or incomplete.

13.3. Right to be forgotten

In certain circumstances you can ask for the data we hold about you to be erased from our records.

13.4. Right to restriction of processing

Where certain conditions apply you have a right to restrict the processing of your data, for instance how we market to you.

13.5. Right to data portability

You have the right to have the data we hold about you transferred to another organisation or provided to you in a machine-readable word format.

13.6. Right to object to processing

You have the right to object or remove your consent for certain types of processing such as direct marketing.

13.7. Right to raise a complaint

You have the right to complain if you have cause to be concerned about the way we capture, treat or process your personal information.

14. CHANGES TO THIS POLICY

We may change this privacy notice from time to time. If we do so, we will post the revised policy on our site and take reasonably practicable steps to ensure that you are aware of the updated privacy notice (including, if we have your email address, e-mailing you notifications of the updated privacy notice).

Privacy Notice Version: Version 1.0

Effective Date: 1 July 2021

15. EXERCISE YOUR RIGHTS

This privacy notice gives effect to many of our responsibilities as a responsible party or a data controller in terms of the applicable legislation in South Africa where we operate.

If you have a concern about the manner in which we are handling your information, or the way that we process it, for example if you feel we:

- are unlawfully processing your personal information;
- are not keeping your personal information secure;

- are misusing your personal information;
- are keeping personal information about you for longer than is necessary;
- hold inaccurate personal information about you;
- have disclosed personal information about you;
- have collected personal information for one reason and are using it for something else;
- or
- have accessed your personal information without your authorisation.

please log a privacy query with us/request a copy of your data or information about your data, by submitting such query to our Information Officer (please see details at clause 18). This email address is actively monitored, and we endeavour to respond to all requests within 1 (ONE) month.

If possible, please supply us with all or any of the following information in order to assist us in the process:

- Full name of the person and/or company lodging the complaint
- Contact details such as email address and telephone number
- How the personal data was collected (if known)
- All necessary information (and what you think we have done wrong)
- The timeframe over which the suspected wrongdoing occurred (if known)
- Any evidence in support of the complaint

In order to verify your identity should you request a copy of your data or information about your data, we may ask for a copy of your passport, driving license, national identity card or birth certificate.

16. CONTACT US

Please contact our Information Officer, Laura Moerat, on laura@toshibasystems.co.za or 021 555 6900.

17. ACCESS TO INFORMATION MANUAL

Should you wish to request access to information or records owned, held by, or otherwise under our control, please see our Promotion of Access to Information Manual (PAIA).

18. CONTACT THE SOUTH AFRICAN INFORMATION REGULATOR

While we try to respond as promptly as possible, resolution times will vary depending on the nature of the complaint. Our Information Officer will liaise with our relevant departments to investigate your complaint. You will be notified of the outcome of your complaint as well as any action taken.

If you remain unhappy after the appeals process you may forward your complaint to the Information Regulator:

infoereg@justice.gov.za

or

SALU Building,
316 Thabo Sehume Street,
PRETORIA
Tel: 012 406 4818
Fax: 086 500 3351

More information can be found at <http://www.justice.gov.za/infoereg/>

19. ABUSIVE, PERSISTENT OR VEXATIOUS CORRESPONDENCE OR COMPLAINTS

For the purposes of lodging complaints, it is the complaint which must be vexatious and not the individual making the complaint.

While we differentiate between people who make numerous complaints as they are of the opinion that things have gone awry and people who are simply being challenging, we do understand that sometimes complainants act in distress, and we will make reasonable allowance for that.

We may decide not to attend to the complaint based on one or more of the following reasons:

- Persisting in a complaint after being advised that there are insufficient or no grounds for your complaint or that we are not the appropriate body.
- Refusing to co-operate with the complaints process, without good reason, but still wanting your complaint to be resolved, including a failure or refusal to specify the grounds of a complaint despite offers of assistance.

- Changing the basis of the complaint as inquiries are made and introducing trivial or irrelevant new information and expecting this to be considered and commented on.
- Submitting repeat complaints, after the complaint procedure has been completed essentially about the same issues, with additions/variations which the Complainant then insists on being treated as new complaints and put through the full complaint procedure again.
- Refusing to accept the outcome of the procedure after its conclusion, repeatedly arguing the point, complaining about the outcome, and/or denying that an adequate response has been given.

20. COOKIES

20.1. Introduction

Our website uses cookies. Insofar as those cookies are not strictly necessary for the provision of our website, we will ask you to consent to our use of cookies when you first visit our website.

20.2. About Cookies

A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

Cookies may be either "persistent" cookies or "session" cookies. A persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

20.3. Why We Use Cookies

We use cookies for the following purposes:

- Authentication - we use cookies to identify you when you visit our website and as you navigate it;
- Status - we use cookies to help us to determine if you are logged into our website;

- Personalisation - we use cookies to store information about your preferences and to personalise our online platform for you;
- Advertising - we use cookies to help us to display advertisements that will be relevant to you;
- Analysis - we use cookies to help us to analyse the use and performance of our online platform and services; and
- Accuracy – we use cookies to help us ensure our records are complete and up to date.

The information which we may passively collect from your device may include your identifying information, contact details, device and device event information, site activity information, log information, telephony log information, location information, and any other information which you permit us, from time to time, to passively collect from your device.

The names of these cookies change from time to time and sometimes from session to session. If you have a query about a specific cookie, please contact us with the name and value of the cookie so that we can identify its purpose.

20.4. Cookies Used By Our Service Providers

Our service providers use cookies and those cookies may be stored on your computer when you visit our online platform.

The names of these cookies change from time to time and sometimes from session to session. If you have a query about a specific cookie, please contact us with the name and value of the cookie so that we can identify its purpose.

20.5. Managing Cookies

Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

[Clear, enable, and manage cookies in Chrome](#)

[How to clear browser cache/history/cookies in Opera](#)

[Delete and manage cookies in Internet Explorer](#)

[Protect your privacy in Mozilla Firefox](#)

Manage cookies and website data in Safari

Microsoft Edge, browsing data, and privacy

If you block cookies for our website, you may not be able to use all the features available on the site.

21. ACCESS TO INFORMATION

Your privacy is important to us. We strive to ensure that our use of your personal information or personal data is lawful, reasonable, and relevant to our business activities, with the goal of improving our services and your experience.

Should you wish to request access to information or records owned, held by or otherwise under our control, please see our **Promotion of Access to Information Manual (PAIA)**.