



## SUPPLIER PRIVACY NOTICE

From the moment we enquire about using your goods or services, to the moment our business relationship ends, we collect and use your personal information so that, for instance, we can use your goods or services.

This notice is about what kind of personal information we collect, how we use and store it, and the rights you have in terms of your personal information.

If you have any questions, please contact [POPIA@ecn.co.za](mailto:POPIA@ecn.co.za).

### 1. WHAT THIS PRIVACY NOTICE IS ABOUT

<b>Who does this privacy notice apply to?</b>	This notice applies to all Electronic Communications Network (Pty) Ltd (ECN) suppliers, service providers and potential suppliers or service providers. In terms of the Protection of Personal Information Act ('POPIA'), you are the data subject.
<b>Who are you sharing your information with?</b>	You are sharing your information with Electronic Communications Network (Pty) Ltd.  Our registered address is:  Reunert - Nashua Building, Woodmead North Office Park, 54 Maxwell Drive, Woodmead, 2191, South Africa  In terms of POPIA, we are the responsible party.
<b>This privacy notice is part of our agreement with you.</b>	This privacy notice forms part of our agreement with you. You should read it with the terms and conditions that apply to any agreement we might have with you.
<b>What kind of information we collect and how we use it.</b>	Because we use your goods or services, we collect, use and retain your personal information.  In most circumstances, the personal information we collect from you is mandatory. This means that we



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	<p>must collect it to comply with the law or because we need it to perform in terms of our agreement with you.</p> <p>When we collect personal information from you that is not mandatory, we always have a specific purpose for collecting that information.</p> <p>If you choose not to provide us with the personal information we need, it will limit our ability to perform in terms of our agreement. For example, if you do not provide us with your banking details, we may not be able to pay you for the goods or services you supplied.</p>
<b>What personal information is.</b>	<p>Personal information is all information relating to a specific individual. This includes contact information, information relating to your race, gender, sex, pregnancy status, marital status, ethnic or national origin, sexual orientation, physical or mental health, disability, religion, belief, culture, language, education background, financial information, criminal behaviour, employment history, personal opinions, views or preferences, and private or confidential correspondence.</p> <p>It does not matter whether the information is held on paper or in an electronic or other format – it is still personal information and must be protected.</p>
<b>Companies also have personal information that must be protected.</b>	<p>A company can also have personal information that must be protected. For example, financial information, such as bank and financial statements, BBBEE scores and tax information.</p>
<b>From time to time we may update this notice.</b>	<p>From time to time, we may have to change this privacy notice to accommodate changes in our business or changes to the law.</p>

## 2. WHAT INFORMATION WE COLLECT

<p><b>The goods or services you supply will determine what information we collect.</b></p>	<p>The type of supplier/service provider information we collect and share depends on the nature of the goods or services you supply and any legal requirements.</p>
<p><b>We will collect information directly from you or from third-party sources.</b></p>	<p>Most of the time we collect your information directly from you. However, sometimes we also collect information from other sources such as a registered credit bureau, public records, publicly available information, government-issued sanctions, lists, or media sources.</p> <p>We may collect information about you from third-party sources when:</p> <ul style="list-style-type: none"> <li>• you give us your consent (e.g., to do a credit check);</li> <li>• we can find the information from a public record (e.g., the Deeds' Registry or CIPC records);</li> <li>• we require the information to comply with a legal obligation (e.g., income tax laws, anti-money laundering or bribery laws and other regulatory requirements);</li> <li>• it is necessary to collect the information from a third-party source to maintain our legitimate interests; and</li> <li>• it is in our legal interest not to collect the information from you (e.g., if we need to verify information about you in a background check).</li> </ul>
<p><b>Here is a list of the personal information that we collect.</b></p>	<p>We collect:</p> <ul style="list-style-type: none"> <li>• personal information of your business contact person (e.g., name, telephone numbers, email addresses, job title, and company department)</li> </ul>



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	<ul style="list-style-type: none"><li>• your company name, contact details and billing details (e.g., physical and postal addresses, banking details and international banking details if you are an international supplier)</li><li>• your CIPC number</li><li>• your VAT number</li><li>• BBBEE certificate details</li><li>• tax compliance status issued by SARS or a Tax Clearance certificate</li><li>• trade references</li><li>• company profile, annual turnover, and financial statements</li><li>• proof of insurance</li><li>• proof of registration with a professional body</li><li>• details of previous projects</li><li>• in some cases, the names, ID numbers and contact details of your directors, members or partners</li><li>• if any of the directors, members, or partners or any of the family members of suppliers or potential suppliers are employed within the Reunert group</li><li>• personal information about your agents if you appointed agents (such as a person or company who manages your property)</li><li>• CCTV footage if you or your employees or agents visit our premises</li><li>• any other information that is relevant so that you could supply us with specific goods or services</li></ul>
<b>We also generate information about you in the form of records.</b>	<p>We generate records of:</p> <ul style="list-style-type: none"><li>• minutes of meetings and reports about a potential supplier/service provider's suitability to supply us with goods or services</li></ul>



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	<ul style="list-style-type: none"><li>• online profiles of all our registered suppliers which we use for payment and other day-to-day administration purposes</li><li>• queries or calls you log with us</li><li>• our purchasing patterns with all of our suppliers</li><li>• correspondence between all potential suppliers or suppliers and our employees</li></ul>
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### 3. WHY WE COLLECT AND PROCESS YOUR PERSONAL INFORMATION

3.1 We process your personal information to conclude a contract with you and to meet our contractual obligations.

<b>We need your personal information to manage our relationship with you and to run our business.</b>	<p>We need your personal information to manage our relationship with you and to run our business. Your personal information is used to:</p> <ul style="list-style-type: none"><li>• assess your application to become a supplier/service provider (this includes assessing whether you have a conflict of interest, whether you comply with South African legislation, and whether you have the minimum requirements necessary to be a supplier);</li><li>• communicate with you about the goods or services you supply;</li><li>• process your invoice for payment and/or set off our debt against payments due by you;</li><li>• send you statements and any other legal documents;</li><li>• ensure the quality of the goods we buy from you;</li><li>• monitor and audit your and our compliance with our contract;</li><li>• monitor your service to us and our service to you;</li><li>• deal with any safety incidents (such as a product recall); and</li></ul>
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	<ul style="list-style-type: none"><li>• create, manage and maintain our supplier databases, including organisational charts.</li></ul>
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3.2 We process your personal information because it is in your or our legitimate interest to do so, because we are legally required to do so, or because you have given us permission.

<b>We process your personal information because it is in your legitimate interest to do so.</b>	When you contact us by email or telephone, we use the personal information we collect to reply to, investigate, and resolve your query, complaint, or request.
<b>We process your personal information because it is in our legitimate interest to do so.</b>	We process your personal information by: <ul style="list-style-type: none"><li>• verifying your information through a background check;</li><li>• monitoring our offices with CCTV and other access control mechanisms (e.g., a visitors' sign-in register), to ensure the safety of all our property, employees, suppliers and clients;</li><li>• analysing how much we spend with you to ensure that we obtain our goods and services in an efficient, on-demand manner and to help us detect fraud and inconsistencies. When we do analytics, we will use your information anonymously as far as we can. We will only provide results of our analytics to third parties if it is anonymous; and</li><li>• monitoring the correspondence between you and our employees to ensure compliance with our internal policies. Please do not send any message that you would not want to be monitored by us.</li></ul>
<b>We are legally required to process some personal information.</b>	We will process your personal information to ensure that we comply with income tax, financial reporting laws, and other legislation. We will use your personal information to:



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	<ul style="list-style-type: none"><li>• perform internal, external, and compliance audits;</li><li>• create financial and tax reports;</li><li>• detect and prevent fraud, crime, money laundering or other malpractice; and</li><li>• engage in any legal proceedings.</li></ul> <p>Here are some legislation, reports and regulations that determine why we process your personal information:</p> <ul style="list-style-type: none"><li>• Financial Intelligence Centre Act 38 of 2001</li><li>• Income Tax Act 58 of 1962</li><li>• Electronic Communications and Transactions Act 25 of 2002</li><li>• National Credit Act 34 of 2005</li><li>• Prescription Act 68 of 1969</li><li>• King Code IV</li><li>• JSE Listing Requirements</li></ul>
<b>We process some personal information with your consent.</b>	<p>If you consent to receiving our newsletter, we will send it to you. You can unsubscribe at any time by following the unsubscribe link at the bottom of the email, or by contacting us.</p> <p>We will ask for your consent before we do a credit check on you should the National Credit Act 34 of 2005 and its regulations require that we obtain consent.</p>

#### 4. HOW WE SHARE YOUR INFORMATION

<p><b>We may share your personal information internally or with service providers for the purposes of managing our supplier relationship with you.</b></p>	<p>Personal information that we may have to share could be:</p> <ul style="list-style-type: none"> <li>• supplier information with other companies in the Reunert group for everyday business purposes;</li> <li>• your banking details with our banking partners to pay you for the goods or services you supplied;</li> <li>• supplier information to comply with legislation, the government, regulator body or a court (e.g., SARS, the JSE, the FIC);</li> <li>• if, from time-to-time parts of the business is sold which could include a transfer of supplier information;</li> <li>• when we share your information with companies to verify it for background check purposes;</li> <li>• with companies who provide services on our behalf so we can do business (e.g., tax, auditors, IT, accountants, lead generation, data analytics, legal and other professional consultants); and</li> <li>• about you if you have given the third party consent to obtain information from us (e.g., when you have listed us as a trade reference).</li> </ul>
<p><b>We only share the minimum amount of your personal information.</b></p>	<p>We only share the minimum amount of personal information that our service providers requires.</p>
<p><b>We only share your personal information with service providers we trust.</b></p>	<p>We require that our service providers agree to keep your personal information secure and confidential and only use it for the purposes for which we shared it with them.</p>
<p><b>Some of the service providers that we use may be in other countries.</b></p>	<p>When we share personal information with service providers in other countries that may not have the same levels of protection of personal information as South Africa, they must undertake to protect your personal information to the same level that we do.</p>





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<b>We provide for appropriate safeguards before we share your personal information.</b>	We have appropriate safeguards in place in contracts between our local and foreign service providers and us.
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## 5. HOW WE STORE YOUR INFORMATION

<b>We retain your personal information for as long as it is reasonably necessary.</b>	We retain your personal information for as long as we have a legitimate reason to keep it. These periods vary depending on the type of personal information, the reason why we originally collected it and if there is a specific retention period required by law.
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## 6. HOW WE KEEP YOUR INFORMATION SECURE

<b>We have reasonable security measures in place to protect your personal information and to minimise the impact of a breach.</b>	We base our security measures on the sensitivity of the personal information that we hold. Our security measures are in place to protect your personal information from: <ul style="list-style-type: none"><li>• loss</li><li>• misuse</li><li>• unauthorised access</li><li>• being altered</li><li>• being destroyed</li></ul>
<b>We regularly monitor our systems for possible vulnerabilities and attacks.</b>	No system is perfect, and we cannot guarantee that we will never experience a breach of any of our physical, technical, or managerial safeguards, but we regularly monitor our systems for vulnerabilities.
<b>We will let you know of any breaches that may affect your personal information.</b>	If something should happen, we have taken steps to minimise the threat to your privacy, and we will let you know if your personal information has been compromised.

	We will also let you know how you can help minimise the impact of the breach.
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## 7. YOUR PERSONAL INFORMATION RIGHTS

<b>You may ask us about your personal information.</b>	You have the right to know when we collect and use your personal information, and to ask us what we know about you and what we do with that information.
<b>You may access your personal information.</b>	<p>You may ask to access your personal information by contacting <a href="mailto:POPIA@ecn.co.za">POPIA@ecn.co.za</a>.</p> <p>We may take up to one month to respond to your request and may charge a fee in some circumstances. We will let you know if this is the case.</p>
<b>You have control over your personal information.</b>	<p>You may:</p> <ul style="list-style-type: none"> <li>ask that we update incorrect personal information, or complete personal information that may be incomplete;</li> <li>ask that we delete your personal information;</li> <li>ask to receive your personal information in a structured, commonly used and machine-readable format;</li> <li>ask that we reuse your personal information for your own purposes across different services;</li> <li>object to the processing of your personal information under certain circumstances;</li> <li>object to automated decision-making and profiling;</li> <li>ask that a human review any automated decisions that we make about you, express your point of view about it, obtain an explanation of the decision, and challenge any automated decision made about you; and</li> <li>ask that we restrict our use of your personal information.</li> </ul>



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<b>You have the right to unsubscribe.</b>	You have the right to unsubscribe from any direct marketing we send you.
<b>You have the right to lodge a complaint with the Information Regulator.</b>	You can contact the Information Regulator at <a href="mailto:infoereg@justice.gov.za">infoereg@justice.gov.za</a> .