



**EDGRAY DISTRIBUTORS (PTY) LTD t/a JUMBO**

**REGISTRATION NUMBER 1983/12657/07**

**THE PROTECTION OF PERSONAL INFORMATION ACT (POPIA)- CLIENT/ USER PRIVACY PROTOCOLS POLICY/STATEMENT.**

**Preamble**

For purpose of this policy, “Jumbo”, “we”, “us”, “our” or “the company” means Edgray Distributors (Pty) Ltd. The purpose of this privacy policy /statement is to advise the clients/ users (data subjects) of Jumbo services, both electronic and otherwise, why data is collected and processed, what data is in focus as well as how it is processed. Jumbo is committed to full compliance with the POPI Act insofar as the utilisation and disclosure of data subject personal information (PI) is concerned. Hence, technical and operational measures have been put in place to protect data subject privacy.

It is important that you read this Statement carefully before submitting any personal information to Jumbo. By submitting any personal information to Jumbo, you provide consent to the processing of your personal information as set out in this Statement. The provisions of this Statement are subject to mandatory, unalterable provisions of Applicable Laws.

Please do not submit any personal information to Jumbo if you do not agree to any of the provisions of this Statement. If you do not consent to the provisions of this Statement, or parts of the statement, Jumbo may not be able to provide its products and services to you. Jumbo invites all data subjects and/ or requesters to engage with its **Information Officer (IO)** in respect of any matter related hereto.

**Scope of application**

This policy applies to data subjects under the POPI Act and its principles extend to the Promotion of Access to Information Act (PAIA) in respect of requesters of records held by Jumbo. PI applies to both natural and juristic persons. Data subjects and requesters are invited to engage with the **Jumbo IO** about any matter pertaining to the POPIA and PAIA, including but not limited to updating PI, deletion of PI, complaints in respect of how PI is being processed and updating consent for electronic direct marketing. The **“Information Officer” can be emailed at [jumbo-io@jumboclothing.co.za](mailto:jumbo-io@jumboclothing.co.za)** for any further engagement on the above.

**About Jumbo**

Jumbo is a well-established clothing and footwear retailer, having traded in South Africa since 1975. Jumbo provides a range of quality fashion for the entire family at the right price. Jumbo strives to be the preferred chain of retail outlets, offering quality fashion at the most competitive prices to the value-for-money shopper and for the benefit of all stakeholders. We will achieve our vision through continuously developing a Jumbo team that is positive, passionate and proud and through adding value to the lives of our customers by providing quality fashion, at the right price, with the commitment to caring service.

**Definition of Personal Information (PI)**

“Personal information” means 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;

### **Purpose of Collecting and Processing PI**

Jumbo processes PI for various purposes including for –

- Engaging in various forms of direct marketing to our customers or prospective customers
- Fulfilling our contractual obligations with our suppliers, service providers, employees and customers.
- Complying with the provisions of statute, regulations and any applicable legislation of South Africa.
- Public safety, crime prevention and quality control as our premises & facilities are monitored by CCTV.
- Lay-by agreements, refunds and/or exchange transactions, competitions, promotions, loyalty programs or any social events that is hosted by Jumbo.
- Attending to the legitimate interests of data subjects for example, general enquiries, employee enquiries or customer complaints or any legal matters that may arise.
- Identifying prospects for enhanced service delivery and business sustainability.
- Sourcing & Recruitment of prospective employees, information supplied by applicants on the company's website, career portal or social media platform will be processed and used for recruitment purposes.
- Pre-vetting or employment checks such as credit & fraud checks, criminal record checks ID and qualification verification & reference checks before considering appointing any candidates as prospective employees.
- Audit and record keeping purposes
- Tracking data subject activity on the website, and or any social media platform which Jumbo makes use of.

### **Lawful Basis**

In respect of the processing of PI as provided for above, Jumbo will adhere to the conditions for the lawful processing of PI, based on its desire to provide data subjects services in their best interests as well as a legitimate interest of Jumbo to achieve its business objectives.

Jumbo takes all data subjects privacy and the protection of their personal information very seriously, and we will only use your personal information in accordance with this statement and applicable data protection legislation. It is important that data subjects take all necessary and appropriate steps to protect their personal information themselves (for example, by ensuring that all passwords and access codes are kept secure).



We have implemented reasonable technical and operational measures to keep your personal information secure. You hereby indemnify and hold Jumbo harmless from any loss, damages or injury that you may incur as a result of incorrect or incomplete personal information provided to Jumbo.

### **Period of holding Personal Information**

Jumbo endeavours to provide the most accurate information possible to stakeholders, including data subjects. Jumbo seeks to verify the accuracy of its information as frequently as possible and to remove information that it learns to be inaccurate. Thus, Jumbo intends to process the information it has about data subjects for so long as it is accurate or until the data subject instructs Jumbo to refrain from processing it – **in order to instruct Jumbo to refrain from collecting and/ or processing PI please send an email to the Information Officer.**

Notwithstanding the above, Jumbo shall hold PI for such period as may be required in terms of statutes such as the Companies Act and various applicable laws, unless we need to retain it for longer for a lawful purpose.

Jumbo will safely delete or destroy PI which we are no longer required or not permitted to retain, or for which we do not have the data subjects' consent.

### **Data Subject Rights**

Data subjects have the right to request that Jumbo to provide them with access to their PI, to rectify or correct their personal information, erase PI or restrict the processing of PI, including refraining from sharing it or otherwise providing it to any third parties. Data subjects also have the right to raise complaints with the Information Regulator. The afore-going rights may be subject to certain limitations pursuant to applicable law. Data subjects can exercise any of the above-mentioned rights by sending an email to [jumbo-io@jumboclothing.co.za](mailto:jumbo-io@jumboclothing.co.za)

Where the company have reasonable doubt as to the identity of the person making an enquiry, we may request additional information to confirm the identity of the person, such as an identity document, including a driver's licence or a passport.

Should Jumbo have reasonable grounds to believe that any data subjects PI has been accessed or acquired by any unauthorised person, we will, as soon as is reasonably possible and lawfully required, notify the applicable regulator, as well as the affected data subjects, unless we are unable to establish the identity of the PI that has been unlawfully accessed.

### **Sources of Personal Information (PI)**

Jumbo gathers PI from several sources, which include directly from data subjects, publicly available sources such as websites, social media, commercial transactions with Jumbo, referrals, prospects, partner agreements, and the like.

We collect PI when you

- voluntarily provide us with information when you interact with us, for example when you send us online enquiries, phone calls, and smses or you subscribe to or consent to receiving newsletters or other communications from us;
- browse, visit or participate in our various channels;
- register an online profile on our website
- enter lay bye agreements, purchase, return, exchange transactions or enquire about products and service from us;
- make general enquiries, lodge complaints, and communicate with us;



- apply for vacancies on our website or careers portals which Jumbo uses by submitting your CV and thereafter should you be employed by Jumbo.
- participate in any of our events or competitions

From time to time we collect your PI from trusted third parties, in which case we will ensure that you have provided your consent for your PI to be disclosed to us. We may also collect your personal information for lawful purposes from your appointed agent, any regulator, or other third party that may hold such information

### **Categories of Personal Information (PI) collected and processed**

Jumbo collects information about data subjects who may be customers, prospective customers as well as information on its employees, suppliers/ service providers and third parties that are part of its scope of operation.

The PI that Jumbo collects is dependent on the transactions the data subject is completing, the reason the data subject is communicating with us and the channel used to communicate with us.

You, as the data subject, consent to the collection of the following information about you:

- personal information that may include your name, address, contact details, date of birth, place of birth, identity number, passport number, bank details, details about your employment, tax number and financial information.
- records of correspondence/ Email correspondence and attachments or enquiries from you or anyone acting on your behalf;
- details of transactions you carry out with us;
- details of contracts, sales or leases you carry out with us;
- sensitive or special categories of personal information, including biometric information, such as images and fingerprints.
- consumer credit information at any credit bureau or third party,
- Organisation details, emails & contact numbers
- Other information that is available in the public domain
- Suppliers and vendors:
  - In the course of our business agreement we may collect personal information about you as a data subject to ensure that the business agreement and matters relating to the agreement can be fulfilled.
  - We may also do due diligence on you to ensure that you meet the requirements set out in our procurement procedures.
  - If you provide any personal information of other persons to us, such as employees or your directors, you warrant that you are authorised to share their personal information with us for purposes set out in the Statement.

Where you provide us with the personal information of third parties you should take steps to inform the third party that you need to disclose their details to us, identifying us. In addition, you should not share their personal information with us, unless they have consented to you sharing such information with us and to us processing such information in accordance with this Statement.

. PI excludes:

- information that has been made anonymous so that it does not identify a specific person;



- permanently de-identified information that does not relate or cannot be traced back to you specifically; and
- non-personal statistical information collected and compiled by us.

Website usage information may be collected using “cookies” which allows Jumbo to collect standard internet visitor usage information.

### **Disclosure of information**

Jumbo may disclose data subject PI to trusted third parties such as service providers who are involved in the delivery of products or services who may process the information of data subjects on our behalf. Jumbo has agreements in place to ensure that it complies with the privacy requirements as required by the POPI Act.

Jumbo may also disclose data subject PI:

- Where it has a duty or a right to disclose in terms of law and/ or industry codes;
- Where it believes it is necessary to protect its rights.

If you do not wish us to disclose this information to third parties, please contact us at the contact details set out above. We may, however, not be able to provide products or services to you if you do not agree with such disclosure.

### **Information Security**

Jumbo is legally obliged to provide adequate systems, technical and operational protection for the PI that it holds and to prevent unauthorized access to as well as prohibited use of PI. Jumbo will therefore on a regular basis review its security controls and related processes to ensure that the PI of data subjects remains secure.

Jumbo has conducted an impact assessment across all of its functions and used the findings thereof to manage risk optimally as well as to provide iterative improvements on an ongoing basis. Jumbo policies and procedures cover the following aspects -

- Physical security;
- Computer and network security;
- Access to personal information;
- Secure communications;
- Security in contracting out activities or functions;
- Retention and disposal of information;
- Acceptable usage of personal information;
- Governance and regulatory issues;
- Monitoring access and usage of private information.
- Investigating and reacting to security incidents.

Jumbo also ensures that it contracts with Operators as required by POPI and it requires appropriate security, privacy and confidentiality obligations of these operators in order to ensure that personal information is kept secure. The same protocols apply to any party to whom Jumbo may pass PI on to for the purposes mentioned herein.



### **How to contact us**

Should you believe that Jumbo has utilised your personal information contrary to Applicable Laws, you undertake to first attempt to resolve any concerns with Jumbo:

Name of Private Body:	Edgray Distributors (Pty) Ltd
Authorised information Officer:	The Information Officer
Email address of information Officer:	<a href="mailto:jumbo-io@jumboclothing.co.za">jumbo-io@jumboclothing.co.za</a>
Postal address:	PO Box 3101, Cambridge, 5206
Physical address:	Unit 1, Frame Park, Phillip Frame Rd, Chislehurst, East London, 5247, South Africa
Phone number:	043 702 1900