



010 020 7721

21 Eastwood Office Park, 11B Riley Road
Bedfordview, Germiston, 2007



ACDC Express Franchising CC – Digital Privacy Policy

ACDC Express Franchising CC, as data controller, is responsible for the processing of your personal information on this website. In this privacy policy, “ACDC Express”, “We” or “us” refers to ACDC Express Franchising CC.

Please carefully read this privacy policy, which describes the ways in which we collect information about individuals who visit this website (“Personal Data”), how we hold and use Personal Data and how we respect your privacy rights.

We may change or update this Privacy Policy from time to time by posting a new privacy policy on this website.

What Personal Data do we process and for which purposes?

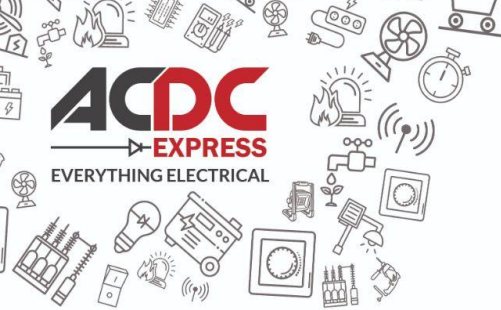
Most of our services do not require any form of registration, allowing you to visit our site without telling us who you are. However, some services may require you to voluntarily provide us with Personal Data, which includes information such as your name, birth date, email address, or telephone number. We may collect and use this personal information to provide you with products, services, and customer support, to bill you for products and services you request, to market products and services which we think may be of interest to you, or to communicate with you for other marketing purposes.

Personal Data used for Website Usage Analytics:

We may also collect and process information about your visit to this website, such as the pages you visit, the website you came from and the searches you perform. We may use such information to help improve the contents of the site and to compile aggregate statistics about people using our site for our internal usage statistics and marketing research purposes.

In doing this, we may install cookies that collect the domain name of the user, your internet service provider, your operating system, and the data and time of access. A cookie is a small piece of information which is sent to your browser and stored on your computer’s hard drive. Cookies do not damage your computer. You can set your browser to notify you when you receive a cookie, which will enable you to decide if you want to accept it or not. You can also refuse cookies altogether. However, if you do not accept our cookies, you may not be able to use all functionalities of our website.

We do not currently respond to web browser ‘do not track’ signals or other mechanisms that provide a method to opt out of the collection of information across websites or other online services but are in the process of implementing these.



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Occasionally, we and our third-party advertising and service providers, may use internet tags (also known as action tags, single-pixel GIFs, clear GIFs and 1-by-1 GIFs) and cookies on this site and may deploy these tags/cookies through a third party advertising partner or web analytical services partner which may be located and store the respective information (including your IP address) in a foreign country. These tags/cookies are placed on both online advertisements that bring users to this site and on different pages on this site. We use this technology to measure the visitors' responses to our sites and the effectiveness of our advertising campaigns (including how many times a page is opened and which information is consulted) as well as to evaluate your use of this website. The third-party or the web analytical service partner may be able to collect data about visitors to our and other sites because of the internet tags/cookies, may compose reports regarding the website's activity for us and may provide further services which are related to the use of the website and the internet. They may provide such information to the other parties if there is a legal requirement that they do so, or if they hire other parties to process information on their behalf.

We may use a number of technologies offered by different providers to support website analytics and user tracking, including technologies offered by the providers below. If you wish to prevent or control the use of these technologies, please follow the links mentioned with that particular third party:

- Facebook (Facebook, Inc., USA) – [Privacy Policy](#), [Social Plug](#), [Opt-out](#)
- Google Analytics (Google Inc, USA) – [Privacy Policy](#)
- LinkedIn (LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland) – [Privacy Policy](#), [Opt-out](#)
- Instagram (USA) – [Privacy Policy](#)

We may combine, aggregate, or anonymise Personal Data with data we may collect from or about you from other sources, such as public databases, providers of demographic information, joint marketing partners, social media platforms, and other third parties.

We may use your data for our business purposes, including audits, monitoring and prevention of fraud, infringement, and other potential misuse of our products and services, and for modifying our services.

Also, we may use your Personal Data:

- if we are required to do so because of an applicable law, requests from public and government authorities (including court order, subpoena, or governmental regulation), even outside your country of residence;
- if we need to enforce our terms and conditions;



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- when we believe in good faith that the use of Personal Data is necessary to protect legal rights, the security or integrity of this website;
- to protect your safety or the safety of others;
- as part of any criminal or other legal investigation or proceeding in your country or in other countries.

When and to whom do we disclose your information?

This Privacy Policy describes the circumstances in which we may share your Personal Data. We may share your Personal Data with other ACDC Express Franchising CC subsidiaries and affiliates worldwide. We also may transfer Personal Data to third parties who act on our behalf, for further processing in accordance with the purpose(s) for which the data were originally collected or may otherwise be lawfully processed, such as services delivery, evaluating the usefulness of this website, marketing, advertising, data management, or technical support.

These third parties have contracted with us to only use Personal Data for the agreed upon purpose, and not to sell Personal Data to third parties, and not to disclose it to third parties except as may be permitted by us, as required by law, or as stated in this Privacy Policy.

We may disclose your Personal Data to a third party in the event that the business or a part of it and the customer data connected with it is sold, assigned or transferred, in which case we would require the buyer, assignee or transferee to treat Personal Data in accordance with this Privacy Policy.

Also, we may disclose your Personal Data to a third party if we are required to do so because of an applicable law, requests from public and government authorities (including court order, subpoena, or governmental regulation), even outside your country of residence; if we need to enforce our terms and conditions; when we believe in good faith that the disclosure is necessary to protect legal rights, the security or integrity of this website; to protect your safety or the safety of others; as part of any criminal or other legal investigation or proceeding in your country or in other countries; or to third parties, advisors, and other entities to the extent reasonably necessary for development of or to proceed with the negotiation or completion of a corporate or commercial transaction.

PRIVACY NOTICE FOR BUSINESS PARTNERS

This privacy notice is addressed to:

- Our customers or prospects, including those who are natural persons (such as contractors);
- The representatives or contact persons of our customers or prospects who are legal entities (such as wholesalers);



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You are receiving this Privacy policy notice because the ACDC Express Franchising CC entity, in its domiciled area, is processing information about you which constitutes personal Data and ACDC Express considers the protection of your personal information a very important matter. ACDC Express is responsible for the processing of your personal data as it decides why and how it is processed, thereby acting as the “responsible party” or the “controller”.

In this Privacy Notice, “we” or “us” refers to ACDC Express Franchising CC.

We invite you to carefully read this Privacy Notice, which sets out the context in which we are processing your personal information and explains your rights and our obligations when doing so.

By agreeing to this Privacy Notice, you provide us with your consent to collect, receive, record, organise, collate, store, update, change, retrieve, read, process, use, distribute and share your personal data in the ways set out in this Privacy Notice, to the extent that such consent may be required to permit us to do so.

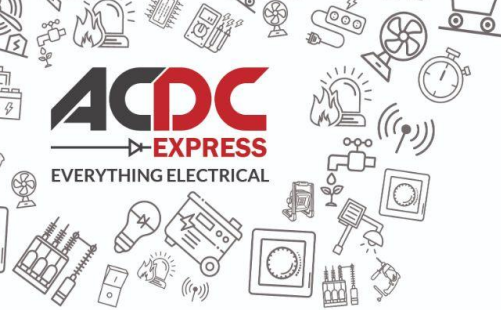
Should you have any further question in relation to the processing of your personal data, we invite you to contact our information officer, Ricardo Maio, ricardom@infinitybrands.co.za

For which purposes do we use your personal data and why is it justified?

Legal basis for the processing

We will only process your personal data if permitted by law, including if:

- we have obtained your prior consent;
- the processing is necessary to carry out actions for the conclusion or performance of a contract to which you are a party ;
- the processing is necessary to comply with our legal or regulatory obligations;
- the processing protects your legitimate interest; and/or
- the processing is necessary for our legitimate interests or the legitimate interests of a third party to whom the personal data is supplied, and does not unduly affect your interests or fundamental rights and freedoms.
- Please note that, when processing your personal data on this last basis, we always seek to maintain a balance between our legitimate interests and your privacy. Examples of such ‘legitimate interests’ may include data processing activities performed:
 - to benefit from cost-effective services (e.g. we may opt to use certain platforms offered by suppliers to process data);
 - to offer our products and services to our customers;



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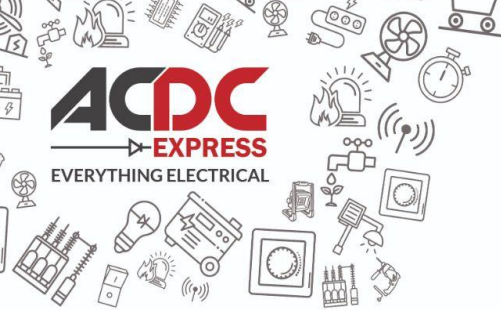


- to prevent fraud or criminal activity, misuses of our products or services as well as the security of our IT systems, architecture and networks;
- to sell any part of our business or its assets or to enable the acquisition of all or part of our business or assets by a third party; and
- to meet our corporate and social responsibility objectives.

Purposes of the processing

We always process your personal data for a specific purpose and only process the personal data which is relevant to achieve that purpose. In particular, we process your personal data for the following purposes:

- manage our relationship with you (e.g. through our databases);
- implement tasks in preparation of or to perform existing contracts;
- evidence transactions;
- provide you with adequate and updated information about disease, drugs as well as our products and services;
- improve the quality of our services by adapting our offering to your specific needs;
- answer your requests and provide you with efficient support;
- send you surveys (e.g. to help us improve your future interactions with us);
- send you communications regarding products or services that we promote;
- manage communications and interactions with you (e.g. through the operation of a database keeping records of interactions with healthcare professionals or managing call planning as well as call reporting and other electronic and digital interactions);
- track our activities (e.g. measuring interactions or sales, number of appointments/calls);
- invite you to events or promotional meetings sponsored by us (e.g. medical events, speaker events, conferences, webinars, meetings on various digital platforms);
- grant you access to our training modules allowing you to provide us with certain services;
- manage our IT resources, including infrastructure management and business continuity;
- preserve the company's economic interests and ensure compliance and reporting (such as complying with our policies and local legal requirements, tax and deductions, managing alleged cases of misconduct or fraud; conducting audits and defending litigation);
- manage mergers and acquisitions involving our company;
- archiving and record keeping;
- billing and invoicing; and
- any other purposes imposed by law and authorities



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Who has access to your personal data and to whom are they transferred?

We will not sell, share, or otherwise transfer your personal data to third parties other than those indicated in this Privacy Notice.

In the course of our activities and for the same purposes as those listed in this Privacy Notice, your personal data can be accessed by or transferred to the following categories or recipients:

- our personnel (including personnel, departments or other companies of the Infinity Brands group) on a strictly need-to-know basis;
- our independent agents or brokers (if any);
- our suppliers and services providers that provide services and products to us;
- our IT systems providers, cloud service providers, database providers and consultants;
- our business partners who offer products or services jointly with us or with our subsidiaries or affiliates;
- any third party to whom we assign, cede or novate any of our rights or obligations;
- our advisors and external lawyers; and
- any national and/or international regulatory, enforcement, public body or court where we are required to do so by applicable law or regulation or at their request.

The above third parties are contractually obliged to protect the confidentiality and security of your personal data, in compliance with applicable law.

We work with affiliates and other trusted partners and service providers located outside of your country of domicile. The personal data we collect from you may therefore also be processed, accessed, stored in or transferred to a country outside South Africa, which may not offer a level of protection of personal data which is substantially similar to the protections as may be enjoyed in your country of domicile.

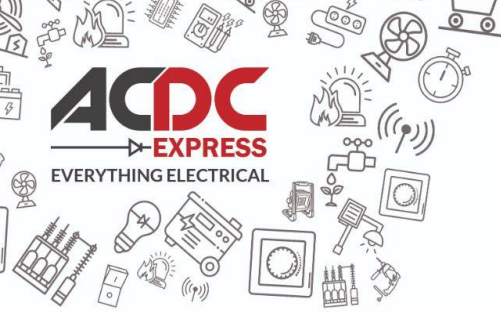
If we transfer your personal data to any third party, we will do so in accordance with data protection laws applicable.

How do we protect your personal data?

We have implemented appropriate, reasonable technical and organisational measures to provide a level of security and confidentiality to your personal data.

These measures take into account:

1. the nature of the data; and
2. the risk of the processing.



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The purpose thereof is to protect it against accidental or unlawful destruction or alteration, loss, damage, unauthorized disclosure or access and against other unlawful forms of processing.

Moreover, when handling your personal data, we:

- only collect and process personal data which is adequate, relevant and not excessive, as required to meet the above purposes; and
- ensure that your personal data remains up to date and accurate.

For the latter, we may request you to confirm the personal data we hold about you. You are also invited to inform us whenever there is a change in your personal circumstances so we can ensure your personal data is kept up-to-date.

How long do we store your personal data?

We will only retain your personal data for as long as necessary to fulfil the purpose for which it was collected or to comply with legal or regulatory requirements. When this period expires, your personal data is removed from our systems.



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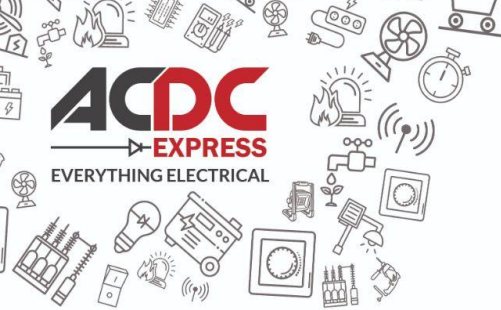


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APPENDIX 2: SCHEDULE OF RECORD OF ACDC Express Franchising CC IN RELATION TO PAIA

Subject of Record	Availability
Personnel	
Personal records provided Personnel	On request in terms of PAIA
Records provided by a third party relating to Personnel	On request in terms of PAIA
Conditions of employment and other Personnel-related contractual and quasi-legal records.	On request in terms of PAIA
Internal evaluation records and other internal records	On request in terms of PAIA
Correspondence relating to Personnel	On request in terms of PAIA
Training schedule and material	On request in terms of PAIA
Customer- Related	
Records provided by a Customer to a third party acting for, or on behalf of ACDC Express Franchising CC.	On request in terms of PAIA
Records provided by a third party to ACDC Express Franchising CC.	On request in terms of PAIA
Records generated by, or within ACDC Express Franchising CC relating to its Customers, including transactional records.	On request in terms of PAIA
Records provided by a Client to ACDC Express Franchising CC.	On request in terms of PAIA
ACDC Express Franchising CC	
Operational Records	On request in terms of PAIA
Databases	On request in terms of PAIA
Information Technology	On request in terms of PAIA
Marketing Records	On request in terms of PAIA
Internal Correspondence	On request in terms of PAIA
Product Records	On request in terms of PAIA



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Statutory Records	On request in terms of PAIA
Internal Policies and Procedures	On request in terms of PAIA
Other Party	
Personnel, Customer or ACDC Express Franchising CC records which are held by another party.	On request in terms of PAIA
Records held by ACDC Express Franchising CC pertaining to other parties, including without limitation, financial records, correspondence, contractual records, records provided by other parties, and records that third parties have provided which relate to contractors and suppliers.	On request in terms of PAIA
ACDC Express Franchising CC may possess records, pertaining to other parties, including without limitation contractors, suppliers, subsidiary / sister companies, joint venture companies, and service providers. Alternatively, such other parties may possess records that can be said to belong to ACDC Express Franchising CC.	On request in terms of PAIA



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APPENDIX 3: PROCESSING OF PERSONAL INFORMATION ACT (POPIA)

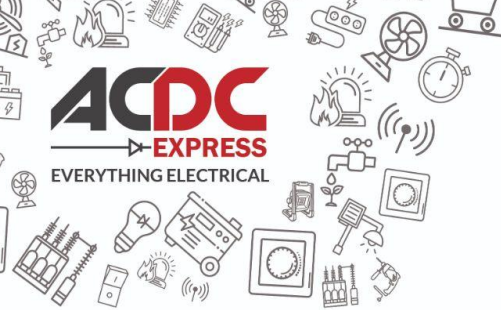
Part 1: Purpose of the Process of Personal Information Act (POPIA)

(A) To provide products , accounts and services to the Customer in accordance with terms agreed to by the Customer;

(B) To undertake activities related to the provision of accounts, services and trade transactions, such as, by way of non-exhaustive methods.

Examples include:

- (1) To fulfill domestic legal regulatory and compliance requirements and comply with any applicable treaty or agreement with the domestic governments applicable to ACDC Express, Affiliates and their agents or payment infrastructure providers;
- (2) to verify the identity of Customer representatives who contact the stores or may be contacted by ACDC Express Franchising CC;
- (3) for risk assessment, information security management, statistical, trend analysis and planning purposes;
- (4) to monitor and record calls and electronic communications with the Customer for quality, training, investigation and fraud prevention purposes;
- (5) for crime detection, prevention, investigation and prosecution;
- (6) to enforce or defend the ACDC Express or ACDC Express affiliates' rights; and
- (7) to manage the ACDC Express Franchising CC's relationship with the Customer, which may include providing information to Customer and Customer affiliates about ACDC Express and ACDC Express affiliates' products and services; and
- (8) the purposes related to any Collection, recording, Collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restrictions, erasure or destruction.



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APPENDIX 4: FORM FOR THE OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION IN TERMS OF POPI

OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION IN TERMS OF
SECTION 11(3) OF THE PROTECTION OF PERSONAL INFORMATION ACT,
2013 (ACT NO. 4 OF 2013)

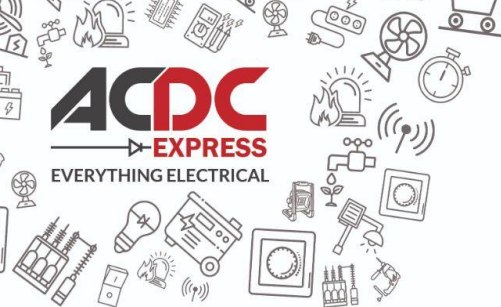
REGULATIONS RELATING TO THE PROTECTION OF PERSONAL
INFORMATION, 2017
[Regulation 2(1)]

Note:

1. Affidavits or other documentary evidence in support of the objection must be attached.
2. If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.

Reference Number

A. DETAILS OF DATA SUBJECT	
Name and Surname:	
Residential / Postal / Business Address:	
Postal Code:	
Contact Number:	
Fax Number:	
Email Address:	
B. DETAILS OF RESPONSIBLE PARTY	
Name and Surname (if the responsible party is a natural):	



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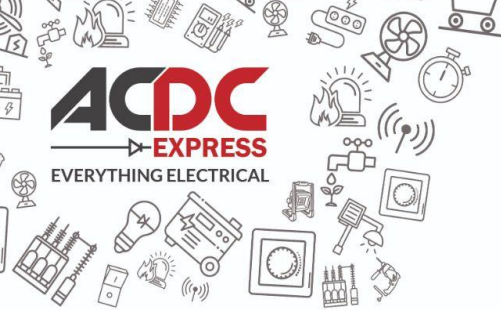
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Residential / Postal / Business Address:	
Postal Code:	
Contact Number:	
Email Address:	
C. REASONS FOR OBJECTION	
Please Provide Reasons for Objection:	
Name of Public /Private Body (if the responsible party is not a natural person):	
Business Address:	
Postal Code:	
Contact Number:	

Signed at this day of20

.....

Signature of Data Subject (applicant)



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APPENDIX 5: FORM FOR THE REQUEST TO DELETE OR CORRECT PERSONAL INFORMATION IN TERMS OF POPI

REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION OR
DESTROYING OR DELETION OF RECORD OF PERSONAL INFORMATION IN
TERMS OF SECTION 24 (1) OF THE PROTECTION OF PERSONAL
INFORMATION ACT, 2013 (ACT NO. 4 OF 2013)

REGULATIONS RELATING TO THE PROTECTION OF PERSONAL
INFORMATION, 2017
[Regulation 3 (2)]

Note:

1. Affidavits or other documentary evidence in support of the request must be attached.
2. If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.

Reference Number

Mark the appropriate box with an "x".

Request for:

Reference Number:

<input type="checkbox"/>	Correction or deletion of the personal information about the data subject which is in possession or under the control of the responsible party.
<input type="checkbox"/>	Destroying or deletion of a record of personal information about the data subject which is in possession or under the control of the responsible party and who is no longer authorised to retain the record of information

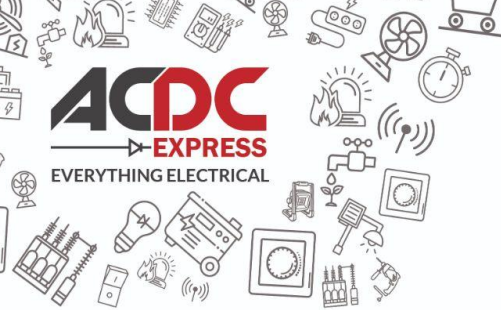


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A. DETAILS OF DATA SUBJECT	
Surname:	
Full Names:	
ID Number:	
Residential / Postal / Business Address:	
Postal Code:	
Contact Number:	
Fax Number:	
Email Address:	
B. DETAILS OF RESPONSIBLE PARTY	
Name and Surname (if the responsible party is a natural):	
Residential / Postal / Business Address:	
Postal Code:	
Contact Number:	
Fax Number:	
Email Address:	
Name of Public or Private Body (if the responsible party is not a natural person):	
Business Address:	



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Postal Code:	
Contact Number:	
Fax Number:	
Email Address	
C. REASONS FOR CORRECTION OR DELETION OF THE PERSONAL INFORMATION ABOUT THE DATA SUBJECT / *DESTRUCTION OR DELETION OF A RECORD OF PERSONAL INFORMATION ABOUT THE DATA SUBJECT WHICH IS IN POSSESSION OR UNDER THE CONTROL OF THE RESPONSIBLE PARTY <i>(Please provide detailed reason for the request).</i>	

Signed at this day of20

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Signature of Data Subject (applicant)