

	<b>PROCESSING NOTICE: VISITORS</b>	
	<b>POLICY NUMBER</b>	<b>REVISION NUMBER</b>
	<b>PAGE NUMBER</b>	<b>EFFECTIVE DATE</b>
	1	2021

## PROCESSING NOTICE

**This processing notice is published in order to comply with section 18 of the Protection of Personal Information Act, 4 of 2013 and explains how we process your personal information. It applies to all persons entering or accessing any property, premises or facility owned, operated or managed by GSA Traders (Pty) Ltd or any of their holding or associated companies or entities.**

Please note:

- **All persons enter the premises entirely at their own risk.**
- **By entering, you indemnify and hold GSA Traders, its directors, officers, employees and agents harmless against any loss or damage of whatsoever nature and howsoever caused resulting from your entering or accessing the premises.**
- **No firearms are allowed on the premises.**
- **You are not allowed on the premises if you are under the influence of dagga, alcohol or drugs.**
- **We reserve the right of admission to the premises.**
- **We reserve the right to search persons entering or leaving the premises and to test persons for drugs and alcohol before allowing them to enter the premises.**
- **We may use CCTV to monitor the premises and persons on the premises.**
- **All vehicles are parked at own risk**

## 1. PURPOSE OF THIS NOTICE

- 1.1 We, GSA Traders (Pty) Ltd trading as GSA Traders (Registration number 2004/033250/07), (hereafter referred to as “we”, “us”, “GSA Traders” or “the company” in our capacity as a Responsible Party, and in order to engage with you, will have to process your Personal Information, and in doing so, will have to comply with a law known as the Protection of Personal Information Act, 4 of 2013 (hereinafter referred to as “POPIA”), which regulates and controls the processing of a legal entity’s and / or an individual’s Personal Information in South Africa, (hereinafter referred to as a “Data Subject”), which processing includes the collection, use, and transfer of a Data Subject’s Personal Information.
- 1.2 In terms of POPIA, where a person processes another’s Personal Information, such processing must be done in a lawful, legitimate and responsible manner and in accordance with the provisions, principles and conditions set out under POPIA.
- 1.3 In order to comply with POPIA, a Responsible Party processing a Data Subject’s Personal Information must:
- 1.3.1 provide the Data Subject with a number of details pertaining to the processing of the Data Subject’s Personal Information, before such information is processed; and
- 1.3.2 get permission or consent, explicitly or implied, from the Data Subject, to process his / her / its Personal Information, unless such processing:
- 1.3.2.1 is necessary to carry out actions for the **conclusion or performance of a contract** to which the Data Subject of the Personal Information is a party;
- 1.3.2.2 is required in order to comply with an **obligation imposed by law**; or
- 1.3.2.3 is for a **legitimate purpose or is necessary to protect the legitimate interest (s) and / or for pursuing the legitimate interests** of i) the Data Subject; ii) the Responsible Party; or iii) that of a third party to whom the Personal Information is supplied; or

- 1.3.2.4 is necessary for the proper performance of a **public law duty**.
- 1.4 In accordance with the requirements of POPIA, and because your privacy and trust is important to us, we set out below how we, GSA Traders, collect, use, and share your Personal Information and the reasons why we need to use and process your Personal Information.
- 1.5 This Processing Notice also includes any holding company, subsidiary or associated company or entity of GSA Traders. Any reference herein to GSA Traders is deemed to include such other holding, subsidiary or associated entity.

## 2. APPLICATION

- 2.1 This Processing Notice applies to you and all persons who come onto our premises and sites, including reception and waiting rooms, offices, operational areas and facilities and parking areas (GSA Traders premises).

## 3. WHAT INFORMATION WE NEED

- 3.1 In order to gain access to the premises, we have to process the following Personal Information, which pertains to you:
- 3.1.1 **Your or your employer or organization's contact information**, such as name, alias, address, identity number, passport number, security number, phone number, cell phone number, vehicle make and registration number, social media user ID, email address, and similar contact data, serial numbers of equipment, details regarding the possession of dangerous weapons, your status with an organization, your images and certain biometrics such as finger prints and similar data, which are required for various legitimate interests, and / or lawful reasons.
- 3.1.2 **Specific identifiers**, which are required in order to protect legitimate interests, comply with legal obligations or public legal duties, or in order to accommodate you in our workplaces, such as any disabilities, **certain** biometric information which may be required for access control such as fingerprints and personal details which we may record in relation to alcohol or drug testing, and **health records or related details**.

3.1.3 **Children's Information**, all Personal Information collected and processed from any person under the age of eighteen (18) for the purposes of accessing the GSA Traders premises will only be processed with the prior permission of the child's parent or legal guardian, who will be required at all times to accompany such child around the GSA Traders premises which he or she is given access to.

#### **4. PURPOSE FOR PROCESSING YOUR PERSONAL INFORMATION**

4.1 Your personal information will be processed by us for the following purposes:

4.1.1 to facilitate access into and out of any GSA Traders premises;

4.1.2 to ascertain who is entering and leaving any GSA Traders premises;

4.1.3 to monitor movements on or in the GSA Traders premises;

4.1.4 to ensure a safe working and operating environment;

4.1.5 to comply with laws, including Security, Health and Safety related laws and legal obligations;

4.1.6 to manage security services;

4.1.7 for the purposes of registering all persons who enter and leave our premises;

4.1.8 for the purposes of managing and investigating security incidents; including accidents within the GSA Traders premises or attention to emergency evacuations; and

4.1.9 other security measures in general.

#### **5. SHARING AND RETAINING YOUR PERSONAL INFORMATION**

5.1 Your Personal Information may under certain circumstances have to be shared with internal parties and / or third parties for the purposes detailed above.

5.2 Your Personal Information will be disposed of within 12 (twelve) months of you leaving our premises, save where it may be required for a longer period. In this regard we retain personal information in accordance with our company records retention schedule, which varies depending on the type of processing, the purpose for such

processing, the business function, record classes, and record types. We calculate retention periods based upon and reserve the right to retain personal information for the periods that the personal information is needed to: (a) fulfil the purposes described in this Privacy Statement, (b) meet the timelines determined or recommended by regulators, professional bodies, or associations, (c) comply with applicable laws, legal holds, and other legal obligations (including contractual obligations), and (d) comply with your requests.

## **6. ACCEPTANCE**

6.1 By providing us with the Personal Information which we require from you as listed under this Processing Notice:

6.1.1 You acknowledge that you understand why your Personal Information needs to be processed;

6.1.2 You accept the terms which will apply to such processing, including the terms applicable to the transfer of such Personal Information cross border;

6.1.3 Where consent is required for any processing as reflected in this Processing notice, you agree that we may process this particular Personal Information.

6.1.4 Furthermore you confirm that where you provide us with another person's Personal Information for processing that you have obtained the required permission from such person (s) to provide us with their Personal Information for processing.

6.2 **It is important for you to note that should you not agree to the above, we will be unable to allow you access to the premises.**