

GSA TRADERS PRIVACY NOTICE

Summary

Please read this privacy notice (“**Notice**”) carefully to understand our policies and practices regarding your Personal Information and how we will treat it.

This Notice applies to individuals who interact with us (“**you**”/ “**yourself**”).

This Notice explains how your Personal Information is collected, used, and disclosed by GSA Traders (Pty) Ltd (“**GSA**”) itself or through the relevant GSA entities, affiliates or Operators (“**GSA**”, “**we**”, “**us**”). It also tells you how you can access and update your Personal Information and make certain choices about how your Personal Information is used.

This Notice covers both our online and offline data collection activities, including Personal Information that we collect through other channels such as referrals or events.

If you do not provide the required or necessary Personal Information to us, we may not be able to provide you with our goods and/or services.

We may amend this notice from time to time – the latest version will always be on our website

You can seek further information and exercise your rights of access, rectification, cancellation, objection, and data portability in respect of your Personal Information, by contacting our Information Officer.

1. INTRODUCTION AND PURPOSE OF THIS NOTICE

1.1 In order to comply with data privacy laws, a person processing another’s Personal Information must:

1.1.1 provide the owner of the Personal Information with a number of details pertaining to the processing of his/her/its Personal Information, before such information is processed; and

1.1.2 get permission or consent from the owner of such Personal Information, to process his/her/its Personal Information, unless such processing:

- is necessary to carry out actions for the conclusion or performance of a contract to which the owner of the Personal Information is a party;
- is required in order to comply with an obligation imposed by law;
- is for a legitimate purpose or is necessary to protect the legitimate interest (s) and / or for pursuing the legitimate interests of i) the owner of the Personal Information; ii) the person processing the Personal Information; or iii) that of a third-party to whom the Personal Information is supplied; or
- is necessary for the proper performance of a public law duty by a public body or on behalf of a public body.

- 1.2 Where any person uses our websites, electronic applications, email or electronic services, or our services in general, we will have to process such person's Personal Information.
- 1.3 In accordance with the data privacy laws, and because your privacy is important to us, please take note of this Privacy Notice, as it describes how we process your Personal Information, including the receipt, collection, use, disclosure, sharing, retention and importantly the protection of your Personal Information.
- 1.4 This Privacy Notice also asks that you provide us with your consent to process your Personal information, where this is required, which consent will be deemed to have been given by yourself, when you provide us with your Personal information for processing.

2. WHO ARE WE?

- 2.1 GSA Traders and their associated entities have been in the business of processing, cold storage, trading and distribution of seafood products to the South African and international markets for the past three decades. They are currently one of the largest independently owned seafood wholesalers in South Africa.
- 2.2 Click on the "about us" tab on the website for further information.

3. APPLICATION OF THE PRIVACY NOTICE

- 3.1 This Privacy Notice applies to
 - 3.1.1 the GSA website and;
 - 3.1.2 to all persons making use of our Services, and;
 - 3.1.3 to you, when using the Website or purchasing any of our products.

4. PERSONAL INFORMATION THAT WE COLLECT ABOUT YOU AND HOW WE COLLECT IT

- 4.1 Depending on how you interact with us (online, offline, over the phone, etc.), we collect various types of information from you, as described below.
 - **Personal contact information.** This includes any information you provide to us that would allow us to contact you, such as your name, postal address, e-mail address, social network details, or phone number, name of employer and related contact details; membership numbers.
 - **Account login information.** Any information that is required to give you access to your specific account profile. Examples include your login ID / email address, screen name, password in unrecoverable form, and/or security question and answer.
 - **Demographic information & interests.** Any information that describes your demographic or behavioural characteristics. Examples include your date of birth, age or age range, gender, geographic location (e.g. postcode/zip code), favourite products, hobbies and interests, and household or lifestyle information, country,

preferred language, marriage status, physical characteristics, personal or household/familial financial status and metrics.

- **Information from computer/mobile device.** Any information about the computer system or other technological device that you use to access the Website such as the Internet protocol (IP) address used to connect your computer or device to the Internet, operating system type, and web browser type and version. If you access our Website via a mobile device such as a smartphone, the collected information will also include, where permitted, your phone's unique device ID, advertising ID, geo-location, and other similar mobile device data. device identification number and type and location information, device and browser information, such as network and connection information (including Internet Service Provider (ISP) and Internet Protocol (IP) addresses), device and browser identifiers and information (including device, application, or browser type, version, plug-in type and version, operating system, user agent, language and time zone settings, and other technical information), advertising identifiers, cookie identifiers and information, and similar data, usage information and browsing history, such as usage metrics (including usage rates, occurrences of technical errors, diagnostic reports, settings preferences, backup information, API calls, and other logs), content interactions (including searches, views, downloads, prints, shares, streams, and display or playback details), and user journey history (including clickstreams and page navigation, URLs, timestamps, content viewed or searched for, page response times, page interaction information (such as scrolling, clicks, and mouse-overs), and download errors), advertising interactions (including when and how you interact with marketing and advertising materials, click rates, purchases or next steps you may make after seeing an advertisement, and marketing preferences), and similar data.
- **Location data.** The location of your device, your household, and similar location data.
- **Payment and Financial information.** Any information that we need in order to fulfill an order or requirement for a service or product, or that you use to make a purchase, such as your bank, debit or credit card details (cardholder name, card number, expiration date, etc.) or other forms of payment (if such are made available), expiration dates, and shipping and billing address;
- **Sensitive Personal Data.** We may seek to collect or otherwise process sensitive Personal Information in order to provide you with our products and services but which processing will always be done in accordance with applicable laws.
- **Your image.** Still pictures, video, voice, and other similar data.
- **Social media and online content.** Information placed or posted in social media and online profiles, online posts, and similar data.
- **Websites/communication usage information.** As you navigate through and interact with our Website or newsletters, we may use automatic data collection technologies to collect certain information about your actions. This includes information such as which links you click on, which pages or content you view and for how long, and other similar information and statistics about your interactions, such as content response times, download errors and length of visits to certain pages. This information is captured using automated technologies such as cookies and web beacons, and is also

collected through the use of third-party tracking for analytics and advertising purposes. You have the right to object to the use of such technologies.

- **Market research & consumer feedback.** Any information that you voluntarily share with us about your experience of using our products and services.
- **Consumer-generated content.** Any content that you create and then share with us on third-party social networks or by uploading it to the Website, including the use of third-party social network apps such as Facebook. Examples include photos, videos, personal stories, or other similar media or content. Where permitted, we may collect and publish consumer-generated content in connection with a variety of activities, including contests and other promotions, website community features, consumer engagement, and third-party social networking.
- **Third-party social network information.** Any information that you share publicly on a third-party social network or information that is part of your profile on a third-party social network (such as Facebook) and that you allow the third-party social network to share with us. Examples include your basic account information (e.g. name, email address, gender, birthday, current city, profile picture, user ID, list of friends, etc.) and any other additional information or activities that you permit the third-party social network to share.

5. SOURCES OF PERSONAL INFORMATION

5.1 Personal Information is collected about you by us from the following sources:

- **The Website.** Including any applications that we may run.
- **E-mail, text and other electronic messages.** Interactions with electronic communications between you and GSA.
- **Offline registration forms.** Printed or digital forms or information we may collect at events or which you may mail to us.
- **Advertising interactions.** Interactions with our advertisements (e.g., if you interact with on one of our ads on a third-party website, we may receive information about that interaction).
- **Data we create.** In the course of our interactions with you, we may create Personal Information about you (e.g. records of your interactions with us).
- **Data from other sources.** Third-party social networks (e.g. such as Facebook, Google), market research (if feedback not provided on an anonymous basis), third-party data aggregators, service providers, promotional partners, public sources.

5.2 In addition, we collect the Personal Information detailed above under clause 4 above, about you and any other party whose details you provide to us, when you use and access the Website, including any access to such Website for the following purposes:

- for whatever reason, generally or specifically;
- to make enquiries about our Services, affiliates, service providers or business partners, via our Website;

- to complete online forms, including call back requests;
- to take part in surveys, to post content on our message boards, or to post any blogs;
- to enter any competitions or prize draws;
- to look for, locate, read and / or download information or publications;
- to request or sign up for marketing material;
- for the performance of contractual terms, or for the enforcement of contractual rights;
- to provide you with details of our terms, conditions, policies and procedures and to enforce and apply same;
- to participate in any interactive areas that appear on our Website;
- to interact with us, our affiliates, service providers, business partners or others; and
- to provide us with your contact details or when you update those details;
- to send us an email;
- to click on a link in an email or advertisement or communication received from us;

5.3 We may also collect your Personal Information where you only partially complete and / or abandon any information inputted into our Website including online forms and may use this information to contact you to remind you to complete any outstanding information and / or for marketing purposes.

6. USES MADE OF YOUR PERSONAL DATA

6.1 The Personal Information detailed under clause 5 above, which you provide to us is used for the following purposes:

WHAT WE USE YOUR PERSONAL INFORMATION FOR	LAWFUL REASON FOR PROCESSING
<p>Operational and Services</p> <p>We use your Personal Information:</p> <ul style="list-style-type: none"> • to provide Services to you, including responding to your enquiries. This typically requires the use of certain personal contact information and information regarding the reason for your inquiry (e.g. technical issue, question/complaint, etc.) and to manage and administer the GSA services; 	<p>Legitimate business purposes;</p> <p>Fulfilling contractual obligations</p> <p>Legal obligations</p> <p>Our legitimate interests</p>

<ul style="list-style-type: none"> • to manage our relationship with you (for example, customer services and support activities); • to provide you with any information that we are required to send to you in order to comply with our contractual, service, regulatory or legal obligations; • to provide you with details of our terms, conditions, policies and procedures and to enforce and apply same; • to attend to queries and to provide any information to you that you have requested; • to analyse your needs, requirements, preferences and habits; • to anticipate your needs based on our analysis of your profile; • to provide you with targeted Services, goods and products or advertising and content; • loan processing • general business purposes; • maintaining your account, • maintain and keeping records of your requirements; • for the management and operation of our communications. 	
<p>Contests, marketing and other promotions</p> <p>With your consent (where required), we use your Personal Information:</p> <ul style="list-style-type: none"> • to provide you with information about our Services, products and goods (e.g. marketing communications or campaigns or promotions). • to deliver targeted advertising, marketing (including in-product messaging) or information to you which may be useful to you, based on your use of the Website and where you have agreed, by providing us with your details, as requested by us, to such advertising and marketing purposes. <p>This can be done via means such as email, ads, SMS, phone calls and postal mailings to the extent permitted by applicable laws. Some of our campaigns and promotions may be run on third-party websites and/or social networks.</p>	<p>With your consent (where required)</p> <p>Fulfilling contractual obligations</p> <p>Legitimate interests</p>
<p>Security</p> <p>We use your Personal Information:</p> <ul style="list-style-type: none"> • to detect, prevent, investigate or remediate, crime, illegal or prohibited activities or to otherwise protect our legal rights (including liaison with regulators and law enforcement agencies for these purposes); and • for the management and operation of our IT and security systems. 	<p>Fulfilling contractual obligations</p> <p>Legal obligations</p> <p>Legitimate interests</p>

<p>We may monitor and record any communications which we hold with you when using the Website, for quality assurance purposes, for evidential purposes and in order to meet our legal and regulatory obligations generally.</p>	
<p>Third-party social networks</p> <p>We use your Personal Information when you interact with third-party social networking features, such as “Like” functions, to serve you with advertisements and engage with you on third-party social networks.</p>	<p>With your consent (where required)</p>
<p>Internal or market research, analytics</p> <p>We may use your Personal Information to conduct internal or market research and measuring the effectiveness of advertising campaigns.</p>	<p>Fulfilling contractual obligations</p> <p>With your consent (where required)</p> <p>Legal obligations</p> <p>Legitimate interests</p>
<p>Legal reasons</p> <p>We use your Personal Information to comply with laws and regulations, including disclosing your Personal Information to third parties (i) when required by applicable law; (ii) in response to legal proceedings; (iii) in response to a request from a competent law enforcement agency; (iv) to protect our rights, privacy, safety or property, or the public; or (v) to enforce the terms of any agreement or the terms of our Website.</p>	<p>Legal obligations</p> <p>Legitimate interests</p> <p>Fulfilling contractual obligations</p>
<p>Quality control</p> <p>We use your Personal Information:</p> <ul style="list-style-type: none"> • to provide, maintain, protect and improve our Website; • to monitor, measure, improve and protect our content, Website, services and provide an enhanced, personal, user experience for you; • to manage and administer your use of our Website, products and services. 	<p>Legitimate business purposes</p> <p>Fulfilling contractual obligations</p> <p>Legal obligations</p> <p>Legitimate interests</p>

Cookies

The Website may contain technology (including Cookies) that enables us to:

- check specific information from your device or systems directly relevant to your use of the Website against our records to make sure the Website is being used in accordance with our end-user agreements and to troubleshoot any problems;
- obtain information relating to any technical errors or other issues with the Website;
- collect information about how you and users use the functions of the features of the Website;
- gather statistical information about the operating system and environment from which you access our Website, applications or services;
- **Log Files.** We collect information in the form of log files that record website activity and gather statistics about your browsing habits. These entries are generated automatically, and help us to troubleshoot errors, improve performance and maintain the security of the Website;
- **Web Beacons.** Web beacons (also known as “web bugs”) are small strings of code that deliver a graphic image on a web page or in an email for the purpose of transferring data back to us. The information collected via web beacons will include information such as IP address, as well as information about how you respond to an email campaign (e.g. at what time the email was opened, which links you click on in the email, etc.). We may use web beacons on the Website or include them in e-mails that we send to you. We use web beacon information for a variety of purposes, including but not limited to, site traffic reporting, unique visitor counts, advertising, email auditing and reporting, and personalisation.

Where you are not prepared to consent to the above types of processing, then you can opt out of this type of processing by managing your cookies and privacy settings within your browser or on the Websites (where applicable).

With your consent
(where required)

7. DISCLOSURE OF YOUR PERSONAL DATA

7.1 We share your Personal Information with the following parties:

- any GSA employee or agent for the purposes set out in this Privacy Notice, (e.g. customer relationship management; software and service compatibility and improvements; or to provide you with any information that you have requested);

- our service providers and agents (including their sub-contractors) or third parties which process information on our behalf (e.g. internet service and platform providers, payment processing providers and those service providers or organizations who we engage to help us provide you with the GSA products and services or to send communications to you);
- Regulators or government departments, in order to meet legal and regulatory obligations;
- any third-party in the context of actual or threatened legal proceedings, provided we can do so lawfully (for example in response to a court order);
- our own professional advisors, including attorneys and auditors for the purpose of seeking professional advice or to meet our audit or legal responsibilities.

7.2 We may share non-personally identifiable information about your use of the Website with third parties, but this will not include information that can be used to identify you.

7.3 Where we share or disclose your Personal Information as described above, such sharing and or disclosure will always be subject to an agreement which will be concluded as between ourselves and the party to whom we are disclosing your Personal Information to, which contractually obliges the recipient of your Personal Information to comply with strict confidentiality and data security conditions.

8. STORAGE AND/OR TRANSFER OF YOUR PERSONAL DATA

8.1 We use appropriate measures (described below) to keep your Personal Information confidential and secure. Please note, however, that these protections do not apply to information you choose to share in public areas such as third-party social networks.

8.2 We store your Personal Information in operating environments that use reasonable security measures to prevent unauthorised access.

8.3 We follow reasonable standards to protect Personal Data. The transmission of information via the Internet is, unfortunately, not completely secure and although we will do our best to protect your Personal Data, we cannot guarantee the security of the data during transmission through the Website.

8.4 It is important that you also play a role in keeping your Personal Information safe and secure. When signing up for an online account, please be sure to choose an account password that would be difficult for others to guess and never reveal your password to anyone else. You are responsible for keeping this password confidential and for any use of your account. If you use a shared or public computer, never choose to have your login ID/email address or password remembered and make sure to log out of your account every time you leave the computer. You should also make use of any privacy settings or controls we provide you in the Website.

- 8.5 The storage as well as the processing of your Personal Information as described above may require that your Personal Information is ultimately transferred/transmitted to, and/or stored at, a destination outside of your country of residence. We may also transfer your Personal Information to countries which have different data protection standards to those which apply in South Africa, but we will take reasonable steps to protect your Personal Information.
- 8.6 Once your Personal Information is no longer required due to the fact that the purpose for which the Personal Information is held has come to an end, such Personal Information will be retained in accordance with our GSA 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 Notice, (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.

9. OTHER SITES AND SOCIAL MEDIA

- 9.1 If you follow a link from our Website to another site or service, this Privacy Notice will no longer apply. We are not responsible for the information handling practices of third-party sites or services and we encourage you to read the privacy notices appearing on those sites or services.
- 10.2 The Website may enable you to share information with social media sites, or use social media sites to create your account or to connect your social media account. Those social media sites may automatically provide us with access to certain Personal Information retained by them about you (for example any content you have viewed). You should be able to manage your privacy settings from within your own third-party social media account(s) to manage what Personal Information you enable us to access from that account.

10. WHEN YOU PROVIDE US WITH INFORMATION ABOUT OTHERS

If you provide us with Personal Information about someone else, you are responsible for ensuring that you comply with any obligation and consent obligations under applicable data protection laws in relation to such disclosure. In so far as required by applicable data protection laws, you must ensure that you have provided the required notices and have obtained the individual's consent to provide us with such Personal Information and that you explain to them how we collect, use, disclose and retain their personal information or direct them to read this Privacy Notice.

11. YOUR INFORMATION AND YOUR RIGHTS

- 11.1 In terms of the data protection laws, you have the following rights:

- **The right of access** - You may ask us, free of charge, to confirm that we hold your Personal Information, or ask us to provide you with details, at a fee, on how we have processed your personal information.
- **The right to rectification** - you have the right to ask us to update or rectify any inaccurate Personal Information.
- **The right to erasure (the 'right to be forgotten')** - where any overriding legal basis or legitimate reason to process your Personal Information no longer exists, and the legal retention period has expired, you may request that we delete the Personal Information.
- **The right to object to and restrict further processing**- where we do not need your consent to process your Personal Information, but you are not in agreement with such processing, you may object to us processing such Personal Information.
- **The right to withdraw consent** - where you have provided us with consent to process your Personal Information, you have the right to subsequently withdraw your consent.
- **The right to data portability** - where you want your Personal Information to be transferred to another party, you can request this in certain circumstances.

12. CHANGES TO THIS PRIVACY STATEMENT AND LAWS

- 12.1 We reserve the right to amend the Privacy Notice at any time, for any reason, and without notice to you other than the posting of the updated Privacy Notice on the Website.
- 12.2 The contents of this Privacy Policy is governed by the laws of the Republic of South Africa.
- 12.3 If any provision of this Privacy Notice is judged to be illegal, void or unenforceable due to applicable law or by order of a court of competent jurisdiction it shall be deemed deleted and the continuation in full force and effect of the remainder of the provisions will not be prejudiced.

13. CONTACT US

Any comments, questions or suggestions about this Privacy Notice or our handling of your Personal Information should be emailed to info@gsatradere.com.

14. COMPLAINTS

- 14.1 Please feel free to contact us using the details provided above regarding any complaint.
- 14.2 if you are unhappy with how we have handled your personal information or responded to your complaint you may contact the Information Regulator via the following website <https://www.justice.gov.za/infoereg>