

# PRIVACY POLICY

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This document represents the Privacy Policy of Dry Wall and Ceiling Distributors (“DCD”, “Us”, “Our”, “We”) Group of Companies.

DCD respects your privacy and is committed to protecting your Personal Information. This privacy policy (“Privacy Policy”) sets out the type of data and information We collect, the manner in which We collect it and the reasons for collecting same, and the manner in which We store, use, disclose, and keep information relating to you and your interactions with Us secure. This Privacy Policy also serves to inform you about your privacy rights and how the law protects you.

Interactions with DCD may include your use of Our website, by way of sales or marketing activities, when you register and reply to a DCD survey, or make use of any of our Products and/or Services (collectively “the Services”) in any manner.

This Privacy Policy is provided in a layered format, so you can click through to the specific areas set out below. Alternatively, you can download a pdf version of the policy [HERE](#).

Please also have reference to the *Definitions* clause below to better understand the meaning and references to some of the terms used in this Privacy Policy.

Reference to “consent”, “your consent” or “your explicit consent” shall include the ticking of a tick box or clicking on a “submit” button or “I agree” button on our website. By visiting our website, you give consent for the processing of your Personal Information by Us.

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## 1. INTRODUCTION

### 1.1. Purpose of this Privacy Policy

- 1.1.1. This Privacy Policy aims to give you information on the manner in which DCD collects and processes your Personal Information through your use of Our website, including any information you may provide to Us.
- 1.1.2. This website is not intended for children and we do not knowingly collect data relating to children.
- 1.1.3. It is important that you read this Privacy Policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing Personal Information about you so that you are fully aware of how and why we are using your data. This Privacy Policy supplements other notices and privacy policies and is not intended to override them.

### 1.2. Contact Details

- 1.2.1. If you have any questions relating to this Privacy Policy or our privacy practices, please contact our Information Officer in the following ways:  
Full Name of Legal Entity : DRY WALL AND CEILING DISTRIBUTORS CAPE TOWN (PROPRIETARY) LIMITED  
Email Address : office@dcdsa.co.za  
Registered Address : 24 Assegaai Street, Parow Industria, Cape Town, Western Cape, South Africa, 7493  
Postal Address : PostNet Suite No 140, Private Bag X22, Tygervalley, Western Cape, South Africa, 7536  
Telephone Number : +27 21 205 4281
- 1.2.2. You have the right to make a complaint at any time to the Information Regulator’s Office (IR), the Republic of South Africa’s authority for data protection issues (<http://www.justice.gov.za/inforeg/>). **We would, however, appreciate the chance to deal with your concerns before you approach the IR so please contact Us in the first instance.**

### 1.3. Amendments to the Privacy Policy

- 1.3.1. We keep our Privacy Policy under regular review. This version was last updated as per the date in the footer. Archived versions can be obtained by contacting Us. Any changes made to our Privacy Policy in future will be posted on Our website. The new version will apply the moment it is published on Our website.
- 1.3.2. It is important that the Personal Information We hold about you is accurate and current. Please keep Us informed if your Personal Information changes during your relationship with Us.

### 1.4. Third-Party Links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

## 2. DATA WE COLLECT

- 2.1. Personal Information does not include data where the identity of the data subject has been removed ("Anonymous Data").
- 2.2. We may collect, use, store and transfer different kinds of Personal Information relating to you which We have grouped together as follows:
- 2.2.1. Identity Data**  
Your Identity Data may include your first name, last name, username or similar identifiers, your title, date of birth and gender.
- 2.2.2. Contact Data**  
Your Contact Data may include your email address and telephone numbers.
- 2.2.3. Technical Data**  
Your Technical Data may include your internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- 2.2.4. Profile Data**  
Your Profile Data may include your interests, preferences, feedback and survey responses (if any).
- 2.2.5. Usage Data**  
Your Usage Data may include information about how you use our website and services. This information shall include the full Uniform Resource Locators (URL) Clickstream to, through and from Our website (including the date and time) and the products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs) and methods used to browse away from the page and any phone number used to call one of our customer service numbers.
- 2.2.6. Marketing and Communications Data**  
Your Marketing and Communications Data may include your preferences in receiving marketing from us and our third parties and your communication preferences.
- 2.3. We also collect, use and share statistical or demographic data for any purpose ("Aggregated Data"). Aggregated Data could be derived from your Personal Information but is not considered Personal Information in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your Personal Information so that it can directly or indirectly identify you, we treat the combined data as Personal Information which will be used in accordance with this Privacy Policy.
- 2.4. We do not collect any Special Personal Information relating to you.
- 2.5. Submission of Personal Information on behalf of another**  
If you provide information on behalf of someone else, then it is your responsibility to obtain the necessary consent from the person/User before making the Personal Information available to Us. On receipt of any Personal Information, we assume that the necessary consent has been obtained and will process the Personal Information as per your instructions. By submitting such Personal Information on behalf of another person/User, you indemnify Us against any third-party claim, where such third party claim relates to Personal Information that has been processed without the necessary consent or other available exception allowed by law.
- 2.6. If you fail to provide Personal Information**  
Where we need to collect Personal Information by law, or under the terms of a contract entered into between Us and yourself, and you fail to provide such data when requested, we will not be able to perform in terms of the contract to which we have entered or may enter with you (for example, to provide you with goods or services (including services for no charge)). In this case, we may have to cancel a product or service you have with Us, however we will notify you if this is the case at the time.

## 3. COLLECTION OF YOUR PERSONAL INFORMATION

We use different methods to collect data from you and data relating to you, including through:

### 3.1. Direct interactions

- You may give us details relating to your identity ("Identity") and your contact information ("Contact") by filling in forms or by corresponding with Us by means of phone, email or otherwise. This includes Personal Information you provide when you:
- 3.1.1. apply for our Products or Services;
  - 3.1.2. request marketing to be sent to you;
  - 3.1.3. enter a competition, promotion or survey; or
  - 3.1.4. give Us feedback or contact Us.

### 3.2. Automated technologies or interactions

As you interact with Our website, we will automatically collect technical data about your equipment, browsing actions and patterns ("Technical Data"). We collect this Personal Information by using cookies (see paragraph 4 below), server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing Our cookies.

### 3.3. Third parties or publicly available sources

We will receive Personal Information about you from various third parties and public sources as set out below:

- 3.3.1. Technical Data from the following parties:
- 3.3.1.1. analytics providers such as Google;
  - 3.3.1.2. advertising networks; and
  - 3.3.1.3. search information providers;

- 3.3.2. Contact data from providers of technical services;
- 3.3.3. Identity and Contact data from data brokers or aggregators; and
- 3.3.4. Identity and Contact data from publicly available sources such as the Companies and Intellectual Property Commission.

#### 4. COOKIES

- 4.1. Our website makes use of cookies to help us understand our Users better.  
*Cookies are small pieces of information sent by an organisation to your computer and stored on your hard drive to allow that website to recognise you when you visit. Cookies do not harm your computer or any files on your computer. Depending on the type of cookie we use, cookies also allow us to make our websites more user friendly.*
- 4.2. DCD may use third party vendors, including, but not limited to, Google and Bing to show DCD-related ads on sites on the internet. Third party vendors use cookies to serve ads based on a User's prior visits to Our website or other websites. Users may opt-out of Google's use of cookies by visiting the Google Advertising Settings Page or the Network Advertising Initiative's opt-out page for other third-party vendors' use of cookies.
- 4.3. You should be able to adjust your browser so that your computer does not accept cookies. If you do this, you will still be able to browse the website but the functions that allow you to access an existing account or page that requires a username or password will not be available.
- 4.4. You can, alternatively, adjust your browser to notify you when a website attempts to put a cookie on your computer. How you adjust your browser to stop it accepting, or to notify you of, cookies will depend on the type of internet browser programme your computer uses.
- 4.5. Please remember, cookies do not contain Identity, Contacts or Financial Information. We do not exchange cookies with any third-party websites or external data suppliers.

#### 5. USE OF YOUR PERSONAL INFORMATION

- 5.1. We will not sell your Personal Information.
- 5.2. We will only use your Personal Information when the law allows us to. Most commonly, we will use your Personal Information in the following circumstances:
  - 5.2.1. Where you have given us your consent to do so;
  - 5.2.2. Where we need to perform in terms of an agreement we have, or are about to enter into with you;
  - 5.2.3. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests; or
  - 5.2.4. Where we need to comply with a legal obligation.
- 5.3. Generally, We do not rely on consent only as a legal basis for processing your Personal Information although We will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting Us.
- 5.4. Purposes for which we will use your Personal Information
  - 5.4.1. We have set out below, in a table format, a description of all the ways we plan to use your Personal Information, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.
  - 5.4.2. Note that We may process your Personal Information for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you require more details relating to the specific legal ground we are relying on to process your Personal Information where more than one ground has been set out in the table below:

PURPOSE/ACTIVITY	TYPE OF DATA	LAWFUL BASIS FOR PROCESSING INCLUDING BASIS OF LEGITIMATE INTEREST
To register you as a new customer	(a) Identity; (b) Contact	Performance in terms of an agreement with you - including the browse wrap agreement (Terms of Use)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or Privacy Policy; and (b) Asking you to leave a review or take a survey	(a) Identity; (b) Contact; (c) Profile; (d) Marketing and Communications	(a) Performance in terms of an agreement with you; (b) Necessary to comply with a legal obligation; (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our services)
To enable you to partake in a prize draw, competition, promotion or complete a survey	(a) Identity; (b) Contact; (c) Profile; (d) Usage; (e) Marketing and Communications	(a) Performance in terms of an agreement with you; (b) Necessary for our legitimate interests (to study how customers use our services, to develop them and grow our business)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity; (b) Contact; (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise); (b) Necessary to comply with a legal obligation

To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity; (b) Contact; (c) Profile; (d) Usage; (e) Marketing and Communications; (f) Technical	Necessary for our legitimate interests (to study how customers use our services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, services, marketing, customer relationships and experiences	(a) Technical; (b) Usage	Necessary for our legitimate interests (to define types of customers for our services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity; (b) Contact; (c) Technical; (d) Usage; (e) Profile; (f) Marketing and Communications	Necessary for our legitimate interests (to develop our services and grow our business)

#### 5.4.3. Marketing

We strive to provide you with choices regarding certain Personal Information uses, particularly around marketing and advertising:

##### 5.4.3.1. Promotional offers from Us

5.4.3.1.1. We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you.

5.4.3.1.2. You will receive marketing communications from Us if you have requested information from Us or acquired Products or Services from Us and you have not opted out of receiving such marketing.

##### 5.4.3.2. Third-Party marketing

5.4.3.2.1. We will get your express opt-in consent before we share your Personal Information with any third party for marketing purposes.

5.4.3.2.2. TAKE NOTE: We may provide (without your consent) third party marketing parties/advertisers with Anonymous Aggregate Data about our Users (for example, we may inform them that 500 men aged under 30 have clicked on a specific product or advertisement on any given day). We may also use such Aggregate Data to help advertisers reach the kind of audience they want to target (for example, women in Gauteng). We may make use of the Personal Information we have collected from you to enable Us to comply with our advertisers' wishes by displaying their advertisement to that target audience.

IMPORTANT: We do not disclose information about identifiable individuals to our advertisers.

##### 5.4.3.3. Opting out

5.4.3.3.1. You can ask us or third parties to stop sending you marketing messages at any time by logging into the website or by contacting us at any time at office@dcdsa.co.za and requesting to opt-out of our marketing services.

5.4.3.3.2. Where you opt out of receiving these marketing messages, this will not apply to Personal Information provided to Us as a result of a Product/Service purchase, warranty registration, Product/Service experience or other transactions.

##### 5.4.4. Change of purpose

5.4.4.1. We will only use your Personal Information for the purposes for which We collected it, unless We reasonably consider that We need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact Us at office@dcdsa.co.za.

5.4.4.2. If we need to use your Personal Information for an unrelated purpose, We will notify you and We will explain the legal basis which allows Us to do so.

5.4.4.3. Please note that We may process your Personal Information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## 6. DISCLOSURE OF YOUR PERSONAL INFORMATION

6.1. We may share your Personal Information with the parties set out below for the purposes set out in the table above.

##### 6.1.1. Internal Third Parties

Where we share your Personal Information to our group (including franchisees) we ensure your Personal Information is protected by requiring all our Group Companies (or franchisees) to follow this policy when processing your Personal Information.

##### 6.1.2. External Third Parties

These include third parties to whom we may choose to sell, transfer or merge parts of our business or our assets.

Alternatively, we may seek to acquire other businesses or merge with them. If a change occurs in our business structure, then the new owners may use your Personal Information in the same way as set out in this Privacy Policy.

6.2. We require all third parties to respect the security of your Personal Information and to treat it in accordance with the law. We do not allow our third-party service providers to use your Personal Information for their own purposes and only permit them to process your Personal Information for specified purposes and in accordance with our instructions.

## 7. INTERNATIONAL TRANSFER

7.1. Some of our external third parties may be based outside the borders of the Republic of South Africa. Therefore, their processing of your Personal Information could involve a transfer of data outside of the borders of the Republic of South Africa.

7.2. Where we use certain service providers, we conclude an agreement with them to confirm that your Personal Information is confidential, they can only process on our instructions and that they should establish and maintain appropriate technological and organizational measurements to protect your Personal Information.

7.3. By submitting your Personal Information to us you consent to the transfer of Personal Information outside the borders of the Republic of South Africa (when required).

## 8. DATA SECURITY

- 8.1. We have put in place appropriate technological and organizational measures to prevent your Personal Information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition to the aforesaid, we limit access to your Personal Information to those employees, agents, contractors and other third parties on a need to know basis. They will only process your Personal Information on our instructions and they are subject to a duty of confidentiality.
- 8.2. Where required by law, we will notify you and any applicable regulator of a breach where we are legally required to do so.

## 9. DATA RETENTION

- 9.1. We will only retain your Personal Information for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your Personal Information for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.
- 9.2. To determine the appropriate retention period for Personal Information, we consider the amount, nature and sensitivity of the Personal Information, the potential risk of harm from unauthorised use or disclosure of your Personal Information, the purposes for which we process your Personal Information and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.
- 9.3. By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for 5 (five) years after they cease being customers, for tax purposes.
- 9.4. In some circumstances you can ask us to delete your data: see paragraph 11 below.
- 9.5. In some circumstances we will anonymise your Personal Information (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

## 10. SOCIAL MEDIA

- 10.1. Our website may, in certain circumstances, provide you with social plug-ins from various social media networks. If you choose to interact with a social network such as Facebook or Instagram (for example by registering an account), your activity on our websites will also be made available to that social network. This is necessary for the performance of your contract with Us which allows you to interact with a social network. If you are logged in on one of these social networks during your visit to one of our websites or are interacting with one of the social plug-ins, the social network might add this information to your respective profile on this network based on your privacy settings. If you would like to prevent this type of information transfer, please log out of your social network account before you enter one of our websites, or change the necessary privacy settings, where possible.
- 10.2. Communication, engagement and actions taken through external social media networks that we participate in are custom to the terms and conditions as well as the privacy policies held with each social media platform respectively.
- 10.3. You are advised to use social media networks wisely and communicate/engage with them with due care and caution in regard to their own privacy policies (if any).
- 10.4. **PLEASE NOTE: WE WILL NEVER ASK FOR PERSONAL OR SENSITIVE INFORMATION THROUGH SOCIAL MEDIA NETWORKS AND ENCOURAGE USERS, WISHING TO DISCUSS SENSITIVE DETAILS OR TO RESOLVE ISSUES/ CONCERNS, TO CONTACT US THROUGH PRIMARY COMMUNICATION CHANNELS SUCH AS BY TELEPHONE OR EMAIL.**
- 10.5. Our social media network page(s) may share web links to relevant web pages. By default, some social media platforms shorten lengthy URL's. You are advised to exercise caution and due care before clicking on any shortened URL's published on social media platforms by this website. Despite our best efforts to ensure that only genuine URL's are published, many social media platforms are prone to spam and hacking and therefore our website and its owners cannot be held liable for any damages or implications caused by visiting any shortened links.

## 11. YOUR LEGAL RIGHTS

- 11.1. Under certain circumstances, you have the following rights under data protection laws in relation to your Personal Information:
  - 11.1.1. Request access to your Personal Information (commonly known as a "data subject access request")  
Currently you have this right under the PAI Act. There may be a fee associated with this request (see below). This enables you to receive a copy of the Personal Information we hold about you and to check that we are lawfully processing it.
  - 11.1.2. Request correction of the Personal Information that we hold about you  
This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
  - 11.1.3. Request erasure of your Personal Information  
This enables you to ask us to delete or remove Personal Information where there is no valid reason for us continuing to process it. You also have the right to ask us to delete or remove your Personal Information where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your Personal Information to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
  - 11.1.4. Object to processing of your Personal Information  
You may object to processing of your Personal Information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your Personal Information for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
  - 11.1.5. Request restriction of processing of your Personal Information  
This enables you to ask us to suspend the processing of your Personal Information in the following scenarios:
    - 11.1.5.1. If you want us to establish the data's accuracy;
    - 11.1.5.2. Where our use of the data is unlawful, but you do not want us to erase it;
    - 11.1.5.3. Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims;
    - 11.1.5.4. You have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.

11.1.6. Request the transfer of your Personal Information to you or to a third party  
We will provide to you, or a third party you have chosen, your Personal Information in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

11.1.7. Withdraw consent at any time where we are relying on consent to process your Personal Information

This will however not affect the lawfulness of any processing carried out before you withdrew your consent. If you withdraw your consent, we may not be able to provide certain Services to you. We will advise you if this is the case at the time you withdraw your consent.

11.2. If you wish to exercise any of the rights set out above, please contact Us at office@dcdsa.co.za.

11.3. Fee required

Apart from the prescribed fees under the PAI Act, you will not have to pay a fee to access your Personal Information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances

11.4. What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal Information (or to exercise any of your other rights). This is a security measure to ensure that Personal Information is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

11.5. Time to respond

We try to respond to all legitimate requests within 30 (thirty) days. Occasionally it could take us longer than 30 (thirty) days if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## 12. DEFINITIONS

12.1. Data Subject means the person to whom Personal Information relates and, in this document, refers to you, as the party providing Personal Information that will be processed by DCD or a relevant third party;

12.2. Group of Companies means any holding company, affiliates of such holding company or affiliates of DCD;

12.3. Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your Personal Information for our legitimate interests. We do not use your Personal Information for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us at office@dcdsa.co.za;

12.4. PAI Act means the [Promotion of Access to Information Act, Act 2 of 2000](#);

12.5. Personal Information shall have the same meaning ascribed to it in terms of the POPI Act;

12.6. POPI Act means the [Protection of Personal Information Act, Act 4 of 2013](#);

12.7. Products means the products we sell and advertise on our website;

12.8. Services means our services which include the sale, transport and installation of the Products;

12.9. Special Personal Information means the information as defined under section 26 of the POPI Act, which includes details relating to your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and biometric information or criminal convictions and offences;

12.10. Third Parties means:

12.10.1. Internal Third Parties

Other divisions within DCD, acting as joint responsible parties or operators and who are based in South Africa and who may also provide IT and system administration services and undertake leadership reporting;

12.10.2. External Third Parties

12.10.2.1. Service providers acting as operators who provide IT and system administration services;

12.10.2.2. Professional advisers acting as operators or joint Responsible Parties, including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services;

12.10.2.3. The South African Revenue Services, regulators and other authorities acting as operators or joint Responsible Parties based in the Republic of South Africa who require reporting of processing activities in certain circumstances;

12.10.2.4. Courts of law or any other authority where we have an obligation under law to share your Personal Information; or

12.10.2.5. In the event that we sell or buy any business or assets, in which case we may disclose your Personal Information to the prospective seller or buyer of such business or assets; and

12.10.3. Users means users of our website (including u!)