

# PRIVACY POLICY AND PRIVACY NOTICE

## brocSand (Pty)Ltd / Atlantic Sands (Pty)Ltd

brocSand / Atlantic Sands value any person's privacy and take the protection of personal information very seriously. It will not share or sell personal information with anyone unless it has been authorised to do so.

### PERSONAL INFORMATION

Includes

- certain information collected on registration; and
- optional information that a person provides to brocSand / Atlantic Sands voluntarily.

Excludes

- information that has been made anonymous so that it does not identify a specific person;
- permanently de-identified information that does not relate or cannot be traced back to you specifically; and
- non-personal statistical information collected and compiled by brocSand / Atlantic Sands and information that has been provided voluntarily in an open, public environment or forum including any blog, chat room, community, classifieds or discussion board. When the information was disclosed in a public forum, it is not confidential and does not constitute personal information entitled to protection under this policy.

### SECTION 1 – HOW DOES brocSand / Atlantic Sands COLLECT INFORMATION?

- When a person make use of brocSand / Atlantic Sands's services or products, he/she will be asked to provide additional information on a voluntary basis ("services information").

### SECTION 2 - WHAT IS DONE WITH PERSONAL INFORMATION?

When a person purchases something from brocSand / Atlantic Sands, as part of the buying and selling process, personal information given by the individual is collected, information such as an individual's name, address and email address.

BrocSand / Atlantic Sands may use any information provided for the purposes indicated by the individual when it agreed to provide. With the individual's permission, brocSand / Atlantic Sands may then send such an individual emails about its business, new products and relevant updates.

### SECTION 3 - CONSENT

How does brocSand / Atlantic Sands obtain consent?

When an individual provides brocSand / Atlantic Sands with-

- personal information when it voluntary enters into a client/service provider relationship
- personal information to complete a transaction, verify credit card details, place an order, arrange for a delivery or return a purchase, the individual consents to brocSand/Atlantic Sands collecting the info and using it for that specific reason only.

If asked for personal information for a secondary reason, like marketing, brocSand / Atlantic Sands will either ask the individual directly for its expressed consent, or provide the individual with an opportunity to decline.

#### How is consent withdrawn?

If after an individual opted-in, it changes its mind, it may withdraw its consent for brocSand / Atlantic Sands to contact it, for the continued collection, use or disclosure of its information, at any time, by emailing [info@brocsand.co.za](mailto:info@brocsand.co.za) or [info@atlantic-sands.co.za](mailto:info@atlantic-sands.co.za)

### **SECTION 4 - DISCLOSURE**

BrocSand / Atlantic Sands will not disclose any personal information to anyone unless it is compelled or required by law to do so or if an individual violated brocSand / Atlantic Sands's Terms of Service.

BrocSand / Atlantic Sands will not sell personal information. No personal information will be disclosed to anyone except as provided for in this privacy policy.

BrocSand / Atlantic Sands may need to disclose personal information to its employees that require the personal information to execute their duties. All employees are however also bound by the terms of this policy.

### **SECTION 5 - THIRD-PARTY SERVICES**

In general, the third-party providers used by brocSand / Atlantic Sands will only collect, use and disclose personal information to the extent necessary to allow them to perform the services they provide to brocSand / Atlantic Sands.

However, certain third-party service providers, such as payment gateways and other payment transaction processors, have their own privacy policies in respect to the information brocSand / Atlantic Sands is required to provide to them for an individual's purchase-related transactions.

For these providers, it is recommended that their privacy policies be read to understand the manner in which personal information will be handled by these providers.

### **SECTION 6 - SECURITY**

To protect personal information, brocSand/Atlantic Sands takes reasonable precautions and follow industry best practices to make sure it is not inappropriately lost, misused, accessed, disclosed, altered or destroyed.

### **SECTION 7-YOUR RIGHTS**

An individual shall always have the right to ask brocSand/Atlantic Sands not to contact him/her for marketing purposes, and can do this at any time by using the "opt out" option that brocSand/Atlantic Sands always provide you with when we send marketing or other information to an individual.

An individual shall also have the right to request access to the information brocSand / Atlantic Sands have collected and processed about an individual and requests that brocSand / Atlantic Sands corrects or updates any incorrect or incomplete information. An individual may at any time lodge an objection with brocSand / Atlantic Sands regarding the collection, use and processing of personal information.

## **SECTION 8- COMMITMENT TO SECURITY**

brocSand/Atlantic Sands have put in place safeguards to protect personal information and to prevent loss, damage or unauthorised access to or disclosure of personal information. These security safeguards are based on generally accepted information security practices and procedures which apply to the products and/or services brocSand / Atlantic Sands provides. brocSand / Atlantic Sands regularly checks that these safeguards are correctly implemented and continually updated in response to new risks or any identified deficiencies.

## **SECTION 12 - CHANGES TO PRIVACY POLICY**

brocSand/Atlantic Sands reserves the right to modify this privacy policy at any time. Changes and clarifications will take effect immediately. If material changes are made to this policy, brocSand/Atlantic Sands will notify everyone on its database that it has been updated, so that all are aware of what information is collected, how it is used, and under what circumstances, if any, brocSand/Atlantic Sands uses and/or discloses it.

***brocSand/Atlantic Sands will not collect or process any information that may be considered "high risk" information as described in section 26 of the Protection of Personal Information Act, 2013, or any information concerning a person younger than 18 years.***

## **QUESTIONS**

If an individual would like to access; correct; amend or delete any personal information brocSand/Atlantic Sands has about him/her, registers a complaint or simply wants more information then the Privacy Compliance Officer can be contacted at [info@brocsand.co.za](mailto:info@brocsand.co.za).

### **Full name and legal status**

**brocSand**, a Private Company (Pty)Ltd incorporated under the laws of the Republic of South Africa.  
Registration number: 2001/022698/07

**Atlantic Sands**, a Private Company (Pty)Ltd incorporated under the laws of the Republic of South Africa.  
Registration number: 2004/028100/07

### **Street address**

23 Oxford Street, Durbanville, Western Cape, South Africa.

### **Postal address**

PO Box 1744, Durbanville, 7551