

PRIVACY POLICY

Introduction

S Buys Pharmacy at SPAR Distribution Centre provide pharmaceutical healthcare products and services through its Retail, Courier pharmacy, Wholesale and Training divisions respectively. We are committed to respecting your privacy with regards to your personal information off- and online. This Privacy Policy was developed to give you a clear understanding of how we and our Web Site operates. It also explains how your personal information is treated. We do not collect, process, share or store personally identifiable information unless you provide your consent to us by way of a telephonic (verbal) consent which is recorded or by way of your written consent. This policy further explains under what circumstances we gather your individual personal information, how we use it, and who may access that information.

Kindly take note that this Privacy Policy may be revised periodically and we therefore recommend that you read our Policy whenever you visit our Site so that you may be aware of any changes.

The Company is committed to all relevant legislation, which includes the Protection of Personal Information Act 4 of 2013 ("POPIA"), once in operation, the Electronic Communications and Transaction Act 25 of 2002 ("ECTA") and the Promotion of Access to Information Act 2 of 2000 ("PAIA").

Purpose

This Privacy Policy sets out our commitment, principles and practices to complying with the POPIA.

Scope

This Privacy Policy applies to the processing of personal information of natural and juristic persons by all employees, employed by the Company, all business units of the Company and all third-party service providers who interact with the Company. Employees and business units are expected to be familiar with, and to comply with this policy. Failure to do so by employees may result in disciplinary action. The Company will ensure that all contracts with third party service providers will comply with the POPIA in terms of the Service Level Agreement between the parties.

Consent

The supply of personal information to the Company by any data subject is at the discretion of the data subject. **By supplying S BUYS with any information, data subjects are accepting the principles, practices and terms contained in this policy.**

We will not process your personal information without obtaining your consent. In respect of all marketing activities relating to the above company's services and/or products, consent to collect or use information will be obtained. Students/customers will be given an option to opt-in or opt-out of any electronic communication.

In respect of any activities consent to collect, process, store and share your personal information will be required either by way of a written agreement or by way of a recorded telephonic consent.

If information is collected through a third party, the third party may be requested to sign an agreement that they comply with the POPIA requirements, if it has not been dealt with in the main Service Level Agreement.

It is noted that the above Company's:

- Has different business units, that process and share personal information of data subject internally and will share information relating to that data subject internally in instances where required; and
- Is obliged to disclose certain categories of information relating to regulatory and legal purposes.

Type of information collected

The type of information collected online and offline varies. The information includes any personal information as defined in the POPIA, but is not limited to details such as name, age, ID numbers, registration numbers, addresses and other contact details, medical aid number liabilities, income and payment records, financial information and banking details such as account numbers etc.

When you visit our website, we do not collect any personally identifiable information without your consent. We may however, collect and store information from you that you voluntarily choose to provide to us or enter on our Web Site, including, but not limited to, "personal identifiable information" such as your name, address, e-mail address, and phone number. As soon as you submit your information to us via the Web Site, we accept that you consent to us processing and storing your personal information

Security, use and sharing of information

We take the security of your personal information very seriously and we take commercially reasonable precautions to maintain that protection. If you need to provide personal information to access features of services, we will clearly disclose how the information will be used. We do not sell, trade or rent you personal information to others. However, we may share your personal information with other S Buys businesses or affiliates, our agents, contractors or business partners located in South Africa and/or any other country, in order that they may perform services for us. For example, your personal information may be shared with your consent

- (i) with a contractor we use to support our business (e.g. fulfilment services, technical support, delivery services, and financial institutions etc.) or;
- (ii) in connection with the sale, assignment, or other transfer of the business of this site to which the information relates, or;
- (iii) where required by applicable laws, court orders, or government regulations.

We have trusted relationships with selected third parties who perform services on its behalf. All services providers are bound by contract to maintain the security of our data subjects' information and to use it only as permitted by the Company.

S Buys uses information to identify its data subjects. This information is necessary to enable S Buys to:

- make contact, if and when required, to promote its services and/or products or in relation to a query;
- perform its duties in pursuance of any contract;
- comply with any regulatory or other business obligation;
- carry out market research, business and statistical analysis;
- carry out any other reasonable business operations; and
- employment of personal.

In addition, since we conduct research on users' demographics, interests and behaviours based upon information provided to us during use of our Web Sites, we may combine your information with

information collected from other individuals to produce anonymous, aggregated statistical information. Aggregated data does not include personally identifiable information. We use this demographic information, such as the percentage of male or female visitors, or the percentage of visitors within certain age brackets, to improve the content of our Site. We also may share this anonymous, aggregated information, which does not identify particular individuals or associate particular individuals with illnesses or conditions, with partners or other third parties.

Information may also be used for other purposes for which permission is given, or if required to by law, or if it is of public interest to disclose such information. S Buys undertakes to only process information that is required and relevant for the purposes that your information is processed.

The Company's will not intentionally collect information about children and will only process information about children with the consent of a parent or guardian, or if otherwise required to do so by law.

The Company does process special personal information as defined in the POPIA, which includes health-related information etc. with your consent, or if otherwise required to do so by law.

Data subjects may request what personal information is held by the Company and with whom it was shared. Data subjects may on reasonable grounds object to the processing of information, after which the Company undertakes not to continue to process your information, except when required to do so by law. The data subject may further request a correction of his/her personal information.

As our Company changes and grows, we might sell or buy companies, subsidiaries, or assets. In such transactions, customer information generally is one of the transferred business assets. Also, in the event that S Buys or substantially all of its assets are acquired, customer information will, of course, be one of the transferred assets.

Safeguarding of information

We understand the value of information and will take all reasonable steps to protect the information from loss, misuse, or unauthorised access.

Our responsibility is to:

- protect and manage information that is held about its data subjects;
- make use of electronic and computer safeguards, such as firewalls to secure data subjects' information;
- have physical and electronic access control to its premises; and
- only authorise access to information to those employees who require it to fulfil their designated responsibilities.

We are committed to use appropriate technical and other security measures in line with acceptable industry standards to safeguard data subjects' information.

For online ordering, S Buys has implemented SSL technology to protect your personally identifiable information. This technology encrypts your information prior to transmission over the Internet. While S Buys has implemented SSL technology for online ordering purposes we cannot guarantee the privacy of transmissions (including, e-mail communications) to and from our Web Sites.

We also make use of physical and managerial procedures to attempt to safeguard your personal information, however we cannot guarantee that it is completely secure from people who might attempt to evade security measures or intercept transmissions over the Internet. Please take note that

advertisers or third-party web sites that have links on our Web Sites may collect personally identifiable information from you. This Privacy Policy does, not cover the information practices of those sites linked to us either through advertisements or other hyperlinks. We suggest that when linking to another site, you always read such site's privacy policy before volunteering any personally identifiable information on that site.

Retention of your personal information

Information will be retained as long as necessary for the purpose it was collected and in line with the Company's Record Retention Policy (drafted in line with regulations governing the duration information should be kept.) Our retention of your data allows us to continue providing you with highly personalised services without interruption.

We believe that choice is one of the most important privacy principles. You have the choice not to submit any personally identifiable information to us (although under such circumstances you would be unable to participate in our services provided.)

Cookies are small pieces of information that a web site places on an individual computer's hard drive. Cookies remember certain information that a web site can then use to make communication between your browser and the site more efficient. Cookies are standard technology in the Internet industry and may be used by some S Buys Web Sites. S Buys will only be able to read those cookies that we place on your hard drive; we cannot access or read any other information. We use cookies to better tailor our services to your needs. We may also use cookies on an aggregate basis to track Site navigation and traffic trends. This aggregated and anonymous information will help us to improve Site content, and may be shared with partners or other third parties. Visitors always have the option of disabling cookies via their browser preferences.

The use of advertising cookies sent by third-party servers is also common in the Internet industry. S Buys has no control over, and cannot protect against, the practices or policies of other web sites.

Web beacons

In order to measure the effectiveness and/or traffic on our Sites, our Sites may use "pixel tags" (also called clear GIFs, web beacons, or web bugs.) A clear GIF (web beacon) is a type of web page graphic that often appears to be invisible because it is usually 1 by 1 pixel in size. The web beacon is used to track the number of users that arrive at our Sites and their navigation through our Sites. For instance, we may use a web beacon to statistically count the number of people using our Site or particular pages within our Site. We sometimes include web beacons in our HTML-formatted E-mail messages that we send (or that are sent on our behalf) in order to determine which E-mail messages were opened and to note whether an E-mail message was acted upon. The web beacon technology does not collect any personally identifiable information (it does not collect your name, address, telephone number or E-mail address.)

Clickstream Data

A "clickstream" or "clickstream data" reflect the specific web pages visited by an individual user, and, importantly, the manner or traffic pattern by which a user moves from one web page to another. We track such information only within our Web Site; we specifically do not track any clickstream activity outside of S Buys Web pages. We track and use this information to understand how our users' habits are similar to or different from one another and specifically to personalise the content, banner ads and promotions that you and other users will see on our Web Site. Clickstream data does not contain or reveal any personally identifiable information about the user.

IP Addresses

An Internet Protocol (IP) address is a number that is automatically assigned to your computer by your Internet Service Provider (ISP) whenever you log onto the Internet. Like other Internet sites, S Buys may use IP addresses to collect aggregate and anonymous information about the number of visitors and site usage. To guarantee your privacy, your IP address is not linked with personal information about you. S Buys does reserve the right, however, to use IP addresses to identify individuals who threaten our Site, service or customers.

Surveys and Contests

From time to time, we may ask for personally identifiable information when you complete a survey or enter a contest. In these instances, we will clearly describe the purpose for collecting such information, as well as intended uses.

Use of Content

No information presented herein is intended as a substitute for medical advice or treatment for specific medical conditions. Use of this online service is subject to the Terms & Conditions.

Leaving S Buys

As a resource to our visitors, we provide links to other web sites. We try to carefully choose those sites that we believe are useful and meet our high standards. However, we do not guarantee the standards of every web site to which we link, nor are we responsible for the content of non-S Buys sites. Links to external web sites are provided only for convenience and/or for informational purposes, and in no way constitute an endorsement.

Your consent

By using our Web Site, you consent to the collection and use of information as set forth in this Privacy Policy. You also acknowledge our right to change this policy, without prior notification, and our commitment to post any such changes on this page so that you are fully informed on the types of information we collect, how we use it, and under what circumstances, if any, it is disclosed.

Access to information

Data subjects have the right to access information, including certain personal information held by S Buys. Requests for information must be made to the Head of the Body or Deputy Information officers:

Head of the Body:

Name:	Jeremy Nicol
Physical address:	S Buys Pharmacy at Spar Distribution Centre, Cnr. Kaolin & Radium Street, Carletonville.
Postal address:	Private Bag X2057, Carletonville, 2500
Telephone number:	018 788 2075
Fax number:	018 786 3705
E-mail address:	jnicol@sbuys.co.za

Information officers:

Name:	Jeremy Nicol (Scriptwise Courier Pharmacy)
Physical address:	S Buys Pharmacy at Spar Distribution Centre, Cnr. Kaolin & Radium Street, Carletonville.
Postal address:	Private Bag X2057, Carletonville, 2500
Telephone number:	018 788 2075
Fax number:	018 786 3705
E-mail address:	jnicol@sbuys.co.za

Name:	Madeleine Malan (S Buys Wholesaler & Forefront)
Physical address:	S Buys Pharmacy at Spar Distribution Centre, Cnr. Kaolin & Radium Street, Carletonville.
Postal address:	Private Bag X2057, Carletonville, 2500
Telephone number:	018 788 2075
Fax number:	018 786 3705
E-mail address:	mmalan@sbuys.co.za

Name:	Estelle Victor (S Buys Academy)
Physical address:	S Buys Pharmacy at Spar Distribution Centre, Cnr. Kaolin & Radium Street, Carletonville.
Postal address:	Private Bag X2057, Carletonville, 2500
Telephone number:	018 788 2075
Fax number:	086 523 3612
E-mail address:	evictor@sbuys.co.za

Deputy Information officers:

Name:	Nadine Grobler (Scriptwise Courier Pharmacy)
Physical address:	S Buys Pharmacy at Spar Distribution Centre, Cnr. Kaolin & Radium Street, Carletonville.
Postal address:	Private Bag X2057, Carletonville, 2500
Telephone number:	018 788 2075
Fax number:	018 786 3705
E-mail address:	ngrobler@sbuys.co.za

Name:	Ina Barkhuizen (Scriptwise Courier Pharmacy)
Physical address:	S Buys Pharmacy at Spar Distribution Centre, Cnr. Kaolin & Radium Street, Carletonville.
Postal address:	Private Bag X2057, Carletonville, 2500
Telephone number:	018 788 2075
Fax number:	086 457 0077
E-mail address:	ibarkhuizen@sbuys.co.za

Name:	Revonne Coetzee (S Buys Wholesaler & Forefront)
Physical address:	S Buys Pharmacy at Spar Distribution Centre, Cnr. Kaolin & Radium Street, Carletonville.
Postal address:	Private Bag X2057, Carletonville, 2500
Telephone number:	018 788 2075
Fax number:	018 786 3705

E-mail address:	rdempers@sbuys.co.za
Name:	Jalia Meyer (S Buys Academy)
Physical address:	S Buys Pharmacy at Spar Distribution Centre C/o Kaolin & Radium Street Carletonville, 2499
Postal address:	Private Bag X2057, Carletonville, 2500
Telephone number:	018 788 2102
Fax number:	086 210 2263
E-mail address:	jmeyer@sbuys.co.za

Access to information in terms of the PAIA must be obtained in accordance with the Access to Information Manual, which is available on our Web Site.

A data subject, having provided adequate proof of identity, has the right to –

- request a responsible party to confirm whether or not S Buys holds personal information about the data subject; and
- request from S Buys the record or a description of the personal information about the data subject held by S Buys, including information about the identity of all third parties, or categories of third parties, who have, or have had, access to the information.

A data subject may, in the prescribed manner, request S Buys to –

- correct or delete personal information about the stakeholder in its possession or under its control that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully; or
- destroy or delete a record of personal information about the data subject that S Buys is no longer authorised to retain in terms of the POPIA.

Approval of the Policy

This policy was approved by the Exco Managers on the 5th day of March 2021 and becomes effective immediately on approval.