

---

## PRIVACY POLICY - ALUMINIUM FEDERATION OF SOUTH AFRICA

### 1. INTRODUCTION

- 1.1 Aluminium Federation of South Africa (“**Company, we, us, our**”) takes the protection of personally identifiable information (“**Personal Information**”) very seriously.
- 1.2 While operating our business, we process Personal Information in a number of ways. This privacy policy (“**Policy**”) explains how we use and protect your Personal Information and covers the individuals whose Personal Information we process in the course of providing our services, which includes, but is not limited to, technical information and advice, education, training and skills upgrading, a range of publications and market industry and business development support to the South African aluminium industry (“**Services**”).
- 1.3 By giving us your Personal Information, you –
- (a) agree to this Policy and authorise us to process your Personal Information;
  - (b) authorise the Company, its Associates, our Service Providers and other third parties to process your Personal Information,
- as set out herein.
- 1.4 For purposes of this section:
- (a) “**Service Provider**” means third party providers of various services that we use while operating our business, including, but not limited to, providers of information technology, data storage, recruitment services and professional advisors.
  - (b) “**Associates**” means related companies and the directors, employees and consultants of the Company or such related companies.
- 1.5 This Policy applies to all parties who we interact with in the course of our business, including, but not limited to, individual clients, visitors to our places of business, and other users of our Services (“**you**”).
- 1.6 Subject to 8.2 and 8.3 below, this Policy does not apply to the information practices of other third parties (relating to or by means of their websites, applications or services) who we may engage in connection with the Services. These third parties may have their own privacy policies, which we encourage you to familiarise yourself with, before using them.

### 2. OUR ROLE REGARDING YOUR PERSONAL INFORMATION

When providing the Services, we generally act as the responsible party, this means that we control how and why Personal Information is collected and further processed.

### 3. PURPOSES OF AND LEGAL BASES FOR OUR PROCESSING OF PERSONAL INFORMATION

- 3.1 We will process your Personal Information, for legitimate purposes, in the ordinary course of our business of providing the Services.
- 3.2 Given the nature of the Services, in most cases your Personal Information is

necessary for us to be able to provide the Services to you (such as when you provide us with certain information in order for your organization to become a member of the Company). If you do not provide us with the necessary Personal Information, we may not be able to provide certain Services, and may have to decline to provide such Services to you.

3.3 We will process your Personal Information on the basis of:

- (a) providing you with the best possible Services with the aim of protecting both of our legitimate interests;
- (b) your consent when you freely provide us with your Personal Information in order to use the Services;
- (c) carrying out actions for the conclusion or performance of a contract to which you are a party;
- (d) improving our products, Services, website and social media page (“**website**”) performance; or
- (e) our compliance with applicable law, including, but not limited to, the Labour Relations Act,

depending on the context.

#### **4. COLLECTION OF PERSONAL INFORMATION**

4.1 We may collect or obtain your Personal Information:

- (a) when you provide it directly to us;
- (b) in the course of our relationship with you;
- (c) as part of providing the Services to you;
- (d) from publicly available sources;
- (e) when you interact with us via our website; and
- (f) when you visit our offices.

4.2 We may in certain limited circumstances also receive your Personal Information from our Affiliates or third parties (such as a public body).

#### **5. CATEGORIES OF PERSONAL INFORMATION**

5.1 We may process the following categories of Personal Information:

- (a) contact information;
- (b) payment information;
- (c) your interests, which have been made publicly available;
- (d) content and advertising information;
- (e) professional information, in relation to our employees, contractors or agents, and prospective employees, contractors or agents;
- (f) information relating to your visits to our website; and
- (g) other categories of Personal Information provided to us by you.

## **6. SPECIAL PERSONAL INFORMATION**

We generally do not process special Personal Information, however, in certain circumstances, we may need to process your special Personal Information (such as the existence of a criminal record, in relation to our employees or prospective employees), which we will do so for legitimate purposes, in the ordinary course of our business of providing the Services, and in accordance with applicable laws.

## **7. PERSONAL INFORMATION OF CHILDREN**

Our Services are not intended for use by children under the age of 18 and we do not knowingly collect Personal Information of children. However, our website is accessible to anyone. To the extent that we do process the Personal Information of a child who would like to use the Services, we will only do so with the consent of the child's parent or guardian, or in order to comply with applicable law.

## **8. SHARING PERSONAL INFORMATION WITH THIRD PARTIES**

8.1 Subject to 8.2 and 8.3 below, we do not share your Personal Information with third parties, unless:

- (a) required to by law; and
- (b) we are requested to do so by a public body, in which case we will, to the extent legally permissible, notify you of such requests before sharing your Personal Information.

8.2 We may share Personal Information with our Affiliates and Service Providers, who process Personal Information to carry out services on our behalf, for legitimate business purposes and in order to provide you with the Services.

8.3 If we share Personal Information with our Affiliates and Service Providers, to the extent required by applicable law, we will ensure this is done in terms of written agreement which obligates the Affiliate or Service Provider to:

- (a) establish and maintain appropriate, reasonable technical and organisational measures to protect the integrity and confidentiality of such Personal Information;
- (b) only process such Personal Information in accordance with our prior written instructions; and
- (c) treat Personal Information which comes to their knowledge as confidential and to not disclose it.

8.4 Affiliates and Service Providers who process Personal Information on our behalf must notify us immediately where they have reasonable grounds to believe your Personal Information has been accessed or acquired by any unauthorised person.

## **9. INTERNATIONAL TRANSFER OF PERSONAL INFORMATION**

9.1 We do not transfer your Personal Information to foreign countries.

9.2 Although unlikely, should the need arise, we will only do so in a manner consistent with applicable law and to a recipient who is subject to a law, binding corporate rules or binding agreement that provides adequate levels of protection.

## **10. SECURITY SAFEGUARDS**

10.1 We take appropriate, reasonable technical and organisational measures to secure the

integrity and confidentiality of your Personal Information, to prevent the loss of, damage to, unauthorised destruction, unlawful access to or processing of, your Personal Information.

- 10.2 Where we have reasonable grounds to believe your Personal Information has been accessed or acquired by any unauthorised person, we will notify the Information Regulator and yourself, as soon as reasonably possible after the discovery or compromise, unless a public body responsible for the prevention, detection or investigation of offences (or the Information Regulator) informs us that notifying you will impede a criminal investigation.

## **11. RETENTION OF PERSONAL INFORMATION**

We will retain your Personal Information for as long as is necessary to achieve (i) the purpose for which it was collected or processed, (ii) a legitimate interest, or (iii) compliance with applicable law. We may also retain your Personal Information for as long as we are authorised, but not obligated, by law to retain your Personal Information.

## **12. COOKIES**

- 12.1 Our website uses cookies, which are small files that may be stored on your device. Cookies are used to ensure our website functions properly, store preferences, provide web analytics and generally improve the website's performance.
- 12.2 Some cookies are placed on your device by us, and others by third parties, such as Google. We encourage you to familiarise yourself with the policies of these third parties to learn more about how they process your Personal Information.

## **13. YOUR RIGHTS**

- 13.1 Where we process your Personal Information based on your consent, you may withdraw your consent at any time, provided that the justification for processing your Personal Information will not be affected.
- 13.2 You may unsubscribe from our mailing lists, or object to direct marketing at any time, free of charge.
- 13.3 In certain circumstances, you may have the right to request access to your Personal Information, or ask us to update, erase or limit our processing of your Personal Information.
- 13.4 You may also have the right to object, in the prescribed manner, to the processing of your Personal Information, on reasonable grounds relating to your particular situation, unless applicable law provides for such processing.
- 13.5 You have the right to lodge a complaint with the Information Regulator, by email at [complaints.IR@justice.gov.za](mailto:complaints.IR@justice.gov.za), or by post to P.O. Box 31533, Braamfontein, 2017.

## **14. CONTACT US**

If you have any questions about this Policy or would like to exercise any rights you may have relating to your Personal Information, please contact our Information Officer by email at [afsa@afsa.org.za](mailto:afsa@afsa.org.za).

Alternatively, you can contact us at:

Address: 2<sup>nd</sup> Floor, Corporate Park, 4 – 6 Skeen Boulevard, Bedfordview, 2008.

Telephone: [+27 \(011\) 455 5553](tel:+27(011)4555553).