

Privacy Policy

BGR Alluvium Incorporated

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Contents

Privacy policy	3
Lawful Processing of information	3
Collection of data	3
Prospective Employees	4
Employees	4
Customers	5
Suppliers.....	6
Individuals screened for COVID 19	6
Consent	7
Retention	7
Your legal rights	7
Changes to this policy	7

Privacy policy

Effective date: 1 July 2021

BGR Alluvium Incorporated is committed to protecting the privacy of personal information of our data subjects. The information you share with us as a data subject allows us to provide you with the best experience with our products and services, or as a stakeholder of BGR Alluvium Incorporated.

It is important that you take all necessary and appropriate steps to protect your data yourself (for example, by ensuring that all passwords and access codes are kept secure).

BGR Alluvium Incorporated has dedicated policies and procedures in place to protect all personal information collected and processed by us. Please read below for more information on how we collect, process, use and disclose personal information.

Registered address: Rhino House, 23 Quantum Street, Techno Park, Stellenbosch, 7600

Information officer contact details: Popi@bgralluvium.co.za

Lawful Processing of information

In line with the 8 Conditions for Lawful Processing of Personal Information as set out in the Protection of Personal Information Act no 4 of 2013 (the Act), we

- Accept joint responsibility and **accountability** with you to responsibly manage and protect your Personal Information when providing our services and solutions to you and ensure compliance with the Act.
- Strive to collect and process your Personal information in a **fair and lawful** manner. We will not process your information if it is unnecessary;
- Undertake to only use your Personal Information for the purpose for which the information is essential to enable us to **assist you or provide services to you**;
- Undertake **not to share or further process** your Personal Information with anyone or for any reason if not required for assisting you with your solutions or as required in terms of legislation or regulations;
- Undertake to take reasonably practicable steps to ensure that information is **complete and accurate**.
- Undertake to be **open and transparent** on the nature, extent and reasons for processing Personal Information;
- Undertake to **safeguard and protect** your Personal Information in our possession;
- We will at all times respect your right to withdraw your consent for the processing of your Personal Information.

Collection of data

Personal data may either be collected directly from you, as data subject, or it may be collected from other sources such as:

- a) The use of cookies on our website
- b) LinkedIn
- c) Facebook
- d) Instagram

Where information is not collected directly from you as a data subject, we will take reasonable steps to inform you of the fact that the information was collected and will be processed.

You must not send us personal information about someone else without first getting his or her consent for it to be used and disclosed in the ways set out in this terms and conditions. This is because we will assume he or she has consented although we may still ask for confirmation from them. Where you do give us information about someone else, or someone else discloses a connection with you, that information may be taken into account with your other personal information.

Prospective employees

In applying for this position you may provide us with personal information as part of the application process. We may also obtain personal information while performing the required background check, reference check and credit check if relevant.

The personal information that may be obtained during this process is as follows:

Personal information	Purpose for processing	Legal basis for processing
Employment Equity Information- Race, Gender, Disability.	The data processing activity is necessary to enter into or perform a contract with the data subject.	Possible employment and for compliance with the Employment Equity Act.
Background information (Academic records, ID number, Employment history, Language skills, views of other people about the person.	To verify your identity and Information is necessary to determine if BGR Alluvium can enter into a contract with you.	The data processing activity is necessary to enter into or perform a contract with the data subject
Contact information (Telephone number, email address, physical address)	To verify your identity and Information is necessary to determine if BGR Alluvium can enter into a contract with you.	The data processing activity is necessary to enter into or perform a contract with the data subject
Other information Name and surname	To verify your identity and be able to properly address you.	The data processing activity is necessary to enter into or perform a contract with the data subject

Employees

BGR Alluvium Incorporated must process personal information of their employees for various legal and employment purposes. The information that will be processed is as follows:

Personal information	Purpose for processing	Legal basis for processing
Employment Equity Information- Race, Gender, Disability.	Possible employment and for compliance with the Employment Equity Act.	The data subject has given permission for the organisation to process their personal data for one or more processing activities.
Identity Name and Surname, ID number	To verify your identity and Information is necessary to	The data subject has given permission for the organisation to process their

	determine if BGR Alluvium can enter into a contract with you.	personal data for one or more processing activities.
Background information (Academic records, Employment history, Language skills, views of other people about the person.	To verify your identity and Information is necessary to determine if BGR Alluvium can enter into a contract with you.	The data subject has given permission for the organisation to process their personal data for one or more processing activities.
Other information Marital status, Name and surname, PAYE number, Account information	To determine your next of kin and be able to properly address you.	The data subject has given permission for the organisation to process their personal data for one or more processing activities.
Contact information (Telephone number, email address, physical address)	To verify your identity and Information is necessary to determine if BGR Alluvium can enter into a contract with you.	The data subject has given permission for the organisation to process their personal data for one or more processing activities.
Biometric information- fingerprint	To gain access to the building.	The data subject has given permission for the organisation to process their personal data for one or more processing activities.

Customers

In order for us to provide you with the best service, we need to collect and process personal information from you as a customer. This information will consist of the following:

Personal information	Purpose for processing	Legal basis for processing
Name, Surname, telephone number, Email address and address.	To ensure accurate on the system (to identify customer)	The data subject has given permission for the organisation to process their personal data for one or more processing activities.
Financial history	Used to identify the customer's specific risks and services to be rendered.	The data processing activity is necessary to enter into or perform a contract with the data subject
Language and birth of the person	To determine the preferred language of communication	The data subject has given permission for the organisation to process their personal data for one or more processing activities.
Employment Equity Information- Race, Gender, Disability.	For our BBBEE certificate	To comply with the Broad-based Black Economic Empowerment Act of 2003

Suppliers

In order for us to communicate with you regarding services you provide/ payment purposes, we need to collect and process personal information from you as a customer. This information will consist of the following:

Personal information	Purpose for processing	Legal basis for processing
Name and Surname	In order to communicate with suppliers and to identify supplier	The data subject has given permission for the organisation to process their personal data for one or more processing activities.
Contact information Email address, physical address and telephone number	In order to communicate with suppliers.	The data subject has given permission for the organisation to process their personal data for one or more processing activities.
Employment Equity Information- Race, Gender, Disability.	For our BBBEE certificate	To comply with the Broad-based Black Economic Empowerment Act of 2003
Other Information: Account information	For payment purposes	The data subject has given permission for the organisation to process their personal data for one or more processing activities.

BGR Alluvium Incorporated will keep your personal information confidential at all times, however, you agree and consent that BGR Alluvium Incorporated may:

- a) Communicate with you electronically in relation with the service or product being provided (email, fax, telephone or through any other relevant or secured electronic platform)
- b) Obtain any relevant personal information, from any person or institution, necessary to comply with the agreement between you and BGR Alluvium Incorporated
- c) Obtain credit information from any person or institution where necessary
- d) Verify the information provided herein and to contact other third party for purposes of the same
- e) Disclose personal information to regulatory or government agencies in accordance with the relevant legislation or directive
- f) Use personal information to market new or other products of the company which may be suitable or relevant to you

Individuals screened for COVID 19

The following needs to be explained verbally to anyone who needs to complete documentation with personal information for COVID 19 Screening. It may also be documented on the document to be completed:

The personal information collected is necessary to comply with the COVID 19 screening as required by the Disaster management Act and supplementary regulations and directives. This information will be kept confidential unless disclosure is required by law. E.g. should a positive case be identified. This information will be stored for a period of 6 months and thereafter be destroyed. If you do not provide the information as required, we can limit or refuse you access to the premises.

Consent

Where the legal basis for us processing your personal information is consent as above, it will be included in the contract or agreement concluded with you. This consent may be withdrawn at any time, however this withdrawal of consent will not make processing we undertook before your withdrawal unlawful. You will not suffer any detriment for withdrawing your consent.

You may withdraw your consent by contacting our information officer, whose details are provided at the beginning of the privacy policy.

Where the legal basis for processing is for the proper performance of the contract, and you fail to provide us with the information or request us to stop processing this information, it may create limitations on our performance of the contract or agreement.

Retention

BGR Alluvium Incorporated is required to comply with various different legislative retention periods, which leads to different retention requirements. As such we have opted for the longest retention period required from us for legal purposes and apply this to all our data. Your personal information will be kept for a period of 8 years in order for us to comply with all legal requirements.

Your legal rights

You have the following rights under the Protection of Personal Information Act:

- a) Request access to your personal information
- b) Request a correction or deletion of personal information
- c) Object to the processing of personal information
- d) Lodge a complaint to the Information Regulator

If you want to exercise any of the rights described above, or are dissatisfied with the way we have used your personal information, please contact the information officer.

Changes to this policy

This policy may change from time to time. The latest effective date will be highlighted at the start of the privacy policy.