

# Privacy Policy

## 1. Introduction

Barone, Budge & Dominick (Pty) Ltd and its affiliates, BBD Holdings (Pty) Ltd, BBD International (Pty) Ltd, BBD Management Services (Pty) Ltd and BBD India (collectively known as “BBD”) respect and acknowledge the importance of protecting your personal information. This Privacy Notice sets out how BBD will process your personal information in the ordinary course of conducting the business of BBD and in addition applies to BBD’s websites (including this site and [www.bbdsoftware.com](http://www.bbdsoftware.com)). This Notice is designed to inform you about the processing of your Personal Information and your rights regarding this processing according to the ‘Privacy Law’ of the countries in which BBD has an operating presence (‘Privacy Law’ is defined as including, but not limited to, the Protection of Personal Information Act No. 4 of 2013 (“POPI”) the General Data Protection Regulation (“GDPR”) and The UK Data Protection Act 2018 .

## 2. What personal information we collect

When you interact with us, we may collect Personal Information from you. You can choose not to provide Personal Information when requested. However, without your requested Personal Information, we may not be able to provide or continue to provide you with the products or services offered by BBD or allow you full access to our websites. We will only collect the minimum Personal Information that we deem necessary to process for ordinary business purposes. Personal Information we collect from you may include:

- your first and last or company name, email address, phone number and other contact information
- log-in and account information for authentication purposes and account access
- your marketing preferences
- demographic data such as your title, age, country and preferred language
- data about how you and your PC or device interact with BBD, including web pages you visit when you use our websites and device, connectivity, IP address and configuration data.

It is not standard practice for us to collect sensitive personal information about you, such as information relating to your health, religion, political beliefs, race or sexual orientation, except with your express consent or unless we are required to do so by law. If we link other data with your Personal Information as provided to us, we will treat that linked data as personal information.

## 3. How we collect Personal Information

We may collect your Personal Information in a variety of ways when you interact with us, including when:

- you engage us for provision of our products and services
- you create an account with us

- we respond to your inquiries and requests
- as a result of communications between you and our representatives
- we obtain feedback from you about our products and services
- we conduct our administrative and business functions
- you register for any of our events, workshops and seminars
- you subscribe to our mailing lists and newsletters
- we market our solutions and services to you
- you access and use our websites
- you apply for employment with us
- you apply for a bursary with us.

We may also collect your Personal Information from third party sources and third parties including public databases, business partners with whom we offer co-branded services or engage in joint marketing activities, and third parties that provide list enhancement or similar services, to the extent that this is permitted by applicable law.

#### **4. Purposes of processing**

We collect and use Personal Information to:

- send communications to you
- establish, manage, and maintain our business relationships
- respond to inquiries and requests
- develop, provide, and improve our services and products
- inform you about our services and solutions
- obtain feedback from you on our services and solutions
- provide you with a more personalised experience when you interact with us
- conduct administrative and business functions
- update our records and keep contact details up to date
- enable you effectively to use and to improve our website
- compile website usage statistics
- enable you to subscribe to newsletters and mailing lists
- enable you to register for BBD events, workshops and seminars
- recruit staff and bursars
- assess the performance of our websites and to improve their operation
- process and respond to privacy questions, concerns and complaints
- fulfil contractual obligations
- to comply with Regulatory and Legal requirements of the countries in which we operate.

#### **5. Sharing your Personal Information**

We may share your personal information for the purposes above with:

- Barone, Budge & Dominick (Pty) Ltd, BBD Holdings (Pty) Ltd, BBD International (Pty) Ltd, BBD Management Services (Pty) Ltd and BBD India who are similarly bound by this Privacy Notice

- business partners, vendors, or contractors to provide requested services or facilitate transactions, including but not limited to processing of orders, assisting with sales-related activities or post-sales support, and providing customer support. It is important to note that any third parties with whom we share personal information are contractually required to implement appropriate data protection and security measures and are not permitted to process personal information for any purpose other than the purpose for which they are given access
- in connection with, any joint venture, merger, sale of company assets, consolidation or restructuring, financing, or acquisition of all or a portion of our business by or to another company
- in response to a request for information by a competent authority in accordance with, or required by any applicable law, regulation or legal process
- where necessary to comply with judicial proceedings, court orders or government orders
- to protect the rights, property or safety of BBD, its business partners, you, or others, or as otherwise required by applicable law
- where you consent to the sharing of your personal information outside the parameters of this Notice.

## **6. Transfers for third parties**

While processing your Personal Information for the purposes indicated above, BBD may use the services of third parties. Thus, the third parties may receive or have access to your Personal Information.

When using the services of any third party BBD will ensure, contractually, that the third party will employ suitable technical and organisational measures to protect your Personal Information, as required by applicable law.

## **7. Cross-border data transfers**

It may be necessary for us to process your personal information in other countries, either to carry out your instructions or for ordinary business purposes. We ensure that these service providers process Personal Information in accordance with Privacy Laws and guidelines, or other legislation that guarantees an adequate data protection level. Transfers of Personal Information to other recipients is not performed without your consent, except where we are obliged to do so by law.

However, when making cross-border transfers of Personal Information, BBD will ensure that the third-party processor will contractually commit to employ suitable technical and organisational measures to protect your Personal Information as required by the applicable law, (hereinafter referred to as “Supplier Data Processing Agreements”) as well as other suitable safeguards recognised by Data Protection Laws.

For more information about appropriate safeguards for the international data transfer or a copy of them, please contact our Information Officer (see How to contact us in section 16 of this Privacy Notice).

## **8. Retention**

We retain your Personal Information for as long as is necessary to fulfil the purposes for which it was collected, or to comply with legal obligations, resolve disputes, protect our assets, or enforce agreements. Depending on the purpose, retention periods will vary. The criteria we use to determine retention periods include whether:

- we are under a legal, contractual, or other obligation to retain Personal Information including pursuant to data retention laws, as part of an investigation or for litigation purposes
- Personal Information is needed to provide our solutions and services business including performance improvement and to maintain accurate business and financial records
- there are automated means to enable you to access and delete your Personal information at any time. We will generally retain Personal Information for a shorter period, where this is not the case
- the Personal Information is sensitive Personal Information in which event we will generally retain this for a shorter period
- you have consented to us retaining your Personal Information for a longer retention period, in which case, we will retain Personal Information in line with your consent.

## **9. Security of your Personal Information**

BBD is committed to protecting your Personal information from misuse, loss, unauthorised access, modification or disclosure by using a combination of physical, administrative and technical safeguards and contractually requiring that third parties to whom we disclose your Personal Information do the same.

## **10. Direct marketing**

You can choose whether you wish to receive marketing communications from BBD by email, SMS and phone, or by following us on social media. Even when you have agreed to this, you may opt out of receiving future marketing materials from us at any time and manage your communication preferences by:

- following the unsubscribe instructions included in each marketing email or SMS text message from us, or
- unfollowing us on social media, or
- sending an email to [crm@bbdsoftware.com](mailto:crm@bbdsoftware.com), including your details and a description of the marketing material you no longer wish to receive from us.

We do not provide your Personal Information for direct marketing purposes or sell, rent, distribute or otherwise make Personal Information commercially available to any third party that is not affiliated to BBD.

## **11. Cookies and similar technologies**

When you access our website, we may use cookies (small text files containing a unique ID number which are placed on your PC or device) and similar technologies including scripts, embedded web links, web beacons, local shared objects (flash cookies) and local storage (HTML 5) to assist us to do things such as:

- enabling you to sign in
- authenticating you
- keeping track of information you have provided to us
- improving your browsing experience
- customising our interactions with you
- storing and managing your preferences and settings
- compiling statistical data
- analysing the performance and usability of our websites
- measuring website traffic patterns
- determining which areas of our website have been visited.

These technologies collect information that your browser sends to our website including your browser type, information about your IP address (a unique identifier assigned to your computer or device which allows your PC or device to communicate over the Internet), together with the date, time and duration of your visit, the pages you view and the links you click. Our websites may also contain web beacons or similar technologies from third party analytics providers, through which they collect information about your online activities across our websites to help us compile aggregated statistics about the effectiveness of marketing campaigns or other business operations.

You can decide which cookies you wish to accept by clicking on the 'settings' section of the pop up banner when you first visit our site – note there are some cookies which are essential for the operating of our site and cannot be disabled by using the settings function – however you can decline these and all other cookies on our site by changing the settings on your web browser.

On most browsers cookies are enabled by default. You can adjust the settings and options on your browser to disable or enable them or visit <https://www.aboutcookies.org> for detailed information about managing cookies on various browsers. Our website gives you control over the cookies we collect. Simply click the settings button when the cookies popup appears and follow the onscreen guide. Please be aware that restricting cookies may impact the functionality of our websites. We recommend that you allow Necessary Cookies.

## **12. Links to third party websites and applications**

Our websites may contain links to sites and applications operated by third parties. We make no representations or warranties in relation to the privacy practices of any third-party site or application and we are not responsible for any third-party content or privacy statements. Your use of such sites and applications is subject to the relevant third-party privacy statements.

### **13. Social media**

We operate and communicate through our designated channels, pages, and accounts on some social media sites to inform, help and engage with our users. We monitor and record comments and posts made about us on these channels so that we can improve our services. The general public can access and read any information posted on these sites. We are not responsible for any information posted on those sites other than the information posted by our designated officials. We do not endorse the social media sites themselves, or any information posted on them by third parties or other users.

When you engage with us through social media, your Personal Information may be processed by the site owner; this processing occurs outside of our control and may take place in a country outside South Africa that may have different privacy regulations.

We regularly update and monitor our social media accounts and welcome feedback and ideas sent to us through these channels. We try to join conversations whenever possible but cannot guarantee that we will read or reply to all messages sent to official BBD social media accounts.

Consistent feedback and helpful suggestions will be given to the relevant people within the company for consideration, but we cannot guarantee that any feedback or suggestions will be acted upon by BBD.

### **14. Your rights**

You can contact our Information Officer at any time using the contact information mentioned in clause 15 below to exercise your rights. These rights are the following:

- The right to information and transparency
- The right of access
- The right of rectification
- The right of erasure
- The right to object to processing
- The right to restrict processing
- The right of data portability
- The right not to be subject to automated decision-making.

### **15. Changes to our Privacy Notice**

We may update this Privacy Notice from time to time. Any updates of this Notice will be posted on the BBD websites, together with an updated revision date. Unless otherwise stated, any new Privacy Notice will supersede the previous Notice.

### **16. How to contact us**

If you have any questions about how your personal information is handled by BBD, you have a privacy concern or you wish to make a complaint, please contact our Information Officer on

[cio@bbdsoftware.com](mailto:cio@bbdsoftware.com). If, after, contacting us you are still not happy then you have the right to complain further with The Regulator of the country in which you reside.

- South Africa – Information Regulator SA (<https://justice.gov.za/inforeg/>)
- United Kingdom: ICO (<https://ico.org.uk/>)
- Netherlands: Autoriteit Persoonsgegevens (<https://autoriteitpersoonsgegevens.nl/en>)

## 17. Validity

This document is valid as of 15 May 2024.