



## Privacy Policy

### Stokdirect Virtual Wholesale (Pty) Ltd Privacy Statement

Protecting the individual's privacy on the Internet is crucial to the future of Internet-based business and the move towards a true Internet economy. We have created this Privacy Statement to demonstrate our firm commitment to the individual's right to privacy. This Privacy Statement outlines our handling practices with regard to such information that can be used to directly or indirectly identify an individual ("Personal Data").

This Privacy Statement applies to [www.stokdirect.africa](http://www.stokdirect.africa) and any other website which references this Privacy Statement. The data controller in the case of **[www.stokdirect.africa](http://www.stokdirect.africa)** is Stokdirect Virtual Wholesale (PTY) Ltd., **21 Aurora Drive, Umhlanga, Durban, South Africa, 4319**. Some Stokdirect Virtual Wholesale (Pty) Ltd entities, offerings, programs and/or websites may have their own, possibly different, privacy statements. We encourage you to read the privacy statements of each of the Stokdirect Virtual Wholesale (PTY) Ltd websites, offerings or programs you visit or review.

### Global Privacy Fundamentals

Our privacy practices set out herein reflect current global principles and standards on handling Personal Data. These principles include notice of data use, choice of data use, data access, data integrity, security, onward transfer, and enforcement/oversight. We abide by the privacy laws in the countries where we do business

### Consent

By using this website, you consent to the collection and use of your Personal Data as described herein. If you do not agree with the terms set out herein, please do not use this website

If we decide to make changes to this Privacy Statement, we will post the changes on this website so that you will always know what Personal Data we collect, and how we use it. We therefore encourage you to periodically look for updates to this Privacy Statement.

As may be required by applicable law, we may also seek your explicit consent to process certain Personal Data collected on this website or volunteered by you. Kindly note that any consent will be entirely voluntary. In case you do not grant the requested consent to the processing of your Personal Data or (in accordance with Subsection 10 (Data Retention) below) later inform Stokdirect that you do not want Stokdirect to further process your Personal Data, however, the (further) use of certain offerings or services of Stokdirect Virtual Wholesale (PTY) Ltd may be either not possible or limited in scope.

## **Collection and Processing of Your Personal Data**

To serve you better and understand your needs and interests, Stokdirect.africa collects, exports, and uses Personal Data with adequate notice (as set out herein) and, where legally required, consent, along with required filings with data protection authorities, when applicable.

When you visit our website, we may record your IP address and use cookies and other Internet technologies (referred to below as Automated Tools and Embedded Web Links) to gather information about our visitors and their interests. Depending on the Automated Tools used, the gathered data comprise, in addition to your IP address, the cloud identity we assign to you when you register with Stokdirect.africa, the type of browser you use, the Stokdirect Virtual Wholesale (PTY) Ltd websites you have visited, the objects you have clicked on a certain Stokdirect Virtual Wholesale (PTY) Ltd website, the time you have spent on a certain website, the referring website from which you have accessed a Stokdirect Virtual Wholesale (PTY) Ltd website and the foreign destination website which you access from a Stokdirect Virtual Wholesale (PTY) Ltd website. The technologies used and the information collected are described in more detail in Subsection 5 (Automated Tools) below. After you have granted your consent ( where legally required ), [www.stokdirect.africa](http://www.stokdirect.africa) may add information collected by way of Automated Tools to user profiles Stokdirect Virtual Wholesale (PTY) Ltd retains about you. Such additional information includes your user ID, website preferences and your interest in Stokdirect's products.

We may further collect and process any Personal Data that you volunteer to us, e.g. when you register for events or other offerings of Stokdirect Virtual Wholesale (PTY) Ltd, subscribe to newsletters, participate in online surveys, discussion groups, forums or Stokdirect's chat service, or when you make purchases or otherwise submit your contact details to [www.stokdirect.africa](http://www.stokdirect.africa). In case you provide Stokdirect Virtual Wholesale (PTY) Ltd with your IDs of social media, Stokdirect Virtual Wholesale (PTY) Ltd may retrieve publicly available information about you.

Such Personal Data will comprise in the individual case (a subset of): your first and last name, your postal and email address (as further detailed in Subsection 2. (Email Addresses) below), your telephone number, log in data for social networks, financial and banking details relevant to process

your order (as further detailed in Subsection 3. (Shopping or Event Registration) below), and certain information about the company you are working for (i.e. your company's name and postal address, your job title and seniority level) as well as information as to which relationship (i.e. which version of Stokdirect Virtual Wholesale (PTY) Ltd's terms of use you have accepted or what our choice regarding receiving marketing materials from [www.stokdirect.africa](http://www.stokdirect.africa) is) between Stokdirect Virtual Wholesale (PTY) Ltd and you exists.

## **Use and Purpose of Collected Personal Data**

The information Stokdirect Virtual Wholesale (PTY) Ltd collects to understand your needs and interests helps [www.stokdirect.africa](http://www.stokdirect.africa) deliver a consistent and personalized experience. We will use such information only as described in this Privacy Statement and/or in the way we specify at the time of collection. We will not subsequently change the way your Personal Data is used without your consent, as required by applicable law. We will exclusively use your Personal Data for the following purposes:

- To process your orders and deliver the products, services and information that you have ordered
- To keep you up to date on the latest product announcements, software updates, software upgrades, security patches, system enhancements, special offers, and other information regarding Stokdirect Virtual Wholesale (PTY) Ltd software and services. This may occasionally include information from other technology companies or business partners about products and services that can add value to your Stokdirect products. In this regard, you expressly acknowledge that your contact details may be shared by Stokdirect Virtual Wholesale (PTY) Ltd with such other companies of the Stokdirect Virtual Wholesale (PTY) Ltd group. Furthermore, you acknowledge that any information required to track your choices regarding receiving marketing materials (i.e. depending on the country where the relevant Stokdirect Virtual Wholesale (PTY) Ltd group company operates whether you have granted an explicit consent into receiving and/or opted-out of receiving marketing materials) may be stored and exchanged between any of the above mentioned companies
- To tailor information about our products and services to your individual interests. For example, during a visit to our website, it allows us to provide you with specific information on products and services that may be of interest;
- To provide the ability to create by way of the Stokdirect Virtual Wholesale (PTY) Ltd Cloud ID Service a single user profile which one individual can use within the whole Stokdirect Virtual Wholesale (PTY) Ltd group of companies to access web offerings and services. Therefore, you acknowledge that such Personal Data required for the creation of your user profile may be shared within and used by the whole Stokdirect Virtual Wholesale (PTY) Ltd group of companies for this purpose. Such service may also allow you to share information about you (including Personal Data) with other registered users of the same service. You can use the functionality of the relevant service to determine which information you want to share;
- Beyond the Stokdirect Virtual Wholesale (PTY) Ltd Cloud ID Service profile described in the bullet point above to provide the ability to create other user profiles and access to other service specific personal profile areas (e.g. in connection with Stokdirect's own partner

programs, forums and communities). Since such profiles may allow you to access services of different members of the Stokdirect Virtual Wholesale (PTY) Ltd group of companies you acknowledge that such Personal Data required for the creation of your user profile may be shared within and used by the whole Stokdirect Virtual Wholesale (PTY) Ltd group of companies for this purpose. Such service may also allow you to share information about you (including Personal Data) with other registered users of the same service. You can use the functionality of the relevant service to determine which information you want to share;

- To provide a personalized user experience and view protected content
- To conduct online "Click to Chat" and "Click to Call" sessions;
- In order to ensure and control the quality of the information and experience you have during chat sessions with [www.stokdirect.africa](http://www.stokdirect.africa) by educating our personnel to effectively answer your questions
- To provide the ability to contact you in order to respond to your inquiries, and provide you with shipping and billing information, and to provide customer feedback and support;
- To conduct questionnaires and surveys in order to provide better products and services to our customers and end users. Your completion of any questionnaires is voluntary;
- To support recruitment inquiries;
- To prepare anonymized data regarding the use of Stokdirect Virtual Wholesale (PTY) Ltd websites and offerings. Stokdirect Virtual Wholesale (PTY) Ltd will use such anonymized data only for the improvement of such websites and offerings
- To meet contractual obligations; and
- To comply with applicable regulatory requirements, in particular resulting from export laws. Stokdirect Virtual Wholesale (PTY) Ltd and its products, technologies and services are subject to the export laws of various countries, including without limitation, to those of the African Union and its member states, and the Republic of South Africa. You acknowledge that, pursuant to the applicable export laws, trade sanctions and embargoes issued by these countries, Stokdirect Virtual Wholesale (PTY) Ltd is required to take measures to prevent entities, organizations and parties listed in government issued sanctioned party lists from accessing certain products, technologies and services through Stokdirect Virtual Wholesale (PTY) Ltd websites or other delivery channels controlled by Stokdirect Virtual Wholesale (PTY) Ltd. You therefore acknowledge and agree that Stokdirect Virtual Wholesale (PTY) Ltd may (i) automatically check any user registration data and other information you provide about your identity against applicable sanctioned party lists; (ii) regularly repeat such checks whenever a sanctioned party list is updated or when you update your information; (iii) block your access to Stokdirect Virtual Wholesale (PTY) Ltd services and systems in case of a potential match; and (iv) in case of a potential match contact you in order to confirm your identity.

Stokdirect Virtual Wholesale (PTY) Ltd will only gather information related to your visit to the [www.stokdirect.africa](http://www.stokdirect.africa) site. We do not track or collect Personal Data from your visits to companies or entities outside the Stokdirect Virtual Wholesale (PTY) Ltd Group of companies beyond the information stated above in the Subsection III. **(Collection and Processing of Your Personal Data)**.

## **E-mail Addresses**

If you choose to give us your e-mail address, we will communicate with you via e-mail. We do not share your e-mail address with others outside the Stokdirect Virtual Wholesale (PTY) Ltd group of companies unless this is required for the business relationship between you and Stokdirect Virtual Wholesale (PTY) Ltd or if you register for third party services. You can choose not to receive any more e-mails at any time (in accordance with Subsection 9. (Choice/Opt-Out) below). However, such choice will not affect the sending of emails that are strictly required to perform the business relationship between you and [www.stokdirect.africa](http://www.stokdirect.africa).

If you choose to register for third-party services, we may need to send some information from your registration with Stokdirect Virtual Wholesale (PTY) Ltd to the service provider, possibly including your e-mail address

## **Shopping or Event Registration**

Our site includes order forms that you fill out to request information, products, and services. These forms may in addition to the information described above collect your financial information, such as your banking details or credit card numbers. Stokdirect Virtual Wholesale (PTY) Ltd ensures to use any financial information that you submit solely for billing and payment purposes for that special transaction. This may include the transfer of your data to third parties involved in executing the transaction, such as banks, credit card companies, payment facilitators and other financial and credit control institutions.

## **IP Addresses**

We use IP addresses to help diagnose problems, to establish the country from which a user is using our websites and services in order to provide appropriate legal statements, to administer our website, and to gather demographic information as further stated in the below Subsection 5 (Automated Tools). We may also use IP addresses or other information, as further explained in Subsection 5 (Automated Tools) below you have shared on this website or at any earlier occasion or a campaign code, to determine which pages on our sites you visit and which topics may be of interest to you so we can provide you with information about relevant products and services.

We may also use IP addresses or other information, as further explained in Subsection 5 (Automated Tools) below you have shared on this website or at any earlier occasion or a campaign code, to determine which pages on our sites you visit and which topics may be of interest to you so we can provide you with information about relevant products and services.

Stokdirect Virtual Wholesale (PTY) Ltd may also collect IP addresses (and other technical information such as browser type) during a Click-to-Chat or Click-to-Call session that you initiate. This information is collected when you connect to [www.stokdirect.africa](http://www.stokdirect.africa) so that we may identify your session, deliver content based on the technical capabilities of your browser, and for quality control purposes. Your IP address will not be used to identify you unless you provide your prior consent.

Stokdirect Virtual Wholesale (PTY) Ltd will only gather information related to your visit to the [www.stokdirect.africa](http://www.stokdirect.africa) site. We do not track or collect Personal Data from your visits to companies or entities outside the Stokdirect Virtual Wholesale (PTY) Ltd Group of companies beyond the information stated above in the Subsection III. (Collection and Processing of Your Personal Data).

## **Automated Tools**

In addition to the information you provide, Stokdirect Virtual Wholesale (PTY) Ltd may also collect information during your visit to [www.stokdirect.africa](http://www.stokdirect.africa) website through Automated Tools, which include Web beacons, cookies, embedded Web links, and other commonly used information-gathering tools. These tools collect certain standard information that your browser sends to our website such as your browser type and language, access times, and the address of the website from which you arrived at a Stokdirect Virtual Wholesale (PTY) Ltd website. Using these tools, Stokdirect Virtual Wholesale (PTY) Ltd is also able to confirm receipt of e-mails that the recipient consented to receive, and can track other information such as pages visited on the relevant [www.stokdirect.africa](http://www.stokdirect.africa) site and whether or not the recipient registers for an event offered by Stokdirect Virtual Wholesale (PTY) Ltd and certain other aggregate data that is not related to a particular individual.

Unless another means to make your choice is listed below, you may refuse the use of Automated Tools like cookies (i) if the relevant website supports Privacy Consent Manager by clicking on the respective link in the footer of the website or, (ii) if Privacy Consent Manager is not available, by selecting the appropriate settings in your browser. Kindly note that in the latter case the settings in your browser regarding cookies are limited to the particular browser installed on a particular device and that, as a consequence, if you visit Stokdirect' (PTY) Ltd websites with different browsers or different devices, you have to disable the tracking cookies in the browsers of all relevant devices. However, kindly further note that if you do this you may not be able to use the full functionality of the relevant site.

Stokdirect Virtual Wholesale (PTY) Ltd is in particular currently using the following Automated Tools for the purposes set out below.

## **Google Analytics**

Some websites which refer to this Privacy Statement use Google Analytics. Google Analytics uses cookies, which are text files placed on your computer to help the website analyze how users use the site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the website, compiling reports on site activity for site operators and providing other services relating to site activity and internet usage.

Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google.

## **Stokdirect Virtual Wholesale (PTY) Ltd Web Analytics**

Some websites which refer to this Privacy Statement use Stokdirect Virtual Wholesale (PTY) Ltd Web Analytics. Stokdirect Virtual Wholesale (PTY) Ltd Web Analytics helps to analyze how users use the relevant site. The information generated (including a part of your IP address and a browser-ID) will be transmitted to and stored by Stokdirect Virtual Wholesale (PTY) Ltd Analytics. Stokdirect Virtual Wholesale (PTY) Ltd Analytics will use this information only for the purpose of evaluating your use of the website and compiling reports on website activity for website operators – and finally, to improve Stokdirect Virtual Wholesale (PTY) Ltd websites.

Each website which uses Stokdirect Virtual Wholesale (PTY) Ltd Web Analytics contains a separate statement regarding such use and provides for an option of the user to opt-out of the tracking by Stokdirect Virtual Wholesale (PTY) Ltd Web Analytics either directly in the relevant statement or by way of the Privacy Consent Manager which can be reached over a link on the relevant page (where available)

## **Usage tracking for marketing purposes**

Stokdirect Virtual Wholesale (PTY) Ltd websites may collect the way you are accessing and using such websites by other means in order to prepare usage profiles that are used to determine which content is the most appropriate to be displayed while you visit a certain website.

In this case, Stokdirect Virtual Wholesale (PTY) Ltd is capturing your usage behavior (websites visited, point in time a website has been visited, activity on a website/clicks made on (objects of) a website, browser type, operating or computing system used, referring website from which you have accessed a Stokdirect Virtual Wholesale (PTY) Ltd website, the location from where you access a website) together with a unique identifier (like your IP address or a cookie ID) that allows Stokdirect Virtual Wholesale (PTY) Ltd to establish that there is a certain person active on its websites but no information like your name that can be used to directly identify you. Stokdirect Virtual Wholesale (PTY) Ltd will use the collected information only in order to display appropriate and relevant content on its websites.

You may opt-out of this tracking (i) if the relevant website supports Privacy Consent Manager by clicking on the respective link in the footer of the website or, (ii) if Privacy Consent Manager is not available, by selecting the appropriate settings in your browser. Kindly note that in the latter case the settings in your browser are limited to the particular browser installed on a particular device and that, as a consequence, if you visit Stokdirect Virtual Wholesale (PTY) Ltd websites with different browsers or different devices, you have to make the respective adjustments in the browsers of all relevant devices. However kindly further note that depending on the settings made in your browser(s) you may not be able to use the full functionality of the relevant site.

## **Embedded Web Links**



Emails from Stokdirect Virtual Wholesale (PTY) Ltd often use links designed to lead you to a relevant area on the Web, after redirection through Stokdirect Virtual Wholesale (PTY) Ltd servers. The redirection system allows Stokdirect Virtual Wholesale (PTY) Ltd to change the destination URL of these links, if necessary, and to determine the effectiveness of our marketing initiatives.

In emails, such links may also allow Stokdirect Virtual Wholesale (PTY) Ltd to determine if you have clicked on a link in the email, and the information about this interaction may be connected to your personal identity. If you do not want Stokdirect Virtual Wholesale (PTY) Ltd to collect information about the links you clicked, you can simply choose not to click on the links in an e-mail that Stokdirect Virtual Wholesale (PTY) Ltd sends you.

## **Cookies**

Cookies are identifiers that can be sent from a site via your browser to be placed on your computer's hard drive. [www.stokdirect.africa](http://www.stokdirect.africa) uses cookies to deliver personalized content, to save you having to re-enter your password or complete registration forms repeatedly, to keep track of your shopping cart, and to tailor our information offerings to how you and others use the site.

We offer to you the following option to make your choice regarding [www.stokdirect.africa](http://www.stokdirect.africa) use of cookies:

Some websites of Stokdirect Virtual Wholesale (PTY) Ltd provide you the option to accept the use of cookies. You may accept or refuse the use of cookies by selecting the appropriate settings in your browser. Kindly note that the settings in your browser regarding cookies is limited to the particular browser installed on a particular device and that, as a consequence, if you visit Stokdirect Virtual Wholesale (PTY) Ltd websites with different browsers or different devices, you have to disable the cookies in the browsers of all relevant devices. Furthermore, please note that if you disable cookies you may not be able to use the full functionality of a website.

Still have questions?

Email: [info@stokdirect.africa](mailto:info@stokdirect.africa)

1st Floor, Liberty Life Building  
21 Aurora Drive  
Umhlanga  
Durban  
4301

Stokdirect delivers innovative route-to-market for consumer goods producers in Africa.