

CONTINENTAL COMPOUNDERS' PRIVACY NOTICE

1. Introduction:

In the undertaking of its core business and in the creation of value for its stakeholders, **Continental Compounders (Pty) Ltd** may be required to process personal information of data subjects within the parameters of the law. This notice has been drafted to serve as **Continental Compounders'** policy statement to declare its intention to comply with the **Protection of Personal Information Act 4 of 2013** (hereafter '**POPIA**'). Furthermore, it provides insights on how the company processes the personal information of data subjects as set out in POPIA. This notice must be read in conjunction with **POPIA and its Regulations** where applicable.

In this notice, reference to **Continental Compounders** refers to the main manufacturing holding company, its subsidiaries and affiliates.

2. Who we are:

Continental Compounders is South Africa's leading specialty masterbatch and additives manufacturer. It does this by working together with its customers to make high quality custom PVC and thermoplastic compounds, tailored around the customers processes and products.

Continental Compounders also has a division dedicated to producing industrial-grade engineering thermoplastics. This division is known as **Continental Engineering Compounds**.

Together, **Continental Compounders** and **Continental Engineering Compounds** serve the following industries: automotive, cabling, confectionary, footwear, industrial, packaging and pharmaceutical to name but a few.

With a vision of becoming an industry-leading compound producer, **Continental Compounders** has managed to grow from its roots in Durban, KwaZulu-Natal and increased its distribution footprint to across the continents of both Africa and Europe. This has been achieved by use of over 40 years of experience and knowledge, surrounding the manufacturing of PVC and thermoplastic compounds.

By its continued growth, **Continental Compounders** is able to empower and uplift those within their employ and also create opportunities for others within the country.

3. The type of personal information we collect:

We currently collect and process the following information:

- i. Information that is necessary to enable **Continental Compounders** to effectively render a service in any manner required. This would include a data subject's name, identity number, car registration number, their employees or Director's personal and contact information etc.,
- ii. Electronic communications sent to **Continental Compounders**,
- iii. Information sent to **Continental Compounders** in response to a vacancy,
- iv. Technical information through the use of cookies retrieved when a data subject completes a form on the **Continental Compounders'** website, subscribes to a newsletter, alerts or other services from **Continental Compounders** or taking part in a competition, prize draw or survey,
- v. Information from the data subject's visits to the **Continental Compounders** website, including the type of browser and operating system that the data subject uses, access times, pages viewed, URLs clicked on, their IP address and the pages visited before and after navigating the CC website,
- vi. Social media tracking pixels that allow other social media platforms to interact with the **Continental Compounders** website and give feedback on the data subject's actions,
- vii. Device information including the unique device identifier, hardware model, operating system and version and mobile network information,
- viii. Personal information that **Continental Compounders** collects when it monitors other websites that may include the data subject's public personal information accessed when reviewing public comments made about **Continental Compounders** and the industries they serve,
- ix. Personal information that **Continental Compounders** collects when a data subject reports a possible adverse event or quality related concern, associated with one of its products, including information such as gender, date of birth, information about the data subject's manufacturing process and products,
- x. The **Continental Compounders** website uses various technologies including cookies which allow the website to recognise and respond to the data subject as an individual. The data subject may elect to decline cookies however not all elements of the website may function as intended, so their website experience may be affected.

4. How we get the personal information and what we use is for:

Most of the personal information we process is provided to us directly by you for one of the following reasons:

- i. Recruitment and onboarding processes,
- ii. Product quote requests,
- iii. Sales processing,
- iv. Product quality complaints and

- v. General enquiries made on the **Continental Compounders** website

We also receive personal information indirectly, from the following sources in the following scenarios:

- i. Market research conductors,
- ii. Distributors of our products,
- iii. Recruitment agencies and recruitment sites such as Pnet and LinkedIn.

We use the information that you have given us in order to:

- i. Share marketing communications about **Continental Compounders** and its products,
- ii. Contacting and interacting with the data subject for the following reasons:
 - Responding to queries from the data subject and
 - To provide important notices and updates, including but not limited to change to terms, standard operating procedures, policies, security alerts and administrative messages,
- iii. Operating **Continental Compounders'** business including:
 - Screening visitors on **Continental Compounders** premises through CCV footage, conducting searches for dangerous weapons and completing the attendance register for security purposes,
 - Complying with applicable laws, regulations and guidance, and
 - Complying with demands or requests made by the Regulators, courts and law enforcement authorities.
- iv. Advertising of vacancies,
- v. Improving **Continental Compounders'** internal day to day operations
 - For internal purposes such as auditing, data analysis and research to help **Continental Compounders** deliver and improve its digital platforms, content and services,
 - To monitor and analyse trends, usage and activities in connection with **Continental Compounders'** products and services to understand which parts of Continental Compounders' digital platforms and services are of the most interest and to improve the design and content of those platforms,
 - To improve **Continental Compounders'** products and services and communications to the data subject and
 - To ensure that **Continental Compounders** has up to date contact information for the data subject, where applicable.

We may share this information with:

- i. Agents and suppliers of **Continental Compounders**, including those who provide it with technology services such as data analytics, hosting and technological support,
- ii. **Continental Compounders'** advisors, auditors and various stakeholders,
- iii. Regulators, governments and law enforcement authorities and

- iv. Other third parties in connection with re-organising part or the whole of **Continental Compounders'** business.

5. When will we process your personal information:

In terms of **POPIA**, the justification grounds which we base the processing of a data subject's personal information consists of the following:

- i. The data subject or a competent person where the data subject is a child, **consents** to the processing,
- ii. The processing is **necessary** to carry out actions for the conclusion or performance of a contract to which the data subject is a party,
- iii. The processing complies with an **obligation** imposed by law on the business,
- iv. The processing protects a **legitimate** interest of the data subject,
- v. The processing is necessary for the proper performance of a **public law** duty by the business or,
- vi. The processing is necessary for pursuing the legitimate **interests** of the business or of a third party to whom the information is supplied.

It is important to note that a data subject has the right to withdraw their consent for the processing of their personal information.

6. How we store your personal information:

Your information is securely stored by the relevant departments which collect a data subject's personal information. **Continental Compounders** will always keep the personal information of a data subject for a period of time required by the law. This will include instances when there is a legal action or investigation in which the data subject's personal information is involved.

Continental Compounders will also keep the personal information of a data subject:

- for as long as needed to provide the data subject with access to services they have requested and
- where the data subject has contacted **Continental Compounders** with an enquiry or request, for as long as necessary to allow the company to respond.

Once the personal information of a data subject is no longer needed for the reasons listed above, we will dispose of your personal information within the next 30 working days.

7. Your data protection rights:

- i. You are entitled to access your personal data by sending a written request to the Information Officer. We may charge you a fee for this service.
- ii. You may also request **Continental Compounders** to correct or supplement any of your personal data which the Information Officer will undertake as soon as practicable.

- iii. Request the destruction of your personal data. The Information Officer in conjunction with the Deputy Information Officers will consider your request in light of any other laws or regulations prohibiting **Continental Compounders** from destroying your personal data.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us on 031 791 0600 if you wish to make a request.

8. Contact details:

Name: Wayne Heathcote

Address: 3 Joule Crescent, Mariann Industrial Estate, 3610

Phone Number: 031 791 0600

E-mail: wayne@compounders.co.za

9. How to complain:

If you have any concerns about our use of your personal information, you can make a complaint to us at info@compounders.co.za.

You can also complain to the Information Regulator if you are unhappy with how we have used your Information. Their contact details are as follows:

The Information Regulator (South Africa)

33 Hoofd Street

Forum III, 3rd Floor Braampark

P.O Box 31533

Braamfontein, Johannesburg, 2017

Complaints email: complaints.IR@justice.gov.za