

**DATA PRIVACY POLICY**  
**STEINHOFF INTERNATIONAL HOLDINGS PROPRIETARY LIMITED**  
**JULY 2021**



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## 1 INTRODUCTION

- 1.1 The protection of your personal information is very important. Personal information may be any form of data that could be used to uniquely identify you.
- 1.2 This Privacy Policy sets out important information on where and how we collect your personal information, what we do with it, how we protect it, and what your rights are. This policy applies to our operations.
- 1.3 If you have any questions about this privacy policy or how we use your personal data, please contact our Data Protection Officer by emailing - [informationofficer@steinhoffinternational.com](mailto:informationofficer@steinhoffinternational.com).

## 2 WHAT PERSONAL DATA DO WE COLLECT ABOUT YOU?

- 2.1 We collect the following personal data about you:
  - 2.1.1 your name, gender, address, contact details, date of birth, identity number, passport number, bank details, and information about relatives, where relevant;
  - 2.1.2 details of contracts, sales or leases concluded with us; and
  - 2.1.3 correspondence records.

## 3 WHERE DO WE OBTAIN YOUR PERSONAL DATA FROM?

- 3.1 We will collect your personal data in a number of ways.
  - 3.1.1 We collect your personal data directly from you when you interact with us, when you contact us by email, phone, or submit personal data online.
  - 3.1.2 We also generate payment and transaction data as a function of providing a service to you.
  - 3.1.3 If you contact us via social media we may collect available details from your social media account.



3.1.4 In addition, we may also collect information about you from our professional advisors or from public records (e.g. information openly available via the internet), although we will only do this where it is necessary for the provision of services to you, where we have a legitimate interest in doing so or where we have a legal duty in the investigation and prevention of money laundering and financial crime.

3.1.5 When you visit our websites or open emails from us, we collect information about your website use and email viewing so we can improve our services.

3.1.6 For more information about how we collect this information please see our Cookie Policy.

#### **4 HOW WE USE YOUR PERSONAL DATA?**

4.1 We use your personal data in the following ways –

4.1.1 to validate your identity;

4.1.2 to provide you services;

4.1.3 to deal with requests you send us and respond to your queries;

4.1.4 to maintain your account;

4.1.5 to tell you about other related services;

4.1.6 for trend analysis to help us develop and improve our products and services;

4.1.7 to comply with our legal and regulatory obligations, for example, transaction reporting under rules imposed by the Financial Conduct Authority;

4.1.8 to deal with any complaints or legal claims;

4.1.9 to detect, prevent and report fraud and financial crime; and



- 4.1.10 to manage our business in an efficient and proper manner, including the management of our financial position, our resources, the risks to which we are exposed and the way in which we arrange our internal operations.

## **5 ON WHAT LAWFUL BASIS DO WE PROCESS YOUR INFORMATION?**

- 5.1 Where we process your personal information, we do so in accordance with applicable privacy laws. The most common legal bases we rely on are –

- 5.1.1 Consent - You have told us you are happy for us to process your personal information for a specific purpose.

- 5.1.2 Legitimate Interests - The processing is necessary for us to conduct our business or to defend our interests, but not where our interests are overridden by your interests or rights.

- 5.1.3 Performance of a contract - We must process your personal information in order to be able to provide you with one of our products or services.

- 5.2 Although less common, there may be circumstances when other legal bases are appropriate -

- 5.2.1 Data Subject legitimate/vital interest - The processing of your personal information is necessary to protect you or in your legitimate/vital interest.

- 5.2.2 Legal obligation - We are required to process your personal information by law.

## **6 HOW DO WE SHARE YOUR PERSONAL DATA?**

- 6.1 In some situations we work with external service providers.

- 6.2 External service providers may only use your data for the purposes of performing the relevant services.



6.3 External service providers may not, therefore, use this data for their own purposes or forward it to others.

6.4 We may share your personal data with other companies to help us deliver services to you including –

6.4.1 group companies who help us administer our services;

6.4.2 companies who help us provide services to you;

6.4.3 companies who help us with administrative services, including mailing services and IT services; and

6.4.4 companies who help us with marketing activities, where you have provided consent to this.

6.5 Where we share your personal data with other companies to provide services to you, we ensure they have adequate safeguards to protect your personal data.

6.6 We will also share your personal data in the following circumstances -

6.6.1 Where we need to do so to comply with our legal or regulatory obligations (which may include sharing information with regulators, auditors, government bodies or law enforcement agencies).

6.6.2 Where necessary, to protect or defend our legal rights or the legal rights of another company or person.

6.6.3 If our business, or any part of it, is transferred or sold, we will transfer your personal data to the company taking over our role, which could include a purchaser or the provider replacing us.

6.6.4 We will never sell your information to anybody for unsolicited marketing.



## **7 HOW LONG DO WE KEEP YOUR PERSONAL DATA FOR?**

We keep your personal data for as long as we need to for the purposes for which it was collected or (if longer) for any period for which we are required to keep personal data to comply with our legal and regulatory requirements.

## **8 WHERE IS YOUR DATA STORED?**

8.1 We use various applications for obtaining and storing certain data.

8.2 We only use companies that provide sufficient protection in line with European legislation.

## **9 DO WE TRANSFER YOUR PERSONAL DATA OVERSEAS?**

9.1 We may administer accounts and provide you with some services through another member of the group, or another company which is based in a country where data protection laws and standards differ from those in your home jurisdiction.

9.2 If you are in Europe this means we may send your personal data to countries outside the European Economic Area.

9.3 Where we send your personal data to another country, we will always ensure adequate measures are in place to safeguard it and to ensure you can exercise your rights effectively.

9.4 If you would like more information about transfers to other countries and the ways in which we protect your personal data, please contact our Data Protection Officer by emailing [informationofficer@steinhoffinternational.com](mailto:informationofficer@steinhoffinternational.com).

## **10 HOW DO WE SECURE YOUR DATA?**

10.1 We use appropriate technical and organisational measures to protect personal information under our control.

10.2 We implement security measures appropriate to the nature of the processing and regularly review these measures to ensure they remain appropriate.



## **11 YOUR RIGHTS ACCESSING YOUR INFORMATION**

11.1 You have a number of rights under applicable privacy laws which you may be able to exercise in relation to the personal information we process about you. These include –

11.1.1 the right to access a copy of the personal information we hold about you;

11.1.2 the right to correction of inaccurate personal information we hold about you;

11.1.3 the right to restrict our use of your personal information;

11.1.4 the right to have your personal data deleted;

11.1.5 the right of data portability; and

11.1.6 the right to object to our use of your personal information.

## **12 COMPLAINTS**

12.1 If you have any complaints about the way we use your personal data please contact our Data Protection Officer who will try to resolve the issue.

12.2 You also have the right to complain to the data protection supervisory authority in your country.

12.3 If you need more information about how to contact your local data protection authority, please let us know by contacting our Data Protection Officer.

## **13 WHO IS RESPONSIBLE FOR YOUR DATA?**

The party responsible for processing your personal data (the controller) is Steinhoff International Holdings Proprietary Limited.

## **14 CAN CHANGES BE MADE TO THIS PRIVACY POLICY?**

14.1 Yes, this privacy policy can be updated. We recommend that you read this privacy policy at regular intervals.





14.2 In the event of any significant changes we will notify you separately.

14.3 To contact us about the way your data is used, you can use the following contact information –

14.3.1 Attention - The Data Protection Officer

14.3.2 Email address - [informationofficer@steinhoffinternational.com](mailto:informationofficer@steinhoffinternational.com)