



PROTECTION OF PERSONAL INFORMATION STATEMENT

1. Introduction

This Protection of Personal Information (POPI) statement forms part of the Thorburn website [terms and conditions](#). It seeks to explain how Thorburn may use Personal Information (PI) collected from you when you use our website. If you do not agree with any term/s of this POPI statement, you must cease your access of this website immediately.

2. Collection

We collect PI directly from you, and where lawful and reasonable, we may collect PI about you from third parties and publicly available sources. We may passively collect information from you and store that information on our server logs, including your internet protocol address ("IP address"), browser type, operating system, device identifier, device model, software version, or mobile or ISP carrier information.

3. Use and Management of Cookies

When you visit any of our Thorburn websites, it may store or retrieve information on your browser, mostly in the form of cookies and other related technologies that will allow our websites to remember you and how you've used the sites every time you come back. This information might be about you, your preferences or your device and is mainly used to give you a more personalised web experience, to improve site performance, to track the effectiveness and relevance of marketing and communication materials shared with you and to analyse the number of people looking at our webpages.

The information does not usually directly identify you, but it is recommended for a more bespoke web experience.

We respect your right to privacy, therefore you have the option to accept or decline the use of cookies when visiting any of our Thorburn websites for the first time. Declining cookies will not deny you access to any of the information on our sites, but it may have an impact on your user experience. At any point in time, you also have the right to disable any cookie information stored on your devices as per the standard guidelines associated with the browser you utilise.

4. Processing

The processing of your information will align to the Protection of Personal Information Act. Thorburn will only process your personal information, where it is lawful to do so. We will not process your PI for a purpose which is incompatible with the purpose for which it was collected unless you have agreed to an alternative purpose or Thorburn is permitted in terms of national legislation of general application dealing primarily with the protection of personal information. In instances where you have the right to object to the processing of your personal information, such requests must be submitted to us in writing.



5. Disclosure

Thorburn will only disclose your personal information if you have agreed that we may disclose your personal information, where we have a duty or a right to disclose in terms of legislation or industry codes as well as where we believe it is necessary to protect our rights.

6. Third Parties

Thorburn will share your Personal Information with its Third Parties, i.e. Service Providers, affiliates and other trusted businesses or persons, only for the purpose of processing your Personal Information in compliance with this Statement.

Prior to sharing your PI with a Third Party, Thorburn will conduct a due diligence to identify any possible risks posed by inadequate controls.

All Third Parties who process PI will do so under a written contractual arrangement which will include obligations on the Third Party in terms of the Protection of Personal Information Act.

Thorburn will not share your information with any Third Party that does not comply with the terms of our POPI Policy.

7. Security Safeguards

We are legally obliged to provide adequate protection for the personal information we hold and to prevent unauthorised access and use of your personal information. We will take all the reasonably necessary technical and organisational measures to protect your personal information in accordance with our IT Information Security Policy, Cyber Security Policy and continue to review our security controls and related processes to ensure that your personal information is secure.

8. Retention

Thorburn will only keep your personal information for:

- as long as necessary for the purposes for which it is processed
- as long as we have an ongoing relationship with you
- as long as needed to provide services to you, and/or
- as long as necessary to comply with legal and contractual obligations.

9. Marketing

We may use your personal information to market our products and services to you. When we do, we will do so in person, by post, telephone, or electronic channels such as SMS, email and fax.

If you are not our customer, or in any other instances where the law requires, we will only market to you by electronic communications with your consent.

In all cases, you can revoke your consent to marketing communications to you at any time.

10. Access to your Personal Information

Thorburn recognises your rights to access all the personal information that we may hold about you and our responsibility to enable you to access this information. To this end, you may request access through our Personal Information Officer in writing at POPI@tsebo.com.



11. Correction of your Personal Information

You have the right to request us to update, correct or delete your personal information. You may do so in writing by contacting us at the numbers/addresses provided below.

We will take all reasonable steps to confirm your identity before making changes to personal information we may hold about you.

We would appreciate it if you would keep your personal information accurate. Please update your information by contacting us at the numbers/addresses provided below.

12. Changes to this Statement

Please note that we may amend this Statement from time to time. Please check this website periodically to inform yourself of any changes.

13. Contacting Us

If you have questions about this Statement or believe we have not adhered to it, or need further information about our POPI standards or wish to give or withdraw consent, exercise preferences or access or correct your personal information, please contact us at the following numbers/addresses:

Personal Information Officer

Tel: 011 441 5300

Email: POPI@tsebo.com

14. Contacting the Information Regulator

You have the right to complain to the Information Regulator, whose contact details are:

The Information Regulator

JD House,
27 Stiemens Street,
Braamfontein,
Johannesburg,
2001

Tel: +27 (0) 10 023 5200

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

General enquiries email: inforeg@justice.gov.za