

PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT 4 OF 2013) POPIA POLICY

Company Name: JWN Marketing (Pty) Ltd
T/A Jewellers Network
Registration Number: 2011/121397/07
Information Officer: Jacoline Nelson

1. Purpose

Jewellers' Network is committed to protecting the privacy, confidentiality, integrity and security of personal information in accordance with the Protection of Personal Information Act, No. 4 of 2013 ("POPIA").

The purpose of this Policy is to ensure compliance with POPIA, regulate the collection, use, storage and sharing of personal information, protect the rights of data subjects, establish procedures for the lawful processing of personal information and promote responsible information management throughout the organisation.

2. Scope

This Policy applies to all personal information processed by Jewellers' Network in the course of its business activities. It applies to directors, management, employees, contractors, members, advertisers, suppliers, newsletter subscribers, website users, event attendees, referral platform participants, prospective members and customers, and any other individual or organisation whose personal information is collected, used, stored or otherwise processed by the Company.

This Policy further applies to all third-party operators, service providers and business partners who process personal information on behalf of Jewellers' Network, including providers of website hosting, email marketing, payment processing, cloud storage, information technology support and related services.

The Policy governs the processing of personal information in all formats, including electronic records, paper-based records, website information, social media interactions, newsletter databases, membership records, referral network records and any other information held by or on behalf of Jewellers' Network.

3. Definitions

For the purposes of this Policy, the following terms shall have the meanings assigned to them below:

Personal Information means information relating to an identifiable, living natural person and, where applicable, an identifiable existing juristic person. Personal information includes, but is not limited to, names, contact details, identification numbers, email addresses, company information, online identifiers, correspondence, membership information and any other information that can be used to identify a person or organisation.

Data Subject means the natural or juristic person to whom the personal information relates and whose personal information is processed by Jewellers' Network.

Processing means any operation or activity concerning personal information, whether by automated or non-automated means. This includes the collection, receipt, recording, organisation, storage, updating, retrieval, use, dissemination, distribution, sharing, merging, restriction, deletion, destruction or disposal of personal information.

Operator means a natural or juristic person who processes personal information on behalf of Jewellers' Network in terms of a contract or mandate, without coming under the direct authority of the Company. Operators may include website hosting providers, cloud service providers, email marketing platforms, payment processors, information technology support providers and other third-party service providers.

Information Officer means the person appointed by Jewellers' Network in terms of the Protection of Personal Information Act, 2013, who is responsible for encouraging compliance with POPIA and PAIA, managing requests relating to personal information, addressing privacy-related concerns and acting as the liaison between the Company and the Information Regulator.

The Company means JWN Marketing (Pty) Ltd T/A Jewellers' Network and includes its directors, employees, authorised representatives and any person acting on its behalf.

Member means any individual, business or organisation registered with or participating in the Jewellers' Network membership programme, referral network or related services offered by the Company.

Consent means any voluntary, specific and informed expression of will in terms of which a data subject agrees to the processing of their personal information.

Direct Marketing means any communication directed to a data subject, whether by electronic communication or other means, for the purpose of promoting or offering products, services, events, publications, membership benefits or other business-related opportunities offered by Jewellers' Network.

4. Information Officer

The Information Officer is responsible for monitoring POPIA compliance, developing and implementing privacy procedures, handling information requests, managing security incidents and data breaches, and liaising with the Information Regulator.

Information Officer

Name: Jacoline Nelson

Position: Information Officer

Email: sales@jewellersnetwork.co.za

Telephone: (010) 030-0888

5. Personal Information Collected

Jewellers' Network may collect, receive, record and process personal information that is necessary for the operation of its publication, membership, networking, referral, advertising and marketing activities. The type of personal information collected will vary depending on the nature of the relationship between the Company and the data subject.

Membership Information

The Company may collect personal information relating to members, including full names, contact names and surnames, identity numbers or company registration numbers where required, telephone numbers, cellular numbers, email addresses, physical and postal addresses, company information, membership status, membership category and records relating to participation in membership services and activities.

Subscriber Information

Where individuals subscribe to newsletters, publications or marketing communications, the Company may collect and process personal information such as names, email addresses, communication preferences and records relating to subscription activity, engagement and communication history.

Referral Network and Networking Information

As part of its industry networking and referral activities, Jewellers' Network may collect and process member profile information, business information, referral submissions, networking interactions, communication records, recommendations, testimonials, user-generated content and other information voluntarily submitted through referral, networking or industry engagement initiatives.

Advertising and Business Information

The Company may collect and process information relating to advertisers, sponsors, suppliers and business partners, including company names, representative contact details, billing and payment information, advertising records, sponsorship information, campaign information, contractual records and correspondence exchanged in the course of business.

Website and Digital Platform Information

When individuals visit the Company's website or utilise its digital platforms, certain information may be collected automatically. This may include IP addresses, browser information, device information, operating system information, cookie data, website usage statistics, user activity records and website analytics data collected through services such as Google Analytics or similar technologies.

Social Media and Marketing Information

The Company may collect and process information made available through social media platforms and other marketing channels. This may include usernames, public profile information, engagement data, comments, messages, competition entries, promotional information, campaign participation records and interaction data obtained through platforms such as Facebook, Instagram, LinkedIn, YouTube and the Company's website.

Communications and Enquiries

The Company may retain records of communications submitted through contact forms, email correspondence, social media interactions, event registrations, customer service enquiries and other communications exchanged with members, subscribers, advertisers, suppliers or members of the public.

6. Lawful Grounds for Processing

Personal information will only be processed where consent has been obtained, processing is necessary for contractual obligations, is required by law, where processing protects a legitimate interest of the data subject or where processing is necessary for the legitimate interests of Jewellers' Network.

7. Purpose of Processing

Jewellers' Network processes personal information for legitimate business purposes and only to the extent necessary to conduct its operations and provide its services.

Personal information may be processed for the administration of memberships, the management and distribution of newsletters, publications and industry communications, the facilitation of networking and referral opportunities, the provision of advertising and promotional services, the management of events and industry initiatives, responding to enquiries and requests, maintaining business relationships, processing payments and contractual obligations, managing supplier and service provider relationships, administering the Company's website and digital platforms, conducting marketing and audience engagement activities, improving services and user experience, complying with legal and regulatory requirements, and protecting the legitimate interests of the Company and its stakeholders.

Jewellers' Network will only process personal information for purposes that are lawful, reasonable and relevant to its business activities and in accordance with the requirements of POPIA.

8. Consent

Where the processing of personal information is based on consent, such consent shall be obtained voluntarily, specifically and on an informed basis. Jewellers' Network will take reasonable steps to ensure that data subjects understand the nature and purpose of the processing before providing their consent.

The Company will maintain records of consent where reasonably practicable and appropriate to do so.

A data subject may withdraw their consent at any time by notifying the Company in writing. The withdrawal of consent will not affect the lawfulness of any processing conducted prior to the withdrawal of such consent, nor will it affect any processing that is permitted or required by law on another lawful basis.

9. Direct Marketing

Jewellers' Network may communicate with existing members, customers and subscribers regarding similar products, services, events, publications, membership benefits and industry-related opportunities. The Company may also send marketing and promotional communications to individuals who have provided their consent to receive such communications.

Such communications may be distributed through various channels, including email newsletters, WhatsApp groups or channels, Facebook, Instagram, LinkedIn, YouTube, the Company's website and other electronic communication platforms used by the Company from time to time.

Where required by law, direct marketing communications will only be sent with the consent of the data subject or where another lawful basis for processing exists. Individuals may choose to opt in to receive communications and may withdraw their consent or opt out at any time.

Newsletter subscriptions, WhatsApp groups and other communication channels will, where applicable, provide a clear mechanism for joining, unsubscribing or withdrawing from marketing communications. The Company will maintain records of marketing preferences and will take reasonable steps to ensure that such preferences are respected and implemented.

The Company will not sell or distribute personal information to third parties for their independent marketing purposes without the consent of the data subject, unless otherwise permitted by law.

10. Special Personal Information

The Company does not intentionally collect or process Special Personal Information as defined in the Protection of Personal Information Act, 2013.

Should Special Personal Information be provided to the Company, or where the collection and processing of such information becomes necessary for a lawful purpose, Jewellers' Network will only process such information in accordance with the requirements of POPIA and any other applicable legislation. Appropriate safeguards will be implemented to protect such information and ensure that it is processed lawfully and only for the purpose for which it was collected.

11. Information Sharing

Jewellers' Network may share personal information with trusted third-party service providers where such disclosure is necessary for the operation of its business, the provision of its services, or the fulfilment of its legal and contractual obligations. These service providers may include website hosting providers, email marketing and newsletter distribution platforms, payment processors, cloud storage providers, information technology service providers, professional advisers and other service providers who assist the Company in carrying out its activities.

Personal information may also be disclosed to regulatory authorities, law enforcement agencies, courts, tribunals or other authorised bodies where required by law, regulation, legal process or a lawful request.

Where necessary for the delivery of services, the facilitation of business relationships, membership activities, referral initiatives or industry networking opportunities, personal information may be shared with business partners or affiliated service providers. In such instances, the Company will take reasonable steps to ensure that appropriate confidentiality, security and data protection obligations are in place.

The Company will not sell, lease or otherwise make personal information available to third parties for their independent marketing purposes without the consent of the data subject, unless such disclosure is permitted or required by law.

12. Cross-Border Information Transfers

Where personal information is transferred to, stored in or processed in a country outside South Africa, Jewellers' Network will take reasonable steps to ensure that such information receives an adequate level of protection and is processed in accordance with the requirements of POPIA.

The Company will only transfer personal information to third parties located outside South Africa where appropriate safeguards are in place, where the recipient is subject to laws, binding agreements or security standards that provide an adequate level of protection, or where the transfer is otherwise permitted under POPIA.

The Company will take reasonable steps to ensure that service providers who process personal information on its behalf maintain appropriate technical and organisational security measures to protect such information against loss, unauthorised access, disclosure, alteration or destruction.

13. Security Safeguards

Jewellers' Network is committed to protecting personal information against loss, unauthorised access, misuse, disclosure, alteration and destruction. The Company will implement and maintain appropriate technical and organisational measures designed to safeguard personal information and reduce the risk of security incidents, data breaches and other cybersecurity threats.

Such measures may include, but are not limited to, access control procedures, password protection, user authentication measures, data encryption where appropriate, firewall and antivirus protection, secure data storage practices, confidentiality obligations imposed on employees and service providers, and the regular review of information security processes and controls.

Where personal information is processed by third-party operators or service providers on behalf of the Company, Jewellers' Network will take reasonable steps to ensure that such parties implement and maintain appropriate security measures to protect the personal information entrusted to them.

The Company will review and update its security measures from time to time to address evolving operational requirements, technological developments and emerging risks.

14. Retention of Information

Jewellers' Network will retain personal information only for as long as is necessary to fulfil the purpose for which it was collected, to comply with applicable legal, regulatory, accounting or reporting obligations, or to support legitimate business requirements. The retention period may vary depending on the nature of the information and the relationship between the Company and the data subject.

Client, member, subscriber, advertiser, supplier and marketing contact records are primarily stored in the Company's digital customer relationship management system, GoldMine, and may also be stored in other authorised business systems used by the Company. Such records will be retained only for as long as is reasonably required for business, operational, contractual, legal and regulatory purposes.

Once personal information is no longer required, Jewellers' Network will take reasonable steps to securely delete, destroy, archive or anonymise the information in accordance with its record retention practices and applicable legal requirements. Access to retained information will be limited to authorised individuals who require such access for legitimate business purposes.

15. Data Subject Rights

In accordance with POPIA, data subjects have the right to request confirmation as to whether Jewellers' Network holds personal information relating to them and to request access to such information. Data subjects may also request the correction, updating or deletion of personal information that is inaccurate, incomplete, irrelevant, excessive, outdated or obtained unlawfully, subject to any legal or contractual obligations that may require the retention of such information.

Data subjects have the right to object, on reasonable grounds, to the processing of their personal information in certain circumstances and may withdraw any consent previously provided for the processing of their personal information, subject to any lawful basis that permits continued processing.

Requests relating to personal information, including requests for access, correction, deletion, objection or withdrawal of consent, must be submitted to the Information Officer in writing. The Company will consider and respond to such requests in accordance with the requirements of POPIA and any other applicable legislation.

16. Data Breaches

Jewellers' Network takes the security of personal information seriously and requires that any actual, suspected or potential data breach, security incident or unauthorised access to personal information be reported immediately to the Information Officer for investigation and assessment.

Upon becoming aware of a data breach, the Company will take reasonable steps to contain the breach, assess the nature and extent of the incident, mitigate any potential harm and prevent a recurrence where possible.

Where required by POPIA, Jewellers' Network will notify the Information Regulator and affected data subjects as soon as reasonably possible and, in the manner prescribed by law. Such notifications shall include sufficient information to enable affected individuals to take

appropriate measures to protect themselves against any potential adverse consequences arising from the breach.

The Company will maintain records of data breaches and security incidents and will review its security measures and procedures following any such incident to strengthen the protection of personal information.

17. Referral Platform Rules

Users of the Company's referral platform, networking services and related digital channels are responsible for ensuring that any information submitted, shared or published by them is accurate, lawful and provided with the necessary authority or consent where it relates to another person or business.

Users must respect the privacy and confidentiality rights of other individuals and may not submit, distribute or publish information that is unlawful, misleading, defamatory, inaccurate or otherwise contrary to applicable laws, including POPIA.

Where personal information is shared through the referral platform or networking activities, users are responsible for ensuring that such information is disclosed in accordance with applicable privacy and data protection requirements.

As part of its membership, networking and referral services, Jewellers' Network may, where appropriate and in the ordinary course of its business, facilitate introductions, referrals and recommendations between members, advertisers, suppliers, service providers and prospective clients. Such referrals will be made using information that has been lawfully obtained and processed in accordance with this Policy and applicable legislation.

Jewellers' Network reserves the right to monitor, restrict, remove or delete any content, information or user activity that it reasonably believes contravenes this Policy, applicable legislation, or the legitimate interests of the Company or its users.

18. Social Media

Jewellers' Network maintains a presence across various social media and digital platforms, including Instagram, Facebook, LinkedIn, YouTube and its website, to promote industry engagement, disseminate information, market its services, communicate with members and subscribers, and support its publishing and networking activities.

Personal information made available through these platforms may be collected and processed for purposes including community engagement, customer support, responding to enquiries, facilitating referrals and networking opportunities, distributing industry news and updates, conducting competitions and promotions, measuring campaign effectiveness, and performing analytics and audience measurement activities.

Any information voluntarily posted, shared or communicated by users through social media platforms may become publicly available depending on the privacy settings of the relevant platform. Users are encouraged to exercise discretion when sharing personal information through public forums and social media channels.

Social media platforms operate independently of Jewellers' Network and are governed by their own terms, conditions and privacy policies. The Company has no control over the privacy practices of these third-party platforms and encourages users to review their respective privacy policies before engaging with them.

19. Complaints

Any concerns regarding privacy or the processing of personal information should first be directed to the Information Officer.

If a data subject is dissatisfied with the manner in which Jewellers' Network has processed their personal information or handled a privacy-related complaint, they may lodge a complaint with the Information Regulator of South Africa.

Information Regulator (South Africa)

JD House, 27 Stiemens Street, Braamfontein, Johannesburg

Website: www.inforegulator.org.za

Email: POPIAComplaints@inforegulator.org.za

20. Policy Review

This Policy shall be reviewed at least annually to ensure its continued effectiveness and compliance with applicable legislation, regulatory requirements and business practices.

The Policy may also be reviewed and updated whenever there are material changes to applicable laws or regulations, significant changes to the Company's operations, the implementation of new systems or technologies, the introduction of new products, services or processing activities, or where privacy, security or compliance risks have been identified.

Any amendments to this Policy will be approved by management and communicated to relevant employees, contractors and other affected stakeholders where appropriate. The most current version of the Policy shall remain available upon request and, where applicable, on the Company's website.

Contact Details

All POPIA-related enquiries should be directed to:

Information Officer: Jacoline Nelson

JWN Marketing (Pty) Ltd

T/A Jewellers Network

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