



Personal Information Privacy Notice

Complete Hairdressing Supplies (Pty) Ltd ("**Complete Supplies**") was established in 1987, after we noticed there was a limited choice of quality hairdressing equipment in South Africa. Our aim is to search for the finest hairdressing equipment from around the world and supply it to our stylists and clients.

Complete Supplies is a "**Responsible Party**" under the Protection of Personal Information Act 4 of 2013 ("**the POPIA**"). As Responsible Party, Complete Supplies determines the purpose of and means for "**Processing**" the "**Personal Information**" of "**Data Subjects**."

"**Processing**" (and its cognates) means anything that can be done with Personal Information, including its collection, receipt, recording, organisation, collation, storage, updating, modification, retrieval, alteration, consultation, dissemination, merging, linking, restriction, degradation, erasure, destruction, or usage in any other manner whatsoever.

"**Personal Information**" means (amongst other) the types of information as listed in the POPIA, relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person.

"**Data Subjects**" means the persons (natural or juristic) to whom Personal Information relates. This includes (amongst other) Complete Supplies' customers, suppliers, service providers, job applicants, apprentices, stylists, employees, directors, shareholders and users of this website.

When does Complete Supplies Process the Personal Information of Data Subjects?

As Responsible Party, Complete Supplies undertakes to only Process the Personal Information of Data Subjects, when:

- **It is necessary for Complete Supplies to discharge its contractual obligations.** In some circumstances, Complete Supplies must Process Personal Information to discharge its contractual obligations. For example, to make statutory payments to the South African Revenue Services (SARS) on behalf of its employees, Complete Supplies must Process their Personal Information (i.e., title, name, surname, and national identification number).
- **Data Subjects consent.** This is when Data Subjects consent to Complete Supplies Processing their Personal Information for a specified purpose. For example, to send stylists and other customers information on promotions and new services & products (where they have opted to receive marketing communications from Complete Supplies), their Personal Information (i.e., title, name, surname, email address) will be Processed.

T: +27 11 791 3391 | F: +27 11 793 4711 | P.O Box 84164, Greenside, Johannesburg, South Africa, 2034
14 Tungsten Industrial Park, CR Swart Drive, Strijdom Park, Johannesburg, 2169, South Africa

Director: Byron Mayer | Reg. no. : 1988/001080/07

- **It is necessary for Complete Supplies to discharge its statutory obligations.** If the law requires Complete Supplies to do so, it may need to Process Data Subjects' Personal Information. For example, when Complete Supplies has to report transactions that appear suspicious under the Financial Intelligence Centre Act 38 of 2001.
- **Complete Supplies is pursuing its legitimate business interests or to protecting Data Subjects' legitimate interest.** For example, when booking appointments for customers or responding to customers' queries, product-related requests and/or complaints, Complete Supplies has to Process their Personal Information (i.e., title, name, surname, gender, telephone number, email address, email correspondence). Complete Supplies may also use this information to inform its marketing strategy, by noting details of customers' habits, preferences, and behaviours towards particular products and services.

Kindly note that in the pursuit of its legitimate business interests, Complete Supplies uses cookies and similar technologies on this website. A cookie is a small file that is downloaded on the Data Subject's device when he/she/it accesses a webpage on this website. The cookie contains information about the Data Subject and his/her/its visit to this website. Cookies are widely used to make websites work, to distinguish unique users, and learn how users interact with this website.

Data Subjects can change their browser settings anytime so that cookies are not accepted. Data Subjects can learn more about how to block cookies by visiting <http://www.allaboutcookies.org/>. Please note that if a Data Subject blocks cookies completely, this website may however not work properly, and some functionalities may not work at all.

How does Complete Supplies Process the Personal Information of Data Subjects?

As Responsible Party, Complete Supplies collects Personal Information about Data Subjects under (amongst other) the following circumstances:

- When customers contact Complete Supplies with queries and/or complaints, Complete Supplies may collect their title, name, surname, gender, telephone number, email address and the nature of their query and/or complaint. Complete Supplies may also keep a record of its correspondence with the previously mentioned customers, so as to inform any future communications and demonstrate how Complete Supplies has communicated with said customers.
- When a customer agrees to receive marketing communications from Complete Supplies, his/her/its title, name, surname, gender, telephone number, email address, and service preferences may be Processed by Complete Supplies and shared by Complete Supplies with its third-party partners.
- When Data Subjects use its website, Complete Supplies collects the following information via cookies and similar technologies:
 - the type of web browser or mobile device they are using;
 - their operating system and IP address;
 - the URL of the landing page and the referring website; and

- the time and date of the Data Subject's visit to this website and the search terms used by the Data Subject to reach this website.
- When a Data Subject engages with Complete Supplies on its social media platforms, for example when a Data Subject submits a comment or query, the contents of such post may be Processed by Complete Supplies.
- When selecting suppliers for goods and services, Complete Supplies may (amongst other) Process the following Personal Information of suppliers –
 - contact details and residential/place of business/postal addresses;
 - identity, passport and work permit documents of natural persons and the directors of juristic persons;
 - certificate of registration/incorporation for juristic persons;
 - board resolution to confirm designation of authority to signatory for juristic persons;
 - VAT and income tax registration numbers and certificates;
 - B-BBEE rating certificate and audit report, where applicable;
 - public liability insurance policy number and certificate;
 - professional indemnity insurance policy number and certificate;
 - details of other insurance policies, where applicable;
 - registration number and letter of good standing, pursuant to the Compensation for Occupational Diseases and Injuries Act 130 of 1993;
 - registration number and letter of good standing, pursuant to the Unemployment Insurance Contributions Act 4 of 2002;
 - bank account details and confirmation letter;
 - audited financial statements;
 - professional body affiliations and membership numbers; and
 - reports from vetting agencies on background and security screening of suppliers.
- When considering job applications, Complete Supplies may (amongst other) Process the following Personal Information of job applicants –
 - title, name, surname, national identification number, passport and/or work permit numbers;
 - contact details such as email address, telephone, postal and residential address;
 - reports from vetting agencies on background, qualifications and security screening;
 - curriculum vitae, including educational and employment record;
 - such other Personal Information and/or or Special Personal Information as Complete Supplies may require for purposes of background, security and health screening; and
 - any other information provided to Complete Supplies on a voluntary basis, such as (amongst other) the names and contact detail of referees.
- Under exceptional circumstances, Complete Supplies may need to Process more sensitive Personal Information about its Data Subjects, which is known as “**Special Personal Information.**” For example, Complete Supplies may Process certain details about customers' health when it books certain services for them.
- Complete Supplies may also collect, use and share “**Aggregated Data**” such as statistical or demographic data for various purposes. Aggregated Data refers to information that could be derived from Data

Subjects' Personal Information but will neither directly nor indirectly reveal their identity – for example, Aggregated Data related to all the users of this website.

With whom does Complete Supplies share Personal Information?

Complete Supplies may share Personal Information about Data Subjects with (amongst other) the following third parties:

- **Affiliates** - This would be any juristic person (and its agents) Controlling, Controlled by, under common Control with or Related to Complete Supplies. “**Control**” (and its cognates) and “**Related**” bears the meaning as ascribed to these terms in the Companies Act 71 of 2008. For example, Complete Supplies may share customers' Personal Information with Affiliates, as part of its regular reporting activities on company performance and for system maintenance support or the hosting of data.
- **Service Providers** - Complete Supplies may disclose Data Subjects' Personal Information to its service providers. Examples of the types of service providers Complete Supplies may disclose Data Subjects' Personal Information to, are (amongst other):
 - the IT company that hosts this website on behalf of Complete Supplies; and
 - to the extent that service providers are required to deliver services to customers.

Complete Supplies' service providers are contractually obligated to keep Data Subjects' Personal Information confidential and are not allowed to use it for any other purpose than to carry out the services they are performing for Complete Supplies.

- **Third parties, where required by law.** Complete Supplies may disclose Data Subjects' Personal Information to a third party if it is necessary to discharge a statutory obligation or comply with an order from a judicial authority, a public authority or a government body or if disclosure is necessary for national security, law enforcement or other matters of public interest.
- **Professional advisors and consultants.** Complete Supplies may disclose customers' Personal Information to its professional advisors and consultants, such as lawyers, auditors, and insurers, as necessary in the course of the professional services they provide it with.
- **Other third parties with customers' consent.** With Data Subjects' consent, Complete Supplies may also share their Personal Information with other third parties.

Does Complete Supplies transfer Personal Information internationally?

When Complete Supplies shares Personal Information about Data Subjects with third parties, as described in the “*With whom does Complete Supplies share Personal Information?*” section above, these third parties may be located outside of the Republic of South Africa. Should Complete Supplies transfer Personal Information about customers outside of the Republic of South Africa, it will take steps to ensure that the said Personal Information receives the same level of protection as if it were processed within the borders of South Africa.

What about third-party websites and content?

Third parties, whose websites Data Subjects may visit after clicking a link on this website, may have less stringent privacy policies. Complete Supplies has no control over these websites and urge Data Subjects to read the privacy notices on these websites, before disclosing any of their Personal Information.

For how long does Complete Supplies keep Personal Information?

Complete Supplies will delete Personal Information about Data Subjects (or render it anonymous) within a reasonable time after fulfilling the purposes mentioned above, unless:

- retention of the Personal Information is required by law;
- Complete Supplies reasonably requires the Personal Information for lawful purposes related to its functions of activities;
- retention of the Personal Information is required by a contract between the parties thereto; or
- where Data Subjects have consented to the retention of their Personal Information.

Further to section 14(2) of the POPIA, Complete Supplies may also retain Personal Information for periods in excess of those contemplated above for historical, statistical or research purposes, as it has established appropriate safeguards against the Personal Information being used for any other purposes.

How does Complete Supplies keep Personal Information secure?

As required by the POPIA Complete Supplies, takes reasonable precautions to protect Personal Information about customers against loss, misuse, or alteration. Unfortunately, the transmission of information via the internet is not entirely secure. Although Complete Supplies will do its best to protect Personal Information about Data Subjects, it cannot guarantee the security of Personal Information transmitted to it via unsecured means - any such transmission is at Data Subjects' own risk.

What are Data Subjects' rights in re their Personal Information?

Pursuant to the POPIA, Data Subjects have (under certain circumstances) the right to:

- **Request access to their Personal Information.** This enables Data Subjects to receive a copy or description of the Personal Information that Complete Supplies is holding about them and to check if this is being Processed lawfully.
- **Request rectification of the Personal Information that Complete Supplies holds about them.** This enables Data Subjects to have any incomplete or inaccurate Personal Information Complete Supplies holds about them, to be rectified.

- **Request destruction or deletion of their Personal Information.** This enables Data Subjects to request Complete Supplies to delete or remove Personal Information that is held about them, where there is no good reason for Complete Supplies to hold such information or continue Processing it.
- **Object to the Processing of their Personal Information, where Complete Supplies is relying on a legitimate business interest** (or those of a third party) and there is something about their situation which makes them want to object to Complete Supplies Processing of their Personal Information on this ground.
- **Lodge a complaint with the Information Regulator should they not be satisfied with Complete Supplies response to any of their above requests.** The Regulator is an independent body established pursuant to section 39 of the POPIA. Data Subjects can find more information about the Regulator and their contact details at <https://infoeregulator.org.za/>.

Field Code Changed

Who do Data Subjects contact to exercise their rights?

Pursuant to sections 55 and 56 of the POPIA, Complete Supplies has appointed an Information Officer. Should Data Subjects want to exercise any of their above-mentioned rights or have any question/s about how Complete Supplies Processes their Personal Information or about this Privacy Notice in general, they can send an email to Complete Supplies Information Officer on solente@carltonw.co.za.

Complete Supplies will consider all requests received and provide feedback to Data Subjects. For the avoidance of any doubt, it is recorded that despite a Data Subject's request for his/her/its Personal Information to be destroyed or deleted, Personal Information will only be destroyed or deleted when Complete Supplies is no longer authorised to retain such records, pursuant to section 14 of the POPIA.