

# THE AD OUTPOST GROUP

## PRIVACY POLICY

### INTRODUCTION:

Welcome to The Ad Outpost Group Privacy Policy.

The Ad Outpost Group comprises of the following companies:

1. Ad Outpost Holdings (Pty) Ltd
2. Ad Outpost (Pty) Ltd
3. Ad Outpost Two Thousand and Seven (Pty) Ltd
4. Hi-Ya Outdoor (Pty) Ltd
5. Solar Street Names (Pty) Ltd
6. Toka Outdoor Advertising (Pty) Ltd
7. Ad Outpost Centurion (Pty) Ltd
8. Ad Outpost Western Cape (Pty) Ltd

The Ad Outpost Group respects your privacy and is committed to protecting your personal information. We have developed this Privacy Policy for you to understand how we collect, process, communicate and use any personal information that you share with us.

**DEFINITION OF KEY TERMS:**

- |    |                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|----|---------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1. | POPI                                  | The Protection of Personal Information Act 4 of 2013, which aims to promote the protection of personal information, processed by public and private bodies, by introducing conditions for the lawful processing of personal information through the establishment of minimum requirements for the processing of such personal information. POPI is applicable to natural persons (individuals), as well as juristic persons (example companies). |
| 2. | Personal data or personal information | Any data / information that identifies a person or an entity. For the sake of uniformity in this Privacy Policy, we will utilise the term “personal information”.                                                                                                                                                                                                                                                                                |
| 3. | Data subject                          | Refers to the person or entity to whom the personal information relates.                                                                                                                                                                                                                                                                                                                                                                         |
| 4. | Responsible party                     | Refers to the party who is collecting, using, communicating, or using a data subject’s personal information.                                                                                                                                                                                                                                                                                                                                     |
| 5. | Relevant personal information         | Types of personal information that we may collect, use, store, or transfer, for example identity data, contact data, financial data, transaction data, technical data, profile data, usage data, marketing and communications data.                                                                                                                                                                                                              |
| 6. | Anonymous data                        | Data or information where the identity has been removed.                                                                                                                                                                                                                                                                                                                                                                                         |
| 7. | Aggregated data                       | May be derived from personal information but is not considered personal information in law as this information does not directly or indirectly reveal your identity, for example statistical or demographic data.                                                                                                                                                                                                                                |
| 8. | Special personal information          | Personal information, for example your race, ethnicity, religious, philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, health, genetic and biometric information.                                                                                                                                                                                                                                   |

9. Information Regulator  
The office of the Information Regulator set up in terms of POPI and empowered to monitor and enforce compliance with the provisions of the POPI Act.
10. Information Officer  
Appointed by an organisation to encourage compliance with POPI, deal with requests in terms of POPI, work with Information Regulator in respect of investigations, ensure compliance with POPI, any other duty as prescribed by the Information Regulator.

## 1. ABOUT THE AD OUTPOST GROUP PRIVACY POLICY

### Purpose:

- 1.1 This Privacy Policy will inform you as to how we look after your personal information, which you provide to us when you enter into an agreement with us, or for the purpose of procuring advertising space or any other service (whether on behalf of an organisation or personally), make payment to us, make an enquiry to us, visit our website at [www.adoutpost.co.za](http://www.adoutpost.co.za) (regardless of where you visit our website from) or otherwise.
- 1.2 This Privacy Policy is applicable to all parties with whom The Ad Outpost Group shares personal information with, including employees of The Ad Outpost Group, regardless of the company the employee is employed in.
- 1.3 This Privacy Policy will also advise you of your privacy rights and how the law protects you. In case of conflict, this Privacy Policy shall prevail over any other agreement or policy regarding privacy with us.
- 1.4 Whenever you provide us with personal information, you are consenting to its collection, and us in accordance with this Privacy Policy, including our use of cookies.
- 1.5 If you provide us with personal information on behalf of someone else, you are confirming that you have provided them with the information in this Privacy Policy, and that they have agreed for us to use their personal information in the manner we describe in this Privacy Policy.
- 1.6 We do not knowingly collect personal information relating to children.
- 1.7 It is important that you read this Privacy Policy together with any other Privacy Policy or fair processing notice we may provide on specific occasions when we are collecting or processing personal information so that you are fully aware of how, and why we are using your personal information.

**Responsible Party:**

- 1.8 The Ad Outpost Group is the Responsible Party and is responsible for your personal information (collectively referred to as the “Company”, “we”, “us” or “our” in this Privacy Policy).
- 1.9 We have appointed an Information Officer who is responsible for overseeing questions in relation to this Privacy Policy. Should you have any questions about this Privacy Policy, including any requests to exercise your legal rights, please contact the Information Officer using the details set out below.

**Contact details:**

The Ad Outpost Group

The Information Officer: Desiree Koomcaran

Physical Address: Office 2, Building 4, Mac Mac Building, Maxwell Office Park, 37 Magwa Crescent, Waterfall City, Waterfall, Gauteng Province, Republic of South Africa

Telephone number: +27 (0)11 253 9000

Email address: [desiree@adoutpost.co.za](mailto:desiree@adoutpost.co.za)

[info@adoutpost.co.za](mailto:info@adoutpost.co.za)

- 1.10. You have the right to make a complaint at any time to the Information Regulator (“IR”). We would, however, appreciate the opportunity to deal with your concerns before you approach the IR. Kindly contact us in the first instance.

**Your duty to inform us of changes:**

- 1.11 It is important that the personal information we hold about you is accurate and current. Kindly keep us informed of your personal information changes during your relationship with us.

### Third-party links on our website:

- 1.12 Our website may include links to third-party websites, plug-ins, and applications.
- 1.13 Clicking on those links or enabling those connections may allow third parties to collect or share personal information about you. We do not control these third-party websites and are not responsible for their privacy policies. When you leave our website, we encourage you to read the Privacy Policy of every website you visit.

## 2. THE PERSONAL DATA OR PERSONAL INFORMATION WE COLLECT ABOUT YOU

### Personal data or personal information:

- 2.1 Personal information, means any data or information about an individual or entity from which that person or entity may be identified. It does not include any data or information where the identity has been removed (anonymous data).
- 2.2 We may collect, use, store and transfer different kinds of personal information about you which we have grouped together as “relevant personal information”, as follows:
- ❖ **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth, job title, gender, identity number, nationality, race, disability.
  - ❖ **Contact Data** includes billing address, delivery address, site address, branch address, email address, telephone numbers and in case of emergency contact person/s and their contact details.
  - ❖ **Financial Data** includes bank account, payment details and income tax numbers.
  - ❖ **Transaction Data** includes details about payments to and from you and other details of services you have purchased from us.
  - ❖ **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website and systems.
  - ❖ **Profile Data** includes your username and password, rentals or orders made by you, information viewed or requested by you, sales enquiries from you, feedback by you and any account preferences.

- ❖ **Usage Data** includes information about how you use our website, products, and services.
- ❖ **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

2.3 We may also collect, use, and share aggregated data such as statistical or demographic data for any purpose. Aggregated data may be derived from your personal information but is not considered personal information in law as this information does not directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific feature of our website. However, if we combine or connect aggregated data with your personal information so that it can directly or indirectly identify you, we will treat the combined data as personal information, which will be used in accordance with this Privacy Policy.

#### **Special Personal Information:**

- 2.4 Special personal information includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data.
- 2.5 We may collect such personal information as may be required for the purposes of reporting in terms of government legislation or any other legal / contractual requirement.
- 2.6 Apart from the provision above, we do not collect any other special personal information.

#### **If you fail to provide personal information?**

- 2.7 Where we need to collect personal information by law, or under the terms of an agreement we have with you, and you fail to provide that personal information when requested, we may not be able to perform the agreement we have or are trying to enter into with you. In this case, we may have to cancel the service you have with us, but we will notify you if this is the case at the time.

### 3. HOW IS YOUR PERSONAL INFORMATION COLLECTED?

3.1 We may use different methods to collect personal information from and about you including through:

3.1.1 **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, e-mail or otherwise. This includes personal information you provide when you:

- ❖ Sign into one of our sites' visitors' books,
- ❖ Apply for any of our services,
- ❖ Create an account with us (on our website or otherwise),
- ❖ Subscribe to our services or publications,
- ❖ Request marketing to be sent to you,
- ❖ Enter a competition, promotion, or survey; or
- ❖ Provide us with feedback,
- ❖ Apply for employment,
- ❖ Are employed by the company.

3.1.2 **Automated technologies or interactions.** As you interact with our website, we may automatically collect technical data about your equipment, browsing actions and patterns. We may collect this personal information by using cookies, server logs and other similar technologies.

3.1.3 **Third parties or publicly available sources.** We may receive personal information about you from various third parties and public sources.

3.1.4 We may also record phone conversations we have with you.



#### 4. HOW WE USE YOUR PERSONAL INFORMATION

4.1 We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- ❖ Where we need to perform on the agreement we are about to enter into or have entered into with you,
- ❖ Where it is necessary for our legitimate interests (or those of a third party) and your interests; and
- ❖ Where we need to comply with a legal or regulatory obligation.

4.2 You have the right to withdraw consent to marketing at any time by contacting us.

#### Purposes for which we will use your personal information:

4.3 We have set out below a description of all the ways we plan to use your personal information, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

4.4 Note that we may process your personal information for more than one lawful ground depending on the specific purpose for which we are using your personal information. Please contact us if you need details about the specific legal ground we are relying on to process your personal information where more than one ground has been set out below:

Purpose	Type of Information	Lawful basis for processing
To register you as a new client, landlord, business partner, supplier, or contact.	Identity, Contact	To perform in terms of the agreement entered into between us and you.
To process your job application with us.	Identity, Contact, Financial.	<ol style="list-style-type: none"> <li>1. To perform in terms of employment agreements with our employees.</li> <li>2. To comply with statutory requirements such as with the relevant labour laws.</li> <li>3. For our own legitimate interest in employing the</li> </ol>

		correct candidate for the vacancy.
Managing payments and collections of monies owed to us.	Identity, Contact, Transactional, Financial, Marketing, Communications.	<ol style="list-style-type: none"> <li>1. To perform in terms of the agreement entered between us.</li> <li>2. For our own legitimate interest in collecting monies owed to us.</li> </ol>
To manage relationships with you which may include notifying you of changes to our Privacy Policy, and asking whether you would like to leave a review and / or participate in a survey.	Identity, Contact, Profile, Marketing, Communications.	<ol style="list-style-type: none"> <li>1. To perform in terms of the agreement entered between us.</li> <li>2. Necessary to comply with legal obligations.</li> <li>3. For our own legitimate interest in keeping our records up to date and being able to improve our service to you.</li> </ol>
To administer and protect our business and our website.	Identity, Contact, Technical.	<ol style="list-style-type: none"> <li>1. For our own legitimate interest for running our business, provision of administration and IT services.</li> <li>2. Necessary to comply with legal obligations</li> </ol>
To deliver website content and advertising to you, and measure and understand its effectiveness.	Identity, Contact, Profile, Usage, Technical, Marketing, Communications.	<ol style="list-style-type: none"> <li>1. For our own legitimate interest to study how clients use our services and to develop our service in order to meet client expectation.</li> </ol>
To make suggestions of services offered by us which may be of interest to you.	Identity, Contact, Technical, Usage, Marketing, Communications, Profile.	<ol style="list-style-type: none"> <li>1. For our own legitimate interest to grow and develop our business.</li> </ol>

**Marketing:**

- 4.5 We may, for an indefinite period, unless otherwise notified by you, use the information provided by you for promotional, marketing, research, and profiling purposes. We will add your contact details to our database and may also send you emails from time to time about our offers relating to the service we have provided to you.
- 4.6 We strive to provide you with choices regarding certain personal information uses, particularly around marketing and advertising. You have the right to withdraw consent to marketing at any time by contacting us directly.

**Promotional offers from us:**

- 4.7 We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which services, offers and other information may be relevant for you (we call this marketing).
- 4.8 You may receive marketing communications from us which information is relevant to the services we have provided to you.

**Website and Cookies:**

- 4.9 The Ad Outpost Group outsources the administration of its website ([www.adoutpost.co.za](http://www.adoutpost.co.za)) to an external party. The Ad Outpost Group shall ensure that the necessary Information Security and Processing Agreement (ISPA) is in place with the external party. Any personal information that is obtained via The Ad Outpost Group website is not shared with any third parties unless permitted.
- 4.10 Leads generated from The Ad Outpost Group website are captured at the website back end, password and firewall protected. The lead is shared with a Gmail account of the website administrators as a backup. Leads are filtered to the [info@adoutpost.co.za](mailto:info@adoutpost.co.za) email address. The information that is stored and passed on is what the user would have indicated on the lead form, i.e. basic contact info.
- 4.11 We may use cookies to monitor how our website is used. This helps us to understand how our clients and potential clients use our website so we can improve on for example layout, function, and design.

- 4.12 A cookie is a piece of information stored on your computer's hard drive that records how you have used a website. Cookies are used to create audiences and to remarket back to website users.
- 4.13 You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies.
- 4.14 Further terms and conditions pertaining to The Ad Outpost Group website and the use of cookies may be indicated on our website and amended from time to time.

**Change of purpose:**

- 4.15 We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason, and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.
- 4.16 If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

**5. DISCLOSURES OF YOUR PERSONAL INFORMATION**

- 5.1 We may disclose your personal information to our service providers or operators who are involved in the delivery of services to you. We have agreements in place to ensure that they comply with the privacy requirements as required by law.
- 5.2 We may also disclose your information:
- ❖ Where we have a duty or a right to disclose in terms of law or industry codes,
  - ❖ Where we believe it is necessary to protect our rights.

**6. INTERNATIONAL TRANSFERS**

- 6.1 We do not knowingly transfer your personal information outside the Republic of South Africa ("RSA"), however, some external third parties may run their operations outside of the RSA. Although they may not be subject to the same data protection laws as organisations based in RSA, we will take steps to make sure they provide an adequate level of protection in accordance with RSA data / privacy protection laws.

- 6.2 By submitting your personal information to us you agree to this transfer, storing or processing at a location outside of the RSA.

## 7. DATA SECURITY

- 7.1 We have implemented appropriate security measures to prevent your personal information from being accidentally lost, used, or accessed in an unauthorised way, altered, or disclosed.
- 7.2 In addition, we limit access to your personal information to those employees, agents, contractors and other third parties on a business need to know basis. They will only process your personal information on our instructions, and they are subject to a duty of confidentiality.
- 7.3 We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach, where we are legally required to do so.
- 7.4 We will, on an on-going basis, continue to review our security controls and related processes to ensure that your personal information remains secure.
- 7.5 Our security policies and procedures cover:
- ❖ Physical security,
  - ❖ Computer and network security,
  - ❖ Access to personal information,
  - ❖ Secure communications,
  - ❖ Retention and disposal of information,
  - ❖ Acceptable usage of personal information,
  - ❖ Governance and regulatory issues,
  - ❖ Monitoring access and usage of private information,
  - ❖ Investigating and reacting to security incidents.
- 7.6 When we contract with third parties, we impose appropriate security, privacy, and confidentiality obligations on them to ensure that personal information that we remain responsible for, is kept secure.
- 7.7 We will ensure that anyone to whom we pass your personal information agrees to treat your information with the same level of protection as we are obliged to.

## **8. DATA RETENTION**

- 8.1 We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.
- 8.2 To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.
- 8.3 Please be aware that, by law, we are required to retain certain basic information about our clients, landlords, suppliers, and business associates (including Contact, Identity, Financial and Transaction Data) for five (5) years or for any statutory prescribed period after they cease being data subjects for tax purposes.
- 8.4 In some circumstances you can ask us to delete your personal information. Please see below for further information.
- 8.5 In some circumstances we may anonymise your personal information (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## **9. YOUR RIGHTS: ACCESS TO INFORMATION**

- 9.1. You have the right to request a confirmation from us free of charge regarding the personal information we hold about you. This will include all personal information held by us as well as third parties who had access to the information.
- 9.2 To do this, simply contact us at the numbers / addresses as provided on this Privacy Policy or our website and specify what information you require. We will require a certified copy of your identity document or entity registration documents and your designation / entitlement before providing the details of the personal information.
- 9.3 In the event that you require us to provide you with copies of the information, please note that any such access request may be subject to a payment of a legally allowable fee.

**What we may need from you:**

- 9.4 We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal information (or to exercise any of your other rights).
- 9.5 This is a security measure to ensure that personal information is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

**Time limit to respond:**

- 9.6 We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made several requests. In this case, we will notify you and keep you updated.

**Correction of your information:**

- 9.7 You have the right to ask us to update, correct or delete your personal information. We will require a certified copy of your identity document or company registration document and your mandate to represent the entity 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.

**10. AMENDMENT**

The Ad Outpost Group may update / amend / supplement this Privacy Policy, from time to time. An updated version shall be placed on our website as confirmation, together with the effective date.

## **11. HOW TO CONTACT US**

If you have any queries about this notice or if you require further information about our privacy practices; wish to withdraw consent, exercise preferences or access or correct your personal information, please contact us at the numbers / addresses listed in this Privacy Policy or on our website ([www.adoutpost.co.za](http://www.adoutpost.co.za)).

**THE AD OUTPOST GROUP  
PRIVACY POLICY  
EFFECTIVE DATE: 1 JULY 2021**