

PRIVACY POLICY FOR BRENNTAG SOUTH AFRICA

1. INTRODUCTION

Welcome to the Privacy Notice of Brenntag South Africa. This Notice outlines how Brenntag South Africa, processes your Personal Data. Brenntag South Africa acts as the Data Controller under applicable data protection laws.

We are dedicated to transparency to help you understand how we handle your Personal Data and ensure compliance with relevant data protection regulations.

Our commitment includes adhering to all relevant data protection laws, such as the Protection of Personal Information Act (POPIA) in South Africa, and other applicable regulations.

2. SCOPE

This Privacy Notice provides information about how we process your Personal Data through this website, including any data you provide.

This Notice is not directed at children under the legal age of majority in your country or region, and we do not knowingly process the Personal Data of individuals under this age.

Note that this Notice does not apply to the Personal Data of our employees, clients, or customers, which is governed by our internal privacy policies.

3. DEFINITIONS

- **Personal Data:** Any information relating to an identified or identifiable individual, including identifiers such as names, identification numbers, location data, and other factors specific to their identity.
- **Processing:** Any operation performed on Personal Data, including collection, storage, use, and deletion.
- **Data Protection Officer (DPO):** The individual responsible for overseeing our data protection practices and ensuring compliance with data protection laws.
- **Data Controller:** The entity that determines the purposes and means of processing Personal Data.
- **Data Processor:** The entity that processes Personal Data on behalf of the Data Controller.

4. DATA PROTECTION OFFICER

We have appointed a Data Protection Officer (DPO) to oversee our data protection practices.

Contact Details:

- **Data Protection Officer**

Name: Morgan Govender
Contact number: 010 020 9100
Email: morgan.govender@brenntag.com

- **Deputy Data Protection Officer**
Name: Wichard Schneider
Contact number: 010 020 9100
Email: wichard.schneider@brenntag.com

5. YOUR PERSONAL DATA RIGHTS AND CONTROLS

Under applicable privacy laws, you have several rights regarding your Personal Data:

- **Right of Access:**
 - **Request Confirmation:** You can ask Brenntag to confirm whether we hold any Personal Data about you.
 - **Request Information:** You can request details about the Personal Data we hold, including information on any third parties who have had access to this data. Please provide adequate proof of identity to exercise this right.
- **Right to Correction or Deletion:**
 - **Correction:** You can request Brenntag to correct any Personal Data that is inaccurate, irrelevant, excessive, outdated, incomplete, misleading, or unlawfully obtained.
 - **Deletion:** You can request the deletion or destruction of Personal Data that we are no longer authorized to retain under applicable laws.
- **Right to Withdraw Consent and Object to Processing:**
 - **Withdraw Consent:** If you have previously consented to the processing of your Personal Data, you have the right to withdraw this consent by notifying our Information Officer using the contact details provided below.
 - **Object to Processing:** You may object to the processing of your Personal Data on reasonable grounds.
- **Right to Opt-Out of Direct Marketing:**
 - **Unsolicited Communications:** You have the right to refuse unsolicited electronic marketing communications, unless you have consented to receive such communications or are an existing Brenntag customer.
- **Right to Not Be Subject to Automated Decision-Making:**
 - **Automated Decisions:** You have the right to avoid decisions that have legal consequences based solely on automated processing of your Personal Data.
- **Right to Transparency and Other Rights:**

- **Transparency:** You have the right to be informed about how Brenntag processes your Personal Data.
- **Access:** You can request a copy of the Personal Data we hold about you.
- **Rectification:** You can ask us to correct any inaccurate or incomplete Personal Data.
- **Erasure:** You may request the deletion of your Personal Data under certain conditions.
- **Restriction:** You can request that we limit the processing of your Personal Data.
- **Objection:** You can object to our processing of your Personal Data if it is based on legitimate interests.
- **Data Portability:** You can request a copy of your Personal Data in an electronic format and transfer it to a third party.
- **Consent Withdrawal:** You can withdraw your consent if processing is based on your consent.
- **Complaint:** You have the right to lodge a complaint with your local Data Protection Authority.

For more details on how to exercise these rights, please contact us at the provided contact details.

6. WHAT, HOW, AND WHY WE PROCESS YOUR PERSONAL DATA

We process your Personal Data for various purposes, including:

- **Website Functionality:** To authenticate users and improve website performance.
- **Legal Compliance:** To comply with legal obligations and respond to legal claims.

The processing is based on legal grounds such as contract performance, legitimate interests, and consent.

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

Purpose/Activity	Type of data	Lawful basis for processing, including basis of legitimate interest
To register you as a new customer	(a) name, surname (b) business contact details like e-mail and business address	Performance of a contract with you
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) name, surname (b) business contact details like e-mail and business address (c) Financial, company bank account (d) Transaction	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a)	(a) name, surname (b) business contact details	(a) Performance of a contract with you (b) Necessary to comply with a

Purpose/Activity	Type of data	Lawful basis for processing, including basis of legitimate interest
Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	like e-mail and business address	legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to partake in a prize draw, competition or complete a survey	(a) name, surname (b) business contact details like e-mail and business address	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)

7. WHAT IF YOU DO NOT PROVIDE US WITH YOUR PERSONAL DATA?

Not providing your Personal Data may hinder our ability to process the information you provide or respond to your queries.

8. WHO WE SHARE YOUR PERSONAL DATA WITH

Your Personal Data may be shared with:

Brenntag may share collected information with third parties to ensure a secure, efficient, and personalized experience. Here's how this works

To Provide Products and Services: Brenntag may share your Personal Data within its affiliated Group and with agents, contractors, or partners who assist with services like database hosting, data processing, or mailing information. These third parties are restricted to using your data solely for their contracted services and must adhere to strict data protection measures under a written contract.

To Respond to Legal Requests and Prevent Harm: Brenntag may disclose your data to comply with lawful requests from government authorities or legal obligations. However, we do not sell your Personal Data to marketers or list it on public directories without your explicit consent.

9. DATA RETENTION

We retain your Personal Data only as long as necessary to fulfil the purposes for which it was collected and to comply with legal requirements.

10. TRANSFERRING YOUR PERSONAL DATA TO OTHER COUNTRIES

We may transfer your Personal Data internationally. We ensure these transfers comply with applicable laws using mechanisms such as Standard Contractual Clauses (SCCs) and Adequacy Decisions to protect your data.

11. HOW WE KEEP YOUR PERSONAL DATA SAFE

We implement robust technical and organizational measures to protect your Personal Data against unauthorized access and breaches. We pride ourselves in ensuring adequate data security.

12. PERSONAL DATA BREACHES

In the event of a data breach that poses a risk to your rights and freedoms, we will notify you and relevant authorities as required by law.

13. OWNERSHIP, REVIEW, AND APPROVAL

The Data Protection Officer is responsible for this Privacy Notice, which is reviewed annually and approved by relevant decision-makers.

For any concerns regarding your Personal Data, you may contact your local Data Protection Authority as referenced below.

In circumstances where there are reasonable grounds to believe that a Data Subject's personal information has been accessed or acquired by an unauthorised person, Brenntag South Africa must notify the Information Regulator. A Data Subject may, furthermore, contact the Information Regulator should they have any complaints in relation to Brenntag South Africa's handling of their personal information. The contact details of the Information Regulator are as follows –

Website: <http://justice.gov.za/inforeg/>

Tel: +27 12 406 4818

Fax: +27 86 500 3351

Email: inforeg@justice.gov.za

Physical address:

JD House
27 Stiemans Street
Braamfontein
Johannesburg
2001

Postal address:

P.O. Box 31533
Braamfontein
Johannesburg
2017

Brenntag South Africa