

PRIVACY POLICY

This Privacy Policy applies to all users of our Website, related Moby-sites and software applications, collectively referred to as “our Platforms”, which are used to access and purchase our products and services.

The purpose of this Privacy Policy is to set out how, why and when LZ Trading t/a Cutprice Wholesalers (“Cutprice”) uses your Personal Information so as to comply with the Protection of Personal Information Act 4 of 2013 (“POPI”).

It is important that you read this Privacy Policy together with our other terms and conditions, privacy notices or policies we may provide from time to time when we collect or use your Personal Information.

Further, please pay special attention to the clauses in this Privacy Policy **that appear in similar text and style (i.e. bold) which:**

- **may limit the risk or liability of Cutprice or a third party.**
- **may create risk or liability for the user.**
- **may compel the user to indemnify Cutprice or a third party.**
- **serves as an acknowledgement, by the user, of a fact.**

We respect your privacy and take the protection of Personal Information very seriously. We strive to deliver excellent service every time you shop with us, and to do this, we need to use some of your Personal Information. This Privacy Policy describes how we handle the Personal Information we collect about you and/or receive from you. By using our Platforms, you agree to the processing of your Personal Information as set out in this Privacy Policy.

In this Privacy Policy, the terms:-

- “**Personal Information**”, and “**process/processing**” bear the same meanings as set out in POPI.
- “**we**”, “**us**” or “**our**” refers to “Cutprice”.
- “**you**” and “**your**” refers to every person that accesses or uses our Platforms also referred to as a user.
- “**registered user(s)**” refers to anyone registered on our Platforms and has provided us with a unique email address and password as well as other Personal Information in order to order goods and services on our Platforms.

IF YOU ARE BELOW THE AGE OF 18

If you are below the age of 18 years, you must always get permission from your parent or guardian before you use our Platforms or give us your Personal Information. We may check that your parent or guardian has given you such permission, for example by asking you to provide us with your parent's or guardian's contact details so we can contact them. We may also check that the contact details you have given us are correct and are the details of a person who is actually your parent or guardian. If we are not able to verify such permission or if a parent or guardian confirms that you do not have their permission, you may not use our Platforms.

Further, Cutprice tobacco products to you if you are under the age of 18 regardless of any supervision by a parent or guardian. You may be requested to provide proof of your age before receiving any tobacco products ordered via our Platforms.

WHAT PERSONAL INFORMATION WE COLLECT AND PROCESS

Cutprice processes Personal Information in a manner that is reasonable, adequate, relevant, non-excessive and purpose-specific. In order for users to access and use our Platforms we collect and process some Personal Information. When you become a registered user, we have to collect and process your Personal Information to render our services to you.

When you register to use our Platforms, we may collect the following Personal Information:

- name and surname.
- email address.
- physical address.
- gender.
- mobile phone number.
- online identifiers.
- date of birth.
- identification number.

Should your Personal Information change or you wish to amend and/or correct this Personal Information you can do this by updating your registered user information in your account profile.

You warrant that the information you have provided is accurate, current, true and correct and that does not impersonate or misrepresent any person or entity or falsely state or otherwise misrepresent your affiliation with anyone or anything.

Information from using our Platforms

When you access our Platforms, whether or not you are a registered user, Cutprice processes some of your Personal Information. Depending on how you access and use our Platforms, we may receive:

- log information, through online identifiers, including information on how, when and for how long you use our Platforms and other services, the content you view and search queries you submit.
- information about the equipment you use to access or use our Platforms, including the type of device you are using, how you access our Platforms, your browser or operating system and your Internet Protocol address.
- the geographic location from which you accessed our Platforms, including your device's global positioning system signal and information about nearby Wi-Fi networks and cell towers. We get this information when you use location-enabled services.
- other information about you from third parties, such as social media.

WHY DO WE PROCESS YOUR PERSONAL INFORMATION?

We process the Personal Information we collect and receive to:

- identify you;
- verify your identity;
- create a user account for you; and/or
- enter into a contract with you.

As a registered user, we also process your Personal Information in order to:

- fulfill our contractual obligations to you when you have ordered goods in order for us to deliver those goods and process returns.
- provide you with information, products or services you request from us.
- communicate with you regarding our Platforms and provide you with information, products or services, including billing, customer support, resolving complaints and quality control.
- notify you about changes to our Platforms, services and products, terms and conditions, privacy policy or notices, and any other changes that impact our Platforms, services and products.
- send you information about competitions, products or services that may interest you (unless you have opted out of receiving such information). Please note that you may also receive newsletters based on your interests, recent orders and browsing behavior. To unsubscribe from newsletters sent to you based on your recent orders and browsing behaviors, visit the Newsletter Subscriptions page under "My Account" or unsubscribe when receiving such a newsletter.
- get feedback from you which we need to develop our products and services and grow our business.
- comply with any legal or regulatory obligations such as tax or financial laws.
- undertake research for statistical purposes. The research and statistics we get from this process do not include your Personal Information and cannot be linked to you, nor can you be identified from these statistics.

RETENTION AND RESTRICTION OF RECORDS

We keep your Personal Information for as long as:

- we need it to provide our Platforms, products or services to you.
- it is required or allowed by law and is in line with our internal retention policies.
- it is necessary to uphold the contract between you and us.
- you have agreed to us keeping your Personal Information subject to your request for us to stop processing your Personal Information.

We will retain your Personal Information for as long as is necessary to achieve the purpose for which this information was collected or subsequently processed. If your Personal Information is used for more than one purpose, we will retain it until the purpose with the latest period expires but we will stop using it for the purpose with a shorter period once that period expires.

By accessing and using the Platform, you consent to us retaining records of your Personal Information for no longer than may be necessary to achieve the purpose for which the information was initially collected or subsequently processed.

USER TRACKING AND COOKIES

When you access and use our Platforms we may use various technological tools to improve your experience on our websites through the use of cookies and/or user tracking.

Cookies are small text files placed on the device that you use to access our Platforms. These files do not contain your Personal Information but allow us to associate you with a particular device. Many websites use cookies and we use cookies to:

- make our Platforms more user friendly.
- personalize your interactions with our Platforms, tailor our services and Platforms to your interests and needs, and ensure they work on your device.
- provide advertising that is relevant to you, limit the number of times you see the same advertisement and measure the effectiveness of the advertisements on our Platforms and other websites, based on your online activities such as the websites and apps you use or content you view, and information we have about you.
- send Opt-In marketing communication if you are not a registered user.

We will not use your Personal Information for any other purpose without your permission.

By accessing and using the Platform, you consent to our use of cookies.

OPT OUT FROM DIRECT MARKETING

You have the right to request us not to contact you for purposes of direct marketing by any form of electronic communication such as automatic calling machines, email and/or SMS notifications by "opting-out" of any direct marketing communications we may send to you.

WHO ELSE GETS TO PROCESS YOUR PERSONAL INFORMATION

We do not sell your Personal Information to third parties for their marketing or any other purposes.

We may provide or make your Personal Information available to:

- our employees, the staff of the company at Cutprice and/or third party service providers in order to enable them to assist us to interact with you via our Platforms for the marketing, ordering or delivery of goods.
- law enforcement, government officials, fraud detection agencies or other third parties when the disclosure of Personal Information is necessary or appropriate in connection with an investigation of fraud, intellectual property infringements, or other activity that is illegal or may expose us to legal liability or financial loss, to report or support the investigation into suspected illegal activity.
- third parties (such as a potential purchaser and its professional advisors) in the event of any reorganization, merger, consolidation, sale, joint venture, or other disposition of any or all of our assets.
- our service providers (under contract with us) who help with parts of our business operations (fraud prevention, marketing, public relations, technology services etc.). However, our contracts dictate that these service providers may only use your Personal Information in connection with the services they perform for us and not for their own benefit or any other purpose, and must treat such information as confidential information.

SECURING YOUR PERSONAL INFORMATION

We secure the integrity and confidentiality of your Personal Information in our possession or under our control by taking appropriate, reasonable technical and organizational measures to prevent loss of, damage to or unauthorized destruction of Personal Information; and unlawful access to or processing of Personal Information.

In order to implement and maintain such measures, we have in place policies, controls and related processes, which are reviewed and updated on a regular basis. Our policies, controls and procedures cover for example:

- physical, technical and network security.
- access controls and monitoring of access.
- secure storage, destruction and encryption of records of Personal Information.
- Personal Information breach reporting and remediation.
- by way of written agreements, imposition of security and confidentiality obligations on third parties (based within or outside the borders of South Africa) who process Personal Information as part of rendering services to us.

Should you disclose your Personal Information to any third party other than Cutprice, Cutprice shall not be liable for any loss or damage arising or suffered by you as a result of the disclosure of such Personal Information to any third party. This is because we do not regulate or control how that third party uses your Personal Information. You should always ensure that you read the privacy policy of any third party.

KNOW YOUR RIGHTS

Having provided adequate proof of your identity, you have the right to:

- view, correct and/or amend your Personal Information we process. Please note that as a registered user, you can do this through your user account for the Personal Information reflected therein.
- request a record or description of your Personal Information. Cutprice may charge a fee in order to provide you with this record of your Personal Information. Where requests to access and amend your Personal Information are manifestly unfounded, excessive or repetitive Cutprice may charge an additional administrative fee or refuse the request.
- request to have your Personal Information corrected, destroyed or deleted. **Please note that you can stop being a registered user by cancelling your account. In this instance Cutprice will only retain your Personal Information subject to any legislative requirement and/or our internal retention policy.**
- us complying with your requests upon receipt unless we have credible reason why we cannot comply.

- us indicating where, if we cannot agree whether to correct or delete your Personal Information as requested, that a correction or deletion was requested but was not made.
- inform you if reasonably practicable, should we change your Personal Information and this has an impact on decisions about you.
- notify you of the action taken by us because of your request.
- notify you of unauthorized access to your Personal Information.
- provide you with reasonable evidence of our compliance with our obligations under this Privacy Policy on reasonable notice and request.
- Submit a complaint to the Information Regulator.

HOW TO LODGE A COMPLAINT WITH THE INFORMATION REGULATOR.

If you have any complaints about this Privacy Policy or our compliance with this Privacy Policy, you can lodge a complaint with the Information Regulator.

The contact details of the Information Regulator are available on its website at: <https://justice.gov.za/inforeg/>

This version of the Privacy Policy replaces any preceding privacy policy provisions on our website. We may occasionally update this Privacy Policy. When you use our Platforms the version of the Privacy Policy posted on this page applies to you.