

## **Intobrand (Pty) Ltd Privacy Policy**

Intobrand (Pty) Ltd is the sole authorised distributor for footwear including FitFlop, Ugg and Hunter Boots in South Africa.

### ***Introduction***

Welcome to our privacy policy. This notice explains how we obtain, use and disclose your personal information in accordance with the requirements of the Protection of Personal Information Act No 4 of 2013 (POPIA). At Intobrand (Pty) Ltd we are committed to protecting your privacy and to ensure that your personal information is collected and used properly, lawfully and transparently. The purpose of this policy is to describe the way that we collect, store, use and protect information that can be associated with you or another natural or juristic person and that can be used to identify you or that person (personal information).

Please read this policy to familiarise yourself with details of the information that we collect from you when you access or use the websites [www.fitflop.co.za](http://www.fitflop.co.za); [www.trenton.co.za](http://www.trenton.co.za) and [www.shoetopia.co.za](http://www.shoetopia.co.za).

### ***Safeguarding your Information***

We are legally obliged to provide adequate protection for the personal information we hold and to prevent any unauthorised access and/or use of personal information. Intobrand (Pty) Ltd will continuously review its security controls and processes to ensure that personal information remains secure.

Our privacy policies and procedures cover:

- Physical security
- Computer and network security
- Access to personal information
- Secure communication
- Security in contracting out activities or functions
- 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

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.

## ***Audience***

This policy applies to you if you are:

- a visitor to our website
- a customer who has ordered products that we provide, either online or in-store
- a customer who signs up to our loyalty programme
- a customer who signs up to receive our newsletter
- a customer who has entered one of our promotional competitions
- a customer who has ordered our products through an affiliate link

This policy applies under certain circumstances.

## ***Personal information***

Personal information includes:

- certain information that we collect automatically when you visit our website
- certain information collected on registration (see below)
- certain information collected on submission; and
- optional information that you provide to us voluntarily (see below)

but excludes:

- information that has been made anonymous that does not identify a specific person
- permanently de-identified information that does not relate or cannot be traced back to a specific person or source
- non-personal statistical information collected and compiled by us and/ or our partners and operators; and
- information that you have provided voluntarily in an open, public environment or forum including any blog, chat room, community, classifieds, or discussion board. Such information has been disclosed in a public forum, and is no longer confidential and does not constitute personal information subject to protection under this policy.

## **Common examples**

Common examples of the types of personal information which we may collect and process include:

- identifying information – such as name, date of birth or identification number of any kind
- contact information – such as a telephone number or email address
- address information – such as a physical or postal address; or
- demographic information – such as your age, gender or marital status
- product-related information – your shoe size

## **Sensitive personal information**

Depending on the products or services that you require, we may also collect sensitive personal information including your:

- financial information – such as bank account details

## ***Acceptance***

### **Acceptance required**

All the terms of this policy must be accepted when ordering our products. If a person does not agree with anything in this policy, then our products may not be ordered.

### **Legal capacity**

You may not access our website or order our products if you do not have legal capacity to conclude legally binding contracts.

### **Deemed acceptance**

By accepting this policy, you are deemed to have read, understood, accepted, and agreed to be bound by all of its terms.

### **Your obligations**

You may only send us your own personal information or the information of another data subject where you have their permission to do so.

## ***Changes***

We may change the terms of this policy at any time by updating our web pages and by serving notices through regular communication channels such as email. We will notify you of any changes by placing a notice in a prominent place on the website or by sending an email detailing the changes made and indicating the date that they were last updated. If you do not agree with the changes, then you must stop using the website and our products or services. If you continue to use the website or our products or services following notification of a change to the terms, the changed terms will apply and you will be deemed to have accepted those updated terms.

## ***Collection***

### **On registration**

Once you register on our website, sign up for our newsletter or sign up as a loyalty rewards member you will no longer be anonymous to us.

This personal information that you provide us with will include:

- name and surname
- email address
- telephone number
- company name, company registration number, and VAT number
- postal address or street address and;
- username and password

We will use this personal information to fulfill your account, for purposes of understanding your requirements, to provide additional services and information to you as we reasonably think appropriate, and for any other purposes set out in this policy.

### **On order or request**

When you order our products or request our services, you will be asked to provide us with additional information on a voluntary basis (products or services information).

### **From browser**

We collect certain information from your web browser, including your Internet usage information when you visit our website.

We automatically receive and record internet usage information on our managed server logs from your browser, such as your Internet Protocol address (IP address), browsing habits, click patterns, version of software installed, system type, screen resolution, colour capabilities, plug-ins, language settings, cookie preferences, search engine keywords, JavaScript enablement, the content and pages that you access on the website, and the dates and times that you visit the website, paths taken, and time spent on sites and pages within the website (usage information). Please note that other websites visited before entering our website might place personal information within your URL during a visit to it, and we have no control over such websites. Accordingly, a subsequent website that collects URL information may log some personal information.

## **Cookies**

For information on how we deal with Cookies, please refer to our Cookie Policy.

## **Web beacons**

We collect certain information from web beacons on our website to compile anonymous information about our website.

Our website may contain electronic image requests (called a single-pixel gif or web beacon request) that allow us to count page views and to access cookies. Any electronic image viewed as part of a web page (including an ad banner) can act as a web beacon. Our web beacons do not collect, gather, monitor or share any of your personal information. We merely use them to compile anonymous information about our website.

## **Optional details**

We collect certain optional information, that you provide when you upload or download content from our website or when you enter competitions, take advantage of promotions, respond to surveys or register and subscribe for certain additional products or services.

You may also provide additional information to us on a voluntary basis (optional information). This includes content or products that you decide to upload or download from our website or when you enter competitions, take advantage of promotions, respond to surveys, order certain additional products or services, or otherwise use the optional features and functionality of our website.

## **Purpose for collection**

We may use or process any product information, or optional information that you provide to us for the purposes that you indicated when you agreed to provide it to us. Processing includes gathering your personal information, disclosing it, and combining it with other personal information. We generally collect and process your personal information for various purposes, including:

- product or services purposes – such as collecting orders or requests for and providing our products or services
- marketing purposes – such as pursuing lawful related marketing activities
- business purposes – such as internal audit, accounting, business planning, and joint ventures, disposals of business, or other proposed and actual transactions; and
- legal purposes – such as handling claims, complying with regulations, or pursuing good governance
- accuracy – such as verifying and updating personal details
- statistical analysis – such as aggregate data processing to identify trends
- reference purposes – such as credit reference verification and services

We may use your usage information for the purposes described above and to:

- remember your information so that you will not have to re-enter it during your visit or the next time you access the website

- monitor website usage metrics such as total number of visitors and pages accessed; and
- track your entries, submissions, and status in any promotions or other activities in connection with your usage of the website

## **Consent to collection**

We will obtain your consent to collect personal information:

- in accordance with applicable law
- when you provide us with any registration information or optional information

## **Use**

### **Our obligations**

- We may use your personal information to fulfil our obligations to you
- To confirm, verify and keep your details up to date

### **Messages and updates**

We may send administrative messages and email updates to you about the website. In some cases, we may also send you primarily promotional messages. We may wish to provide you with information about new products or services in which we think you may be interested. We will not send you promotional messages unless you have chosen to opt-into them. You can choose to opt-out of promotional messages. We may also send you one message asking you to opt-into promotional messages without you having opted-into promotional messages.

We may use your information to send you administrative messages and email updates to you regarding the website and for marketing purposes within the bounds of relevant legislation.

### **Targeted content**

We may use your information for targeted content in certain, specified instances.

While you are logged into the website, we may display targeted adverts or recommendations and other relevant information based on your personal information. In a completely automated process, computers process the personal information and match it to adverts or related information. We never share personal information with any advertiser, unless you specifically provide us with your consent to do so. Advertisers receive a record of the total number of impressions and clicks for each advert. They do not receive any personal information. If you click on an advert, we may send a referring URL to the advertiser's website identifying that a customer is visiting from the website. We do not send personal information to advertisers with the referring URL. Once you are on the advertiser's website however, the advertiser is able to collect your personal information.

## **Disclosure**

### **Sharing**

We may share your personal information with:

- other divisions or website operators within the company so as to provide joint content and services like registration, for transactions and customer support, to help detect and prevent potentially illegal acts and violations of our policies, and to guide decisions about our products, services, and communications (they will only use this information to send you marketing communications if you have requested their products or services)
- an affiliate, in which case we will seek to require the affiliates to honour this privacy policy
- our products or services providers under contract who help provide certain products or services or help with parts of our business operations, including fraud prevention, bill collection, marketing, technology services (our contracts dictate that these product or service providers only use your information in connection with the products or services they supply or services they perform for us and not for their own benefit)
- credit bureaus to report account information, as permitted by law
- banking partners as required by credit card association rules for inclusion on their list of terminated merchants (in the event that you utilise the services to receive payments and you meet their criteria); and
- other third parties who provide us with relevant services where appropriate, including but not limited to Facebook or Google

We may share your personal information with third parties for the purposes of fulfilling our obligations to you among other purposes. We aim to have agreements in place with relevant suppliers and third-party service providers to ensure that they comply with the privacy requirements as required by the Protection of Personal Information Act No 4 of 2013 (POPIA Act).

## **Regulators**

We may disclose your personal information as required by law or governmental audit, as required by industry codes and where we believe it is necessary to protect our rights.

## **Law enforcement**

We may disclose personal information if required:

- by a subpoena or court order
- to comply with any law
- to protect the safety of any individual or the general public; and
- to prevent violation of our customer relationship terms

We may disclose personal information to third parties if required for legal reasons.

## **No selling**

We will not sell personal information. No personal information will be disclosed to anyone except as provided in this privacy policy.

## **Marketing purposes**

We may disclose aggregate statistics (information about customer population in general terms) about personal information to advertisers or business partners.

## **Employees**

We may need to disclose personal information to our employees that require the personal information to effect their duties. These include our management, human resources, accounting, audit, compliance, information technology, or other personnel.

## **Change of ownership**

If we undergo a change in ownership, or a merger with, acquisition by, or sale of assets to, another entity, we may assign our rights to the personal information we process to a successor, purchaser, or separate entity. We will disclose the transfer on the website. If you are concerned about your personal information migrating to a new owner, you may request us to delete your personal information.

## ***Security***

We take the security of personal information seriously and make every reasonable effort to comply with applicable data protection laws. A hosting company hosts our website in a secure server environment that utilises a firewall and requisite security measures to prevent interference and access from external parties. We authorise access to personal information only for those employees who require it to fulfil their job responsibilities. We implement disaster recovery procedures where appropriate.

## **Accurate and up to date**

We will make every attempt to keep the personal information we collect as accurate, complete and up to date as is necessary for the purposes defined in this policy. From time to time we may request you to update your personal information on the website, and you can also update your personal information at any time by accessing your account. You are able to review or update any personal information that we hold on you by accessing your account online, emailing us, or phoning us. Please note that in order to better protect you and safeguard your personal information, we take steps to verify your identity before granting you access to your account or making any corrections to your personal information.

Please keep your personal information accurate and up to date by accessing your account online, emailing us, or phoning us.

Further to the above, you have the following rights over your personal information:

- Right of access to information collected - you may make a written request for details of your personal information and a copy of that personal information
- Right to rectification - you have the right to have inaccurate information about you corrected or removed
- Right to object to the processing of personal information - you have the right to object to processing of your information for purposes of unsolicited electronic communication
- Right to lodge a complaint to the Information Regulator.

If you have a complaint about our use of your information, please contact us directly so that we can address your complaint.

Should you not be satisfied with the outcome, you also have the right to lodge a complaint regarding the processing of your personal information with the Information Regulator.

You can direct a complaint to the Office of the Information Regulator at:



JD House  
27 Stiemens Street  
Braamfontein  
Johannesburg  
2001

Postal Address:  
P.O Box 31533  
Braamfontein  
Johannesburg  
2017  
Email general – [inforeg@justice.gov.za](mailto:inforeg@justice.gov.za)  
Complaints – [complaints.IR@justice.gov.za](mailto:complaints.IR@justice.gov.za)

## **Retention**

We will only retain your personal information for as long as it is necessary to fulfil the purposes explicitly set out in this policy, unless:

- retention of the record is required or authorised by law; or
- you have consented to the retention of the record

During the period of retention, we will continue to abide by our non-disclosure obligations and will not share or sell your personal information.

We may retain your personal information in physical or electronic records at our discretion  
We will only retain your personal information for as long as is necessary.

## ***Transfer to another country***

We may transmit or transfer personal information to the country in which it was collected and process it in that country. Personal information may be stored on servers located outside the country in which it was collected whose laws protecting personal information may not be as stringent as the laws in the country in which it was collected. You consent to us processing your personal information in a foreign country whose laws regarding processing of personal information may be less stringent.

## ***Access and Correction of Personal Information***

Clients have the right to access, update, correct or delete the personal information that Intobrand (Pty) Ltd holds relating to them. You may choose to delete correct or update the personal information you have submitted to us, by clicking the relevant menu in any of the pages on our website or partner websites, or

contacting us by phone or email. We may no longer process your personal information once you object to the processing of your personal information.

## ***Limitation***

We are not responsible for, give no warranties, nor make any representations in respect of the privacy policies or practices of any linked or third-party websites.

## **Enquiries**

If you have any questions or concerns arising from this privacy policy or the way in which we handle personal information, wish to withdraw consent, exercise preferences or access or correct your personal information, please contact us.

Nicola Savage [nicola@savvymarketing.co.za](mailto:nicola@savvymarketing.co.za) – Chief Information Officer