

## 1. Introduction

- 1.1. New Laceys Promotions (Pty) Ltd ('Laceys'), in its capacity as the responsible party respects the privacy of every person who visits and/or uses this website, websites related to Laceys properties or services, websites linking to and from this website and/or Laceys' social media platforms ('the Service'). Laceys will comply with all applicable data protection laws and regulations.
- 1.2. This privacy policy must be read in conjunction with Laceys' website terms and conditions. Both the website terms and conditions and this privacy policy constitute a fully binding legal agreement and it is recommended you read both documents carefully. Your use of the Service signifies your agreement to the terms and conditions and this privacy policy.
- 1.3. If you do not agree with either the terms and conditions, or this privacy policy, you are prohibited from using the Service and must immediately refrain from doing so. Furthermore, if you do not agree with this privacy policy, or the terms of use, you should not provide any of your personal information to Laceys, and Laceys shall not be liable for any further use of the Service by you.
- 1.4. This privacy policy sets out Laceys' approach in respect of the use of your personal information. By submitting your personal information to Laceys, and/or by using the Service, you will be regarded as having consented to – where necessary and appropriate – the processing of personal information referred to in this privacy policy. Consequently, by continuing to use the Service, you acknowledge and agree that Laceys may collect, use and transfer your personal information in accordance with this policy, and applicable legislation in the Republic of South Africa.

## 2. Who is Laceys?

- 2.1. Laceys is an importer and distributor of children's toys, electronics, party goods, housewares and electronics. Laceys is based at, and can be contacted at 29 Qashana Khuzwayo Road, New Germany, 3610 or via the contact form available at <https://www.laceys.co.za/contacts>.
- 2.2. In general, you can visit this website without providing personal information, however Laceys may from time-to-time require and use your personal information in order to respond to service or other requests, or to contact you with information about the industry – this personal information will be collected in accordance with this privacy policy, and applicable South African legislation.

## 3. Consent

- 3.1. By using the Service, you agree and consent to Laceys collecting retaining your personal information and processing it for such periods as Laceys may determine is necessary in terms of legitimate business purposes. Specifically, through your

use of the Services you also give express consent to Laceys to disclose your personal information to:

- 3.1.1. any person that provides services (which services may include verifying, updating and processing Protected Personal Information) to Laceys or acts as Laceys' agent or to whom Laceys has transferred or proposes to transfer any of its rights and duties in respect of its clients, customers or users (some of these persons may be located outside of the Republic of South Africa), and share Laceys' customers', clients' or users' personal information with Laceys' service providers, locally and outside the Republic of South Africa, as necessary Laceys may ask persons who provide services to Laceys to agree to Laceys' privacy policies if they need to access any personal information to carry out their services; and
- 3.1.2. Laceys' legal advisors, financial advisors, auditors or a competent court in legal proceedings.

#### **4. Overview of the information Laceys may collect**

- 4.1. In order to enable Laceys to provide you with a streamlined experience, it will use your personal information to provide you with the Service, to respond to your service requests, to improve its service offerings, or to improve the Service, and only in accordance with the Protection of Personal Information Act 4 of 2013 ('POPIA'). Laceys through the use of the Service, collects personal information with your consent.
- 4.2. Laceys may also use your personal information to contact you regarding any complaint, query or comment. Furthermore, and in accordance with POPIA, Laceys may use your personal data to carry out its obligations arising from any contract with you, to notify you about changes to its service or to the website, to assist with business development, and in connection with any legal proceedings, or where Laceys has a right or duty to disclose the information in terms of law or industry codes.
- 4.3. Specific information Laceys may hold:
  - 4.3.1. Laceys may, for example, collect and use the following information about you:
    - 4.3.1.1. name and surname;
    - 4.3.1.2. title;
    - 4.3.1.3. South African identity number and/or international passport number;
    - 4.3.1.4. date of birth;
    - 4.3.1.5. contact information including email address, physical address, and cell phone number;
    - 4.3.1.6. your curriculum vitae that you submit to Laceys;
    - 4.3.1.7. IP address geographical location, or cookie information;
    - 4.3.1.8. details of visits to Laceys' website; and

- 4.3.1.9. any other information which Laceys reasonably needs to perform its duties in pursuance of any agreement it may have with you, make decisions about you in relation to the goods or the Service, or fulfil its regulatory or other business obligations.
- 4.3.2. In addition, Laceys may, from time-to-time, use third party services (such as Google Analytics) that collect, analyse and monitor log data pertaining to the Service in order to optimize, improve and audit the products and services Laceys offers.
- 4.4. Personal information about children and special personal information:
  - 4.4.1. Laceys does not collect personal information about children and will only process information about children with the express consent of a competent person (someone like the parent or guardian) or if otherwise permitted in law.
  - 4.4.2. Laceys also does not process any "special personal information" as defined in POPIA, which includes for example political, religious or health-related information, and it will only process special personal information with your express consent or if otherwise permitted to do so in law.
- 4.5. Specific Information Laceys may share
  - 4.5.1. Laceys will only share your information with third parties that it has trusted relationships with, and selected third parties who perform services on its behalf. All service providers are bound by contract with Laceys to maintain the security of your personal information and to use it only as permitted by Laceys, in accordance with this policy and in accordance with POPIA and applicable law.
- 4.6. How Laceys uses your information
  - 4.6.1. Laceys undertakes to only process your information insofar it is adequate, relevant and not excessive for the purposes set out below. Further, Laceys will only use your personal information for a purpose compatible with that for which it was collected.
- 4.7. Laceys will use your information to:
  - 4.7.1. operate and manage your agreement with us or correspondence you may have with us;
  - 4.7.2. carry out, monitor and analyse our business;
  - 4.7.3. contact you via social media or by email, SMS, letter, telephone or in any other way about our products and services as allowed for in law, unless you tell us that you prefer not to receive marketing communications;
  - 4.7.4. to form a view of you as an individual and to identify, develop or improve products or services that may be of interest to you;
  - 4.7.5. carry out market research, business and statistical analysis;
  - 4.7.6. perform other administrative and operational purposes including the testing of systems;
  - 4.7.7. comply with our regulatory or other obligations;

4.7.8. carry out any other reasonable business operation considering our business and the relationship between the parties.

4.7.9. Your information may also be used for other purposes for which you give your permission or where Laceys is permitted to do so in law or it is in the public interest to disclose the information.

4.8. You may on reasonable grounds object to the processing of your personal information, after which Laceys undertakes not to continue to process such information, except as provided for in law.

## **5. Cookies and Web Beacons**

5.1. Cookies are files with small amounts of data, which may include an anonymous unique identifier. Cookies are sent to your browser from a web site and stored on your computer's hard drive.

5.2. Like many sites, Laceys uses "cookies" to collect information. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our website or even order goods. You may ask for a full list of the cookies Laceys collects by sending an email to info@laceys.co.za.

5.3. Our website may contain electronic image requests (sometimes referred to as "web beacon" requests) 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. Laceys merely uses them to compile anonymous information about its website and/or the Service.

## **6. Security**

6.1. The security of your personal information is important to us, but no method of transmission over the Internet, or method of electronic storage, is 100% secure. While Laceys strives to use commercially acceptable means to protect your personal information, Laceys cannot guarantee its absolute security, but Laceys can guarantee that it will take all reasonable measures to protect the security of your data.

## **7. Access to your information**

7.1. You have a right to access certain personal records Laceys holds about you. Requests can be made to Laceys' Information Officer in writing by email to MagsH@laceys.co.za.

## **8. Accuracy and correctness**

8.1. Laceys wants to make sure that your information is accurate and up to date. You may also ask Laceys to correct or remove any information that you think is inaccurate and you can do so by sending us an e-mail to MagsH@laceys.co.za

## **9. Transfers of personal information outside South Africa**

- 9.1. Laceys may transfer personal information outside South Africa to a foreign country for the purposes of providing the Service. Personal information may be stored on servers located outside South Africa in a foreign country whose laws protecting personal information may not be as stringent as the laws in South Africa. You consent to Laceys processing your personal information in a foreign country whose laws regarding processing of personal information may be less stringent. Laceys will at all times ensure that all reasonable measures to protect the security of your data are taken and that any data transferred out of the country will only be processed in accordance with Laceys' instructions.

## **10. Links to other websites and social media platforms**

- 10.1. This privacy policy applies only to our website, and to the Service, and not to websites or social media platforms or pages owned and/or operated by third parties. Laceys may provide links to other websites which Laceys believes may be of interest to its visitors. Laceys aims to ensure that such websites are of the highest standard. However, due to the nature of the Internet, Laceys cannot guarantee the privacy standards of websites to which Laceys links or be responsible for the contents of sites other than this one, and this privacy policy is not intended to be applicable to any linked, non-Laceys site or social media platform.

## **11. Third Party Sites and Services**

- 11.1. Laceys encourages you to review the privacy statements of the websites and applications ("Third Party Sites") you choose to link to from Laceys in order for you to understand how those Third Party Sites collect, use and share your information. Laceys is not responsible for the privacy statements or other content on Third Party Sites outside of Laceys and the Laceys family of sites related to the Service.
- 11.2. You specifically consent that Laceys may share your personal information with the following third party services through the use of the Services and that your interactions via this website and with Laceys may result in the following privacy policies of such third parties applying to your personal information:

- 11.2.1. Stock2Shop
- 11.2.2. Netmechanic
- 11.2.3. GoMedia
- 11.2.4. Dawn Wing
- 11.2.5. Vectra
- 11.2.6. Magento

## **12. Changes to this policy**

- 12.1. Laceys may amend this policy from time-to-time. Please check our website periodically to inform yourself of these changes.



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### 13. Indemnity

Through your interactions with the Service and with Laceys you accept that Laceys takes reasonable and practical steps to safeguard personal information in its possession. To the fullest extent permissible by law, you hereby indemnify and hold harmless Laceys, its employees, related entities, service providers and agents against any liability, damages and/or legal action whatsoever and howsoever arising, including negligence on the part of Laceys, its employees, service providers or agents and Laceys shall not accept liability for any damages or any type of loss suffered by you when utilising the Service and Third Party Sites.

New Lacey's Promotions (Pty) Ltd

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