

Standard Website Privacy & Cookies Policy

The Protection of Personal Information Act, 2013 (“POPI”) came into complete commencement on 1 July 2021, in this regard we have a number of obligations and duties in terms of POPI that we must comply with. The protection of your personal information is a high priority for us, and we have taken steps to ensure that your personal information is protected and remains private.

In addition to this document serving as our privacy policy, this document will also serve as our data subject notification as contemplated in section 18 of POPI. In this regard, this document will inform you of what personal information we collect, why we collect it, how we use it and what safety measures are in place to protect it.

Where we refer to “process”, it means how we collect, use, store, make available, destroy, update, disclose, or otherwise deal with your personal information. As a general rule we will only process your personal information if this is required to deliver or offer a service, provide a product or carry out a transaction.

We may combine your personal information and use the combined personal information for any of the purposes stated in this Privacy Policy.

In this document any reference to “we” or “us” or “our” is reference to **Bargain Books**.

If you use our services, goods and/or products, you agree that we may process your personal information as explained under this Privacy Policy.

We may change this Privacy Policy from time to time if the law or our business practices requires it.

The version of the Privacy Policy displayed on our website at the time of your interaction with us will be applicable.

What is personal information?

Personal information refers to any information that identifies you or specifically relates to you. Personal information includes, but is not limited to, the following information about you:

Age	Financial history	Personal views
Belief	Gender	Physical address
Birth	Identity number	Physical health
Biometric	Language	Pregnancy
Colour	Location information	Race
Conscience	Marital Status	Religion
Correspondence	Mental Health	Sex
Criminal history	Medical History	Sexual orientation
Culture	Name	Social origin
Disability	National Origin	Symbol
Education	Online identifier	Telephone number
E-mail address	Other particular assignment	Well being

Employment history
Ethnic origin

Personal opinions
Personal preferences

Is the supply of personal information voluntary or mandatory?

The supply of certain personal information is mandatory where we are required to collect such information in terms of applicable legislation. If you do not provide this personal information, we may be unable to comply with our legal obligations or conclude or perform a contract with you.

We may be required to collect and process personal information in terms of the following legislation, where applicable:

- Basic Conditions of Employment Act, No. 75 of 1997
- Labour Relations Act, No. 66 of 1995
- Employment Equity Act, No. 55 of 1998
- Unemployment Insurance Act, No. 63 of 2001
- Compensation for Occupational Injuries and Diseases Act, No. 130 of 1993
- Income Tax Act, No. 58 of 1962
- Companies Act, No. 71 of 2008
- National Credit Act, No. 34 of 2005 (where customers apply for credit facilities)
- Consumer Protection Act, No. 68 of 2008

In addition, where required, personal information may be processed in terms of the Protection of Personal Information Act, No. 4 of 2013.

In other instances, the supply of personal information is voluntary. However, where such information is necessary for us to:

- Create and manage customer accounts
- Administer loyalty programmes
- Process credit applications
- Complete online purchases and deliveries
- Conduct direct marketing (where consent has been obtained)
- Respond to customer queries

Failure to provide the required personal information may result in us being unable to provide the requested products or services.

When will we process your personal information?

We will only process your personal information for lawful purposes relating to our business if the following applies:

- if you have consented thereto.
- if a person legally authorised by you, the law, or a court, has consented thereto.
- if it is necessary to conclude or perform under a contract, we have with you.
- if the law requires or permits it.

- if it is required to protect or pursue your, our or a third party's legitimate interest.

What is special personal information?

Special personal information is personal information about the following:

Biometric information	Philosophical beliefs	Sex life
Criminal behaviour	Political persuasion	Trade union membership
Ethnic origin	Race	
Health	Religious beliefs	

When will we process your special personal information?

We may process your special personal information in the following circumstances:

- if you have consented to the processing.
- if the information is being used for any Human resource or payroll requirement.
- if the processing is needed to create, use, or protect a right or obligation in law.
- if the processing is for statistical or research purposes and all legal conditions are met.
- if the special personal information was made public by you.
- if the processing is required by law.
- if racial information is processed, and the processing is required to identify you; and / or if health information is processed, and the processing is to determine your insurance risk, or to comply with an insurance policy or to enforce an insurance right or obligation.

When and from where we obtain personal information about you?

We may collect personal information about you from the following sources:

- Directly from you when you:
 - Purchase products in-store or online
 - Apply for a credit facility
 - Register for a loyalty programme
 - Create an online account
 - Subscribe to marketing communications
 - Contact us via email, telephone, social media, or customer support
 - Participate in surveys, competitions, or promotions
- From your use of our website, mobile platforms, or digital channels, including through cookies and similar technologies.
- From publicly available sources where you have deliberately made your information public.
- From third parties where it is lawful to do so, including:
 - Payment service providers and banks involved in processing transactions
 - Credit bureaux and credit assessment service providers (where you apply for credit)
 - Delivery and courier service providers
 - Marketing service providers and advertising platforms
 - Fraud prevention agencies
 - Regulatory authorities or governmental bodies where required by law
 - Our service providers, agents, and subcontractors who assist us in operating our business

Where required by law, we will obtain your consent before collecting personal information about you from third parties.

Reasons we need to process your personal information.

We process your personal information for the following purposes:

- To provide you with our products and services, whether in-store or online.
- To process transactions and payments.
- To administer and manage your credit facility (where applicable), including credit assessments and account management.
- To deliver products, documents, and notices to you.
- To manage and administer customer accounts.
- To enable your participation in our loyalty programme, including:
 - Determining eligibility
 - Allocating and managing reward points
 - Monitoring qualifying purchases
 - Informing you of relevant offers and benefits
- To communicate with you regarding your purchases, accounts, queries, complaints, and service updates.
- To respond to enquiries, requests, or complaints.
- To conduct direct marketing where you have consented or where otherwise permitted by law.
- To conduct customer satisfaction surveys and promotional campaigns.
- To improve, develop, and enhance our products, services, stores, and online platforms.
- To conduct market research, analytics, and statistical analysis (on an aggregated or anonymised basis where possible).
- To verify your identity and prevent fraud or other unlawful activity.
- To comply with applicable laws, regulations, industry codes, and regulatory requirements.
- To enforce our contractual rights and protect our legal interests.
- For internal record-keeping, reporting, and administrative purposes.

How we use your personal information for marketing

We may use your personal information to market our products, services, promotions, and special offers to you.

We may communicate with you for marketing purposes through:

- In-store communications
- Post
- Telephone
- SMS
- Email
- Other electronic communication channels

Where you are an existing customer, we may send you direct marketing communications in respect of similar products or services, subject to your right to opt out at any time.

Where you are not an existing customer, or where required by law, we will only send you direct marketing communications by electronic means if you have given us your prior consent.

You have the right to withdraw your consent or opt out of receiving marketing communications at any time by:

- Following the unsubscribe instructions included in electronic communications;
- Contacting us using the details provided in this Privacy Policy; or
- Updating your marketing preferences through your customer account (where applicable).

Your withdrawal of consent will not affect the lawfulness of any processing conducted prior to such withdrawal.

When how and with whom we share your personal information?

In general, we will only share your personal information if any one or more of the following apply:

- if you have consented to this.
- if it is necessary to conclude or perform under a contract, we have with you;
- if the law requires it; and / or
- if it's necessary to protect or pursue your, our or a third party's legitimate interest.

Under what circumstances will we transfer your information to other countries?

We will only transfer your personal information to third parties in another country in any one or more of the following circumstances:

- where your personal information will be adequately protected under the other country's laws or an agreement with the third-party recipient.
- where the transfer is necessary to enter into or perform under a contract with you, or a contract with a third party that is in your interest.
- where you have consented to the transfer; and / or
- where it is not reasonably practical to obtain your consent, the transfer is in your interest.

This transfer will happen within the requirements and safeguards of the law. Where possible, the party processing your personal information in the other country will agree to apply the same level of protection as available by law in your country or if the other country's laws provide better protection the other country's laws would be agreed to and applied.

How we secure your personal information

- We will take appropriate and reasonable technical and organisational steps to protect your personal information according to industry best practices. Our security measures (including physical, technological, and procedural safeguards) will be appropriate and reasonable. This includes the following:
 - keeping our systems secure (like monitoring access and usage);
 - storing our records securely.
 - controlling the access to our buildings, systems and/or records; and
- safely destroying or deleting records.
- Ensure compliance with best practice standards.

How long do we keep your personal information?

We will keep your personal information for as long as:

- the law requires us to keep it.
- a contract between you and us requires us to keep it.
- you have consented for us keeping it.
- we are required to keep it to achieve the purposes listed in this Privacy Policy.
- we require it for statistical or research purposes.
- a code of conduct requires us to keep it; and / or
- we require it for our lawful business purposes.

Take note: We may keep your personal information even if you no longer have a relationship with us, for the historical data that may be required by your employer or employee.

Our cookie policy

A cookie is a small piece of data sent from our websites or applications to your computer or device hard drive or Internet browser where it is saved. The cookie contains information to personalise your experience on our websites or applications and may improve your experience on the websites or applications. The cookie will also identify your device, like the computer or smart phone.

By using our websites or applications you agree that cookies may be forwarded from the relevant website or application to your computer or device. The cookie will enable us to know that you have visited the website or application before and will identify you. We may also use the cookie to prevent fraud and for analytics.

Your duties and rights about the personal information we have about you.

You must provide proof of identity when enforcing the rights below.

You must inform us when your personal information changes.

Please contact our Information Officer to give effect to any of the below rights.

You have the right to request access to the personal information we have about you by contacting us. This includes requesting:

- confirmation that we hold your personal information.
- a copy or description of the record containing your personal information; and
- the identity or categories of third parties who have had access to your personal information.

We will attend to requests for access to personal information within a reasonable time. You may be required to pay a reasonable fee to receive copies or descriptions of records, or information about third parties. We will inform you of the fee before attending to your request.

Please note that the law may limit your right to access information.

You have the right to request us to correct or delete the personal information we have about you if it is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, obtained unlawfully or we are no longer authorised to keep it. You must inform us of your request in writing. It may take up to 15 business days for the change to reflect on our systems. We may request documents from you to verify the change in personal information.

A specific agreement that you have entered into with us may determine how you must change your personal information provided at the time when you entered into the specific agreement. Please adhere to these requirements. If the law requires us to keep the personal information, it will not be deleted upon your request. The deletion of certain personal information may lead to the termination of your business relationship with us.

You may object on reasonable grounds to the processing of your personal information.

We will not be able to give effect to your objection if the processing of your personal information was and is permitted by law; you have provided consent to the processing and our processing done according to your consent or the processing is necessary to conclude or perform under a contract with you.

Where you have provided your consent for the processing of your personal information, you

may withdraw your consent. If you withdraw your consent, we will explain the consequences to you. We may proceed to process your personal information even if you have withdrawn your consent if the law permits or requires it. It may take up to 15 business days for the change to reflect on our systems, during this time we may still process your personal information. You must inform us of any objection in writing.

You have a right to file a complaint with us or any Regulator with jurisdiction about an alleged contravention of the protection of your personal information by us. We will address your complaint as far as possible.

The contact details for the Information Regulator is as follows:

Email:	POPIAcomplaints@inforegulator.org.za
Postal Address:	P.O. Box 31533, Braamfontein, Johannesburg, 2017
Physical Address:	JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001.

How can you get in touch with us?

For any queries in relation to this letter or our processing of your personal information in general, you can contact our Information Officer and/or Deputy Information Officer at the following details:

Name: John O'sullivan/ Stacy Staudt
Contact Number: 021 706 1461
Email Address: john@bargainbooks.co.za/ stacy@bargainbooks.co.za

Physical Address: 10 Mymoena Crescent, Athlone Industrial Park, Athlone, Cape Town, 7764

