



INNOVATION™
DELIVERY
RESULTS

DATA PRIVACY AND SECURITY STATEMENT

for

BUI MEDICAL TECHNOLOGY SUPPLIERS AND ALL
SUBSIDIARY COMPANIES

In accordance with

The Following Data Protection Acts:

Protection of Personal Information Act, 4 of 2013 – South Africa

Data Protection Act, 2019 – Kenya

California Consumer Privacy Act of 2018 (last amended in 2019) – United States of America

The Data Protection Act 2018 – United Kingdom

GDPR EU Regulation 2016-679

SIGNOFF SHEET

AUTHORS/CONTRIBUTORS

Author(s)	Position	Email	Contact Number
Reinardt Munnik	Group Legal	legal@firsttech.co.za	
Rob Catterall	Group Legal	legal@firsttech.co.za	
Grace Uchena	Group Legal	legal@firsttech.co.za	
Nandi Ndaba	Group Legal	legal@firsttech.co.za	
Richard Hammond	Head of Group Legal	Richardh@firsttech.co.za	

CHANGE RECORD

Date	Author(s)	Version	Change Reference
2016-06-01	Reinardt Munnik	V1	First version
2017-07-01	Reinardt Munnik	V2	Included revision history table and quality records table
2017-11-01	Rob Catterall	V3	Review and Update
2019-03-01	Grace Uchena	V4	Review and Update
2020-01-01	Nandi Ndaba	V5	Review and Update
2021-06-01	Richard Hammond	V6	Review and Update

REVIEWS

Date	Author(s)	Version	Change Reference
2016-06-01	Yuraisha Mari	V1	First version
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2017-11-01	Yuraisha Mari	V3	Review and Update
2019-03-01	Richard Hammond	V4	Review and Update
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GLOSSARY OF TERMS

Term	Explanation
Affiliated Companies	In relation to First Technology Investments (Pty) Ltd, a subsidiary of this entity, or any division or operating branch of each subsidiary of this entity and all of its subsidiaries
BUI	BUI Medical and Technology Suppliers (Pty) Ltd and all subsidiaries.
Electronic Document	Soft copy of a document that is electronically stored within BUI approved guidelines
Employees	An employee and/or any member of staff and/or independent contract and/or subcontractor of the Employer and/or any individual or entity involved in the provision of services on behalf of the Employer
External Document	Document originated by an external third party
Objective	The defined purpose or aim of a Process, an Activity, or an organisation. Objectives are usually expressed as measurable targets.
Official Document	Document established such as BUI Policies, Manuals and Processes
Permanent Employee	An employee appointed in a position on the staff establishment of an organisation on an open-ended contract.
Policy	A set of principles or rules formulated and enforced by top management intended to direct and limit actions in pursuit of an agreed practice or long-term goals.
Procedure	A fixed, step-by-step sequence of Activities or cause of action (with definite start and end points) that must be followed in the same order to correctly perform a task.
Process	A structured set of Activities designed to accomplish a specific Objective. A Process takes one or more defined inputs and turns them into defined outputs. A Process may include any of the roles, responsibilities, tools, and management controls required to reliably deliver the outputs. A process may comprise of one or several Procedures.
Record	Information created, received, and maintained as evidence and information by an organisation or person, in pursuance of legal obligations or in the transaction or business.
Standard	A standard specifies uniform uses of specific technologies or configurations. Here we are talking about a specific internal standard of an organisation.
Subsidiary(ies)	Shall mean the following wholly owned subsidiaries of BUI Medical and Technology Suppliers (Pty) Ltd (as updated from time to time): <ol style="list-style-type: none"> 1. BUI Security Services (Pty) Ltd 2. BUI Ltd 3. BUI Consulting LLC 4. MTOM Systems Ltd

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1. INTRODUCTION

BUI respects your privacy, and the protection of your personal information is important to us. We are committed to ensuring the security and protection of the personal information that we process, and to provide a compliant and consistent approach to data protection, in accordance with the requirements of all applicable laws as amended from time to time.

This Statement describes how BUI will collect, use, disclose, and protect your personal information, and your rights in this regard, specifically in relation to the website we operate, with URL www.bui.co.za (the "Site") and any Applications which we may partially or wholly develop, manage, or offer, which include but are not limited to (the "Apps").

By using the Site and/or Apps, you consent to the collection, usage, processing, and storage of personal information in accordance with this Privacy Statement and/or in compliance with the law.

2. PERSONAL INFORMATION COLLECTED

Your personal information that is collected by the Site and/or Apps may be used for the following purposes:

- 2.1. To register you for inclusion in our service and/or Apps; to fulfil your requests; to investigate and/or address your queries/correspondence; to contact you to obtain or provide information with respect to transactions; to process transactions; to verify the accuracy of our records; or to contact you regarding customer satisfaction surveys;
- 2.2. In relation to the ordering, purchase and/or sale, and delivery of goods and/or services;
- 2.3. To contact you regarding newsletters, new features, special offers, promotional competitions, goods or services, or any other products offered by us, our affiliates, or our partners, (unless you have opted out from receiving marketing material from us, which you may do at any time);
- 2.4. For record-keeping purposes;
- 2.5. The fulfilment of any contractual or legal obligation;
- 2.6. The pursuit of any contractual or legal right;
- 2.7. To improve our goods, services, and your experience on our Site and/or Apps, for example, by processing technical information such as your browser version and operating system;
- 2.8. To provide us with a better understanding of our target market, for example, processing information gathered through cookies and code;
- 2.9. For the purposes of research and statistics to assist in our business operations;
- 2.10. Some voluntarily provided personally identifiable information may be captured for a specific, clearly defined/obvious purpose, and processed in accordance with and in furtherance of this purpose;

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3. USE AND RETENTION OF PERSONAL INFORMATION

- 3.1. We may collect your information directly from you, or from a range of other sources, in accordance with the law. While using our Site and/or Apps, we may request that you provide us with certain personal information that can be used to contact or identify you. Personal information may include, but is not limited to: Full names, age, date of birth, ID number, comprehensive contact details, postal and physical addresses, banking details, financial details, credit history, purchasing history, details of income, job title, employer, employment history, your location, and your device information.
- 3.2. Where possible, we will indicate when the disclosure of information is mandatory as opposed to voluntary.
- 3.3. Your personal information will be retained in accordance with any agreement between us and applicable law, and by continuing to use our Site and/or Apps, and/or by providing us with personal information, you agree that we may retain that information for as long as it is necessary for current or potential future business operations and/or opportunities with you, after which time it will be duly destroyed.

4. YOUR CONSENT

- 4.1. You consent to us disclosing your personal information to the following third parties, for the purposes stated below:
 - 4.1.1. Any applicable third party necessary for the outsourcing of/assistance with any of the abovementioned functions/purposes, or in pursuit of fulfilling the abovementioned functions/purposes or part thereof;
 - 4.1.2. To our employees and/or third-party service providers who assist us in interacting with you for the ordering, purchase and/or sale and delivery of goods and/or services;
 - 4.1.3. To law enforcement, government officials, fraud detection agencies or other third parties when we believe, in good faith, that the disclosure of personal information is necessary to prevent physical harm or financial loss, to report suspected illegal or unlawful activity, or to investigate violations of the Privacy Policy;
 - 4.1.4. To our contracted service providers, who assist us with our business operations. These service providers are contractually mandated to only process your information in terms of POPI and for the specified purpose;
 - 4.1.5. To our suppliers, in order for them to liaise directly/indirectly with you/us, in the event of you submitting a warranty claim/complaint/query/other correspondence regarding any goods or services which may require their involvement.
- 4.2. Where you provide personal information of someone else to us on the Site and/or the Apps, or in any other manner or on any other platform, you agree that you have obtained the necessary consent of those people/businesses/entities to share that information with us.

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5. THE SECURITY OF PERSONAL IDENTIFIABLE DATA

BUI takes the confidentiality of your personal information seriously, and we will ensure that all of our employees, third party service providers, divisions, partners, and any other people or entities, who may have access to your personal information, are bound by confidentiality and compliance agreements in relation to all personal information we share with them.

- 5.1. Whilst we take all reasonable steps to protect your personal information, we cannot accept any liability whatsoever for unauthorised or unlawful disclosures/processing of your personal information, made by/as a result of third parties who are not subject to our control.
- 5.2. We do not regulate or control third parties, and if you disclose your personal information to a third party, we cannot accept liability whatsoever suffered as a result thereof. You should always read a third party's privacy policy before sharing your personal information with them.

6. CROSS BORDER TRANSFER

You agree to the transfer of your personal information to countries outside of South Africa and/or your country of residence, which have different data protection rules than in South Africa and/or your country, for the purposes of current or potential future business operations or opportunities.

7. SITE CONTENT

- 7.1. Our Site and/or Apps do not offer information intended to attract children. We do not knowingly solicit personal information from children under the age of majority.

8. YOUR RIGHTS

- 8.1. You have the right to:
 - 8.1.1. Request that we confirm whether or not we have records of your personal information, and to request that we provide you with a copy thereof, alternatively, that we correct, update, or delete these records. Such requests may be subject to the payment of a legally allowable fee;
 - 8.1.2. Object to the processing of your personal information;
 - 8.1.3. Object to automated decision-making and profiling;
 - 8.1.4. Unsubscribe from direct marketing; and
 - 8.1.5. Withdraw your consent to process your personal information.
- 8.2. Your rights in this regard may be exercised by contacting us on Legal@firsttech.co.za
- 8.3. You further have the right to lodge a complaint with the applicable regulator if you believe we are interfering with the protection of your personal information.

9. LOG DATA

- 9.1. We collect Log Data whenever you visit/use our Site and/or Apps. This Log Data may include, but is not limited to, information such as your computer's Internet Protocol address, browser type, browser version, the pages of our Site and/or Apps that you visit and for how long, and the time and date of your visit.

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- 9.2. In addition, we may share your information with third-party service providers that collect, monitor, and analyse this information. These third-party service providers may perform a variety of tasks on our behalf, including but not limited to processing payment, data analytics and research, electronic message delivery, and website hosting. However, we do not share your personal information with third parties (other than service providers acting on our behalf) unless we have a lawful basis for doing so, and when sharing your personal information with third-party service providers, we take all reasonable measures to ensure that your personal information remains secure.

10. COOKIES

- 10.1. “Cookies” are files with a small amount of data, which may include an anonymous unique identifier, generated by a website, and saved on your computer’s hard drive by your browser.
- 10.2. We use cookies to collect information. Cookies assist us to recognise if you have used our Site and/or Apps before, to facilitate your on-going access to and use thereof, and to allow us to track usage behaviour and compile aggregate data that will allow us to improve the functionality and your experience of the Site and/or Apps.
- 10.3. You can change your browser settings to refuse all cookies, but as a result, you may not be able to view, access, or use all parts of our Site and/or Apps. By continuing to use our Site and/or by not disabling “cookies”, you are deemed to consent to our use of any personal information collected using those cookies.

11. SECURITY

- 11.1. The security of your personal information is important to us, and we have adopted commercially reasonable security measures to protect your personal information, including reasonable organisational, technical, and administrative measures. Only authorised staff have access to your personal information and are required to honour its confidentiality. However, no method of electronic transmission or storage is 100% secure, and despite taking all reasonable steps to protect your personal information, we cannot guarantee its full and absolute security, and by continuing to use our Site and/or Apps, and/or in providing us with your information, you agree that you will not hold us liable for data leaks that may occur.
- 11.2. We will notify you if we become aware of any unauthorised use, disclosure, or processing of your personal information. Should you become aware of such a privacy breach, you agree that you will take all necessary steps to mitigate any damage that may occur as a result thereof.
- 11.3. If you have reason to believe that your interaction with us and/or the personal information you have provided to us is no longer secure, please immediately notify us of the problem by contacting us in accordance with the “Contact Us” section below.

12. PRIVACY STATEMENT AMENDMENTS

We reserve the right to amend or update our Privacy Statement, and such amendments will be clearly reflected on the Site and/or Apps, which you may view at any time. Your continued use of the Site and/or Apps after amendments are made to the Privacy Statement will constitute your acknowledgment of and consent to the amendments.

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13. DISCLAIMER

- 13.1. You use the Site and/or Apps at your own risk and assume full responsibility for any risk or loss resulting from use of the Site and/or Apps or reliance on any information thereon.
- 13.2. Whilst we take reasonable measures to ensure that the content of the Site and/or Apps is accurate, we make no representations or warranties, as to the quality, timeliness, operation, integrity, availability, or functionality of the Site and/or App or as to the accuracy, completeness, or reliability of any information thereon. If any such representations or warranties are made by our representatives, we will not be bound thereby.
- 13.3. We do not accept liability for any damage or loss arising from your access to or use of the Site and/or Apps and/or any content therein, unless otherwise provided by law.
- 13.4. Any views or statements made or expressed on the Site and/or Apps are not necessarily our views, or the views of our directors, employees and/or agents.
- 13.5. In addition to the disclaimers contained elsewhere on the Site and/or Apps, or in this Privacy Statement, we also make no warranty or representation that the information or files available on the Site and/or Apps are free of viruses, spyware, malware, trojans, destructive materials or any other data or code which is able to corrupt, destroy, compromise, disrupt, disable, harm, jeopardise or otherwise impede in any manner the operation, stability, security functionality or content of your computer system, computer network, hardware or software in any way.

14. CONTACT US

If you have any queries or concerns with regards to our Privacy Statement, kindly contact us at Legal@firsttech.co.za