

July 2021

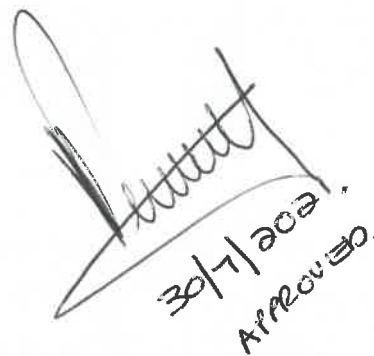
THE CHEMICAL AND ALLIED INDUSTRIES' ASSOCIATION'S EXTERNAL PRIVACY NOTICE - SOUTH AFRICA

This Privacy Notice (the "Privacy Notice") sets out how the Chemical and Allied Industries' Association ("CAIA") handles the personal information that is processed, the types of personal information collected, how such personal information is used, who personal information is shared with, and how personal information is protected.

1 Questions about this Privacy Notice

If there are any questions or queries about this Privacy Notice, CAIA's privacy practices, or if an update is required to the information provided to us, please contact the Information Officer at:

Company:	Chemical and Allied Industries' Association
Name:	Deidre Penfold
Designation	Executive Director
Telephone number:	011 327 6547
E-mail address:	caiainfo@@caia.co.za



30/7/2021
Approved

2 Terminology

Please be familiar with the following words and phrases as they have particular meanings in terms of the Protection of Personal Information Act No. 4 of 2013 ("POPIA") and are used throughout this Privacy Notice:

Term	Definition
Personal Information	<p data-bbox="627 510 1497 622">Information about an identifiable, living, natural person, and in so far as it is applicable, an identifiable, existing juristic person (for example the member company of CAIA), including –</p> <ul data-bbox="675 667 1497 1727" style="list-style-type: none"><li data-bbox="675 667 1497 846">• information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;<li data-bbox="675 898 1497 976">• information relating to the education or the medical, financial, criminal or employment history of the person;<li data-bbox="675 1010 1497 1122">• any identifying number, symbol, email address, physical address, telephone number or other particular assigned to the person;<li data-bbox="675 1167 1497 1200">• the biometric information of the person;<li data-bbox="675 1245 1497 1279">• the personal opinions, views or preferences of the person;<li data-bbox="675 1323 1497 1469">• correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;<li data-bbox="675 1514 1497 1570">• the views or opinions of another individual about the person; and<li data-bbox="675 1626 1497 1727">• the name of the person where it appears with other personal information relating to the person or where the disclosure of the name itself would reveal information about the person.

Special personal information	<p>Information relating to a data subject's:</p> <ul style="list-style-type: none"> • Racial or ethnic origin; • Political opinions and persuasion; • Religious beliefs or beliefs of a similar nature; • Trade union membership; • Physical or mental health or condition; • Sexual life or sexual orientation; • Offences or alleged offences or information relating to any proceedings for offences committed or allegedly committed; or • Biometric data allowing or confirming the identification of a person.
Processing	<p>Any operation or activity or set of operations whether or not by automatic means concerning personal information, including the collection, receipt, recording, organisation, storage, updating or modification, retrieval, alteration, consultation or use, dissemination by means of transmission, distribution or making available in any other form, merging, linking, as well as restricting, erasure or destruction of information.</p>
Data Subject	<p>The individual or juristic person to whom the personal information relates.</p>

3 The type of information that CAIA may process

The types of personal information, including special personal information CAIA may hold includes:

- 3.1 contact information (such as name, postal or email address, and phone number);
- 3.2 business contact information (such as job title, department and name of organisation);
- 3.3 professional information (such as experience with CAIA products or services);
- 3.4 username and password for the accounts CAIA may establish on CAIA's websites;
- 3.5 content (such as photographs, comments, and business information);
- 3.6 information provided in connection with a membership application or membership renewal application;
- 3.7 information generated by CAIA in the course of managing CAIA's relationships, such as a history of interactions;
- 3.8 information in connection with interactions with pages visited on CAIA websites, such as the IP address, browser type, device used to access CAIA websites, preferences and information clicked on the CAIA websites; and
- 3.9 all data submitted to comply with the requirements to obtain or maintain Responsible Care® signatory status (such as but not limited to audit results and Key Performance Indicator ("KPI") data).

Please note that the provision of personal information, including special personal information, to CAIA is voluntary, however, in certain circumstances a failure to provide CAIA with the requisite information may mean that CAIA is unable to process the application for membership with CAIA, or the Responsible Care® signatory status may lapse due to non-compliance with agreed requirements.

4 Purposes for which CAIA process personal information

CAIA processes personal information for a number of reasons including, but not limited to, –

- 4.1 establish/renew CAIA membership;
- 4.2 administer and provide CAIA membership benefits;
- 4.3 process membership applications or membership renewal applications, that are submitted to CAIA;

- 4.4 register for and facilitate participation in CAIA programmes, conferences and events whether in person or on-line;
- 4.5 correspond regarding events, or other CAIA-related products or services, including those of the Responsible Care® Initiative and its compliance requirements;
- 4.6 populate the online CAIA member directory and email lists, and provide contact details to other parties such as Government (where express consent has been obtained in writing for the latter);
- 4.7 send CAIA newsletters, other informational materials, advocacy/regulatory/Responsible Care® Initiative-related participatory invitations that may be of interest as a CAIA member. CAIA will provide the opportunity to opt out of receiving such information in each such communication;
- 4.8 to allow proper functioning of CAIA websites which includes, amongst others, proper display of content, interface personalisation and ensuring that the website is safe and secure to protect against misuse.
- 4.9 to administer, collect and analyse data submitted to CAIA as a part of Responsible Care® compliance requirements through the Key Performance Indicators' questionnaire and submission system, and to report on outcomes including in a disaggregated manner where necessary to keep sensitive information confidential.

5 Legal grounds for processing personal information

In South Africa, POPIA requires CAIA to process personal information lawfully and in a reasonable manner that does not infringe privacy rights as a data subject. Where CAIA processes personal information to provide a product or service, CAIA does so because it is necessary to perform CAIA's contractual obligations. The purpose for which personal information is processed is necessary in CAIA's legitimate interests to provide products and services, to maintain relationships, and to protect CAIA's business, for example, against fraud. In addition, CAIA may process personal information in order to comply with legal requirements to which it is subject (for example, tax or financial reporting requirements).

6 Disclosure of personal information relating to data subjects

CAIA intends to keep personal information, including special personal information, confidential, in compliance with legal obligations. CAIA does not sell, rent, trade or otherwise disclose any personal information, including special personal information, to third parties, other than as described in this Privacy Notice, for the purposes described above, or as CAIA discloses at the time the information is collected. CAIA may disclose personal information in accordance with and where permitted by applicable law or a particular data subject:

- 6.1 in order for CAIA to comply with legal obligations, e.g. where CAIA is required to disclose certain information to tax authorities or where CAIA is required to respond to requests by law enforcement;
- 6.2 to protect the security or integrity of the CAIA business, including databases and systems as well as the safety of CAIA employees, members and website visitors;
- 6.3 to any of CAIA's outsourced vendors, suppliers or distributors to facilitate the provision of contracted services or goods or to provide expanded services to members and website visitors, for example; outsource the processing of certain interactive website functions, administering email services, and specific studies by CAIA and/or its partners/service providers; and
- 6.4 to any other third party, where consent has been provided.

7 Security measures used to protect personal information

CAIA takes appropriate physical, technical and organisational security measures designed to safeguard and secure any personal information, including special personal information, that is provided to CAIA. Nevertheless, unencrypted transmission to CAIA via the internet is not completely secure and CAIA cannot guarantee the security of personal information during any such unencrypted transmission.

8 International transfer of personal information

CAIA may disclose or transfer personal information, including special personal information, to a third party situated in a country outside South Africa for further processing in accordance with the purposes set out above, in particular personal information may be stored in a cloud administered by third party service providers situated outside South Africa. In these circumstances CAIA will, as required by section 72 of POPIA, ensure that privacy rights are adequately protected by organisational, technical, contractual and/or other lawful means.

9 Retention of personal information

Personal information will not be retained for longer than required to fulfil the purpose for which the personal information was collected or for a period of time thereafter as required by applicable domestic law or where CAIA has a legitimate or lawful purpose for retaining such information.

10 Data subjects' rights

In terms of POPIA, the following rights of data subjects are applicable -

- 10.1 the right of access to personal information, including special personal information relating to the data subject;

- 10.2 the right to have the processing of personal information, including special personal information restricted;
- 10.3 the right to object to the processing of personal information, including special personal information;
- 10.4 the right not to be subject to decisions based solely on automated processing of personal information and/or special personal information;
- 10.5 the right to have inaccurate personal information, including special personal information, corrected;
- 10.6 the right to have personal information, including special personal information destroyed and/or deleted

11 **Links to other websites**

CAIA websites may contain links to other websites. CAIA is not responsible for the privacy practices or the content of third-party websites. To help ensure the protection of privacy, it is recommended that the privacy policy of any website visited via a link from any CAIA website is reviewed.

12 **Updates to this Privacy Notice**

CAIA may at any time at its sole discretion revise or update this Privacy Notice. CAIA will indicate at the top of the Privacy Notice when the Privacy Notice was most recently updated. All changes are effective immediately when they are posted and apply to all access to and use of CAIA websites thereafter. If there is an objection to any modification, the sole recourse is to discontinue using CAIA websites and providing CAIA with personal information.

13 **Cookies**

In order to collect certain information described in this Privacy Notice, CAIA may use cookie technology on its websites. A cookie is a small text file which is sent to the browser the website is being accessed from and stored on that browser's computer's hard drive, mobile phone or other device. Session cookies make it easier to navigate CAIA websites and expire when the browser is closed. Tracking cookies remain longer and help in understanding how CAIA websites are used and enhance user experience. The browser can be set to provide a notification when a cookie is received. This enables an informed decision regarding whether or not it is accepted or not. However, some of the services and features offered through CAIA websites may not function properly if cookies are disabled.