10 Wigford Road Masons Mill Pietermaritzburg P.O Box 1250
Pietermaritzburg 3200
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Facsimile + 27 33 398 1201
E-Mail: pmb@troxsa.co.za
www.troxsa.co.za



POPI ACT

Dear Customers and Suppliers

TROX respects your privacy. Personal information data protection is of the utmost importance to us and is a vital step in the process of ensuring we deliver the best quality products and service to you.

Introduction:

TROX GROUP protects your data according to its own IT security and data protection guidelines based on the South African POPI Act. An external legal advisory firm checks the procedures of TROX GROUP to make sure they comply with the regulations.

Many possibilities are available to record and use the customers telephonic/electronic & website data. TROX GROUP takes data protection seriously and has created its own data protection guideline on the basis of the South African POPI Act. We have undertaken to collect as little data as possible and to guarantee the greatest possible amount of transparency. We also guarantee comprehensive protection of your data.

Who we are:

TROX is a global leader in the development, production and sale of components, units and systems for the ventilation and air conditioning of rooms. With 27 subsidiary companies in 26 countries on 5 continents, 14 production facilities, importers and representatives. TROX is present in over 70 countries.

TROX South Africa is based at Pietermaritzburg in KwaZulu-Natal, with an Administrative office and a sales office in Gauteng, covering Botswana, Namibia, North West Province, Free State and Mpumalanga.

The type of personal information we collect:

*We currently collect and process the following information:

- Personal identifiers, contacts and characteristics (name and contact details)
- Data regarding identity (company, business telephone number, department, first and last name)
- General availability (street, city, postal code, country)
- Communication (language, phone number, e-mail address)

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How we obtain the personal information and what we use this information for:

Most of the personal information we process is provided to us directly by you for one of the following reasons:

Website enquiry:

Personal data is required to guarantee the proper settlement of the procedure for which you have entered the data. Your address is required for seminar registration, for example, so that we can send you documentation; the country must be entered for service inquiries in case special regulations have to be taken into consideration for the respective country. In all cases, the data is used to identify you clearly as a customer or prospect so that we can communicate with you and offer you or your company relevant information or documentation (such as specific news, products, lists). Further use of the data does not occur. In particular, we do not make any personal evaluations of your access attempts.

Telephonic Enquiry:

Telephonic enquiries resulting in quotations for goods and services rendered where these quotes will require information from you in regards to the project, the name to whom the quote should be made out to and anything else that would deem the quote complete.

Order

Order placement: The collected user data is saved in our customer processing system. There, the data is used to settle the order and provide customer care (manufacturing shipping, invoicing). In addition, the data of orders made under a collective customer number is available to all users of this collective customer number via the TROX NET access. The service inquiry is passed on to the corresponding departments and processed there. Here, only the data required to ensure proper communication (company, last name, address, country, and e-mail address) is needed.

We also receive personal information indirectly, from the following sources in the following scenarios:

Digital Catalogues

How we use your data:

The data you enter in the contact forms/entry boxes is used only for internal purposes (e.g. for problem-free communication with the user) and not passed on to third parties.

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Sharing of information:

We will not share your personal information, other than to provide you with a service, or as required by law.

When will we process your personal information:

In terms of the Protection of Personal Information Act (POPIA), the justification ground which we base our processing on consist out of the following:

- The data subject or a competent person where the data subject is a child consents to the processing.
 Kindly note that you have the right to withdraw your consent;
- The processing is **necessary** to carry out actions for the conclusion or performance of a contract to1 which the data subject is a party;
- The processing complies with an obligation imposed by law on the business;
- The processing protects a legitimate interest of the data subject;
- The processing is necessary for the proper performance of a public law duty by the business;
 Or
- The processing is necessary for pursuing the legitimate **interests** of the business or of a third party to whom the information is supplied.

How we store your personal information:

Your information is securely stored on our company databases, file servers and end point devices which are securely protected against data breaches.

We shall keep your information for the timeframe prescribed by law and shall dispose it in the manner set out by the act.

Your data protection rights:

- You are entitled to access your personal data by sending a written request to infoza@troxgroup.com. We may charge you a fee for this service.
- You may also request Ashley Govender to correct or supplement any of your personal data which TROX South Africa will undertake as soon as practicable.
- Request the destruction of your personal data. TROX South Africa will consider your request in light of any other laws or regulations, which may prohibit us from destroying your personal data.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at info-za@troxgroup.com if you wish to make a request.

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Contact details:

Name: Ashley Govender

Address: 10 Wigford Road, Masons Mill, Pietermaritzburg 3201

Phone Number: 033 398 9444

E-mail: ashley.govender@troxgroup.com

How to complain:

If you have any concerns about our use of your personal information, you can make a complaint to us at info-za@troxgroup.com

You can also complain to the Information Regulator if you are unhappy with how we have used your Information.

The Information Regulator (South Africa)

33 Hoofd Street Forum III, 3rd Floor Braampark P.O Box 31533 Braamfontein, Johannesburg, 2017

Complaints email: complaints.IR@justice.gov.za