



## **TROUPANT PUBLISHERS PROCESSING NOTICE**

### **IMPORTANT NOTES**

*NO FIREARMS ARE PERMITTED ON THE TROUPANT PUBLISHERS PREMISES.*

*NO ONE IS ALLOWED TO CONSUME DAGGA, ALCOHOL OR DRUGS ON THE TROUPANT PUBLISHERS PREMISES.*

*NO ONE IS ALLOWED ONTO THE TROUPANT PUBLISHERS PREMISES IF UNDER THE INFLUENCE OF DAGGA, ALCOHOL OR DRUGS.*

*WE RESERVE THE RIGHT TO SEARCH YOU, AND/OR TEST YOU FOR DAGGA, DRUGS OR ALCOHOL BEFORE YOU ARE PERMITTED ACCESS TO THE TROUPANT PUBLISHERS PREMISES.*

*PLEASE TAKE NOTE OF OUR STANDARD ACCESS TO THE TROUPANT PUBLISHERS PREMISES  
DISCLAIMER.*

### **1. PURPOSE OF THIS NOTICE**

- 1.1 In order to do business, Troupant Publishers (Pty) Ltd, Registration Number 1995/005201/07 (“we”, “us”, “Troupant Publishers ” or “the company”) in our capacity as a Responsible Party, will have to process Personal Information, and in doing so, will have to comply with a law known as the Protection of Personal Information Act, 4 of 2013 (hereinafter referred to as “POPIA”), which regulates and controls the processing of a legal entity’s and/or an individual’s Personal Information in South Africa, (hereinafter referred to as a “Data Subject”), which processing includes the collection, use, and transfer of a Data Subject’s Personal Information.
- 1.2 In terms of POPIA, where a person processes another’s Personal Information, such processing must be done in a lawful, legitimate and responsible manner and in accordance with the provisions, principles and conditions set out under POPIA.
- 1.3 In order to comply with POPIA, a Responsible Party processing a Data Subject’s Personal Information must:
  - 1.3.1 provide the Data Subject with a number of details pertaining to the processing of the Data Subject’s Personal Information, before such information is processed; and
  - 1.3.2 get permission or consent, explicitly or implied, from the Data Subject, to process his / her / its Personal Information, unless such processing:
    - is necessary to carry out actions for the **conclusion or performance of a contract** to which the Data Subject of the Personal Information is a party
    - is required in order to comply with an **obligation imposed by law**; or

- is for a **legitimate purpose or is necessary to protect the legitimate interest(s) and/or for pursuing the legitimate interests** of i) the Data Subject; ii) the Responsible Party; or iii) that of a third party to whom the Personal Information is supplied; or
  - is necessary for the proper performance of a **public law duty**.
- 1.4 In accordance with the requirements of POPIA, and because your privacy and trust is important to us, we set out below how we, Troupant Publishers collect, use, and share your Personal Information and the reasons why we need to use and process your Personal Information.

## 2. APPLICATION

This Processing Notice applies to you and all persons who come onto our premises and sites, including reception and waiting rooms, offices, operational areas and facilities, manufacturing areas and parking areas (Troupant Publishers premises).

## 3. WHAT INFORMATION WE NEED

3.1 In in order to gain access to the premises, Troupant Publishers has to process the following Personal Information, which pertains to you:

- **Your or your employer or organization's contact information**, such as name, alias, address, identity number, passport number, security number, phone number, cell phone number, vehicle make and registration number, social media user ID, email address, and similar contact data, serial numbers of equipment, details regards the possession of dangerous weapons, your status with an organization, your images and certain biometrics such as finger prints and similar data, which are required for various legitimate interests, and/or lawful reasons.
- **Specific identifiers**, which are required in order to protect legitimate interests, comply with legal obligations or public legal duties, or in order to accommodate you in our workplaces, such as any disabilities, **certain** biometric information which may be required for access control such as fingerprints and personal details which we may record in relation to alcohol or drug testing, and **health records or related details**.
- **Children's Information**, all Personal Information collected and processed from any person under the age of eighteen (18) for the purposes of accessing the Troupant Publishers premises will only be processed with the prior permission of the child's parent or legal guardian, who will be required at all times to accompany such child around the Troupant Publishers premises which he or she is given access to.

## 4. PURPOSE FOR PROCESSING YOUR PERSONAL INFORMATION

4.1 Your personal information will be processed by us for the following purposes:

- to facilitate access into and out of the Troupant Publishers premises;
- to ascertain who is entering and leaving the Troupant Publishers premises;
- to monitor movements on or in the Troupant Publishers premises;
- to ensure a safe working and operating environment;
- to comply with laws, including Security, Health and Safety related laws and legal obligations;
- to manage security services;

- for the purposes of registering all persons who enter and leave the Troupant Publishers premises;
- for the purposes of managing and investigating security incidents; including accidents within the Troupant Publishers premises or attention to emergency evacuations; and
- other security measures in general.

## **5. SHARING AND RETAINING YOUR PERSONAL INFORMATION**

5.1 Your Personal Information may under certain circumstances have to be shared with internal parties and/or third parties for the purposes detailed above.

5.2 Your Personal Information will be disposed of within 12 (twelve) months of you leaving our premises, save where it may be required for a longer period. In this regard we retain personal information in accordance with our Troupant Publishers records retention schedule, which varies depending on the type of processing, the purpose for such processing, the business function, record classes, and record types. We calculate retention periods based upon and reserve the right to retain personal information for the periods that the personal information is needed to: (a) fulfil the purposes described in this Privacy Statement, (b) meet the timelines determined or recommended by regulators, professional bodies, or associations, (c) comply with applicable laws, legal holds, and other legal obligations (including contractual obligations), and (d) comply with your requests.

## **6. ACCEPTANCE**

6.1 By providing us with the Personal Information which we require from you as listed under this Processing Notice:

- You acknowledge that you understand why your Personal Information needs to be processed.
- You accept the terms which will apply to such processing, including the terms applicable to the transfer of such Personal Information cross border.
- Where consent is required for any processing as reflected in this Processing notice, you agree that we may process this particular Personal Information.

6.2 Furthermore you confirm that where you provide us with another person's Personal Information for processing that you have obtained the required permission from such person(s) to provide us with their Personal Information for processing.