



# Privacy Notice

***Last updated: 19/05/2021***

## **When does this Notice apply?**

Libra Labels respects your right to privacy. This Notice explains who we are, how we collect, share and use personal information about you, and how you can exercise your privacy rights. This Notice applies in general to all instances where we collect and process personal information. In particular this Notice applies to personal information that we collect through our website ("Website") and personal information that we collect of our customers, suppliers, and other individuals through any other form of interaction whether online or offline. Whenever we collect your personal information, we will either provide you with a separate notice that will comply with relevant privacy and data protection laws or we will refer you to this Notice.

## **Who we are**

Libra Labels is one of the leading manufacturers and suppliers of premium quality products in self-adhesive labels for diverse industries as well as suppliers of price marking guns, bandsaw blades, barcode printers & ribbons & till rolls for points of sale. With experience in the relevant fields, the highly skilled professionals of our well-managed organisation strive for perfection in all stages from production all the way through to product hand-over. With a long standing footprint in the industry we have the experience, expertise and knowledge needed to deliver outstanding products while maintaining the high level of service which our customers expect.

## **Who do we collect personal information from?**

While we are a business-to-business company we collect and process personal information of various categories of persons in order to function and to maintain a relationship with the people that we hold personal information about.

We collect and process personal information about

- Website visitors
- Customers, Suppliers, Business Partners (and their employees)
- Employees, Contractors and Staff (and applicants / candidates)

## **What personal information does Libra Labels collect and why?**

### **1. Website visitors**

#### **Information that you provide voluntarily**

Certain parts of our Website may ask you to provide personal information voluntarily: for example, we may ask you to provide your contact details (including your name, company, address, telephone number and email address). We will use this information for the purposes set out below:

- to improve our products and services;
- to respond to online queries, supply requested information on Libra Labels products, process and ship orders, fulfill online marketing offers, establish approved links and for internal market analysis;
- to periodically send promotional emails about new products, special offers or other information which we think you may find interesting using the email address which you have provided;
- to contact you for market research purposes. We may contact you by email, phone, fax or mail. We may use the information to customise this Website according to your interests; and
- for the specific purpose stated on forms on this Website.

#### **Information that we collect automatically**

When you visit our Website, we may collect certain information automatically from your device. In some countries, this information may be considered personal information under applicable data protection laws.

Specifically, the information we collect automatically may include information like your IP address, device type, unique device identification numbers, browser-type, broad geographic location (e.g. country or city-level location) and other technical information. We may also collect information about how your device has interacted with our Website, including the pages accessed and links clicked.

Collecting this information enables us to better understand the visitors who come to our Website, where they come from, and what content on our Website is of interest to them. We use this



information for our internal analytics purposes and to improve the quality and relevance of our Website to our visitors.

Some of this information may be collected using cookies and similar tracking technology, as explained further under the heading “Cookies and similar tracking technology” below.

## **2. Customers, Suppliers, Business Partners, and Visitors**

If you are a current or prospective customer or supplier of ours (or if you are an employee, contractor, agent or other representative of a current or prospective customer or supplier of ours), we may collect and use the following personal information about you:

- Identification data – such as your name, date of birth, photograph.
- Contact details – such as business or delivery address, telephone/business email address, fax number, etc.
- Professional details – such as your job title/position, employer, company registration number, etc.
- Financial characteristics – such as account number and bank details, invoice address.
- National identifiers – such as ID and VAT number.
- Information relating to your (or your employer's) sales history with us.
- Other information you choose to provide to us, for example the purpose of your visit if you visit one of our site locations.
- IP addresses or other information that we may collect from you if you visit our Website

We may collect and use this personal information about you for the following purposes:

- For the purpose of general business relationship management within Libra Labels, including contract management; for example, to enable us to deliver our services to you (or your employer), or to audit the provision of services by you (or your employer) to Libra Labels.
- To manage our daily business activities, such as executing payments [or to set up a credit arrangement with you or your employer];
- To manage any queries, complaints or claims relating to the services you (or your employer) provide to Libra Labels or that Libra Labels provides to you (or your employer);
- For direct marketing, advertising and public relations purposes, in connection with Libra Label’s business activities, products and services (including to make recommendations about our services and products), and to inform you (or your employer) about important developments within Libra Labels;
- Where necessary to comply with laws and regulations, under judicial authorisation, or to exercise or defend the legal rights of Libra Labels ;
- To help us conduct our business more effectively and efficiently or check and improve the quality of our products and/or services;
- To investigate violations of law or breaches of other Libra Labels policies.

## **3. Employees, Contractors and other staff**

When we source candidates we minimise the personal information that we collect and process to only that which is necessary for recruitment.

When we employ successful candidates, we have a need to collect and process additional information needed for the purposes of carrying out the obligations and exercising specific rights in the field of employment law.

### **Who do we share your personal information with?**

We may disclose your personal information to the following categories of recipients:

- to our group companies, third party services providers and partners who provide data processing services to us (for example, to support the delivery of, provide functionality on, or help to enhance the security of our Website), or who otherwise process personal information for purposes that are described in this Privacy Notice or notified to you when we collect your personal information.
- to any competent law enforcement body, regulatory, government agency, court or other third party where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person;



- to an actual or potential buyer (and its agents and advisers) in connection with any actual or proposed purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your personal information only for the purposes disclosed in this Privacy Notice;
- to any other person with your consent to the disclosure.

### **Cookies and similar tracking technology**

We may use cookies and similar tracking technology (collectively, “Cookies”) to collect and use personal information about you, including to serve interest-based advertising. For further information about the types of Cookies we use, why, and how you can control Cookies, please see our Cookie Policy.

### **How do we keep your personal information secure?**

We use appropriate technical and organisational measures to protect the personal information that we collect and process about you. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal information. Libra Labels has a comprehensive Security program with a focus on protecting personal information.

### **Your data protection rights:**

- You are entitled to access your personal data by sending a written request to [info@libra.co.za](mailto:info@libra.co.za). We may charge you a fee for this service.
- You may also request [info@libra.co.za](mailto:info@libra.co.za) to correct or supplement any of your personal data which **Daniel de Oliveira (Information Officer)** will undertake as soon as practicable.
- Request the destruction of your personal data. **Daniel de Oliveira (Information Officer)** will consider your request in light of any other laws or regulations prohibiting Libra Labels cc 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@libra.co.za](mailto:info@libra.co.za) / 010 822 4326 if you wish to make a request.

**Considering the Protection of Personal Information Act, the lawful bases we rely on for processing personal information are:**

- (a) Your consent. You can withdraw your consent at any time. You can do this by contacting us at [info@libra.co.za](mailto:info@libra.co.za) or unsubscribe on our website at <https://www.libra.co.za/subscription-form/>**
- (b) We have a contractual obligation.**
- (c) We have a legal obligation.**

### **How we store your personal information:**

Your information is securely stored on our server which is situated on our premises.

If you choose to withdraw consent to use your information, we will then dispose of your information by deleting all records containing your information from our server, phoning records, and accounting system.

### **Data retention**

We retain personal information we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements).

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

We keep information for the minimum period of time legally required of us by SARS and other governing bodies. Once this time is reached we disassociate and destroy all your personal information unless your authorization is given to keep the information longer.

### **Updates to this Privacy Notice**



We may update this Privacy Notice from time to time in response to changing legal, technical or business developments. When we update our Privacy Notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make. We will obtain your consent to any material Privacy Notice changes if and where this is required by applicable data protection laws. You can see when this Privacy Notice was last updated by checking the “last updated” date displayed at the top of this Privacy Notice.

### **Confidentiality**

Libra Labels CC will:

- treat your personal information as strictly confidential;
- take appropriate technical and organizational measures to ensure that your personal information is kept secure and is protected against unauthorized or unlawful processing, accidental loss, destruction or damage, alteration, disclosure or access;
- Promptly notify you within a reasonable time, if we become aware of any unauthorized use, disclosure or processing of your personal information;

### **How to complain:**

If you have any concerns about our use of your personal information, you can make a complaint to us at [info@libra.co.za](mailto:info@libra.co.za) or unsubscribe on our website at <https://www.libra.co.za/subscription-form/> You can also complain to **Daniel de Oliveira** the Information Officer email address [daniel@colourpoint.co.za](mailto:daniel@colourpoint.co.za) if you are unhappy with how we have used your data or if you wish for us to stop processing your information.

### The Information Regulator address:

33 Hoofd Street  
Forum III, 3rd Floor Braampark  
P.O Box 31533  
Braamfontein, Johannesburg, 2017  
Mr Marks Thibela  
Chief Executive Officer

Telephone number: Tel No. +27 (0) 10 023 5207, Cell No. +27 (0) 82 746 4173

Information Regulator website: <https://www.justice.gov.za/infoereg/>

### **How to contact us**

If you have any questions or concerns about our use of your personal information, please contact us at [info@libra.co.za](mailto:info@libra.co.za).

The Information Officer of your personal information is Daniel de Oliveira at Libra Labels cc.