
Protection of Personal Information Act Privacy Notice

1. INTRODUCTION

- 1.1 **Baseline Racquets** is a leading South African Sporting goods supplier. Its mission is *“to provide quality products at competitive rates along with expert service and advice”*. **Baseline Racquets** is a supplier to both the private and public sectors of the market. In this notice, reference to **Baseline Racquets** refers to the holding company and its South African subsidiaries.
- 1.2 As part of managing the business and creating value for its various customers, **Baseline Racquets** is required, in certain instances, to process personal information. Accordingly, **Baseline Racquets** is required to protect the personal information as set out in the Protection of Personal Information Act of 2021, including its Regulations (POPI Act).
- 1.3 This notice constitutes **Baseline Racquets** policy statement to declare its commitment to comply with the POPI Act. Accordingly, it provides insights on how Baseline Racquets processes personal information of data subjects as set out in the POPI Act.
- 1.4 **Baseline Racquets** shall ensure that personal information is processed within the parameters of the law.
- 1.5 This notice must be read in conjunction with the POPI Act and its Regulations, where applicable.

2. OBJECTIVE

- 2.1 The objective of this notice is to give effect to the POPI Act and to provide clarity on the following:
 - 2.1.1 What personal information **Baseline Racquets** collects about a data subject and the basis thereof;

- 2.1.2 How **Baseline Racquets** uses and protects the personal information of a data subject;
- 2.1.3 How long **Baseline Racquets** keeps the personal information of a data subject;
- 2.1.4 The rights of a data subject regarding their personal information; and
- 2.1.5 What the data subject should do if he/she does not want to provide **Baseline Racquets** with his personal information.

3. INTERPRETATION AND DEFINITIONS

In this notice:

- 3.1 Clause headings are for convenience and reference only and shall not be used in the interpretation thereof;
- 3.2 Any gender includes the other genders and a natural person includes a juristic person and vice versa;
- 3.3 All the annexures (if any) hereto are incorporated herein and shall have the same force and effect as if they were set out in the body of this notice;
- 3.4 The following words and/or expressions shall, unless the context indicates otherwise, bear the meaning assigned to them below and in the POPI Act;
 - 3.4.1 **“Cookie/s”** (also called web cookie, Internet cookie, browser cookie, or simply cookie) is a small piece of data sent from a website and stored on the user's computer by the user's web browser while the user is browsing to inter alia remember stateful information (such as items added in the shopping cart in an online store) or to record the user's browsing activity.
 - 3.4.2 **“Data subject”** means the person to whom Personal information relates;
 - 3.4.3 **“Employee”** means a permanent, fixed-term or temporary employee of **Baseline Racquets**;
 - 3.4.4 **“Operator”** means a third party that processes Personal information in terms of a mandate or contract with **Baseline Racquets**, without coming under the direct authority of **Baseline Racquets**;

- 3.4.5 **“Information officer”** means the person appointed by **Baseline Racquets**, from time to time, who is responsible for the monitoring of compliance, by **Baseline Racquets**, with the conditions for the lawful processing of Personal information; dealing with requests made to **Baseline Racquets** in terms of the POPI Act; working with the Regulator in relation to investigations conducted in relation to prior authorisation by the Data subject and ensuring compliance by **Baseline Racquets** with the provisions of the POPI Act;
- 3.4.6 **“Person”** means any person, company, close corporation, trust, partnership or other entity;
- 3.4.7 **“Personal information”** means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to—
- 3.4.7.1 information relating to the name, surname, gender, age, and date of birth of the person;
 - 3.4.7.2 any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
 - 3.4.7.3 the personal sporting preferences, brand preferences or shopping preferences of the person;
 - 3.4.7.4 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;
- 3.4.8 **“Privacy Notice or Notice”** means this Notice as amended from time to time;
- 3.4.9 **“Processing”** means any operation or activity or any set of operations, whether or not by automatic means, concerning Personal information, including—
- 3.4.10 the collection, receipt, recording, organisation, collation, storage,

3.4.11 updating or modification, retrieval, alteration, consultation or use;

3.4.11.1 dissemination by means of transmission, distribution or making available in any other form; or

3.4.11.2 merging, linking, as well as restriction, degradation, erasure or destruction of information.

4. PROCESSING OF PERSONAL INFORMATION

4.1 Personal information **Baseline Racquets** collects about a data subject and the basis thereof

The Personal information **Baseline Racquets** collects in the ordinary course of business includes:

- a. only information that is adequate, necessary, and relevant to enable it to effectively render a service or assist in any manner required, such as the Data subject's name, identity number (where applicable), registration number, Data subject's employees or its director's Personal information, contact information etc;
- b. electronic communications sent to **Baseline Racquets**;
- c. information submitted to **Baseline Racquets** through social media channels.
- d. technical information, for instance through the use of cookies, such as - activity data, such as when the Data subject completes a form on the Baseline Racquets

website, subscribes to a newsletter, alerts or other services from **Baseline Racquets** or taking part in a competition, prize draw or survey;

- e. information from the Data subject's visits to the **Baseline Racquets** website, including the type of browser and operating system that the Data subject uses, access times, pages viewed, URLs clicked on, his IP address and the pages visited before and after navigating the **Baseline Racquets** website;
- f. social media tracking pixels that allow platforms such as Facebook and Twitter to interact with the **Baseline Racquets** website and give feedback on the Data subject's actions;
- g. device information, including the unique device identifier, hardware model, operating system and version and mobile network information;
- h. Personal information that **Baseline Racquets** collects when it monitors other websites may include the Data subject's public Personal information, for example when **Baseline Racquets** monitors digital reviews or preferences. **Baseline Racquets** may combine information that it has about a Data subject from various sources; and
- i. The **Baseline Racquets** website uses various technologies including "cookies" which allow the website to recognise and respond to the Data subject as an individual. The Data subject can elect to accept or decline cookies. If a Data subject elects to decline cookies, not all elements of the website may function as intended, so his website experience may be affected.

4.2 Protecting the Data subject's Personal information

- a. **Baseline Racquets** uses a variety of security measures and technologies to help protect Personal information of a Data subject from unauthorised access, use, disclosure, alteration or destruction in line with applicable Personal information

protection and privacy laws. For example, when **Baseline Racquets** shares the Personal information of a Data subject with external suppliers, it shall put in place a written agreement which commits the suppliers to keep the Data subject's Personal information confidential, and to put in place appropriate security measures to keep it secure.

- b. Despite the security measures that **Baseline Racquets** has in place to protect Personal information of a Data subject (firewalls, password access and encryption methods), the Data subject acknowledges that it may be accessed by an unauthorised third party, e.g. as a result of an illegal activity.
- c. From time to time **Baseline Racquets** may provide links to websites or mobile applications that it does not own or control. This Notice does not apply to those websites. If a Data subject chooses to use those websites, he must check the legal and privacy policies or statements posted on each website or mobile application he accesses to understand their privacy practices.

4.3 How does **Baseline Racquets** use the Personal information of a Data subject

Baseline Racquets may use the Personal information of a Data subject to provide the Data subject with information and services including:

- a. online events, such as webcast events;
- b. marketing communications about **Baseline Racquets** products and services.
Baseline Racquets will obtain consent for marketing to the extent required by law.
- c. Contact and interact with the Data subject, including to:
 - i. respond to requests from the Data subject to provide important notices and updates, such as changes to terms, standard operating procedures (SOPs), policies, security alerts and administrative messages.
- d. Operate **Baseline Racquets** business, including:
 - i. Screening visitors through CCTV footage for security reasons, attaining attendance if required by the Government in monitoring the spread of Covid 19. Complying with applicable laws, regulations and guidance; and
 - ii. complying with demands or requests made by regulators, governments, courts and law enforcement authorities.
 - iii. Improve **Baseline Racquets** day-to-day operations, including:

- e. for internal purposes such as auditing, data analysis and research to help **Baseline Racquets** deliver and improve its digital platforms, content and services;
- ii. to monitor and analyse trends, usage and activities in connection with **Baseline Racquets** products and services to understand which parts of **Baseline Racquets** digital platforms and services are of the most interest and to improve the design and content of those platforms;
- iii. to improve **Baseline Racquets** products and services and communications to the Data subject; and
- iv. to ensure that **Baseline Racquets** has up-to-date contact information for the Data subject, where applicable.

4.4 How long will **Baseline Racquets** keep Personal information of a Data subject

Baseline Racquets will always keep the Personal information of a Data subject for the period required by law and where it needs to do so in connection with legal action or an investigation in which it is involved. Otherwise, **Baseline Racquets** will keep Personal information of a Data subject:

- a. for as long as needed to provide the Data subject with access to services he has requested;
- b. where the Data subject has contacted **Baseline Racquets** with a question or request, for as long as necessary to allow **Baseline Racquets** to respond to the question or request and as required by law.

4.5 Instances where sharing of Personal information of a Data subject by **Baseline Racquets** is permitted

- a. **Baseline Racquets** may share Personal information of a Data subject with the following third parties:
 - i. **Baseline Racquets** agents and suppliers, including those who provide it with technology services such as data analytics, hosting and technical support;
 - ii. **Baseline Racquets** professional advisors, auditors and business partners;
 - iii. regulators, governments and law enforcement authorities; and
 - iv. other third parties in connection with re-organising all or any part of **Baseline Racquets** business.
- b. Personal information of a Data subject may be processed by **Baseline Racquets** and **Baseline Racquets's** third party suppliers outside of the Data subject's home country. Personal information laws in the countries to which the Personal information of a Data subject is transferred may not be equivalent to, or as protective as, the laws in the Data subject's home country.
- c. **Baseline Racquets** will implement appropriate and reasonable measures to ensure that the Personal information of a Data subject remains protected and secure when it is transferred outside of the Data subject's home country, in accordance with applicable Personal information protection and privacy laws. These measures include data transfer agreements implementing standard data protection clauses.

4.6 The Data subject's rights regarding his Personal information

The Data subject is entitled to:

- a. request **Baseline Racquets** for access to Personal information **Baseline Racquets** holds about him;
- b. request the correction and/or deletion of his Personal information;
- c. request the restriction of the processing of his Personal information, or object to that processing;
- d. withdraw his consent to the processing of his Personal information (where **Baseline Racquets** is processing his Personal information based on his consent);
- e. withdraw his consent to receive marketing messages.

4.7 What the Data subject should do if he/she does not want to provide **Baseline Racquets** with his Personal information

- 4.7.1 Where a Data subject is given the option to share his Personal information with **Baseline Racquets**, he can always elect not to do so.
- 4.7.2 If a Data subject objects to the processing of his Personal information, or if he has provided his consent to processing and he later chooses to withdraw it, **Baseline Racquets** will comply with the request in accordance with its legal obligations. **Baseline Racquets** legal obligations in respect of the withdrawn information shall therefore cease to exist.

5. IMPORTANT NOTICE TO DATA SUBJECTS

- 5.1 By visiting **Baseline Racquets** website and communicating electronically with **Baseline Racquets**, the Data subject consents to the processing, including transfer of his Personal information as set out in this Notice.
- 5.2 **Baseline Racquets** is continually improving its methods of communication and adding new functionality and features to its website. Due to these ongoing changes, changes in the law and the changing nature of technology, **Baseline Racquets** data protection practices will change from time to time. If and when its protection practices change, **Baseline Racquets** will update this Notice to describe its new practices. The Data subject is encouraged to check it regularly.

6. CONTACT US

- 6.1 For any questions or requests regarding this Notice or if a Data subject would like to exercise his rights including contacting the Information officer, please use the following contact information of the Information officer:

info@baselineracquets.co.za or 011 453 5005