

BioToxLab (Pty) Ltd respects your right to the protection of your personal information and it is our policy to comply with the Protection of Personal Information Act (POPIA) (Act no. 4 of 2013). This Privacy Policy explains how we lawfully, transparently, and properly collect, manage, use, disclose and store your information. BioToxLab is committed to protecting your privacy. This Policy is supplemented by other Company policies such as confidentiality and non-disclosure policies and agreements, data and information management policies, and retention of records policy.

In this Policy, Personal Information, as defined in POPIA, means:

Information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to –

1. Information relating to the race, gender, sex, pregnancy, marital status, nationality, 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;
2. Information relating to the education or the medical, financial, criminal or employment history of the person;
3. Any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
4. The biometric information of the person;
5. The personal opinions, views or preferences of the person;
6. 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;
7. The views or opinions of another individual about the person, and the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person.

THE INFORMATION WE COLLECT

At BioToxLab, we normally collect Personal Information directly from the Data Subject (relevant individual). The Personal Information we collect varies depending on the purposes for which it needs to be collected, but include information such as:

- Name and address
- Phone/e-mail contact details
- Credit information
- Qualifications & experience information
- Quality information
- Process & industry information

We collect Personal Information/data when you

- Complete forms to engage with us (e.g. client take-on forms, Analysis Request Forms, Vendor pre-evaluation forms etc.);
- Use or view our website or communicate with us via other electronic platforms.

WHY WE COLLECT YOUR PERSONAL INFORMATION AND HOW WE USE AND RETAIN IT

We collect and process your personal information mainly to contact you for the purposes of understanding your requirements and delivering services accordingly.

We only collect, use, and disclose Personal Information where that information is reasonably necessary for purposes which are directly related to one or more of our functions or activities. You may request at any time that you remain anonymous when dealing with us, and to the extent that is lawful and practicable for us to enable you to do so, we will accommodate that request. However, if Personal Information is not provided in full where we have indicated that it is required or when it is otherwise requested, we may not be able to process your orders and our employees, contractors and consultants may not be able to provide services in an effective manner or at all.

Your Personal Information will only be used for the declared and agreed purposes. This may include:

- Confirming, verifying, and updating client/vendor/employee information;
- For audit and record keeping purposes;
- To carry out the contracts/services requested;
- To comply with legal and regulatory requirements or when it is otherwise allowed by law;
- During legal proceedings.

Personal Information relating to the Company, Company employees, clients or vendors, whether is hard or soft copy format, shall be protected, handled and disposed of in accordance with the provisions of the POPIA. Your Personal Information may be retained, where necessary for legal or trend research purposes. Personal Information will not be retained longer than is necessary for achieving the purposes for which the information was collected and subsequently processed. However, the following situations may prevent this:

- When retention of records is required or authorized by law;
- When the Data Subject has consented to the retention of the records;
- When the Company reasonably requires the record for lawful purposes related to its functions/activities;
- When a contract between the parties requires the retention of records.

BioToxLab will destroy, delete or de-identify records as soon as reasonably practicable and destruction will be done in accordance with the provisions of POPIA.

DISCLOSURE

We only disclose personal information for the purposes for which it was given to us, or for purposes which are directly related to one of our functions or activities, unless required to disclose it by law, unless we have your consent, or unless one of the following situations apply:

- Outsourcing/sub-contracting
 - We may from time to time use external service providers to provide us with certain outsourced or sub-contracted services. We endeavour to not provide any of your Personal Information to such vendors and should we be required to disclose your Personal Information to them, we will only disclose such information to the extent necessary for them to perform the services we have requested, and in such cases, we will require them to sign confidentiality agreements to maintain the privacy of your information.
 - We do not give your Personal Information to government agencies, organisations or anyone else unless one of the following applies:
 - You have consented;
 - You would expect us or we have informed you of our intent to do so;
 - We are required by law (but we will still inform you of such situations);
 - We believe on reasonable grounds that disclosure is required to prevent or lessen significant risk to your life or physical, mental or emotional health or that of any other person;
 - We take appropriate action in relation to a reasonable suspicion of unlawful activity, or misconduct of a serious nature, that relates to our functions or activities;
 - Disclosure is required to assist any entity, body or person to locate a person who has been reported as missing;
 - Disclosure is made for the purpose of establishing, exercising or defending a legal or equitable claim;
 - Disclosure is made for the purposes of a confidential alternative dispute resolution process.
 - We will never sell your Personal Information to a third party.
- Profiling
 - We (or our service providers on our behalf) may collate information about you and your preferences, and evaluate certain things about you, to create a profile to personalise our communication and interaction with you.
 - We (or our service providers on our behalf) may also use Personal Information to identify market segments and use that information for data analysis and direct marketing.
 - We do not engage in any automated profiling which may result in decisions having a legal or similar material impact on you.
- Data analysis
 - We (or our service providers on our behalf) may use certain information to conduct data analysis (e.g. survey data; project data);
 - We use the results of data analyses for a range of purposes, including marketing, service development and policy development;
 - We do not use sensitive information for data analysis.

INFORMATION QUALITY, ACCURACY AND CORRECTION

We take reasonable steps to make sure that the personal information we collect is accurate, complete and up-to-date. These steps include maintaining and updating personal information on a regular basis.

You are in control of any Personal Information you provide to us. If, at any time, you would like to correct the Personal Information provided to us or if you would like to change your preferences for contact from us, you can let us know by contacting us using the details provided below.

You can access the Personal Information we currently hold or request that we change that personal information at any time. We endeavour to respond to any such request within a reasonable period. We will allow access or make the changes unless we consider that there is a sound reason under the POPIA or other relevant law to withhold such information. If we cannot agree to make required changes to Personal Information, we will provide you a written notice which sets out the reasons for our refusal and the mechanisms available to complain about the refusal. We will attach this statement to our records.

You may also request access to Personal Information we hold in archive for legal and administrative reasons, which are not current records.

Should you wish to allow a third party to access your details, you need to notify us in writing and it will be noted on as such.

You have the right to withdraw your consent to the processing of your Personal Information. By withdrawing consent, this will not affect the lawfulness of processing based on consent prior to it being withdrawn.

INFORMATION SECURITY

We take reasonable steps to protect the personal information we hold from misuse, interference, loss, unauthorised access, modification, or disclosure.

These steps include a properly configured firewall, encrypted transmission of electronic data, up-to-date anti-virus and malware software and strict access control policies on electronic data and paper files in locked cabinets and physical access restriction to such records. When no longer required, Personal Information is destroyed in a secure manner or deleted – this is done considering other regulatory requirements.

YOUR RIGHTS

You have the right to –

- Access – you have the right to request BioToxLab for copies of your Personal Information/data;
- Rectification – you have the right to request BioToxLab to correct any information you believe is inaccurate – you also have the right to request BioToxLab to complete information you believe is incomplete;
- Erasure – you have the right to request BioToxLab to erase your Personal Information/data, under certain conditions;
- Restrict processing – you have the right to request BioToxLab to restrict the processing of your personal data, under certain conditions;
- Data portability – you have the right to request BioToxLab to transfer the data we have collected to a third party, or directly to you, under certain conditions.

In addition, you can object to the processing of your Personal Information/data in some circumstances (in particular, where we do not have to process the data to meet a contractual or other legal requirement, or where we are using the data for profiling, data analysis or direct marketing).

These rights may be limited, for example if fulfilling your request would reveal personal data about another person, or if you ask us to delete information which we are required by law to keep or have compelling legitimate interests in keeping.

DETAILS OF THE INFORMATION OFFICER

The Information Officer of BioToxLab (Pty) Ltd is Mrs Lizet Swart. She is responsible for compliance with the conditions of the lawful processing of personal information and other provisions of POPIA. No deputy Officer has been assigned.

Any request for Personal Information can be directed to:

Information Officer:	Mrs Lizet Swart 012 753 2192 lizet@biotoxsa.co.za
Deputy Information Officer:	N/A

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