



Customer Privacy Policy

It is our promise to customers that we respect the trust you place in us and the privacy of the information you share. Part of providing superior customer service includes making sure that we're building a relationship of trust with our customers. Our way of doing that is to let you know in a clear, prominent, and easily accessible way how we collect, use, share, and above all protect your personal information. In this policy, Systemic Stairway™, "we", "us" or "the Company" refers to the sole proprietor Dr JA Day.

We will only collect personal information that is necessary for the purposes described in this policy and will only process personal information in compliance with applicable laws, including the protection of Personal Information Act (POPIA) and in ways that are for, or compatible with, the business purposes for which the personal information was collected or that are subsequently authorised by you.

This Policy outlines:

- How and why we collect your personal information;
- How your personal information is used and protected;
- When and with whom we share your personal information; and
- What choices you can make about how we collect, use, and share your personal information.

Systemic Stairway™ takes steps to ensure that we manage your personal information properly to maintain your trust. We may collect the following categories of personal information. Not all categories may be collected about every individual and this will depend on the purpose for which we need the personal information:

- Personal identifiers, such as name and address;
- Device and online identifiers and related information, such as telephone number and email address;
- Internet, application, and network activity, such as cookie IDs and browser visits;
- Government identifiers, such as CIPC registration numbers, national identification numbers and driver's license numbers;
- Demographic information, such as age and date of birth;
- Financial information, such as annual financial statements, bank statements, credit and debit card numbers and claims information;
- Purchase history information, such as products you have bought, rented, and returned;
- Location information, such as geo-location information;
- Audio, visual, and other sensory information, such as audio and video recordings;
- Employment information, such as occupation, title, licenses and professional memberships; or
- Individual preferences and characteristics, such as inferences related to shopping patterns and behaviours.

Collection of Personal Information

We collect information from you in a variety of ways. It may be:

- Provided directly by you;
- Collected from a device associated with you or your household;
- Collected through on-premis technology;
- Collected from another company within our family of companies; or
- Collected from an external third-party source.

Information Collected From a Device Associated With You

You passively provide us information through technology. Some of this information may be linked to you personally. This information helps our websites and mobile services work correctly and supports our customer marketing and analytics efforts – our work to understand our customers’ needs and provide information about our products and services. Here are some examples:

- **Device Information:** We collect technical information when you visit our websites or use our mobile applications or services. This includes information such as Internet Protocol (IP) address, the type of mobile device you use, your device operating system and browser type, a unique device identifier, the address of referring websites, the path you take through our websites, and other information about your session on our websites.
- **Browsing Information:** We use our own and third-party technologies such as cookies, web beacons, and mobile device identifiers to collect information about the use of our websites and mobile services. We use these tools to provide an integrated and more personalized shopping experience for you. For example: cookies allow us to provide you relevant information as you use or return to our sites; web beacons allow us to know if a certain page was visited, an email was opened, or if ad banners on our websites and other sites were effective. Under certain circumstances, we permit third parties to collect information on our websites for their own business purposes using cookies, web beacons, iframes and similar technologies.;
- **Precise Device Location Information:** We may collect information about your location when your device is set to provide location information.

Information Provided Directly by You

You actively share information with us in various ways in our stores and online. For example, you share information when you:

- Make an in-store or online purchase, or other transaction, with us;
- Create an account on one of our websites or mobile services;
- Use a gift registry or create a mobile shopping list;
- Participate in our programs;
- Conduct a transaction or request a service where we collect information (including when required by law);
- Request customer service or contact us;



- Post a review or comment on one of our social media pages, or post a rating, review or other user-generated content on one of our websites or mobile services; and
- Participate in a contest, sweepstake, promotion, or survey

All personal information that is supplied to the Company must be accurate, up-to-date, not misleading and complete in all respects. You undertake to immediately advise the Company of any changes to your personal information should any of these details change.

Our goal is to limit the information we collect to the information needed to support our business.

Purpose for Collection of Personal Information

The information collected and processed by Systemic Stairway™ may be used for the following purposes:

- To fulfil your order or requests for services and provide customer service;
- To create and maintain your account;
- To conduct auditing and monitoring of transactions and engagement;
- To conduct marketing, personalization, and third-party advertising, subject always to your right at any time to opt out of such communication. If you want to remove your contact information from all lists and please visit unsubscribe on the website (www.systemicstairway.com);
- To protect the security and integrity of our websites, mobile services and our business, and help prevent fraud;
- To update our operational and technical functionality;
- To conduct business analysis, such as analytics, projections and identifying areas for operational improvement;
- To conduct research and development; or
- To fulfill our legal functions or obligations.

All Personal Information which you provide to the Company will be used and/or retained only for the purposes for which it is collected, whereafter it will be permanently destroyed. We will only retain personal information for longer than the purpose for which it was collected if it is required by law or where you have given consent for us to retain such information for an extended period.

Sharing of Personal Information

All of the categories of personal information that we collect may be shared with other companies, including those within our corporate family, for a business purpose. We will not sell or rent your personal information for money. We may share your personal information in limited circumstances, such as to conduct our business, for other companies to offer you and administer your use of co-branded products, in the event all or a part of our business is merged, sold or reorganized, when legally required, as described below, or with your consent.

We will not share your personal information outside of our corporate family of companies, except in the following circumstances:

- Service Providers- We share personal information about you with service providers that help with our business activities, including shipping vendors, billing and refund vendors, payment card processors,



marketing and advertising vendors, and companies that help us improve our products and services. We require our service providers to keep your personal information secure. We do not allow our service providers to use or share your personal information for any purpose other than providing services on our behalf. Your personal information may be stored and processed by our service providers in the particular country or other locations where the service providers or Systemic Stairway™ maintain;

- Co-Branded Products and Services- We may share your personal information with companies that offer cobranded products or services. These companies are prohibited from using your personal information for purposes other than offering you, and administering your use of, these co-branded products and services;
- Legal Requirements and Protection of Our Company and Others- We may share your personal information in other special circumstances, which include situations when sharing is required by law, or we believe sharing will help to protect the safety, property, or rights of Systemic Stairway™, our customers, our associates, or other persons. Examples include:
 - Protecting the health or safety of customers;
 - Addressing crimes committed on Systemic Stairway™ property;
 - Identifying and addressing fraud or financial risk;
 - Providing personal information from cameras to law enforcement at their written request;
 - Responding to a search warrant or other valid legal inquiry; and
 - Responding to an investigative body in the case of a breach of an agreement or violation of law.
- Business Transfers- In the event that all or a part of our business is merged, sold or reorganized (including transfers made as a part of insolvency or bankruptcy proceedings), personal information about you could be shared with the successor business. We will use reasonable measures to help ensure that any successor treats your information in accordance with this Policy.
- Website to help analyse our web page flow, measure promotional effectiveness, and promote trust and safety. Cookies assist us in providing our services. You are always free to decline our cookies if your browser permits, although in that case you may not be able to use certain features on the Website and you may be required to re-enter your password more frequently during a session. The cookies do not contain any of your personally identifiable information.

We may share aggregated or pseudonymous information (pseudonymous information includes things like: device identifier, type of device, IP addresses, cookies and other information associated with your browsing and app usage) with other companies, such as publishers, advertisers, measurement analytics providers, and others. We do not share information that directly identifies you (information such as name or email address) with these companies.

We also allow companies that show advertisements on our webpages or our apps to collect information from your browsers or devices via the use of cookies or other technologies. Other companies' use of cookies and other data collection technologies are subject to their own privacy policies, not this one. Like many companies, we may allow cookie matching with select partners. However, these parties are not authorized to access information from Systemic Stairway™ cookies.



Our Website also links to other websites that may collect personally identifiable information about you. Company is not responsible for the privacy practices or the content of those linked websites.

Where we need to transfer your personal information outside the borders of South Africa, we will ensure that we only transfer the personal information to countries that have similar privacy laws to those applicable in South Africa or to a party who is contractually bound to comply with data protection obligations which impose no lesser legal requirements than those imposed by POPIA.

Before transferring personal information to a third-party contractor, such as an authorised service provider, the Company will obtain assurances from the third party that it will process personal information in a manner consistent with this policy. Where we learn that a third-party contractor is using or disclosing personal information in a manner contrary to this policy, we will take reasonable steps to prevent such use or disclosure.

With Your Consent

In circumstances other than those described above, we will ask for your affirmative consent before we share your personal information outside of our corporate family of companies, and we also will not sell or rent your personal information for money.

Websites and Mobile Applications

By using our websites, mobile applications, Wi-Fi and/ or by providing your information to us you expressly consent to our collection and use of the information you disclose to us in accordance with this policy, including but not limited to your consent for us to share your information as set out in this privacy policy. If you disclose any personal information relating to other people to us, you warrant that you have the authority to do so and to permit us to use the information in accordance with this policy.

By using our websites, mobile applications, Wi-Fi and/ or by providing your information to us, you agree to the practices described in this policy and you agree to Systemic Stairway™, its directors, officers, employees, servants, agents and/or contractors and/or other third parties to process (which will include collecting, using and disclosing) your personal information for the purposes stated in this policy.

If you do not agree to this policy, please do not use our websites, mobile applications, Wi-Fi and/ or provide your information to us. Any use by you of our websites, mobile applications, Wi-Fi and/ or any provision by you of your information will be deemed to constitute your acceptance of the terms in this policy.

Security

The security and confidentiality of your personal information is important to us. We have implemented technical, administrative, and physical security measures to protect your personal information from unauthorised access or disclosure and improper use.

Access to your personal information is restricted to only to those employees who need the personal information to perform a specific job / task. All employees with access to Personal Information are kept up to date on our security and privacy practices. After a new policy is added, these employees are notified and/or



reminded about the importance we place on privacy, and what they can do to enhance protection for our supplier and service provider's personal information.

We are committed to ensuring that our security measures which protect your personal information are continuously reviewed and updated where necessary. It is important for you to protect yourself against unauthorised access to your account password. Be sure to log out of your account or to close your browser after you have completed your visit to the website or mobile application.

Whilst we will do all things reasonably necessary to protect your personal information, we cannot guarantee nor do we accept any liability of whatsoever nature for any unauthorised or unlawful disclosure and/or use of your personal information, either by employees and/or made by any third parties (including third party service providers) who are not subject to our control, unless such disclosure and/or use is as a result of our gross negligence.

Your rights

Upon reasonable request and in accordance with POPIA, we will grant customers reasonable access to their personal information and will permit them to correct, amend or delete personal information that is incomplete or inaccurate.

Should you so request, we will provide you with the record or a description of the personal information which we have about you, including information about the identity of all third parties who have, or have had, access to the personal information: (i) within a reasonable time; (ii) at a prescribed fee, if any; (iii) in a reasonable manner and format; and (iv) in a form that is generally understandable.

Should you wish to make a request please send email to info@systemicstairway.com.

We will take reasonable steps to ensure that all personal information is kept as accurate, complete and up to date as reasonably possible but may not always expressly request you to verify and update your personal information, unless this process is specifically necessary. We expect that you will notify us from time to time in writing of any updates required in respect of your personal information.

In addition, you may cancel or modify the email communications you have chosen to receive from us by following the instructions contained on our website. If you have any questions concerning your personal information or how to exercise these rights, please Contact Us at info@systemicstairway.com.

You also have the right to lodge a complaint with the Information Regulator. You can email the Information Regulator with your complaint/query at inforeg@justice.gov.za or call them on 012 406 4818. Visit their website for more details: <http://www.justice.gov.za/inforeg/contact.html>.

The Company reserves the right to amend this policy at any time. All amendments to this policy will be posted on the website.