
NEWSTRACK ONLINE (PTY) LTD
PRIVACY NOTICE & PAIA MANUAL

PRIVACY NOTICE IN TERMS OF CONDITION 6, SECTION 18, NOTIFICATION

1. INTRODUCTION

We respect the privacy of everyone who visits this website. As a result we would like to inform you regarding the way we would use your Personal Information. We recommend you to read this Privacy Notice and Consent so that you understand our approach towards the use of your Personal Information. By submitting your Personal Information to us, you will be treated as having given your permission – where necessary and appropriate – for disclosures referred to in this policy. By using this web site, you acknowledge that you have reviewed the terms of this Privacy Notice and Consent to Use of Personal Information (the "Privacy Notice and Consent") and agree that we may collect, use and transfer your Personal Information in accordance therewith.

If you do not agree with these terms, you may choose not to provide any Personal Information but this may impact on our ability to support you as a customer or supplier. This Privacy Notice and Consent forms part of our Terms and Conditions of Use and such shall be governed by and construed in accordance with the laws of South Africa. This Notice explains how we obtain, use and disclose your personal information, as is required by the Protection of Personal Information Act, 2013 (POPI Act). At Newstrack Online (PTY) LTD we are committed to protecting your privacy impact and to ensure that your Personal Information is collected and used properly, lawfully and openly.

2. WHO WE ARE

Newstrack Online (PTY) LTD is an online news curation agency that delivers just the news you need to know about.

Innovative monitoring software is used to identify relevant news from thousands of online news sources, as and when it happens.

Through a combination of proprietary filtering software and our comprehensive curation process, we pinpoint business-critical news.

Founded in 2006, we have grown to become an indispensable resource that leading multinational companies rely on daily.

3. DEFINITION OF PERSONAL INFORMATION

According to the POPI Act "Personal Information" means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person. The POPI Act, which has more specific examples if you need them, can be found at the following link:

https://www.gov.za/sites/default/files/gcis_document/201409/3706726-11act4of2013protectionofpersonalinforcorrect.pdf

4. COLLECTION OF PERSONAL INFORMATION

We collect and process your Personal Information mainly to provide you with access to our services and products, to help us improve our offerings to you, to support our contractual relationship with you and for certain other purposes explained below. The type of information we collect will depend on the purpose for which it is collected and used. We will only collect information that we need for that purpose.

We collect information directly from you where you provide us with your personal details, for example when you purchase or supply a product or services to or from us or when you submit enquiries to us or contact us. Where possible, we will inform you what information you are required to provide to us and what information is optional.

Examples of information we collect from you are:

- name
- address
- email address
- telephone/cell number
- user-generated content, posts and other content you submit to our web site

We also collect information about you from other sources as explained below.

With your consent, we may also supplement the information that you provide to us with information we receive from other companies in our industry in order to offer you a more consistent and personalized experience in your interactions with Newstrack Online (PTY) LTD.

Collection of Non-Personal Information

We may automatically collect non-Personal Information about you such as the type of internet browsers you use or the website from which you linked to our website. We may also aggregate details which you have submitted to the site (for example, the products or services you are interested in). You cannot be identified from this information and it is only used to assist us in providing an effective service on this web site. We may from time to time supply third parties with this non-personal or aggregated data for uses in connection with this website.

Cookies policy

We use the term "cookies" to refer to cookies and other similar technologies covered by the POPI Act on privacy in electronic communications.

- **What is a cookie?**

Cookies are small data files that your browser places on your computer or device. Cookies help your browser navigate a website and the cookies themselves cannot collect any information stored on your computer or your files. When a server uses a web browser to read cookies they can help a website deliver a more user-friendly service. To protect your privacy, your browser only gives a website access to the cookies it has already sent to you.

- **Why do we use cookies?**

We use cookies to learn more about the way you interact with our content and help us to improve your experience when visiting our website. Cookies remember the type of browser you use and which additional browser software you have installed. They also remember your preferences, such as language and region, which remain as your default settings when you revisit the website. Cookies also allow you to rate pages and fill in comment forms. Some of the cookies we use are session cookies and only last until you close your browser, others are persistent cookies which are stored on your computer for longer.

- **How are third party cookies used?**

For some of the functions within our websites we use third party suppliers, for example, when you visit a page with videos embedded from or links to YouTube. These videos or links (and any other content from third party suppliers) may contain third party cookies and you may wish to consult the policies of these third party websites for information regarding their use of cookies.

- **How do I reject and delete cookies?**

We will not use cookies to collect personally identifiable information about you. However, should you wish to do so, you can choose to reject or block the cookies set by the websites of any third party suppliers by changing your browser settings – see the Help function within your browser for further details. Please note that most browsers automatically accept cookies so if you do not wish cookies to be used you may need to actively delete or block the cookies.

You can also visit www.allaboutcookies.org for details on how to delete or reject cookies and for further information on cookies generally. For information on the use of cookies in mobile phone browsers and for details on how to reject or delete such cookies, please refer to your handset manual. Note, however, that if you reject the use of cookies you will still be able to visit our websites but some of the functions may not work correctly.

5. HOW WE USE YOUR INFORMATION

We will use your Personal and Non-Personal Information only for the purposes for which it was collected or agreed with you, for example:

- Evaluate the use of the site, products and services
- For audit and record keeping purposes
- For monitoring and auditing site usage
- Help speed up your future activities and experience on the site.
- In connection with legal proceedings
- Make the site easier to use and to better tailor the site and our products to your interests and needs
- To carry out our obligations arising from any contracts entered into between you and us
- To notify you about changes to our service
- To respond to your queries or comments
- We will also use your Personal Information to comply with legal and regulatory requirements or industry codes to which we subscribe or which apply to us, or when it is otherwise allowed by law.
- Where we collect Personal Information for a specific purpose, we will not keep it for longer than is necessary to fulfil that purpose, unless we have to keep it for legitimate business or legal reasons. In order to protect information from accidental or malicious destruction, when we delete information from our services we may not immediately delete residual copies from our servers or remove information from our backup systems.
- You can opt out of receiving communications from us at any time. Any direct marketing communications that we send to you will provide you with the information and means necessary to opt out.

6. DISCLOSURE OF PERSONAL INFORMATION

We may also disclose your information:

- Where we have a duty or a right to disclose in terms of law or industry codes;
- Where we believe it is necessary to protect our rights.

7. PERSONAL INFORMATION SECURITY

We are legally obliged to provide adequate protection for the Personal Information we hold and to stop unauthorised access and use of personal information. We will, on an on-going basis, continue to review our security controls and related processes to ensure that your Personal Information is secure.

Our security policies and procedures cover:

- Physical security measures
- Cyber security measures
- Training in information security
- Policies in information security

When we contract with third parties, we impose appropriate security, privacy and confidentiality obligations on them to ensure that Personal Information that we remain responsible for, is kept secure.

We will ensure that anyone to whom we pass your Personal Information agrees to treat your information with the same level of protection as we are obliged to.

8. ACCESS TO YOUR PERSONAL INFORMATION

You have the right to request a copy of the Personal Information we hold about you. To do this, simply contact us at the numbers/addresses listed on our home page and specify what information you would like. We will take all reasonable steps to confirm your identity before providing details of your personal information.

Please note that any such access request may be subject to a payment of a legally allowable fee, as laid down in our PAIA Manual.

9. CORRECTION OF YOUR PERSONAL INFORMATION

You have the right to ask us to update, correct or delete your personal information. We will take all reasonable steps to confirm your identity before making changes to Personal Information we may hold about you. We would appreciate it if you would take the necessary steps to keep your Personal Information accurate and up-to-date by notifying us of any changes we need to be aware of.

10. RETENTION OF PERSONAL DATA

Newstrack Online (PTY) LTD will retain your data in compliance with the POPI Act and in compliance with other applicable legislation.

11. AUTOMATED DECISION MAKING

Newstrack Online (PTY) LTD does not use Automated Decision Making in connection with your personal data.

12. RIGHT TO OBJECT

In terms of the POPI Act (POPIA) section 18. (h) (iv) you have the right to object to the processing of personal information as referred to in section 11(3) of the POPIA.

13. RIGHT TO LODGE A COMPLAINT

In terms of the POPI Act (POPIA) section 18. (h) (v) you have the right to lodge a complaint to the Information Regulator (South Africa) (IRSA). The IRSA contact details are:

<https://www.justice.gov.za/inforeg/contact.html>
JD House, 27 Stiemens Street
Braamfontein, Johannesburg, 2001

P.O Box 31533
Braamfontein, Johannesburg, 2017
Complaints email: POPIAComplaints.IR@justice.gov.za

14. CHANGES TO THIS NOTICE

Please note that we may amend this notice from time to time. Please check our website periodically to inform yourself of any changes.

15. HOW TO CONTACT US

If you have any queries about this notice or believe we have not adhered to it, or need further information about our privacy practices or wish to give or withdraw consent, exercise preferences or access or correct your personal information, please contact us at the numbers/addresses listed on our website www.newstrack.online in the Newstrack Online (PTY) LTD PAIA Manual.

MANUAL PREPARED IN TERMS OF SECTION 51 OF THE PROMOTION OF ACCESS TO INFORMATION ACT (ACT 2 OF 2000)

1. INFORMATION REQUIRED UNDER SECTION 51(1) (a) OF THE ACT

Designated Head of Newstrack Online (PTY) LTD: Available on request.

Postal Address of Newstrack Online (PTY) LTD: PO BOX 693 Northlands 2116

Street Address of Newstrack Online (PTY) LTD: 4th Floor, The Firs, Cradock Ave, Rosebank, Johannesburg, Gauteng, South Africa, 2196.

Tel. No of Newstrack Online (PTY) LTD: +27 10 100 3055

E- Mail address of Newstrack Online (PTY) LTD: info@newstrack.online

2. DESCRIPTION OF GUIDE REFERRED TO IN SECTION 10

A Guide has been compiled in terms of Section 10 of PAIA by the South African Human Rights Commission (SAHRC). It contains information required by a person wishing to exercise any right, contemplated by PAIA. It is available in all of the official languages.

Information Regulator South Africa
JD House, 27 Stiemens Street
Braamfontein, Johannesburg, 2001

P.O Box 31533
Braamfontein, Johannesburg, 2017

General enquiries email: infoereg@justice.gov.za.

3. RECORDS AVAILABLE IN TERMS OF OTHER LEGISLATION

Records available in terms of other legislation are as follows:

- Basic Conditions of Employment Act No. 75 of 1997
- Broad-based Black Economic Empowerment Act 53 of 2003
- Companies Act No 71 of 2008 and Applicable Regulations
- Compensation for Occupational Injuries and Health Diseases Act No. 130 of 1993
- Copyright Act No. 98 of 1978
- Electronic Communications and Transactions Act No 25 of 2002
- Employment Equity Act. No. 55 of 1998
- Income Tax Act No 58 of 1962
- Labour Relations Act No 66 of 1995
- Occupational Health and Safety Act No. 85 of 1993
- Promotion of Access to Information Act No.2 of 2000
- Protection of Personal Information Act 4 of 2013
- Regulation of Interception of Communication and Provision of Communications Act, No.2 of 2000
- Skills Development Act 97 of 1998
- Skills Development Levies Act No 9 of 1999
- Trade Marks Act 194 of 1993
- Unemployment Insurance Act No. 63 of 2001
- Unemployment Insurance Contributions Act No 4 of 2002
- Value Added Tax Act No 89 of 1991

4. RECORDS AUTOMATICALLY AVAILABLE

No notice has been submitted by the company to the Minister of Justice and Constitutional Development regarding the categories of records, which are available without a person having to request access in terms of Section 52(2) of PAIA. However, the information on the website of the business is automatically available without having to request access in terms of PAIA.

5. SUBJECTS AND CATEGORIES OF RECORDS HELD BY NEWSTRACK ONLINE (PTY) LTD

General information about Newstrack Online (PTY) LTD can be accessed via the internet on www.newstrack.online, which is available to all persons who have access to the internet.

The subjects on which the private body holds records and the categories on each subject in terms of Section 51(1)(e) are as listed below. Please note that a requester is not automatically allowed access to these records and that access to them may be refused in accordance with Sections 62 to 69 of the Act:

5.1 Companies act records

- Documents of Incorporation
- Memorandum of Incorporation
- Records relating to the appointment of Auditors

5.2 Financial records

- Accounting Records
- Annual Financial Reports
- Annual Financial Statements
- Asset Registers
- Bank Statements
- Banking details and bank accounts
- Debtors / Creditors statements and invoices
- General ledgers and subsidiary ledgers
- General reconciliation
- Invoices
- Policies and procedures
- Rental Agreements
- Tax Returns

5.3 Income tax records

- PAYE Records
- Documents issued to employees for income tax purposes
- Records of payments made to SARS on behalf of employees
- All other statutory compliances:
 - VAT
 - Skills Development Levies
 - UIF
 - Workmen's Compensation

5.4 Personnel documents and records

- Address Lists
- Employment Contract
- Leave Records
- Salary Records
- SETA records

5.5 Procurement department

- Contractor, supplier agreements
- Lists of suppliers, products, services and distribution

5.6 Sales department

- Customer details

5.7 IT department

- Hardware asset registers
- Information security policies/standards/procedures

5.8 Purpose of processing of personal information

- To support sales and marketing activities
- To support recruitment and management of staff
- To support engagement with suppliers
- To support engagement with the general public
- To support engagement with the media

5.9 **Data subjects categories and their personal information**

- Customers: record of customer life cycle
- Employees: record of employee life cycle
- Suppliers: record of supplier life cycle
- General public: tracking general enquiries and web site visits
- Media: records of media interactions

5.10 **Planned recipients of personal information**

- Statutory authorities
- Law enforcement
- Tax authorities
- Financial institutions
- Industry bodies

5.11 **Planned trans-border flows of personal information**

- Flows to service providers/operators
- Flows to business partners
- Flows to customers
- Flows to suppliers
- Flows through the use of social media

5.12 **Security measures to protect personal information**

- Physical security measures
- Cyber security measures
- Training in information security
- Policies in information security

6. DETAIL ON HOW TO MAKE A REQUEST FOR ACCESS

The requester must complete Form C and submit this form together with a request fee, to the head of Newstrack Online (PTY) LTD. The form must be submitted to the head of Newstrack Online (PTY) LTD at his address, fax number, or electronic mail address as stated earlier in this manual.

Form of request:

- The requester must use the prescribed form, as attached in terms of Article 8 of this manual, to make the request for access to a record. This must be made to the designated head. This request must be made to the address, fax number or electronic mail address of the body concerned [s 53(1)].
- The requester must provide sufficient detail on the request form to enable the designated head to identify the record and the requester.
- The requester should indicate which form of access is required.
- The requester should indicate if any other manner is to be used to inform the requester and state the necessary particulars to be so informed [s 53(2)(a) and (b) and (c)].
- The requester must identify the right that is sought to be exercised or to be protected and provide an explanation of why the requested record is required for the exercise or protection of that right [s 53(2)(d)].
- If a request is made on behalf of another person, the requester must then submit proof of the capacity in which the requester is making the request to the satisfaction of the designated head of the private body [s 53(2)(f)].
- A requester who seeks access to a record containing personal information about that

requester is not required to pay the request fee.

- Every other requester, who is not a personal requester, must pay the required request fee.
- The designated head of the private body must notify the requester (other than a personal requester) by notice, requiring the requester to pay the prescribed fee (if any) before further processing the request [s 54(1)].
- The fee that the requester must pay to a private body is currently R50,00. The requester may lodge an application to the court against the tender or payment of the request fees 54(3)(b)].
- After the designated head of the private body has made a decision on the request, the requester must be notified in the required form.
- If the request is granted then a further access fee must be paid for the search, reproduction, preparation and for any time that has exceeded the prescribed hours to search and prepare the record for disclosure [s 54(6)].

Grounds for refusing a request:

Newstrack Online (PTY) LTD has the right to reject any request for information submitted in terms of Sections 62 to 70 of Chapter 4 of the PAIA Act.

7. AVAILABILITY OF THE MANUAL

This manual is available for inspection free of charge.

Publication date of this manual: 01/07/2021