

## SAINT-GOBAIN AFRICA PRIVACY POLICY

### • WHAT IS THIS

- At Saint-Gobain, privacy is a serious matter and we are committed to protecting it.
- In accordance with the General Data Protection Regulation (“GDPR”) and the Protection of Personal Information Act, 2013 (“POPIA”) this policy explains when, why and how companies in our group governed by these laws:
  - collect personal data about individuals and, where applicable, juristic persons;
  - use this information;
  - disclose this kind of data to others, when this is necessary and under certain conditions;
  - keep secure and confidential this personal data.

For purposes of this policy, the following terms when referenced herein, shall have the corresponding meaning as defined under POPIA:

- "personal data" shall include reference to "personal information"; and
- "controller" shall include reference to "responsible party".

### • WHAT ARE THE POLICY CHANGES?

- This policy may evolve over time so please check the date on this page to make sure that you have the latest version.
- This policy was last updated June 2021.

### • WHO WE ARE

- Saint-Gobain Construction Products South Africa (Pty) Limited, its subsidiaries, sister companies, and other Saint-Gobain entities located in Africa, collectively form Saint-Gobain Africa. Saint-Gobain Africa is a part of the global Saint-Gobain group (hereinafter the “Group”). Whenever dealing with one of our Group companies (hereafter the “Company”), the “controller” of your personal data will be processed by the Company that decides why and how your personal data is processed.
- Where this policy refers to “we”, “our” or “us” below, unless mentioned otherwise, this refers to the particular Company that is the controller of your personal data.

### • HOW AND WHAT PERSONAL INFORMATION IS COLLECTED

We may collect and process the following personal data:

- **Personal data you give to us:** this is information about you that you give to us, entirely voluntarily, by entering information *via*:
  - one of our websites;
  - our mobile applications;
  - social media platforms;
  - corresponding with us by phone, email or otherwise.

Should you fail to provide or delay in providing your information we reasonably require, we may be unable to offer our goods and services to you and/or we may terminate the supply of any of our services provided with immediate effect.

Example: this includes information provided at the time of registering to use our websites, subscribing to the services we provide through our websites, posting material or requesting further services, managing your account online (including accessing documentation and engaging in

correspondence with us by phone, email or otherwise). We may also ask you for information when you report a problem with our websites. If you complete any surveys requested for research purposes, we will collect information in such circumstances as well.

The information you give us may relate to your identification, such as your name, address, email address and phone number, or enquiry details, and may include records of any correspondence and responses to any surveys.

- **Personal data we collect about you:** we may automatically collect the following information:
  - details of transactions you carry out through the websites, and your visits to our websites, including, but not limited to, traffic data, location data, weblogs and other communication data, and the resources you access;
  - technical information, automatically collected, including anonymous data collected by the hosting server for statistical purposes, the Internet protocol (IP) address used to connect your computer or device to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform. Please see [cookies](#) for further information;
  - any personal data which you allow to be shared that is part of your public profile or third party social network.
  
- **Personal data we may receive from other sources:** we obtain certain personal data about you from sources outside our business which may include our Group companies or other third party companies.

The remaining provisions of this policy also apply to any personal data we obtain from these sources.

## • **WHY AND HOW WE USE YOUR PERSONAL DATA**

**We process your personal data lawfully for:**

- the purpose of handling communication and exchange of information with our websites users;
- the purpose of managing our customer/prospect relations; notably when processing your orders, responding to your requests or by regularly sending you news and information on our products, our brands or our initiatives that might arouse your interest;
- any other specific purpose indicated at the time of collecting the information.

**We may use and process your personal data principally:**

- **where you have provided freely given and informed CONSENT** and for specific, determined and legitimate purposes.

You may withdraw your consent for us to use your information by contacting us at any time.

- **where it is necessary for us to pursue our LEGITIMATE INTERESTS** as a business or the legitimate interest of a third party to whom the personal data is supplied.

For example, for the following purposes:

- direct marketing activities (other than by way of unsolicited electronic communications where we are required to obtain your prior consent) as analysis to inform our marketing strategy, and to enhance and personalise your user experience; assess and improve our service to customers through recordings of any calls with our contact centres;
  - detection, prevention and mitigation of fraudulent or other illegal activities;
  - network and information security in order for us to take steps to protect your information against loss or damage, theft or unauthorised access.
- **where it is necessary for us to COMPLY WITH A LEGAL OBLIGATION** and notably:

- to comply with specific laws, that require the collection, processing and reporting of certain categories of personal data, for tax, accounting and transformation purposes;
  - to assist a public authority or criminal investigation body;
  - to identify you when you contact us under certain legal circumstances;
  - to verify the accuracy of data we hold about you.
- **where it is required for the PERFORMANCE OF A CONTRACT** we have with you, or because you have asked us to take specific steps before entering into a contract. This will include information that we process in order to enable you to make use of our website and the services we provide through it.
- **where it is necessary to protect your LEGITIMATE INTERESTS**
- For example:
- where we use your personal data to protect your rights under law;
  - where we process your personal data to protect you from harm, loss and liability
- **In respect of Direct Marketing by unsolicited electronic communications** we will use your personal data to send you direct marketing about other products and services that we feel may be of interest to you. We will give you the opportunity to consent to the receipt of direct marketing communications at the point that you apply or register to receive the services and on each occasion thereafter that you receive direct marketing communications from us. Should you already be considered an existing customer of the Group who receives direct marketing from us in relation to the same or similar services, we will give you the opportunity to refuse direct marketing communications on each subsequent occasion that you receive direct marketing communications from us. You can also change your marketing preferences at any stage by contacting us.

**Before we use and process your special personal data and/or personal data relating to children principally, we will establish a lawful basis, to permit us to use such data. These include:**

- your consent or the competent consent in respect of a child;
- where it is necessary for the establishment, exercise or defence by us of a right or obligation in law or to comply with an international public law obligation;
- for historical, statistical or research purposes to the extent that: (i) the purpose serves a public interest and the processing is necessary for the purpose concerned; or (ii) it appears to be impossible or would involve a disproportionate effort to ask for your consent, and sufficient guarantees are provided to ensure that the processing does not adversely affect your privacy to a disproportionate extent;
- you have deliberately made the personal data public; or
- a specific exemption provided for under POPIA in relation to each category of special personal data or personal data relating to children, such as to identify you when it is essential for that purpose and to comply with laws and other measures designed to protect or advance persons, or categories of persons, disadvantaged by unfair discrimination.

## • **WHO MAY RECEIVE OR HAVE ACCESS TO YOUR PERSONAL DATA**

### ➤ **Group companies**

We may share your information with other Companies within the Saint-Gobain group for internal administrative purposes or for marketing purposes in connection with the products and/or services that complement their own range of products and/or services that might interest you.

We may also transmit your personal data when we redirect your request to our contacts within the Group who are able to handle your request (for example, to solve a problem you have reported to us).

➤ **Our suppliers and service providers**

We may disclose your information to our third party service providers, agents, subcontractors and other organisations for the purposes of providing services to us or directly to you on our behalf. Such third parties may include cloud service providers (such as hosting and email management) or advertising agencies, administrative services, credit reference agencies, credit/debit card payment processors, customer satisfaction surveys or other third parties who provide services to us and assist us in the operation of our business and website.

When we use third party service providers, we only disclose personal data that is necessary for them to provide their service and we have a contract in place that requires them to keep your information secure and confidential, and not to use it other than in accordance with our specific instructions.

➤ **Third parties who provide products and services to you through us**

We work closely with various third parties to bring you a range of products and services which are complementary to those which we provide. In particular, we may offer finance or insurance products in relation to our own products and services.

When you enquire about or purchase one or more of these products or services through us, the relevant third party may use your details to provide you with information and to carry out their obligations arising from any contracts you have entered into with them.

These third party product providers may share your information with us which we will use in accordance with this policy. In some cases, they will be acting as a controller of your information and therefore we advise you to read their own privacy policy.

➤ **Other ways we may share your personal data**

We may transfer your personal data:

- to a third party as part of a sale of some or all of our business assets to any third party or as part of any business restructuring or reorganisation;
- if we are under a duty to disclose or share it in order to comply with any legal obligation or when this disclosure is required by applicable laws, court orders or government regulations, to detect or report a crime, to enforce or apply the terms of our contracts or to protect the rights, property or safety of our visitors and customers;
- to enforce applicable terms of use, to protect the rights, privacy, safety or property of our companies;
- if you have consented to the disclosure.

However, we will always take steps to ensure that your privacy rights continue to be protected.

• **WHERE WE STORE YOUR PERSONAL DATA AND TRANSFER YOUR PERSONAL DATA**

Your information is stored either in our databases or in the databases of our service providers. Mainly because of the international dimension of the Saint-Gobain group and in order to optimize service quality, the information you provide to us may be transferred to countries outside South Africa.

In such cases, we will take to the appropriate security and confidentiality measures to ensure that your privacy rights continue to be protected as outlined in this policy. These steps include imposing contractual obligations on the recipient of your personal data in the form of a binding agreement or ensuring that the recipients are subject to laws that provide the same or similar data protection principles as provided for under POPIA that aim to ensure adequate protection.

To the extent that we transfer any special personal data or personal data relating to children to third parties to other Saint-Gobain group companies located in countries that do not have adequate data protection laws as provided for under POPIA, we shall do so only with the requisite prior authorisation of the Information Regulator, being the data protection authority in South Africa, in circumstances where required.

## • **HOW LONG WE KEEP YOUR PERSONAL DATA**

We retain your personal data for a period of time necessary to achieve the purpose for which we use that information and to fulfil our obligations under other law, unless a longer retention period is (i) permitted by law, (ii) required for lawful purposes relating to our functions or activities; (iii) required in terms of a contract between us; or (iv) permitted with your consent. Except in specific cases, this period is specified at the time the information is collected.

We do not retain personal data in an identifiable format for longer than is necessary.

## • **WHAT ARE YOUR RIGHTS**

**Subject to applicable law and certain exemptions, restrictions or circumstances, you may have the right:**

- **To access your personal data, however we may and where applicable, must, refuse access to information in terms of the grounds for refusal of access to records set out in the applicable laws including the Promotion of Access to Information Act, 2000;**
- **To correct, modify and update your personal data where it is inaccurate, irrelevant, excessive, incomplete, misleading or out of date;**
- **To erase, delete or destroy your personal data where it is inaccurate, irrelevant, excessive, incomplete, misleading or unlawfully obtained or restrict its processing in specific circumstances;**
- **To withdraw your consent at any time;**
- **To lodge a complaint with the competent supervisory authority whose contact details are available on the relevant website. In respect of the South African Information Regulator, you may contact the office at: [complaints.IR@justice.gov.za](mailto:complaints.IR@justice.gov.za) and at 27 (0) 10 023 5200 or 33 Hoofd Street Forum III, 3rd Floor Braampark, South Africa,**
- **Braamfontein, Johannesburg, 201.**
- **To seek a judicial remedy.**

**These rights may be exercised by written request sent to the contact details that will be provided to you at the time of data collection. A reply will be provided to you within a reasonable delay, in accordance with the applicable regulations.**

## • **HOW WE ENSURE SECURITY AND CONFIDENTIALITY OF YOUR DATA**

Our aim is to keep your data as safe and secure as possible at all times. Once we have received your personal data, we put in place reasonable and appropriate technical and organisational measures and controls to prevent as much as possible any accidental or unlawful destruction, loss, alteration, or unauthorised access.

## • **HOW COOKIES WORK**

Like many other websites, our websites use cookies (including Google Analytics cookies) to obtain an overall view of the volumes and the habits of our visitors on our websites.

“Cookies” are small pieces of information sent to your device and stored on its hard drive to allow our website to recognise you when you visit.

It is possible to switch off cookies by setting your browser preferences. For more information on how we use cookies and how to switch them off on your device, please visit the applicable cookies policy of the concerned website.

- **CONTACT US**

- Please direct any queries about this policy to our **Information Officer** using our contact details below.
- Our email address for data protection queries is [InformationOfficerZA@saint-gobain.com](mailto:InformationOfficerZA@saint-gobain.com)