



**SUSTAINIVITY
PTY LTD**

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POPI Act & PRIVACY POLICY

Privacy Policy (POPIA Compliant)

SUSTAINIVITY PTY LTD, registration number **2019/184031/07**, is the Publisher of Lovescam Pocket Guide, written by Zola De Villiers. **SUSTAINIVITY** respects your right to privacy and is committed to protecting your personal information in accordance with the Protection of Personal Information Act 4 of 2013 (POPIA).

This Privacy Policy explains how we collect, use, disclose, and safeguard your personal information when you visit our website (www.zoladevilliers.co.za), purchase our products, or engage with our services.

1. The 8 POPIA Conditions for Lawful Processing

We adhere to the eight statutory conditions set out in POPIA for processing personal information:

1. **Accountability:** Ensuring compliance with POPIA throughout data processing.
2. **Processing Limitation:** Processing data lawfully, minimally, and with consent or justification.
3. **Purpose Specification:** Collecting data for explicit, defined, and lawful reasons.
4. **Further Processing Limitation:** Ensuring secondary data use aligns with the original purpose.
5. **Information Quality:** Keeping personal information accurate, complete, and updated.
6. **Openness:** Maintaining transparency regarding data practices.
7. **Security Safeguards:** Implementing technical and organizational measures to prevent loss or unauthorized access.
8. **Data Subject Participation:** Enabling individuals to access, correct, or request deletion of their data.

2. Personal Information We Collect

We only collect personal information that is relevant and necessary for our business functions. This may include:

- **Contact Details:** Name, email address, physical address, and phone number.
- **Billing Details:** Payment preferences and billing address (processed via secure payment gateways).

- **Technical & Usage Data:** IP address, browser type, pages visited, and cookies (collected automatically when visiting our website).

3. How We Collect Personal Information

We collect information directly from you when you:

- Fill out contact or enquiry forms on our website.
- Place an order or register for a user account.
- Subscribe to our newsletter or marketing communications.
- Interact with us via customer support, phone, or email.

4. Purpose of Data Processing

Your personal information will only be used for the specific purposes for which it was collected, including:

- Fulfilling and processing orders, deliveries, and transactions.
- Communicating with you regarding your orders or inquiries.
- Sending promotional material and updates (only with your explicit opt-in consent).
- Complying with legal, tax, and accounting obligations.

5. Third-Party Sharing & Operators

We do not sell or trade your personal information. We may share your data with trusted third-party service providers (known as "Operators" under POPIA) who assist us in operating our business, such as:

- Payment gateway providers.
- Delivery and courier services.
- Web hosting and IT infrastructure providers.

All third-party operators are legally required to maintain strict confidentiality and apply security standards equal to or exceeding our own.

6. Cross-Border Data Transfers

Where personal information is transferred outside of South Africa (e.g., cloud storage servers located abroad), we ensure that the recipient country or organization offers an adequate level of data protection equivalent to POPIA, or that an agreement is in place requiring compliance with South African data protection rules.

7. Security Safeguards & Data Retention

- **Security:** We employ physical, technical, and administrative measures—including SSL encryption, secure access controls, and regular systems monitoring—to prevent unauthorized access, loss, or damage to your personal data.
- **Data Retention:** Personal information is retained only for as long as necessary to fulfill the purpose for which it was collected or to satisfy statutory legal requirements. Once no longer required, data is securely destroyed or de-identified.

8. Your Legal Rights as a Data Subject

Under POPIA, you have the right to:

- **Access:** Request confirmation of whether we hold personal information about you and request a copy.
- **Correction/Deletion:** Request that inaccurate, incomplete, or outdated information be updated or erased.
- **Objection:** Object to the processing of your personal information on reasonable grounds or object to direct marketing.
- **Withdraw Consent:** Withdraw consent previously given for direct marketing communications at any time.

To exercise any of these rights, please contact our Information Officer using the details below.

9. Contact Details & Information Officer

If you have questions about this policy, wish to access your personal data, or believe your rights have been infringed, please contact our designated Information Officer:

- **Information Officer:** Jeanetha Brink
- **Company Name:** JBC Consulting Pty Ltd
- **Email Address:** Jeanetha@jeanetha-brink.co.za
- **Physical Address:** 218 Grysbok Street, Mooikloof, Boschkop, Pretoria, 0036
- **Phone Number:** +27 82 322 5287

Lodge a Complaint with the Regulator: If you are dissatisfied with our response, you have the right to lodge a complaint with the South African **Information Regulator**:

- **Website:** <https://infoeregulator.org.za/>
- **Email:** enquiries@infoeregulator.org.za / POPIAComplaints@infoeregulator.org.za