



BLUE SKY DISTRIBUTION INTERNATIONAL

PRIVACY POLICY

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1. WHO WE ARE

Blue Sky Distribution International (Pty) Ltd (“Blue Sky Distribution”) provides proven beauty care products in the clinical cosmetics, beauty and medical aesthetics industry.



Blue Sky Distribution is committed to sound business practices, as well as protecting your privacy and to ensure that your personal information is collected and used properly, lawfully and transparently in compliance with the Protection of Personal Information Act 4 of 2013 (“POPI”) read with the Constitution of the Republic of South Africa.

2. ABOUT THIS POLICY

2.1 This privacy policy explains how we obtain, use, disclose and protect your personal information, in accordance with the requirements of POPI.

2.2 This policy will set out the manner in which personal information is collected, managed, stored, used and protected by Blue Sky Distribution. This policy applies to all employees of Blue Sky Distribution and its subsidiaries or partners.

2.3 The objectives of this policy are to inform you:

- that we process personal information lawfully in terms of POPI;
- as to the manner in which we processes and protects personal information;
- that we adopt good practices in terms of processing of personal information;
- of the consequences of breaching its responsibilities in terms of POPI;
- display the commitment of Blue Sky Distribution to uphold and respect information privacy.

3. ESSENTIAL DEFINITIONS

3.1 “**personal information**” means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to -

- information relating to the race, gender, marital status, national origin, age and birth of the person;
- information relating to the financial, criminal or employment history of the person;
- any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
- the biometric information of the person;
- 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.



PERSONAL INFORMATION OF HUMANS AND COMPANIES

3.2 “**processing**” means any operation or activity or any set of operations, concerning personal information, including -

- the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;
- dissemination by means of transmission, distribution or making available in any other form; or
- merging, linking, as well as restriction, degradation, erasure or destruction of information.



Data subject (you)

The personal information relates to (you) data subject, who is protected by POPI.

Responsible party (us)

The responsible party determines purpose of and means of processing personal information and remains responsible for processing.

4. TYPES OF INFORMATION WE COLLECT

4.1 Blue Sky Distribution collects and processes your personal information primarily to contact you for the purposes of understanding your requirements, have all the required financial details, due diligence, trade marketing and delivering services and products accordingly. For this purpose we will collect following types of personal information:

- Personal details, including but not limited to names, surnames and ID numbers and banking account details.
- Contact details, including email address, telephone numbers and physical addresses.
- Financial details including payment and credit history, judgments and defaults.
- CIPC details, including company registration numbers and names of directors.

4.2 Blue Sky Distribution collects and processes the personal information of our employees primarily to comply with labour and employment legislation and maintain good employee relations. For this purpose we will collect and process employee data, including salary, disciplinary records, banking details, account numbers and tax information.

5. HOW WE COLLECT INFORMATION

Blue Sky Distribution collects personal information via multiple sources relying on voluntary disclosure, including email, comments on website, website forms, trading contracts, telephone and application forms.

6. HOW WE PROCESS INFORMATION

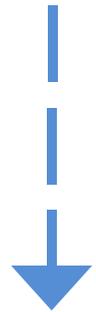
6.1 WE ARE ACCOUNTABLE

As prescribed by POPI, Blue Sky Distribution will take responsibility and remains accountable for personal information in its possession and processed by it and will ensure that the conditions for lawful processing are given effect to and complied with. Blue Sky Distribution will take reasonably practicable steps to ensure that the personal information is complete, accurate, not misleading and updated where necessary.

6.2 ONLY FOR THE PURPOSE WE NEED

6.2.1 Blue Sky Distribution undertakes to process personal information -

- lawfully, in accordance with POPI;
- in a reasonable manner that does not infringe your right to privacy.



purpose

6.2.2 Personal information will only be processed if -

- you consent thereto, alternatively, if you have entered into a contract with Blue Sky Distribution (in which instance express consent would not be required);
- processing is necessary to carry out actions for the conclusion or performance of a contract to which you are a party;
- processing complies with an obligation or duty required or imposed by law;
- processing protects a legitimate interest of yours;
- processing is necessary for the proper performance of a public law duty by a public body or
- processing is necessary for pursuing the legitimate interests of ours or of a third party to whom the information is supplied.

6.2.3 We will always collect personal information directly from you, unless -

- the information is from a public record or has deliberately been made public by you;
- you have consented to the collection from another source and this collection would not prejudice a legitimate interest of yours;
- collection of the information from another source is necessary -

- to comply with an obligation imposed by law or to enforce legislation;
- for the conduct of proceedings in any court or tribunal;
- in the interests of national security; or
- to maintain the legitimate interests of ours or of a third party to whom the information is supplied;
- collecting the information directly from you would prejudice a lawful purpose of the collection; or
- collecting the information directly from you is not reasonably practicable in the circumstances of the particular case.



6.3 WHY WE COLLECT PERSONAL INFORMATION

6.3.1 Blue Sky Distribution will collect personal information for the following and/or related purposes:

- References of an employee or job applicant, for purposes of employment
- Ensuring quality of delivery of services and products to customers
- Complying with contracts with various parties
- Confirmation of employment and vetting of employees
- Debt collection, including tracing in the event of default on payment
- Compliance with legislation
- Performing and processing credit checks
- Assisting in treating customers fairly, by having complete and up to date information about the customer
- Effective communication with clients and suppliers, to avoid misunderstandings or failure to communicate as a result of incorrect information
- Marketing products and services
- Process information to generate quotations and invoices
- Delivering products to clients

6.3.2 Once personal information, processed and stored by Blue Sky Distribution, has been retained for the full term as dictated by Blue Sky Distribution or as required by law or becomes in any way redundant, Blue Sky Distribution will destroy or delete the record of personal information in a manner that prevents its reconstruction in an intelligible form.

6.4 TRANSPARENCY

6.4.1 Blue Sky Distribution will ensure that all the documentation of processing operations under its responsibility will be stored and preserved for the required duration and purpose.

6.4.2 If personal information is collected, Blue Sky Distribution will take reasonably practicable steps to ensure that you are made aware (whether by means of contract, email notification or statement on its website) of all of the following -

- the information being collected or the source from which it is collected;
- our name and address (or that of the third party sender);
- the purpose for which the information is being collected;
- whether or not the supply of the information by yourself is voluntary or mandatory;
- the consequences of failure to provide the personal information;
- any particular law authorising or requiring the collection of the personal information;
- if we intend to transfer the information to a third country or international organisation, for instance where information is stored on a cloud server based in a foreign country, that the level of protection afforded to the information by that third country or international organisation is adequate.



6.5 WE PROTECT YOUR INFORMATION

6.5.1 Blue Sky Distribution undertakes to secure the integrity and confidentiality of personal information in its possession or under its control. This is done by taking appropriate, reasonable technical and organisational measures to prevent the loss of, damage to or unauthorised destruction of personal information, and unlawful access thereto (by either a third party or internally by someone within Blue Sky Distribution) or unlawful processing thereof.

6.5.2 Blue Sky Distribution has put in place the following adequate safeguards to secure the integrity and confidentiality of personal information:

- Physical access control to our accounts buildings
- Password security on all devices
- Firewalls

- Encrypted storage devices
- “Iron Tree” protection software
- “SAGE Evolution” protection systems
- Training
- Daily back-ups of information
- Company policies

6.5.3 Blue Sky Distribution will conduct periodical risk assessments regarding the processing of personal information, to determine the level of internal and external risks, as well as to implement measures to mitigate and minimise any risks identified.

6.6 IN CASE OF A DATA BREACH

Where there are reasonable grounds to believe that your personal information has been accessed or acquired by any unauthorised person, Blue Sky Distribution will as soon as reasonably possible after the discovery notify you and the Information Regulator.

7. DISCLOSURE OF INFORMATION

Where applicable, we may disclose your personal information to our service providers, partners, holding or sister companies, companies and people who are involved in the delivery of products or services to you. We have agreements in place to ensure that they comply with the privacy requirements as required by POPI.

8. CONTACT US

If you have any questions or concerns regarding this policy, your personal information held by Blue Sky Distribution, the correction or deletion of personal information or updating your personal information held by Blue Sky Distribution, you should contact Blue Sky Distribution by sending an email to Wayne La Grange wayne@blueskyinternational.co.za.

