



## DIRECT MARKETING POLICY

### Introduction

#### 1. Overview

The purpose of this policy is to ensure The Company markets to their clients and prospects in a way that respects their privacy, respects their interests, and ensures the client or prospect has given us the necessary consent to market to them directly, thus ensuring The Company is compliant with section 69 of the POPI act.

#### 2. Scope

All employees, contractors, consultants, temporary and other workers at The Company including all personnel affiliated with third parties must adhere to this policy. This policy applies to clients or prospective clients of The Company.

#### 3. Policy Statement

##### 3.1. Consent

The processing of personal information of a data subject for the purpose of direct marketing by means of any form of electronic communication, including automatic calling machines, facsimile machines, SMSs, or e-mail is prohibited unless the data subject:

- Has given consent.
- They are a client/customer, and the processing of their data is of the client's best interest.

##### 3.2. When may The Company approach a data subject

The Company may only approach a data subject taking into account the below:

- Their consent is required.
- If they have not previously withheld consent
- The Company may only approach a data subject once.

##### 3.3. How does The Company obtain consent?

The subject's consent must be requested in the following ways:

- Opt-in on The Company website
- Manual opt-in form
- In The Company client contracts
- In written consent either via a signed document or in email.

Each opt-in form needs to clearly state that the collection of such consent is for the purpose of direct marketing, if this is not stated, The Company may not process this information for the use of direct marketing.

##### 3.4. When is processing of personal information for direct marketing purposes allowed?

Processing the personal information of a customer or data subject is acceptable if:

- The contact details of the client were obtained when a sale of a product or service is made
- For the purpose of direct marketing similar products that is in the client's best interest
- For the primary purpose of marketing only

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- The client or data subject has not refused to receive communication or has previously not opted out.

### 3.5. What is required in the direct marketing message?

All direct marketing communication must contain the following:

- Details and identity of the sender (or the person on whose behalf the communication has been sent)
- An address or contact details to which the recipient may send a request to stop receiving such communication.
- Optionally, an opt out button that directly links to The Company CRM system

### 4. Who should send direct marketing communication?

It is recommended that all communication come from the marketing/sales department in order to ensure a central hub for direct marketing compliance however in certain instances other departments may send out communication. The marketing/sales and the respective departments will also make use of best practice direct marketing systems that simplify the process of complying and to ensure every single marketing communication is aligned with section 69 of the POPI act.

### 5. References

(The below mentioned policies will only be applicable should the Company implement same.)

Document Name
Exceptions Policy
Information Policy

### 6. Outputs

The following records need to be kept and stored securely.

Record	Responsible Person	Retention	Disposition
Date of information collected	Marketing Manager	Until the information is no longer needed	Delete / Shred
Date of opt-out	Marketing Manager	5 years	Delete

All records must be stored in the pre-allocation location. All physical copies need to be stored in a lockable cabinet or drawer.

### 7. Enforcement

An employee found to have violated this policy may be subject to disciplinary action, up to and including termination of employment. A violation of this policy by a temporary worker, contractor or vendor may result in the termination of their contract or assignment with The Company.

Any exception to the policy must comply with the **Exceptions Policy**.

### 8. Definitions

TERMS	DESCRIPTION
CRM	A customer relationship management system where all client/customer information is stored on.

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Information Officer name Warren Kidgell

Information Officer signature WKidgell

Signed at Pinetown on this 1st day of July 2021

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