

1. INTRODUCTION

This document describes how MGL Avionics CC collects and uses your personal information and your choices and rights in relation to your personal information.

It applies to personal information that we collect from you physically, via e-mail, through our users group or through third parties.

2. PERSONAL DATA WE COLLECT

MGL Avionics CC is subject to the Protection of Personal Information Act, No. 4 of 2013 ("POPIA"), of which the operative provisions came into effect on 1 July 2020. "Personal information" is defined in POPIA as information relating to an identifiable, living, natural person and where it is applicable, an identifiable, existing juristic person, including but not limited to:

- (a) information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;
- (b) information relating to the education or the medical, financial, criminal or employment history of the person;
- (c) any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
- (d) the biometric information of the person;
- (e) the personal opinions, views or preferences of the person;
- (f) 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;
- (g) the views or opinions of another individual about the person; and
- (h) the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person.

Depending on how you interact with us, personal information we collect may include but without limitation:

- your name
- email address
- postal address
- physical address
- telephone number (fixed or mobile)

MGL Avionics CC may also where applicable, be subject to the General Data Protection Regulations 2016/679 of the European Union ['EU'] ("GDPR"), which is the primary legislation dealing with the protection and regulation of personal information. If you are a natural person based in the EU, who wish to or have procured products or services offered by MGL Avionics CC and in the process you have provided us with personal information in order to process your enquiry and/or transaction, we will supplement our obligations as set out herein with additional aspects of GDPR, where appropriate and applicable.

3. COLLECTION OF PERSONAL INFORMATION

We may collect your personal information from you in a variety of ways when you interact with us, including:

- We collect personal information when you place orders for our products or request information or technical assistance on our products.
- When you communicate with us.
- We collect personal information when we respond to your inquiries and requests, obtain feedback from you about our products or you apply for employment with us.

4. LEGAL BASIS FOR COLLECTING YOUR PERSONAL INFORMATION

When we process your personal information in connection with the purposes set out in this Privacy Statement, we may rely on one or more of the following legal bases, depending on the purpose for which the processing activity is undertaken and the nature of our relationship with you:

- Our legitimate interests for the purpose of managing, operating or promoting our business,
- Where this is necessary to comply with a legal obligation on us, whether contractually or otherwise.
- To protect the vital interests of any individual
- Where you have consented for such processing to take place.

5. USE OF YOUR PERSONAL INFORMATION

We may use your personal information to:

- Enable you to effectively use and to improve products.
- Perform administrative and business functions.
Send administrative information to you.
- Obtain feedback from you about our products.
- Respond to your inquiries and fulfil requests by you.
- Update our records and keep your contact details up to date.

6. YOUR RIGHTS

As a data subject you have the right to have your personal information processed in accordance with the conditions for the lawful processing of personal information as referred to in Chapter 3 of POPIA, including the right:

- to be notified that—
- personal information about you is being collected as provided for in terms of section 18; or
- your personal information has been accessed or acquired by an unauthorised person as provided for in terms of section 22;
- to establish whether a responsible party holds personal information of you and to request access to your personal information as provided for in terms of section 23;
- to request, where necessary, the correction, destruction or deletion of your personal information as provided for in terms of section 24;

- to object, on reasonable grounds relating to your particular situation to the processing of your personal information as provided for in terms of section 11 (3) (a);
- to object to the processing of your personal information—
- not to be subject, under certain circumstances, to a decision which is based solely on the basis of the automated processing of your personal information intended to provide a profile of you as provided for in terms of section 71;
- to submit a complaint to the Regulator regarding the alleged interference with the protection of your personal information as a data subject or to submit a complaint to the Regulator in respect of a determination of an adjudicator as provided for in terms of section 74; and
- to institute civil proceedings regarding the alleged interference with the protection of your personal information as provided for in section 99.

All references to sections above are to sections in POPIA.

7. SHARING OF PERSONAL INFORMATION

We may share your personal information for the purposes set out in this Privacy Statement (as applicable):

- Where you consent to the sharing of your personal information.
- In connection with any joint venture, merger, sale of company assets, consolidation or restructuring, financing, or acquisition of all or a portion of our business by or to another company.
- Where applicable, for credit reference, fraud prevention or business scoring agencies, or other credit scoring agencies.
- For debt collection agencies or other debt recovery organisations.
- For other legal reasons:

We may share your personal information in response to a request for information by a competent authority in accordance with, or required by any applicable law, regulation or legal process;

Where necessary to comply with judicial proceedings, court orders or government orders; or

To protect the rights, property or safety of MGL Avionics CC, its business partners, you, or others, or as otherwise required by applicable law.

Any third parties with whom we share personal information are contractually required to implement appropriate data protection and security measures to protect personal information and are not permitted to use personal information for any purpose other than the purpose for which they are provided with or given access to personal information.

8. SECURING YOUR PERSONAL INFORMATION

MGL Avionics CC is committed to protecting your personal information from accidental or unlawful destruction, damage, loss, alteration, unauthorised access or disclosure by using reasonable, appropriate, physical, administrative and technical safeguards and contractually requiring that third parties to whom we disclose your personal information do the same.

9. COOKIES ETC

MGL Avionics CC does not retain cookies on our website and does not keep any records of visits to our website nor items browsed.

10. DIRECT MARKETING

MGL Avionics does not send out any direct marketing communications.

11. RETAINING PERSONAL INFORMATION

We will retain your personal information for as long as is necessary to fulfil the purpose for which it was collected unless a longer retention period is required to comply with legal obligations, resolve disputes, protect our assets, or enforce agreements. The criteria we use to determine retention periods include whether:

- We are under a legal, contractual or other obligation to retain personal information, or as part of an investigation or for litigation purposes;
- Personal information is needed to maintain accurate business and financial records;
- There are automated means to enable you to access and delete your personal information at any time;
- You have consented to us retaining your personal information for a longer retention period, in which case, we will retain personal information in line with your consent.

12. CONTACT DETAILS

If you have any complaints, requests or questions about how your personal information is handled by MGL Avionics CC, you have a privacy concern or you wish to make a request or a complaint relating to your personal information, please contact us.

- Tel: 021-852-2216 (International ++27+21-852-2216)
- Physical address: Ground floor, Trident Park 2, 1 Niblick Way, The Triangle, Somerset West, South Africa
- Email: info@MGLAvionics.co.za

You also have the right to lodge a complaint with the POPIA Information Regulator.

Dated: 19 May 2021