

South Africa Privacy Statement

This South Africa Privacy Statement supplements the [Zebra Privacy Statement](#) (“**South Africa POPIA Addendum**”) to the extent you use our Site and the *Protection of Personal Information Act, 2013* (“**POPIA**”) is applicable to you. Psion Africa Proprietary Limited and its affiliates (“**Zebra**”, “**Us**” or “**We**”) are committed to POPIA compliance.

1. DEFINITIONS

As used in this South Africa POPIA Addendum, the following terms shall have the following meanings:

- 1.1. “**Data Subject**” or “**You**” means any person to whom the specific Personal Information relates, as contemplated in POPIA;
- 1.2. “**IO**” means the Information Officer of Zebra Technologies;
- 1.3. “**Operator**” means a person who Processes Personal Information for a Responsible Party in terms of a contract or mandate, without coming under the direct authority of that party;
- 1.4. “**Personal Information**” means information relating to an identifiable, living, natural person, and (where applicable) an identifiable, existing juristic person, including the name, race, gender, marital status, address and identifying number of a person, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
- 1.5. “**POPIA**” means the *Protection of Personal Information, of 2013*, and any regulations or codes of conduct promulgated thereunder;
- 1.6. “**Processing**” or “**Process**” means any activity that involves the use of Personal Information. It includes any operation or activity or any set of operations, whether or not by automatic means, concerning Personal Information, including:
 - 1.6.1. the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;
 - 1.6.2. dissemination by means of transmission, distribution or making available in any other form; or
 - 1.6.3. merging, linking, as well as restriction, degradation, erasure or destruction of information;

- 1.7. **“Responsible Party”** means a public or private body or any other person which, alone or in conjunction with others, determines the purpose of and means for Processing Personal Information;
- 1.8. **“Site”** means Zebra’s website www.zebra.com; and
- 1.9. **“Special Personal Information”** means Personal Information concerning the religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life or biometric information of a Data Subject; or the criminal behaviour of a Data Subject to the extent that such information relates to the alleged commission by a Data Subject of any offence; or any proceedings in respect of any offence allegedly committed by a Data Subject or the disposal of such proceedings.

2. **INFORMATION WE COLLECT AND RECEIVE**

As a Responsible Party and in some instances as an Operator, we collect, Process and use Personal Information in a manner that is lawful, reasonable and not excessive.

2.1. **Personal Information we collect**

The categories of Personal Information we collect is set out in the [Zebra Privacy Statement](#).

2.2. **Information from third-party sources**

We may receive additional information about you that is publicly or commercially available and combine that with the information we have collected or received about you in other ways.

2.3. **Special Personal Information**

2.3.1. We will not collect or use your Special Personal Information.

3. **HOW WE USE THE INFORMATION WE COLLECT AND RECEIVE**

3.1. Zebra collects and receives information about you for the purposes set out in the [Zebra Privacy Statement](#). We use the information we collect and receive for the following general purposes:

- 3.1.1. for the performance of a contract we have with you (such as if you purchase our products or services, we'll use your information to carry out our obligation to complete and administer your order);
- 3.1.2. for compliance with a legal obligation to which Zebra is subject to (such as tax obligations and when we are obliged to comply with lawful requests from competent authorities such as law enforcement);

- 3.1.3. for the purposes of our legitimate interests (such as tailoring your experience on our Sites and for fraud detection), provided that such processing does not outweigh your rights and freedoms; and
- 3.1.4. the processing may also be pursuant to other applicable legal basis for data processing. To the extent that a legal ground described above would not apply to processing of your Personal Information by us, we will seek your consent for such specific purpose in accordance with applicable law.

4. **TRANSFER OF INFORMATION**

- 4.1. We are based in and operate from South Africa. Your information, including Personal Information, may be transferred to and maintained on servers located outside of your country of residence, where the data privacy laws, regulations and standards, may not be equivalent to the laws in your country of residence.
- 4.2. We might transfer your Personal Information to places outside of South Africa and store it there, where our suppliers might Process it. If that happens, your Personal Information will only be transferred to and stored in country that has equivalent, or better, data protection legislation than South Africa or with a service provider which is subject to an agreement requiring it to comply with data protection requirements equivalent or better than those applicable in South Africa.
- 4.3. For the purposes set out in the Zebra Privacy Policy, your Personal Information may be transferred outside of the country in which it was collected to Zebra Technologies Corporation ("**Zebra US**"), the parent company of Zebra located in the United States, its subsidiaries, affiliates and third party service providers located in other jurisdictions. We will ensure that all transfers are lawful and that there are appropriate legal and security arrangements, including implementing supplementary measures to achieve a level of protection equivalent to POPIA.
- 4.4. Zebra as a group of companies has entered into an intra-group data transfer agreement, which incorporates binding corporate rules in order to transfer Personal Information in accordance with section 72 of POPIA. This agreement ensures appropriate and suitable safeguards with Zebra US, Zebra UK, our subsidiaries, affiliates and third party service providers.
- 4.5. Our Operators commit to using approved methods to ensure the lawful transfer of Personal Information outside of South Africa. Additionally, Zebra's Operators make strong commitments to Zebra related to limiting access to the data that is stored with them. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this South Africa POPIA Addendum.
- 4.6. Your use of our Site, followed by your submission of information to us, represents your consent to such transfer.

5. CHANGES TO THE SOUTH AFRICA POPIA ADDENDUM

Zebra reserves the right to change the South Africa POPIA Addendum and the Zebra Privacy Policy from time to time. Any changes that we may make will be posted on our Site and will be effective from the date of posting.

6. ACCESS TO, CORRECTION AND DELETION OF YOUR PERSONAL INFORMATION

- 6.1. You may request details of Personal Information which we hold about you under the *Promotion of Access to Information Act, 2000* (“**PAIA**”). Fees to obtain a copy or a description of Personal Information held about you are prescribed in terms of PAIA. Confirmation of whether or not we hold Personal Information about you may be requested free of charge. If you would like to obtain a copy of your Personal Information held by Zebra, please review our PAIA Manual located at [manual-in-compliance-with-section-51-promotion-of-access-to-information-act-2000-south-africa-en-gb.pdf \(zebra.com\)](#)
- 6.2. You may request the correction of Personal Information Zebra holds about you. Please ensure that the information we hold about you is complete, accurate and up to date. If you fail to keep your information updated, or if your information is incorrect, Zebra may limit the products and services offered to you or elect not to open the account.
- 6.3. You have a right in certain circumstances to request the destruction or deletion of and, where applicable, to obtain restriction on the Processing of Personal Information held about you. If you wish to exercise this right, please contact us using the contact details set out below in clause 8.
- 6.4. You have a right to object on reasonable grounds to the Processing of your Personal Information where the Processing is carried out in order to protect our legitimate interests or your legitimate interests, unless the law provides for such Processing.

7. COMPLAINTS

- 7.1. Should you believe that Zebra has utilised your Personal Information contrary to Applicable Laws, you undertake to first attempt to resolve any concerns with us.
- 7.2. If you are not satisfied with such process, you may have the right to lodge a complaint with the Information Regulator, using the contact details listed below:

E-mail address: complaints.IR@justice.gov.za

Physical address JD House
27 Stiemens Street
Braamfontein

Johannesburg, 2001

8. **IO CONTACT DETAILS**

If you have any comments or questions about the South Africa POPIA Addendum or how we handle your Personal Information, please contact the IO.

IO Name:	Neil Gouveia
E-mail address:	privacy@zebra.com