

## Privacy Policy for Greenways Pharmacy House and Home CC trading Greenways Dispensary

### For purposes of the Policy:

- The terms used in this Privacy Policy shall bear the meaning ascribed to such terms in section 1 of the Protection of Personal Information Act, No. 4 of 2013 (“**POPIA**”).
- “**you**” or “**your**” refers to you:
  - the user of the Website and/or mobile Application or any of the Social Media Networks, which includes:
    - Users who have registered and created patient profiles on the Website, or whose profiles have been created by a medical professional on his/her behalf; and
    - Medical professionals, such as doctors or nurses, who have registered and created a profile on the doctor’s portal on the Website;
  - Greenways Dispensary’s service providers; and
  - Greenways Dispensary’s employees and/or consultants.
- “**we**” or “**us**” or “**our**” or “**Greenways Dispensary**” refers to Greenways Pharmacy House and Home CC, registration number 2010/155841/23, a close corporation incorporated in terms of the laws of South Africa, and any subsidiaries and affiliated companies within the Greenways Dispensary Group and its consultants, contractors, developers, and/or employees that Greenways Dispensary may engage and/or employ from time to time;
- “**Social Media Network**” means the social media pages and networks including, but not limited to Facebook, Twitter, YouTube, LinkedIn, Instagram, Pinterest, and Tumblr;
- “**Website**” or “**Websites**” means any of our website/s, including the Greenways Dispensary website accessible at [www.greenswaysdispensary.co.za](http://www.greenswaysdispensary.co.za), the Greenways Dispensary Apps and any Social Media Networks; and
- “**the App**” or “**Application**” or “**Greenways Dispensary Apps**” means any online application software that is provided by or is connected with Greenways Dispensary that you install or download from an online application store and access via a mobile device, including any smartphone and/or tablet device.

### 1. General Principles of the Privacy Policy

- 1.1 This Privacy Policy has been prepared in accordance with POPIA (and the POPIA Regulations) and explains how Greenways Dispensary and any of its affiliates, as a Responsible Party, Processes and makes use of the Personal Information collected about you, as a Data Subject, in connection with our Websites and/or services (**this Privacy Policy**).
- 1.2 This Privacy Policy applies to all Data Subjects whose Personal Information is Processed by Greenways Dispensary.
- 1.3 Greenways Dispensary is committed to safeguarding and keeping confidential your Personal Information.
- 1.4 When dealing with your Personal Information Greenways Dispensary will:
  - 1.4.1 only disclose, collate and Process (“**use**”) your Personal Information with your express written permission unless we are otherwise legally required to do so; and
  - 1.4.2 not use your Personal Information for any other purpose, other than that which is disclosed to you, unless you give Greenways Dispensary your express written permission to do so, or unless Greenways Dispensary is permitted or required to do so by law.
- 1.5 By using the Website and/or Application, registering or applying online for any Greenways Dispensary products or services, contacting Greenways Dispensary electronically or providing your Personal Information to Greenways Dispensary in any other format, you provide Greenways Dispensary with your **express written permission** to Process and/or share your Personal Information within the Greenways Dispensary Group of Companies and with the Greenways Dispensary’s partners, in the ordinary course of Greenways Dispensary’s business, including for purposes of providing you with our products and services. **You may revoke this consent in writing at any time.**
- 1.6 This Privacy Policy is incorporated in full into the General Terms and Conditions of Use (“**the Terms**”). By accessing and/or using the Website and/or Application and/or Social Media Networks and/or providing your Personal Information to Greenways Dispensary in any other format, you agree that you have read, understood and agree to be bound by the Terms existing at that time.
- 1.7 **If you do not wish to be bound by the Terms, or do not consent to the Processing of your Personal Information in accordance with this Privacy Policy, please do not continue to use the Website and/or Application and/or provide any of your Personal Information to the Website or otherwise.**

### 2 What do we mean by Personal Information

- 2.1 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:
  - 2.1.1 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;
- 2.1.2 information relating to the education or the medical, financial, criminal or employment history of the person;
- 2.1.3 any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
- 2.1.4 the biometric information of the person;
- 2.1.5 the personal opinions, views or preferences of the person;
- 2.1.6 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;
- 2.1.7 the views or opinions of another individual about the person; and
- 2.1.8 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 (collectively, “**Personal Information**”).

### 3 Special Personal Information

- 3.1 Special Personal Information means Personal Information concerning:
  - 3.1.1 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
  - 3.1.2 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.
- 3.2 Greenways Dispensary may be required to Process Special Personal Information and is permitted to do so in the following circumstances:
  - 3.2.1 The Processing is carried out with your consent;
  - 3.2.2 The Processing is necessary for the establishment, exercise or defence of a right or obligation in law;
  - 3.2.3 The Processing is necessary to comply with an obligation of international public law;
  - 3.2.4 The Processing is for historical, statistical or research purposes to the extent that:
    - The purpose serves a public interest and the Processing is necessary for the purpose concerned; or
    - It appears to be impossible or would involve a disproportionate effort to ask for consent,
 and sufficient guarantees are provided for to ensure that the Processing does not adversely affect the individual privacy of the Data Subject to a disproportionate extent; and
  - 3.2.5 Information has deliberately been made public by you.
- 3.3 To the extent that Greenways Dispensary is required to Process any Special Personal Information in any other circumstances other than those listed above, we will obtain your consent to Process the Special Personal Information.
- 3.4 To the extent that Greenways Dispensary Processes Personal Information about you concerning your health, Greenways Dispensary does so as a healthcare institution or facility and such Processing is necessary for your proper treatment and care. Greenways Dispensary will treat any Personal Information regarding your health as confidential, unless we are required by law or in connection with our duties and services to communicate the information to other parties who are authorized to Process such information.

### 4 How we collect your Personal Information

- 4.1 Greenways Dispensary collects and Processes your Personal Information whenever you use any of the Websites, register or create an online profile, complete an application form, contact Greenways Dispensary electronically via email, feedback forms, Social Media Networks, comments and discussion forums or otherwise, or use one of the products, services, facilities, tools or utilities offered by Greenways Dispensary on the Websites. This information is provided voluntarily to us by you.
- 4.2 Where possible, Greenways Dispensary will endeavor to collect information directly from you. However, there may be occasions where Greenways Dispensary receives information about you from third parties, including (but not limited to) your medical professional if you are a patient, your patient if you are a medical professional, dispensing pharmacies or third parties with whom we have a relationship. In order to comply with regulations in South Africa, before Greenways Dispensary is able to supply pharmacies with products to dispense, it receives South Africa Health Products Regulatory Authority approval letters.
- 4.3 Insofar as any forms are completed and/or profiles are created on the Websites by medical professionals, in the presence of (whether physically, telephonically or virtually), or on behalf of you as the patient, we are entitled to assume that you have expressly authorised the medical professional to Process your Personal Information or Special Personal Information and/or to provide any such Personal Information or Special

Personal Information to us.

## 5 Information Processed by Greenways Dispensary as an Operator

- 5.1 Greenways Dispensary provides a platform to facilitate and assist medical professionals to complete their regulatory obligations when prescribing medicinal cannabis. In order to do this, medical professionals may upload patient details to our Websites including contact information, medical information and treatment information. In this situation, Greenways Dispensary acts solely as an Operator. If you wish to amend, update, delete or access any information which has been uploaded to the Website by your medical professional you may contact them directly and/or log onto your profile using the credentials created for you by your medical professional.
- 5.2 When Greenways Dispensary Processes Personal Information or Special Personal Information as an Operator (for example where a medical professional provides Greenways Dispensary with a patient's Personal Information or Special Personal Information on behalf of the patient, which consent the medical professional confirms has been obtained), Greenways Dispensary will:
  - 5.2.1 Process such Personal Information or Special Personal Information only with the knowledge or authorisation of the Responsible Party (for example, the medical professional); and
  - 5.2.2 Treat the Personal Information or Special Personal Information which comes to our knowledge as confidential and will not disclose it, unless it is required by law to do so or in the course of the proper performance of our duties as an Operator.
- 5.3 Where Greenways Dispensary acts as an Operator, we are entitled to assume that the Responsible Party has complied with POPIA in obtaining and Processing the Personal Information or Special Personal Information.

## 6 Information gathered using cookies and other analytical technologies

- 6.1 **The Websites uses cookies, server logs, and other technologies that allow us to collect information about you, including your use of the Website.**
- 6.2 Cookies are small files that we transfer to your computer or mobile device, via your web browser, that typically expire after a defined period of time. They allow us to provide the services you request, tailor advertising to your interests (if you have consented to such direct marketing), and aggregate certain analytical information about you. This information is not associated with a specific personal identity, but rather includes information such as:
  - 6.2.1 your Internet Protocol (IP) address;
  - 6.2.2 device identifying information, for example, the type of Internet browser, device and operating system you use to access the Website;
  - 6.2.3 the location from which you access the Website;
  - 6.2.4 the frequency of visits to the Website;
  - 6.2.5 details as to the time and duration of your visit to the Website, the page from which you were directed to the Website and the page to which you navigated when you were finished, pages accessed during your visit, the amount of time spent on each page and how you interacted with other site users; and
  - 6.2.6 details of services, programmes, channels and advertisements that you view and how you view them.
- 6.3 Your acceptance of cookies and other analytical technologies is entirely voluntary. Most web browser software is initially set up to accept the use of such technologies, however you can reset your web browser software to indicate when they are being used and/or to refuse any such use. You are also able to delete cookies at any time.
- 6.4 Some parts of the Website will not function properly or may be considerably slower if you refuse cookies. For example, without cookies, you will not be able to set personalised preferences.

## 7 The types of Personal Information we collect

- 7.1 You can navigate and view certain pages of the Websites without providing any Personal Information. However, should you wish to make use of certain special features or the products and services provided by Greenways Dispensary, you will be required to register and create a profile on the Website and provide us with your Personal Information to enable Greenways Dispensary to provide you with the information, services and products you wish to have access to.
- 7.2 The information that we collect and Process about you depends on your relationship with Greenways Dispensary as either a patient, medical professional, employee/consultant or service providers. The information you provide us with may include, but is not limited to the following:
  - 7.2.1 Patients:
    - Your contact information such as your name, email address, phone number, location, physical and postal address, gender, date of birth, medical insurance details and national identity or passport number;
    - Your medical information such as state of health, medical health history, blood results, diagnosis, prescribed medications, your lifestyle, diet and

- exercise regime;
  - Your financial information such as payment card and bank account details; and
  - Details of any of the products and services you have used, ordered or enquired about.
- 7.2.2 Medical professionals:
- Your contact information such as your name, email address, phone number, location, national identity or passport number;
  - Your professional information such as your professional registration number, health practitioner type, your qualification, specialty, office details and practice address; and
  - Your patient's contact information, medical information and/or financial information. In this regard, you warrant that you have obtained the relevant patient's permission and consent to provide such Personal Information to us.
- 7.2.3 Employees/consultants:
- Your contact information such as your name, email address, phone number, physical and postal address, gender, date of birth and national identity or passport number;
  - Your employment data such as employee files, contracts of employment, bonus and increase letters and CVs of current and prospective employees;
  - Your disciplinary records such as the records specifying the nature of any disciplinary transgressions, actions taken by Greenways Dispensary and reasons for such actions;
  - Employment Equity data such as Employment Equity Plan and other records required under Employment Equity Act, 55 of 1998); and
  - Payroll data such as payroll reports, salary slips, bank account details, PAYE, UIF and SDL reports, leave reports and workman's compensation documentation.
- 7.2.4 Service providers:
- Your contact information such as your name, email address, phone number, physical and postal address; and
  - Your financial information such as your VAT number and bank account details.
- 7.3 The provision of your Personal Information as contemplated in this clause is voluntary, however, you are required to provide any Personal Information we reasonably require (in a form acceptable to us) to meet our obligations in connection with the services we provide to you, including any legal and regulatory obligations. Where you fail to provide or delay in providing information that we reasonably require to fulfil these obligations, we may be unable to offer the services to you and/or we may terminate the relationship with you with immediate effect.

## 8 How we use your Personal Information

- 8.1 Greenways Dispensary collects and Processes your Personal Information in order to provide our products, services, facilities, tools or utilities offered to you.
- 8.2 Greenways Dispensary collects your Personal Information, and has a lawful basis for Processing such information for, amongst others, the following reasons:
- 8.2.1 Your contact information and/or professional information:
- To send you notifications and facilitate your communications with the Websites;
  - To establish and verify your identity with the relevant regulatory body so as to minimise the need for you to re-enter information;
  - To arrange a consultation, treatment or follow up with you;
  - Where your medical professional/patient, as the case may be, has provided your information to us in order to arrange a consultation with you or to contact you for referral purposes;
  - To participate in surveys provided by us for research purposes and statistical purposes;
  - To personalise and tailor our services to meet your needs;
  - To send you promotional material or details which we think may be of interest to you;
  - For marketing purposes including receiving email newsletters, to post content to any of the Websites;
  - To participate in promotional competitions; or
  - To activate your Greenways Dispensary membership.
- 8.2.2 Your medical information:
- to Process your instructions or requests relating to the specific health products and services you require;

- To understand general customer trends and patterns so we can develop and support existing and ongoing marketing strategies for our products and services;
  - To conduct academic research. This research is conducted to evaluate and improve Greenways Dispensary's product offerings. You are advised that information may be shared with third parties such as academics, medical funders and researchers. All information collected for research purposes will be kept strictly confidential and all data will be depersonalised. No Personal Information or Special Personal Information will be made available to a third party without your written consent given in terms of this Privacy Policy. If we publish the results of this research, you will not be identified by name.
- 8.2.3 Your payment information:
- To obtain payment for our services; and
  - To make payment for your services.
- 8.2.4 To administer, maintain and secure the Websites;
- 8.2.5 To aid Greenways Dispensary in fulfilling any contractual obligations which we may to you or any thirdparty; and/or
- 8.2.6 To enable us to comply with any obligations imposed on us by law, code of conduct or any other legal or regulatory requirement.
- 8.3 Greenways Dispensary has the following lawful bases/justifications to Processes your Personal Information:
- 8.3.1 Processing with your consent;
- 8.3.2 Processing for the provision of healthcare or treatment;
- 8.3.3 Processing which is necessary for performance of contract;
- 8.3.4 Processing for the protection of a legitimate interest of Data Subject;
- 8.3.5 Processing for pursuing our legitimate interests or the legitimate interests of a third party to whom the information is supplied;
- 8.3.6 Processing for scientific research purposes; and
- 8.3.7 Processing as a result of an obligation imposed by law.

## 9 How we share your Personal Information

- 9.1 Your privacy is important to us and we will therefore not sell, rent or provide your Personal Information or Special Personal Information to any unauthorised third parties for their independent use, without your consent, unless required by law. **If, at any stage after you have given Greenways Dispensary your consent, you no longer wish Greenways Dispensary to use or share your Personal Information or Special Personal Information, you may at any stage withdraw your consent.**
- 9.2 For purposes of providing you with the benefit and use of the Websites, products and services, we may be required to share your Personal Information with or to third parties or Operators who will Process the data on behalf of Greenways Dispensary as follows:
- 9.2.1 We may share your Personal Information with companies that form part of the same group of companies as us. These companies will be bound by this Privacy Policy and will handle your Personal Information in accordance with this Privacy Policy;
- 9.2.2 We may share your Personal Information with our employees, contractors or agents for purposes of and to the extent necessary to provide you with the Greenways Dispensary products and services and to fulfil the purposes set out in clause 8;
- 9.2.3 We may share your information with our partners or other third party suppliers that we have partnered with in order to provide you with the services and products requested by you through the Websites. Where Personal Information is shared with partners, such information will not be used for any other purpose other than to carry out the services they are performing for and on our behalf. We have entered into written agreements with all third parties that are authorised to Process your information on our behalf, in terms of which the security and confidentiality of your information is protected;
- 9.2.4 Greenways Dispensary may enter into arrangements with its partners or other third party suppliers which will require us to disclose your Personal Information to these third parties. You hereby consent to Greenways Dispensary disclosing your Personal Information to these third parties for this purpose and you also consent to receiving data about yourself from these third parties. If at any time after you have given Greenways Dispensary your consent you no longer wish to disclose your Personal Information to these third parties, you may at any time withdraw your consent;
- 9.2.5 There may be instances where you have the option to share your Personal Information with Greenways Dispensary and Linked Websites (as set out in the Terms). If you elect to share your Personal Information in this manner, we will share your Personal Information with Linked Websites;

- 9.2.6 We may share your Personal Information where it is necessary in order to enforce or apply this Privacy Policy, the Terms or any other contract between us, as well as where it is necessary to protect our rights, property or safety of that of our customers, employees, contractors, agents or any third party, or to limit any actual or reasonably perceived risk to us or any such parties;
  - 9.2.7 We may share your Personal Information in accordance with our Cookie policy set out in clause 6;
  - 9.2.8 We will share your Personal Information where required to do so by law, or in response to any law enforcement action, subpoena or warrant; and
  - 9.2.9 We may share your Personal Information with any successor or proposed successor of our business or any entity that acquires control or ownership of Greenways Dispensary or any of our group of companies. We may also share your Personal Information with any third party whose business, assets or shares we acquire or propose to acquire.
- 9.3 Greenways Dispensary is not responsible for any representations or information or warranties or content on any third party website (including third party websites linked to the Websites). Greenways Dispensary does not exercise control over the privacy policies of these third parties and you should refer to the privacy policy of these third parties to see how they protect your privacy.
- 9.4 Such third parties will be required to treat the Personal Information which comes to their knowledge as confidential and will not be permitted to disclose it, unless required by law or in the course of the proper performance of their duties.

## **2 Cross-border transfers of Personal Information**

- 2.1 Where we collect Personal Information about you in the Republic of South Africa we may be required to transfer the information to countries outside the Republic of South Africa for the purposes of providing you with the services as outlined in this Privacy Policy.
- 2.2 Should we be required to transfer any personal information to such locations outside of the Republic of South Africa, and to Process the personal information in such locations, we will ensure that the third party who will be the recipient of the personal information will be subject to a law, binding corporate rules or binding agreement which provides an adequate level of protection that effectively upholds principles for reasonable Processing of the personal information that are substantially similar to the conditions for the lawful Processing of the personal information as prescribed by POPIA.

## **10 Protection of your Personal Information**

- 10.1 Greenways Dispensary values the information that you choose to provide and will take reasonable steps to protect your Personal Information from loss, misuse or unauthorised alteration. The information Greenways Dispensary has about you is stored in databases that have built-in safeguards to ensure the privacy and confidentiality of that information. Where the information is stored by Greenways Dispensary physically, Greenways Dispensary will ensure that such information is safeguarded and protected from loss, misuse or unauthorised alteration
- 10.2 When you use the products, services, facilities, tools, or utilities provided by Greenways Dispensary on the Greenways Dispensary Website, you may be given or required to provide an access number, username, password and/or personal identification number (PIN). You must always keep your username, access card, password and/or PIN a secret and ensure that you do not disclose it to anyone.

## **11 Your rights**

- 11.1 Nothing contained in this Privacy Policy shall be interpreted or construed as a waiver, restriction, limitation, or deprivation of your rights in terms of the POPIA. In particular, you have the right at any time to:
  - 11.1.1 establish whether we hold your Personal Information and to request access to your Personal Information;
  - 11.1.2 object to what you believe to be the unlawful Processing of your Personal Information;
  - 11.1.3 object to the Processing of your Personal Information on reasonable grounds relating to your particular situation, unless processing is required by law;
  - 11.1.4 object to the Processing of your Personal Information for purposes of direct marketing;
  - 11.1.5 withdraw your consent to the Processing of your information in terms of this Privacy Policy and request us to cease such Processing and delete all records of your Personal Information. You can do so by contacting us [legal@greenwaysdispensary.co.za](mailto:legal@greenwaysdispensary.co.za). You can also click the "Unsubscribe" link contained in all emails that you have consented to receive from us, which will automatically unsubscribe you from such service;
  - 11.1.6 request us to correct, destroy or delete any of your Personal Information that may be in our possession or under our control where such information is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, or unlawfully obtained. In this regard, please take note that any such deletion may impact on your ability to utilise the full functionality of the

- 11.1.7 Websites and any of our services and products;
- 11.1.7 not 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;
- 11.1.8 institute civil proceedings regarding the alleged interference with the protection of your Personal Information; and
- 11.1.9 submit a complaint to the Information Regulator regarding an alleged interference with the protection of your Personal Information in accordance with this Privacy Policy.

## 12 Accuracy and Correction of Personal Information

12.1 Whilst we will take all reasonable and practicable steps to ensure your Personal Information is complete, accurate and not misleading, Greenways Dispensary is not responsible for the accuracy, completeness, or currency of your Personal Information. In this regard:

- 12.1.1 you may from time to time be requested to confirm that the Personal Information we have collected about you is up to date and correct; and
- 12.1.2 you must report any changes to your Personal Information to us in order to keep the data accurate and to ensure that we can continue to provide quality products and services to you.

12.2 Please notify us of any updates or corrections to your Personal Information held by Greenways Dispensary, by contacting us at [legal@greenwaysdispensary.co.za](mailto:legal@greenwaysdispensary.co.za).

## 13 Access to Information

13.1 We will at all times, and to the fullest extent possible, provide you with online access to your Personal Information and online profile.

13.2 You have the right at any time to request us:

- 13.2.1 to confirm, free of charge, whether we hold any of your Personal Information;
- 13.2.2 to provide you with a record or description of any of your Personal Information that is held by us; and
- 13.2.3 to provide information about the identities of all third parties, or categories of third parties, who have or have had access to your Personal Information.

13.3 You may be required to pay a fee (or part deposit) in order to enable us to respond to any request made in terms of clause 13.2. If so, we will provide you with a written estimate of the fee before proceeding with the disclosure.

## 14 Retention

14.1 We will retain your Personal Information only for as long as is necessary in order to fulfil the purpose for which it was collected or Processed. In general, and unless otherwise determined, we do not consider it necessary to retain your Personal Information for a period of more than six years from the date on which you last accessed the Website or provided us with your Personal Information.

14.2 We may retain some or all of your Personal Information beyond the time period contemplated in clause 14.1, where:

- 14.2.1 you explicitly consent to the further retention of such information;
- 14.2.2 we reasonably require such information to be retained for lawful purposes related to our business functions or activities;
- 14.2.3 such information is necessary to be retained for historical, statistical or research purposes;
- 14.2.4 we are required by law to retain such information (for example, we are required in terms of the Consumer Protection Act 2008 to retain all information relating to promotional competitions for a period of three years);
- 14.2.5 we are required to retain such information for evidentiary purposes; or
- 14.2.6 we are required to retain such information by virtue of a contract entered into between us.

14.3 Any information retained pursuant to clause 14.2.1-14.2.6 shall be retained only for so long as is required to fulfil the purposes for which it was retained for any additional period.

14.4 Upon us no longer being entitled to retain it, we will, as soon as reasonably practicable, delete, destroy or de-identify all of your Personal Information held by us.

## 15 Security

15.1 While Greenways Dispensary cannot guarantee the security of your information in the course of its transmission from you to us online, and you agree that you do this at your own risk, we will however take all appropriate, reasonable technical and organisational measures to maintain the security, integrity and confidentiality of your Personal Information collected and stored by us. These measures are aimed at preventing:

- 15.1.1 loss, damage or unauthorised destruction of your Personal Information; and
- 15.1.2 unlawful access to, or Processing of your Personal Information.

- 15.2 Subject to certain exceptions provided for in terms of the law, we will notify you and the Regulator as soon as reasonably possible after becoming aware that your Personal Information has been unlawfully disclosed, accessed, acquired, or otherwise compromised.
- 15.3 Greenways Dispensary will ensure that, to the extent that your Personal Information is transferred to any third party, the third party establishes and maintains adequate security measures and maintains the security and integrity of your Personal Information. Such third party will be required to notify Greenways Dispensary immediately if there is reason to believe that your Personal Information has been accessed or acquired by an unauthorised person.
- 15.4 You accept that you are responsible for keeping your account login information (including your username and password) and the security for your mobile device (in the form of a device auto-lock feature, pin access control etc.) secure and confidential. Should you become aware that your account password has or may have become compromised, it is your responsibility to immediately change your password.

## **16 Direct marketing**

- 16.1 As a customer of Greenways Dispensary we may from time to time Process your Personal Information to send you direct marketing by means of electronic communication for the purpose of providing you with information on any similar products or services that we provide. In this regard, you will be given a reasonable opportunity to object, free of charge and in a manner free of unnecessary formality, to such use of your electronic details at the time when your Personal Information is collected and on the occasion of each communication for the purpose of marketing if you have not initially refused such use.
- 16.2 Should you consent to receiving direct marketing from us by means of electronic communication, you will be required to demonstrate your consent on any of the Websites. By providing your consent on any of the Websites, you consent to the use of your Personal Information for purposes of direct marketing of our products and services.
- 16.3 You are entitled to request that we desist from using your Personal Information for the purposes of direct marketing, and we will provide you with the necessary functionality for you to do so with ease, each time we market to you.
- 16.4 Should you make a request in terms of clause 16.3, we will immediately desist from sending you any direct marketing communications, although we may send you written or electronic confirmation before doing so.

## **17 Children**

- 17.1 Our Website should not be accessed by children under the age of 18.
- 17.2 We do not offer any products or services to children under the age of 18.

## **3 Changes to this Privacy Policy**

- 3.1 This Privacy Policy was published on 28 July 2021 and will be regularly reviewed and updated when necessary. You are therefore encouraged to review the Privacy Policy each time you access and/or visit any of the Websites and/or each time you provide your Personal Information to Greenways Dispensary.
- 3.2 This Privacy Policy will be made available:
- 3.2.1 on Greenways Dispensary's Website;
  - 3.2.2 at Greenways Dispensary's principal place of business for public inspection during normal business hours;
  - 3.2.3 to the Information Regulator established in terms of section 39 of POPIA upon request; and
  - 3.2.4 upon written request to [legal@greenwaysdispensary.co.za](mailto:legal@greenwaysdispensary.co.za).

## **4 Which laws apply to this Privacy Policy**

- 4.1 This Privacy Policy is governed by the laws of the Republic of South Africa, and you consent to the jurisdiction of the South African courts in respect of any dispute which may arise out of or in connection with the formation, interpretation, substance or application of this Privacy Policy.

## **5 Consequences of failure to provide your Personal Information**

- 5.1 It is mandatory for you to furnish your Personal Information when registering on the Website or applying online for any Greenways Dispensary products or services.
- 5.2 Should the Personal Information not be provided, and should you fail to furnish your consent to the Processing of the Personal Information, Greenways Dispensary will be unable to register your profile or provide you with any of its products or services.

## **6 Complaints and Enquiries**

- 6.1 Please direct any queries and/or comments and/or requests in connection with this Privacy Policy, the Processing of your Personal Information, or the rights conferred to you under the applicable data privacy laws to [legal@greenwaysdispensary.co.za](mailto:legal@greenwaysdispensary.co.za).
- 6.2 Please note that we may reject requests that are vexatious or frivolous, that require disproportionate



technical effort or impracticality to address, or that would risk or infringe the privacy of others.

6.3 If you wish to lodge a complaint about the way in which we use your Personal Information you should raise this with us by contacting us in the first instance at [legal@greenwaysdispensary.co.za](mailto:legal@greenwaysdispensary.co.za).

6.4 However, if you are not satisfied with the way we have handled your complaint you have the right to raise the matter with the Information Regulator, the details of which are as follows:

The Information Regulator (South Africa):  
33 Hoofd Street  
Forum III, 3rd Floor Braampark  
Braamfontein,  
Johannesburg email: [infoleg@justice.gov.za](mailto:infoleg@justice.gov.za)