



**TOPHENEGG (PTY) LTD**

PROTEIN FOR THE NATION, QUALITY WITHOUT HESITATION

Privacy Policy

# TOPHENEGG (Pty) Ltd Privacy Policy

**Policy Title:** Privacy Policy

**Effective Date:** 29 July 2024

**Last Updated:** 29 July 2024

## 1. Introduction

TOPHENEGG (Pty) Ltd ("we," "us," "our") is committed to protecting the privacy and personal information of our customers, employees, and stakeholders. This Privacy Policy outlines our practices regarding the collection, use, and protection of personal information, in compliance with the General Data Protection Regulation (GDPR) and the Protection of Personal Information Act (POPIA).

## 2. Scope

This Privacy Policy applies to all personal information collected, processed, and stored by TOPHENEGG (Pty) Ltd in connection with our business operations, including through our website, services, and products. It covers personal information of individuals in the European Union (EU) under the GDPR and individuals in South Africa under POPIA.

## 3. Key Definitions

- **Personal Information:** Any information relating to an identified or identifiable natural person. This includes, but is not limited to, names, contact details, identification numbers, online identifiers, and other data that can identify a person.

- **Processing:** Any operation or set of operations performed on personal information, including collection, storage, use, and dissemination.
- **Data Subject:** An individual whose personal information is processed.
- **Data Controller:** The entity that determines the purposes and means of processing personal information.
- **Data Processor:** The entity that processes personal information on behalf of the Data Controller.

#### 4. Legal Basis for Processing

We process personal information based on the following legal grounds:

- **Consent:** Where you have provided explicit consent for the processing of your personal information.
- **Contractual Necessity:** Where processing is necessary to perform a contract with you or to take steps at your request before entering into a contract.
- **Legal Obligation:** Where processing is necessary to comply with a legal obligation.
- **Legitimate Interests:** Where processing is necessary for our legitimate interests, provided that such interests are not overridden by your fundamental rights and freedoms.

#### 5. Information We Collect

We collect the following types of personal information:

- **Contact Information:** Name, email address, phone number, company information, title, and address information.

- **Identification Information:** Identification numbers, date of birth, and other identifying information.
- **Financial Information:** Bank account details, payment information.
- **Online Information:** IP address, browser type, browsing history, cookies, and other online identifiers.
- **Employment Information:** CV, qualifications, work history, and references for recruitment purposes.

## 6. How We Use Your Information

We use personal information for the following purposes:

- **Service Provision:** To provide, operate, and maintain our products and services.
- **Customer Support:** To respond to inquiries, provide customer support, and manage customer relationships.
- **Marketing and Communication:** To send promotional materials, newsletters, and other communications, where permitted by law.
- **Legal Compliance:** To comply with legal obligations and regulatory requirements.
- **Security:** To protect our systems, data, and users from unauthorized access or breaches.
- **Recruitment:** To process job applications and manage hiring processes.

## 7. Sharing of Personal Information

We may share personal information with:

- **Service Providers:** Third-party vendors and service providers who perform services on our behalf, such as payment processing, IT support, and marketing.

- **Legal and Regulatory Authorities:** Where required by law or regulation, or to protect our rights, safety, or property.
- **Business Transfers:** In the event of a merger, acquisition, or sale of assets, personal information may be transferred to the acquiring entity.

## 8. International Transfers

Where personal information is transferred outside of the country where it was collected, we ensure appropriate safeguards are in place to protect the data in compliance with applicable data protection laws, including GDPR and POPIA. This may include the use of standard contractual clauses, binding corporate rules, or other lawful mechanisms.

## 9. Data Security

We implement appropriate technical and organizational measures to protect personal information from unauthorized access, alteration, disclosure, or destruction. These measures include encryption, access controls, and regular security assessments.

## 10. Data Retention

We retain personal information only for as long as necessary to fulfil the purposes for which it was collected, or as required by law. Once personal information is no longer needed, we securely delete or anonymize it.

## 11. Data Subject Rights

Data subjects have the following rights under GDPR and POPIA:

- **Access:** The right to request access to the personal information we hold about you.
- **Rectification:** The right to request correction of inaccurate or incomplete personal information.
- **Erasure:** The right to request deletion of your personal information, subject to certain legal exceptions.
- **Restriction:** The right to request restriction of processing under certain conditions.
- **Data Portability:** The right to request a copy of your personal information in a structured, commonly used, and machine-readable format.
- **Objection:** The right to object to the processing of your personal information based on legitimate interests, direct marketing, or other grounds.
- **Withdraw Consent:** The right to withdraw consent at any time, where processing is based on your consent.

To exercise these rights, please contact us at [privacy@tophenegg.site](mailto:privacy@tophenegg.site)

## 12. Cookies and Tracking Technologies

We use cookies and similar tracking technologies to enhance user experience, analyse website traffic, and for targeted advertising. You can manage your cookie preferences through your browser settings.

## 13. Changes to This Policy

We may update this Privacy Policy from time to time. Any changes will be posted on our website, social media channels, and, where required, we will notify you of significant changes. Your continued use

of our services after any changes constitute your acceptance of the revised policy.

#### **14. Contact Information**

If you have any questions or concerns about this Privacy Policy or our data practices, please contact:

##### **Data Protection Controller**

TOPHENEGG (Pty) Ltd

2 Tienie Kruger Street, Minnebron, Brakpan, 1541

Email: [privacy@tophenegg.site](mailto:privacy@tophenegg.site)

Telephone: 0 (+27) 87 223 0461/ 0 (+27) 81 326 6388

##### **Data Protection Processor**

Zoho Corporation SA (Pty) Ltd

Vineyard Office, Estate, Farm 1, Building A, 99 Jip de Jager Drive, De Bron, Bellville, Cape Town, Western Cape ("**Zoho SA**").7530

Email: [legal-request@zohocorp.com](mailto:legal-request@zohocorp.com)

Telephone: 0 (+27) 800221023

This Privacy Policy ensures that TOPHENEGG (Pty) Ltd complies with GDPR and POPIA, protecting the privacy and personal information of all individuals we interact with. We are committed to transparency, security, and respecting your rights.