



BUSBY GROUP PRIVACY POLICY

1. This privacy policy governs the treatment of personally identifiable information, which You may provide to Bachique 705 (Pty) Ltd, trading as The New House of Busby, Steve Madden South Africa (Pty) Ltd, Busby Airport Stores (Pty) Ltd and Gazania Investments 381 (Pty) Ltd whose chosen address for purposes of this privacy policy is Gosforth Business Park, corner Silverstone Road and Van Riebeeck Avenue, Gosforth Park, Gauteng, 1401 (collectively referred to as “**Busby**”).
2. Busby respects Your privacy and will take reasonable measures to protect it and will implement and operate all reasonable information security controls in order to protect and preserve the confidentiality, integrity and accessibility of all personal information and the risks relating thereto.
3. In the event that You:
 - 3.1. register as a user on any Busby website, including, without limitation, www.busbyhouse.com, www.guess.co.za, www.aldoshoes.co.za, www.stevemadden.co.za and/or www.frasersluggage.co.za (collectively referred to as the “**Websites**”) and/or sign up to receive newsletters and/or marketing information and/or complete an in-store and/or online customer information, Busby may require You to provide certain personally identifiable information, such as Your name and surname, credit card details, email address, physical address, date of birth, details relating to your lifestyle and/or mobile telephone number (collectively referred to as “**Personal Information**”);
 - 3.2. supply your Personal Information to Busby in terms of clause 3.1 or for any other reason whatsoever, You expressly agree and acknowledge that Busby may:
 - 3.2.1. provide You with access to Your Personal Information to view and/or update Your personal details;
 - 3.2.2. take appropriate technical and organisational measures to ensure that Your Personal Information is kept secure and is protected against unauthorised or unlawful processing, accidental loss, destruction or damage, alteration, disclosure or access;
 - 3.2.3. promptly notify You if it becomes aware of any unauthorised use, disclosure or processing of Your Personal Information;
 - 3.2.4. provide You with reasonable evidence of its compliance with its obligations under this privacy policy on reasonable notice and request; and
 - 3.2.5. upon Your request, promptly return or destroy any and all of Your Personal Information in its possession or control.

4. Please note that:
 - 4.1. in certain circumstances the Personal Information, which You provide to Busby, may be shared by Busby with its international licensors and/or partners (collectively referred to as “**Licensors**”), provided that such Licensors are subject to data protection laws, which provide an adequate level of protection in relation to the processing and use of Personal Information;
 - 4.2. by providing Personal Information to Busby, You will be deemed to have provided your express consent to the use and lawful processing thereof by Busby and, if applicable, the transfer thereof to the Licensors;
 - 4.3. Busby does not and will not knowingly collect, maintain, disclose or otherwise process Personal Information from minors below the age of 18, without the permission of such minor’s parents or legal guardians.
5. Busby will collect data about how You use its services and products and by providing such data you will be deemed to have provided Busby with Your express consent to the lawful use and processing thereof.
6. In addition to the aforesaid, Busby may:
 - 6.1. receive and store certain types of personal data whenever You interact with Busby online, through the use of cookies and tracking technologies, as detailed in the Website terms and conditions applicable to each Website;
 - 6.2. collect personal data and/or information from third parties where Busby operates accounts on such third party platforms, such as Facebook and Google.
7. Busby will:
 - 7.1. treat Your Personal Information as strictly confidential;
 - 7.2. automatically collect and store certain information in its server logs, such as web clicks, internet protocol addresses, device event information, cookies which may uniquely identify Your browser or Your account with Busby;
 - 7.3. not retain Your Personal Information for longer than the period for which it was originally needed, unless it is required by law to do so, or You consent to the retention thereof for a longer period.
8. Your Personal Information will be collected, processed and/or disclosed for the following purposes:
 - 8.1. to process Your payments, if You purchase products, to provide You with Your order status, deal with Your enquiries and requests and assess and handle any complaints;
 - 8.2. to process and answer Your enquiries and/or to contact You to answer Your questions and/or requests;
 - 8.3. to develop and improve Busby products, services, communication methods and/or the functionality of the Websites;
 - 8.4. to manage and give effect to its business requirements regarding Your participation in any competitions and/or promotions, which You may have entered;

- 8.5. to communicate information to You and to manage Your registration and/or subscription to any Busby newsletters or other communications;
 - 8.6. to authenticate the identity of individuals making contact with Busby by telephone, electronic means or otherwise;
 - 8.7. for use in internal training and/or quality assurance purposes;
 - 8.8. to understand and assess the interests, wants, and changing needs of consumers, to improve the Websites, current products and/or services and/or for developing new products and/or services;
 - 8.9. to provide You with personalised products, communications and/or targeted advertising, including without limitation, product recommendations and/or invitations to events;
 - 8.10. to perform a contract to which You are or will be a party and/or where Busby has a legal obligation to collect, process and/or disclose Your Personal Information.
9. Where appropriate and required, You may be deemed to have consented to the use and processing of Your Personal Information, as a result of providing it to Busby or Busby will request that You provide Your consent to use and process Your Personal Information and in circumstances where You are deemed to or have provided your consent, You have the right to withdraw Your consent and/or object to any collection, processing and/or collection of Your Personal Information at any time by notifying the Busby information officer at info@busbyhouse.com.
10. In certain instances, Busby will rely on a legitimate interest for processing Your Personal Information on the basis that this ground will only be used where it is necessary to achieve a legitimate interest and will only be relied upon where there is a no less intrusive way to process Your Personal Information.
11. Busby will share and/or transfer Your Personal Information to third parties when:
- 11.1. You have consented to the disclosure;
 - 11.2. it is required in order to provide the services, which You have requested and/or in order to comply with a law or court order;
 - 11.3. it is necessary to:
 - 11.3.1. enforce and/or apply the terms and conditions of an agreement, which Busby may have entered into with a merchant and/or other third party;
 - 11.3.2. protect the rights, property or safety of Busby, its employees, users and/or customers.
12. You have the right to lodge a complaint regarding any collection, processing and/or collection of Your Personal Information to the Information Regulator, the contact details of which are as follows:

Physical address: 33 Hoofd Street
Forum III
3rd Floor Braampark
Braamfontein

Email: infoereg@justice.gov.za