



DRAMATIC, ARTISTIC and LITERARY
RIGHTS ORGANISATION (Pty) LIMITED

PRIVACY STATEMENT

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1. GENERAL STATEMENT

In line with the Protection of Personal Information Act, 2013 (“POPIA”) and Promotion of Access to Information Act, 2000 (“PAIA”), Dramatic Artistic and Literary Rights Organisation Proprietary Limited (“DALRO”) respects your privacy and is committed to protecting your privacy. This Privacy Statement explains our policies and practices regarding the personal and other information we process. It is through this disclosure, and in line with section 18 of POPIA, that we intend to provide you with a level of comfort and confidence in how we collect, use, and safeguard personal and other information we collect or that you provide through this website, and how you can contact us if you have any questions or concerns. It is our sincere hope that by explaining our data handling practices we will develop a trusting and long-lasting relationship with you. By using the site, you agree to the terms of this Privacy Statement.

1.1. DALRO Website and General Data Collection Practices:

- 1.1.1. This Privacy Statement applies to www.dalro.co.za which is administered by a third-party vendor on behalf of DALRO.
- 1.1.2. The general business purpose of this website is to provide visitors with:
 - 1.1.2.1. Information about DALRO;
 - 1.1.2.2. The services provided by DALRO;
 - 1.1.2.3. Updates on legislation, news, and social media; and
 - 1.1.2.4. Contact information of DALRO.

1.2. Personally Identifiable Information We Collect from You:

When you visit www.dalro.co.za we will not collect any personally identifiable information about you unless you provide consent to us voluntarily. By providing your personal information on the site you voluntarily consent for DALRO to collect and process your information. For purposes of this Privacy Statement, personally identifiable information is information that identifies you as an individual or a juristic person, such as your full name, identification number, physical address, telephone number, and email address. You may opt not to provide us with personally identifiable information, and if you do so, you are still able to access our website. We will only retain your personal information for as long as it is necessary for the fulfilment of the purposes for which it was

collected or as agreed with you or as required by law.

1.3. How We Use the Personally Identifiable Information We Collect:

1.3.1. Personally identifiable information collected on www.dalro.co.za may be used to:

- 1.3.1.1. Fulfil a site user request.
- 1.3.1.2. Respond to your comments or requests for information.
- 1.3.1.3. Contact you, if necessary, in the course of providing you with the services offered by DALRO.
- 1.3.1.4. Generate site analytics that improve our site layout, content, product offerings and services.
- 1.3.1.5. Compile user data that is stored in our database which may be used for marketing and other purposes; and
- 1.3.1.6. Comply with legal and regulatory requirements or industry codes to which we subscribe, or which apply to us, or when it is otherwise allowed by law.

1.4. Other (Non-Personally Identifiable) Information We Collect from Site Visitors:

- 1.4.1. DALRO (www.dalro.co.za) may collect other “non-personally identifiable information” from site visitors. This means that we do not track these items on an individual basis that identifies the site visitor, but rather gather and collect this information on an aggregate [or anonymous] basis that includes all site visitors. Non-personally identifiable information includes tracking the site pages that are visited, or the amount of time spent on our site.
- 1.4.2. Our primary goal in collecting non-personally identifiable information from you is to be able to perform site metrics that allow us to improve the functionality of the website.
- 1.4.3. We may use session and persistent “cookies,” session logs, spotlight ads/web beacons/GIF/pixel tags, banner ads or links, and third-party click tracking analytics tools (such as Adobe) to collect aggregate or other non-personally identifiable information about site visitors. An explanation on collection methods and how they work is included in the Methods to Collect Information, below.

1.5. How We Use the Aggregate or Non-Personally Identifiable Information We Collect:

1.5.1. Non-Personally identifiable information collected on www.dalro.co.za may be used to:

- 1.5.1.1. Compile aggregate and statistical data to help in website design and to identify popular features.
- 1.5.1.2. Measure site activity to allow us to update our site to better meet user wants and needs.
- 1.5.1.3. Provide you with content that may be of interest to you based on pages visited and items viewed.
- 1.5.1.4. The DALRO website (www.dalro.co.za) may utilize non-personally identifiable information for the purpose of performing analytics on the user's experience while visiting this site. This analysis:
 - 1.5.1.5. Is performed on an aggregate level and does not identify you or your information personally.
 - 1.5.1.6. Is performed in order to improve our website and the user experience.
 - 1.5.1.7. May include the use of session and/or persistent cookies to track user movement.

2. METHODS TO COLLECT INFORMATION:

- 2.1. A "cookie" is a small text file that helps us in many ways to make your visit to our website more enjoyable and meaningful to you. For example, cookies avoid you having to log in every time you come back to one of our websites. They also allow us to tailor a website or advertisement to better match your interests and preferences. There are a couple different types of cookies.
- 2.2. Emails or electronic newsletters we send may use tools (e.g., pixel tags or web beacons) to gather email metrics and information to improve the reader's experience such as how many of the emails are opened, if they were printed or forwarded, the type of device (e.g., mobile or PC) from which they were opened, and the city, state, and county associated with the applicable IP address. In general, any electronic image viewed as part of a webpage, including an ad banner, can act as a web beacon.

3. SHARING YOUR INFORMATION

- 3.1. DALRO (www.dalro.co.za) does not share, sell, or rent personally identifiable information with any independent companies for their own use without providing you with a choice.

- 3.2. Personally identifiable information that you provide to us in the course of requesting a product or service through this website may be gathered and stored in our database and be used for purposes of contacting you for promotional offers, marketing programs, or other communications from this website. However, you can unsubscribe or opt out from receiving direct marketing at any stage by contacting us at information.officer@dalro.co.za and requesting that no further information be sent to you.
- 3.3. We may share personally identifiable information with DALRO partners or contractors in the normal course of business. DALRO partners or contractors of www.dalro.co.za who have access to your personally identifiable information in connection with providing services for www.dalro.co.za are required to keep the information confidential and are not permitted to use this information for any other purpose than to carry out the services they are performing for www.dalro.co.za.
- 3.4. DALRO will disclose your personally identifiable information, without notice, if.
- 3.4.1. in the good faith belief that such action is necessary to:
- 3.4.1.1. conform to the edicts of the law or comply with legal process served on DALRO, its affiliates or the site.
- 3.4.1.2. protect and defend the rights or property of DALRO, its affiliates or this site; or
- 3.4.1.3. act under exigent circumstances to protect the personal safety of DALRO or affiliate personnel, users of their websites, or the public; or
- 3.5. if required to do so by law.

4. Access To and Control Over the Use of Your Information:

- 4.1. To correct or update your personally identifiable information contact us at: DALRO
Waverley Office Park Building 1 15 Forest Road
Bramly
Gauteng 2090
Telephone: +27 (0)10 822 7469
Email: information.officer@dalro.co.za
Alternatively, you can complete the Personal information Request Form found under

Appendix A of the POPIA Policy on our website and deliver same to the contact details set out above.

4.2. DALRO will use reasonable efforts to correct any factual inaccuracies in your information.

4.3. The scope of access available for this request is for information stored in the database that holds the data for www.dalro.co.za. Any personally identifiable information that has been collected from you on other company websites will not be accessible or changeable through the processing of this request.

5. SECURITY OF YOUR INFORMATION

5.1. Safeguarding information of visitors to our website is important to us. While no systems, applications or websites are 100% secure, we use systems, policies, and procedures to maintain accuracy of information and to protect information from loss, misuse, or alteration. You are welcome to request our Information Technology Policy by contacting our information officer in line with PAIA or by using Appendix A of our PAIA Policy which is available on our website, for more information.

5.2. When you send personally identifiable information, such as email address or telephone numbers, to www.dalro.co.za to protect your data we use technologies such as:

5.2.1. Secure Database Practice on SQL Database Config Server, Secure Script, Secure Password Policies, Disabling My History.

5.2.2. Server Brute Force Prevention: Specific IP in violation can be blocked, number of failed login attempts invoke block.

5.2.3. Any mailing Technology to manage subscriptions and users on the system are managed and actioned effectively when required with options to (unsubscribe, receive email/not, accepted/not, format (html/text).

5.2.4. Subject Data Management Practice: (where upon request we can extract, delete, or “forget” off our web systems and databases any user information.

6. PROCESSING OF PERSONAL INFORMATION

By visiting this site and by providing your personally identifiable information to us, you understand and consent to the collection, use, processing, transfer, and disclosure of your personally identifiable and non-personally identifiable information globally in accordance with this Privacy Statement.

Therefore, by visiting this site and by providing such information, you consent to the transfer of such information across country borders, and to the use, processing, and disclosure of such information in global locations. Your consent shall be deemed to include your consent to transfer of the personally identifiable or non- personally identifiable information to locations that may have different levels of privacy protection than in your own country.

7. LINKS TO OTHER WEBSITES

DALRO provides links to other web sites, including but not limited to those of publishers, foreign performing, reprographic and collective rights management organizations, and licensing customers, to help you find additional information in which you may be interested. We encourage you to review the Privacy Statements of all sites that you visit, including those whose links are provided so that you can understand how those sites collect, use, and share your information. Please keep in mind that DALRO is not responsible for the privacy practices of these other web sites.

8. CONTACTING US

If you have any questions, comments, or concerns about this online Privacy Statement for www.dalro.co.za privacy practices, or have any questions regarding the contents of this website please contact us at:

DALRO

Waverley Office Park Building 115 Forest Road

Bramly Gauteng 2090

Telephone: +27 (0)10 822 7469

Email: information.officer@dalro.co.za

DALRO is committed to working with you in order to obtain a fair and rapid resolution of any complaints or disputes about privacy and the handling of your data. DALRO will be happy to respond to your questions and comments.

If you are unsatisfied with the way in which we have dealt with your complaints in respect of our use of your personal information, you have the right to contact the Information Regulator, whose contact details are available at <https://www.justice.gov.za/infoereg/>.

9. PRIVACY STATEMENT EFFECTIVE DATE AND REVISION DAYS:

Occasionally we may update the Privacy Statement for www.dalro.co.za in order to reflect any

changes to the website or our privacy practices.