

Smollan Privacy Notice

Effective Date: 5 June 2025

Introduction

Smollan and its affiliates ("we," "us," or "our") respect your privacy and are committed to protecting your personal data. This Privacy Notice describes how we collect, use, disclose, and protect your personal information when you visit our website <https://www.smollan.com> (the "Website").

By using the Website, you agree to the collection and use of your personal data in accordance with this Privacy Notice and applicable data protection laws globally.

Data Controller Information

Smollan is the data controller for personal data collected through this Website. If you have any questions about this Privacy Notice, please contact our Information Officer via this [LINK](#).

As required under Article 27 of the GDPR and UK GDPR, we will appoint a representative in the EU and UK. Details will be added here once confirmed.

Personal Data We Collect

We collect different types of personal data, including:

- *Identity Data:* Name, title.
- *Contact Data:* Address, email, phone number.
- *Technical Data:* IP address, browser type, operating system, time zone, location, and device information.
- *Usage Data:* Information on how you use our Website, including browsing activity.
- *Marketing Data:* Preferences for receiving marketing and communication from us.
- *Recruitment Data:* Information submitted as part of a job application, including CVs, employment history, qualifications, references, and any other information relevant to recruitment.
- *Special Categories of Data:* We do not intentionally collect sensitive data such as racial/ethnic origin, health data, or political opinions unless required by law or with your explicit consent.

Legal Basis for Processing

We process your personal data based on the following legal bases:

- *Consent (where required):* Where you have given explicit permission for certain processing activities.
- *Legitimate Interest:* When we have a business reason to process your data that is not overridden by your rights.
- *Contractual Necessity:* Where processing is necessary to fulfill our contractual obligations with you.
- *Legal Obligation:* When required to comply with legal or regulatory requirements.

How We Use Your Data

We use your personal data to:

- To operate our business and provide you with the services you have requested.
- To verify your identity.
- To acknowledge, confirm and deal with your enquiry, brief or order.
- Where we are asked to deal with any other enquiries or complaints you may make.
- To notify you about any changes to this Site, or services provided through this Site.
- To provide you with information about our services. Any marketing email that you receive from us will allow you to unsubscribe to further email promotions.
- To contact you in connection with user/customer/member surveys and use any information you choose to submit in response.
- To administer our Site and ensure that our Site is presented in the most effective manner for you and your computer/device.
- For internal business/technical operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes and as part of our efforts to keep our Site secure.
- On an aggregate basis, to understand how individuals collectively use the features of our Site.
- To give effect to your legal rights and your rights under this Privacy Notice.
- To protect against fraud, identity theft, and other unlawful activity.
- To establish or exercise any legal rights or claims.
- Process job applications and assess candidates for employment.
- To satisfy our obligations under applicable law, this Privacy Notice, and any other policies or terms that are applicable to our relationship with you.
- For other purposes to which you have consented, and we may combine personal data that you provided to us with other information we collect about you for the purposes set out in this Privacy Notice.

Sharing and Disclosure of Personal Data

We may share your personal data with trusted third parties to support the delivery, security, and optimisation of our services. These include:

- Affiliated Companies within the Smollan group that may assist in operational and administrative functions.
- Service Providers, including:
- Service Providers, including:
 - Website hosting and technical support providers based in South Africa;
 - Email and productivity platforms such as Microsoft 365 (USA/EU) and Google Workspace (USA), used for communication, document storage, and collaboration;
 - Analytics and tag management services such as Google Analytics and Google Tag Manager (USA), to assess website performance and visitor trends;
 - Advertising and social media partners such as LinkedIn (USA/Ireland), for targeted marketing and audience analysis;
 - Video content platforms such as YouTube (Google LLC, USA), for embedded multimedia;

- Consent and preference management systems, including OneTrust (UK/USA), for cookie management and data subject rights handling.
- Recruitment Partners, where relevant, including third-party platforms or agencies engaged to support our talent acquisition process.
- Legal and Regulatory Authorities, where disclosure is necessary for compliance with legal obligations or to protect our legal rights.
- Professional Advisors, such as lawyers, auditors, or consultants, where disclosure is necessary for legitimate business interests.
- Third parties in connection with business transfers, including mergers, acquisitions, or asset sales.

We ensure that any international transfers of personal data are protected through adequate safeguards, including the use of Standard Contractual Clauses (SCCs) approved by relevant data protection authorities.

If you would like more detail about our third-party data recipients, including names and country locations, please contact us using the details provided in the “Contact Us” section of this Privacy Notice.

International Data Transfers

Your data may be transferred and stored outside your country of residence. We ensure adequate safeguards, such as standard contractual clauses (SCCs) approved by relevant authorities, to protect your data.

Your Rights and Choices

Depending on applicable laws in your jurisdiction, you may have the following rights:

- *Access*: Request a copy of the personal data we hold about you.
- *Rectification*: Request correction of inaccurate or incomplete data.
- *Erasure*: Request deletion of your personal data.
- *Restriction*: Request limitation of data processing.
- *Objection*: Object to data processing based on legitimate interests.
- *Data Portability*: Request transfer of your personal data to another entity.
- *Withdraw Consent*: Where processing is based on consent, withdraw it at any time.
- *Lodge a Complaint*: File a complaint with a relevant data protection authority.

If you wish to exercise any of these rights please select this [LINK](#) and complete the online form. We may also need to ask you for further information to verify your identity before we can respond to any request.

If you are dissatisfied with how we have handled your personal data or a data rights request, you have the right to lodge a complaint with a data protection supervisory authority.

You may contact the authority in the country where you live, work, or where the alleged infringement occurred.

If you are located in the European Union or United Kingdom, you may wish to contact:

EU:

Data Protection Commission (DPC)
21 Fitzwilliam Square South, Dublin 2, D02 RD28, Ireland
www.dataprotection.ie
Tel: +353 (0)761 104 800 | Email: info@dataprotection.ie

UK:

Information Commissioner's Office (ICO)
Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF, United Kingdom
www.ico.org.uk
Tel: +44 (0)303 123 1113

For all other jurisdictions, please contact our central privacy team using [this link/form/email], and we will advise you of the appropriate authority in your region if required.

Data Retention

We retain your personal data only as long as necessary for the purposes outlined in this Privacy Notice unless a longer retention period is required by law.

<!-- OneTrust Cookies List start -->

<div id="ot-sdk-cookie-policy"></div>

<!-- OneTrust Cookies List end -->

<!-- OneTrust Cookies Settings button start -->

<button id="ot-sdk-btn" class="ot-sdk-show-settings">Cookie Settings</button>

<!-- OneTrust Cookies Settings button end -->

Data Security

We apply appropriate technical and organizational measures to secure your data. If you suspect a breach, contact us immediately.

Children's Privacy

Our Website is not directed at children under 18. We do not knowingly collect their data. If identified, it will be deleted.

Changes to this Privacy Notice

We may update this Privacy Notice. The "Effective Date" will reflect the most recent changes. Continued use of the Website implies acceptance.

Contact Us

Questions, comments or requests regarding this Privacy Notice should be made by completing the form available via this [LINK](#) or by post to: FAO Data Protection, Smollan, P.O. Box 51537, Raedene, Johannesburg, South Africa, 2124.