

Privacy Policy

Please read our privacy policy which forms part of our terms of service.

1. Introduction

- 1.1. Nampharm Community is committed to data protection and the right to privacy.
- 1.2. This privacy policy is directly incorporated as part of our Terms and sets out the basis on which any Personal Data (as defined below) that we collect from you, or that you provide to us, will be used, stored and processed by us.

2. Important information and who we are

- 2.1. Your information will be collected by Nampharm Community.
- 2.2. This privacy policy gives you information about how we collect and use your Personal Data through your use of this Platform, including any data you may provide when you register with us or purchase a product or service. This Platform is not intended for children and we do not knowingly collect data relating to children.
- 2.3. If you have any questions about this privacy policy, including any requests to exercise your legal rights please contact the us using the information set out in the contact details section.

3. The types of personal data we collect about you

- 3.1. “**Personal Data**” means any information about an individual from which that person can be identified.
- 3.2. We may collect, use, store and transfer different kinds of Personal Data about you which we have grouped together as follows:
 - 3.2.1. **Identity Data** includes first name, last name, date of birth and gender.
 - 3.2.2. **Contact Data** includes billing address, delivery address, email address and telephone numbers.
 - 3.2.3. **Financial Data** includes payment history and banking details.
 - 3.2.4. **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.

3.2.5. **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, device ID and other technology on the devices you use to access this Platform.

3.2.6. **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.

3.2.7. **Usage Data** includes information about how you interact with and use our Platform, products and services.

3.2.8. **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

3.3. We also collect, use and share **aggregated data** such as statistical or demographic data which is not Personal Data as it does not directly (or indirectly) reveal your identity. For example, we may aggregate individuals' usage data to calculate the percentage of users accessing a specific website feature in order to analyse general trends in how users are interacting with our Platform to help improve the Platform and our service offering.

4. How is your personal data collected

4.1. We use different methods to collect data from and about you including through:

4.1.1. **Your interactions with us.** You may give us your Personal Data by filling in online forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

4.1.1.1 apply/purchase for our products or services;

4.1.1.2 create an account on our Platform;

4.1.1.4 request marketing to be sent to you;

4.1.1.5 enter a competition, promotion or survey; or

4.1.1.6 give us feedback or contact us.

4.1.2. **Automated technologies or interactions.** As you interact with our Platform, we will automatically collect technical data about your equipment, browsing actions and patterns. We collect this Personal Data by using cookies, server logs and other similar technologies. We may also receive technical data about you if you visit other Platform employing our cookies.

4.2. Technical Data is collected from the following parties:

4.2.1. analytics providers such as Google.

4.3. Contact, financial and transaction data is collected from our Platform, providers of technical, payment and delivery services.

4.4. Identity and contact data may also be collected from data brokers or aggregators.

4.5. Identity and contact data may also be collected from publicly available sources.

5. How we use your personal data

Basis

5.1. We collect your Personal Data on one or more of the following bases:

5.1.1. **Performance of a contract with you:** Where we need to perform the contract, we are about to enter into or have entered into with you.

5.1.2. **Legitimate interests:** We may use your Personal Data where it is necessary to conduct our business and pursue our legitimate interests, for example to prevent fraud and enable us to give you the best and most secure customer experience. We make sure we consider and balance any potential impact on you and your rights (both positive and negative) before we process your Personal Data for our legitimate interests. We do not use your Personal Data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

5.1.3. **Legal obligation:** We may use your Personal Data where it is necessary for compliance with a legal obligation that we are subject to. We will identify the relevant legal obligation when we rely on this legal basis.

5.1.4. **Consent:** We rely on consent only where we have obtained your active agreement to use your Personal Data for a specified purpose, for example if you subscribe to an email newsletter.

5.2. Third Party Marketing

5.2.1. We will get your express consent before we share your Personal Data with any third party for their own direct marketing purposes.

5.2.2. The Platform may occasionally contain links to third-party websites. If you click on the links to third-party websites, you leave our website. We are not responsible for the content of third-party websites or for the security of your Personal Data when you use them. Third-party service providers and third-party websites may have their own privacy policies governing the storage and retention of Personal Data. They may also collect information

that is not Personal Data, such as your IP address, browser specification or operating system.

5.2.3. This privacy policy does not govern Personal Data provided to, stored on, or used by third-party providers or third-party websites. We recommend that when you enter a third-party website you review its privacy policy as it relates to how that website collects, processes, stores and protects your Personal Data.

5.3. Opting out of marketing

5.3.1. You can ask to stop sending you marketing communications at any time by logging into the Platform and checking or unchecking relevant boxes to adjust your marketing preferences.

5.3.2. If you opt out of receiving marketing communications, you will still receive service-related communications that are essential for administrative or customer service purposes for example relating to order confirmations for a product/service warranty registration, appointment reminders, updates to our Terms and conditions, checking that your contact details are correct.

5.3.3. You may access, remove, review, and/or make changes to Personal Data that you provide us with, by editing your profile on the platform. If you register, we may also send you any legally required notifications and certain notifications including service-related notices and notices regarding a change to any of our policies. For example, we may send you a notice regarding server problems or scheduled maintenance to the Platform. You can always opt out of certain e-mail communications from us, including our notifications to you.

5.3.4. We will not change your preferences without your consent.

6. Disclosure of your Personal Data

6.1. We may share with third-party service providers certain information, such as your browser capabilities or operating system, that we have collected in order to better understand which advertisements and services may interest you.

6.2. We may also share your Personal Data where necessary for the bases set out above, including third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your Personal Data in the same way as set out in this privacy policy. We will notify you of any transaction in which substantially all of our assets are sold to or merged into another company, including assets which contain your Personal Data. The acquiring company will be given access to your Personal Data without your consent.

6.3. We require all third parties to respect the security of your Personal Data and to treat it in accordance with the law. We do not allow our third-party service providers to use your Personal

Data for their own purposes and only permit them to process your Personal Data for specified purposes and in accordance with our instructions.

- 6.4. On rare occasions, we may be required to disclose your Personal Data because of legal or regulatory requirements. In such instances, we reserve the right to disclose your Personal Data as required in order to comply with our legal obligations including complying with court orders, warrants, subpoenas, service-of-process requirements or discovery requests.
- 6.5. We may also disclose information about our users to law enforcement officers or others, in the good-faith belief that such disclosure is reasonably necessary to enforce our Terms and conditions or this privacy policy or respond to legal claims that any content violates the rights of third parties, or to protect our intellectual property rights or our personal safety or the personal safety of our users or the general public.

7. International Transfers

We may transfer your Personal Data to service providers that carry out certain functions on our behalf. This may involve transferring Personal Data outside Namibia to countries which have laws that do not provide the same level of data protection as Namibian law. Whenever we transfer your Personal Data out of Namibia to service providers, we ensure a similar degree of protection is afforded to.

8. Data Security

We have put in place appropriate security measures to prevent your Personal Data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your Personal Data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your Personal Data on our instructions and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected Personal Data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

9. Data Retention

- 9.1. We will only retain your Personal Data for as long as reasonably necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your Personal Data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.
- 9.2. To determine the appropriate retention period for Personal Data, we consider the amount, nature and sensitivity of the Personal Data, the potential risk of harm from unauthorized use or disclosure of your Personal Data, the purposes for which we process your Personal Data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

10. Contact details

10.1. If you have any questions about this privacy policy or about the use of your Personal Data, please contact us at community@nampharm.com.na

11. Notification of changes

11.1. We reserve the right to change this privacy policy from time to time and at our sole discretion. We will notify you of material changes to this privacy policy.

Data	Optionality	Storage	Use
Full Name	No	Encrypted	Service Delivery
Cellphone Number	No	Encrypted	Service Delivery
Email	No	Encrypted	Service Delivery
Address & Location	Yes	Encrypted	Service Delivery
Interests	Yes	Encrypted	Service Delivery
Date of Birth	Yes	Encrypted	Personalized Service Delivery
Gender	Yes	Encrypted	Personalized Service Delivery
Medical Aid Information	Yes	Encrypted	Personalized Service Delivery
Device Information	No	Encrypted	Fraud protection
Payment Information	No	Encrypted	Regulatory Compliance
Usage Date	No	Encrypted	Service Delivery