

Privacy Statement – CA Sales Botswana

<https://www.casales.co.bw/>

Effective date: 30 June 2026

This Privacy Statement explains how CA Sales & Distribution and Dafin Sales & Distribution together, “**CA SALES**”, (we, us, our) collect, use, share, and protect personal data when you visit our website, contact us, or use our online services. CA Sales & Distribution and Dafin Sales & Distribution act as Joint Data Controllers and jointly determine the purposes and means of processing personal data described in this Privacy Statement. We process personal data in accordance with Botswana’s Data Protection Act, 2024 (“**DPA**”).

1. Data controller and contact details

Data controller: CA Sales & Distribution (Pty) Ltd & Dafin Sales & Distribution (Pty) Ltd

Registered address: CA Sales & Distribution, Portion 867, New Lobatse Road, Opposite Kgale Hill, Gaborone, Botswana

Email: dpo@casales.co.bw

Telephone: +267 392 2815

We have appointed a Data Protection Officer (DPO) to be contacted at:

dpo@casales.co.bw

2. Key definitions (these definitions have the meaning ascribed to them in terms of the DPA)

- **Personal data** means information relating to an identified or identifiable individual.
- **Sensitive personal data** means special categories of personal data that receive additional protection under the DPA.
- **Processing** means any operation performed on personal data (e.g., collection, use, storage, disclosure, deletion, alteration, transmission, dissemination).
- **Data subject** means the individual whose personal data is processed (e.g., website visitor, customer contact, job applicant).

3. Personal data we collect

Depending on how you use our website, we may collect the following categories of personal data:

- **Identity and contact details:** name, company name, job title, email address, telephone number, delivery address, IP address, GPS location, and other contact details you provide.

- **Account and transaction details (if applicable):** customer or account references, order information, invoices, and delivery details.
- **Communications:** messages you send through contact forms, email, phone, or other channels, and our responses.
- **Technical and usage data:** IP address, device identifiers, browser type, pages visited, date/time of visits, referring URLs, and similar analytics data.
- **Preferences:** marketing preferences and communication choices.
- **Cookies and similar technologies:** information collected via cookies (see section 6).

4. Where we get your personal data

- **Directly from you** when you contact us, place an order, request a quotation, register an account (if available), or subscribe to updates.
- **Automatically** through your use of our website (e.g., through cookies and analytics).
- **From third parties** where relevant, such as logistics partners, payment providers (if used on the website), or publicly available sources (e.g., business contact information), to the extent permitted by law.

5. How we use your personal data (purposes and legal basis)

We only process personal data where we have a lawful basis under the DPA. The table below summarises the main purposes for which we process personal data and the legal bases we typically rely on.

Purpose	Typical lawful basis under the DPA
Respond to enquiries, requests for quotations, and customer support	Necessary for steps taken at your request / performance of a contract; and/or our legitimate interests in operating and improving our business communications
Create and manage customer/vendor relationships, process orders, deliveries, returns, and after-sales support	Performance of a contract; compliance with legal obligations (e.g., records and taxation); legitimate interests
Operate, maintain, secure, and improve our website (including troubleshooting, auditing, and analytics)	Legitimate interests; and where required, consent for non-essential cookies/technologies
Marketing communications (e.g., newsletters, promotions) and managing your preferences	Consent where required; and/or legitimate interests (for business-to-business marketing where permitted). You can opt out at any time.

Prevent fraud, protect our systems, and ensure network and information security	Legitimate interests; compliance with legal obligations
Comply with legal and regulatory requirements and respond to lawful requests from authorities	Compliance with legal obligations; tasks carried out in the public interest or under authority of law (where applicable)

6. Cookies and similar technologies

We may use cookies and similar technologies to operate our website, remember your preferences, and understand how the website is used. Where required by the DPA, we will request your consent for non-essential cookies (such as analytics or advertising cookies). You can manage cookies through your browser settings and, where available, our cookie banner/manager.

7. How we share personal data

We do not sell personal data. We may share personal data with:

- **Service providers (processors):** website hosting, IT support, analytics providers, email/communications tools, CRM systems, and other vendors who help us operate our website and business. They are authorised to process personal data only as necessary to provide services to us and are required to protect it.
- **Delivery and logistics partners** where needed to deliver goods or services.
- **Payment service providers** if our website enables payments (note: we do not store full payment card details on our systems where a third-party payment provider is used).
- **Professional advisers** (e.g., lawyers, auditors, insurers) where necessary.
- **Regulators, courts, law enforcement, and other authorities** where required by law or to protect our rights.
- **Business transfers** if we undergo a merger, acquisition, restructuring, or sale of assets, subject to appropriate safeguards.

8. Cross-border transfers

Where we transfer personal data outside Botswana (for example, where a service provider hosts data on servers outside Botswana), we will do so in accordance with the DPA's requirements for cross-border transfers. This may include transfers to jurisdictions recognised as providing an adequate level of protection and/or putting in place appropriate safeguards (such as contractual protections) to ensure your personal data remains protected.

9. Security

We implement appropriate technical and organisational measures designed to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, or access. These measures may include access controls, staff confidentiality obligations, secure configuration of systems, and encryption where appropriate. No method

of transmission or storage is completely secure; therefore, we cannot guarantee absolute security.

10. Retention

We keep personal data only for as long as necessary for the purposes set out in this Privacy Statement, unless a longer retention period is required or permitted by law (for example, for accounting, tax, or legal claims). We consider the nature of the data, the purpose for which it was collected, legal requirements, and limitation periods when setting retention periods.

11. Your rights under the DPA

Subject to the DPA and any applicable exceptions, you may have the right to:

- be informed about how your personal data is processed;
- request access to your personal data;
- request correction/rectification of inaccurate or incomplete personal data;
- request deletion/erasure of personal data in certain circumstances;
- object to certain processing (including, where applicable, direct marketing);
- request restriction/limitation of processing in certain circumstances;
- request portability of personal data (where applicable);
- withdraw consent at any time where processing is based on consent (withdrawal will not affect the lawfulness of processing before withdrawal); and
- not be subject to a decision based solely on automated processing where the DPA provides this protection.

To exercise your rights, please contact us using the details in section 1. We may request reasonable information to verify your identity and to understand your request. We will respond within 30 (thirty) days of having received your request.

12. Complaints

If you have concerns about how we process your personal data, please contact us first so we can try to resolve the issue. You also have the right to lodge a complaint with the Botswana Information and Data Protection Commission (the supervisory authority responsible for enforcing the DPA).

13. Children's personal data

Our website is not intended for children. Where we knowingly collect personal data from a child in relation to information society services, we will do so in line with the DPA's requirements (including obtaining parent/guardian consent where required). If you believe a child has provided us with personal data without appropriate consent, please contact us so we can take appropriate action.

14. Marketing preferences

You can opt out of receiving marketing communications from us at any time by using the unsubscribe option in the message or by contacting us. Even if you opt out of marketing, we may still send you non-promotional messages where necessary (for example, about your orders, deliveries, or important service notices).

15. Automated decision-making

We do not make decisions that have legal or similarly significant effects on you based solely on automated processing, unless we inform you otherwise and we have a lawful basis and safeguards as required by the DPA.

16. Third-party links

Our website may contain links to third-party websites or services. This Privacy Statement does not apply to those third parties. We encourage you to review their privacy statements before providing them with personal data.

17. Updates to this Privacy Statement

We may update this Privacy Statement from time to time to reflect changes in our practices, technology, legal requirements, amendments to the law or other factors. We will post the updated version on this page and update the effective date above.