

Sharpest Thorn Designs - Privacy Policy Last Updated: [08/01/2026]

## 1. Introduction

Sharpest Thorn Designs (Pty) Ltd ("we," "us," "our," or "Company") respects your privacy and is committed to protecting your personal information. This Privacy Policy explains how we collect, use, disclose, and safeguard your information when you visit our website [www.sharpestthorndesigns.co.za](http://www.sharpestthorndesigns.co.za) (the "Site") or purchase our products. We comply with South Africa's Protection of Personal Information Act (POPIA) and other applicable data protection laws, including the General Data Protection Regulation (GDPR) for European Union customers. By using our Site, you consent to the data practices described in this policy.

## 2. Information We Collect

### 2.1 Personal Information

We may collect the following personal information:

- Identifiers: Name, surname, email address, phone number
- Demographic Information: Age, gender (if voluntarily provided)
- Financial Information: Payment details (processed securely through third-party payment processors)
- Shipping Information: Physical address, postal code, city, country
- Account Information: Username, password (if you create an account)

### 2.2 Automatically Collected Information

When you visit our Site, we automatically collect:

- Device Information: IP address, browser type, operating system
- Usage Data: Pages visited, time spent, click patterns
- Location Data: General location based on IP address
- Cookies and Tracking Technologies: See Section 6 for details

### 2.3 Information from Third Parties

We may receive information from:

- Payment processors (transaction status only)
- Shipping carriers (delivery status)
- Social media platforms (if you interact with us)

## 3. How We Use Your Information

We use your personal information for the following purposes:

### 3.1 Order Processing and Fulfillment

- To process and fulfill your orders
- To arrange shipping and delivery
- To send order confirmations and updates
- To process returns, refunds, or exchanges

### 3.2 Customer Service

- To respond to inquiries and provide support
- To resolve issues or complaints
- To send important notices (policy changes, security alerts)

### 3.3 Marketing and Communications (with consent)

- To send promotional emails about new products or offers
- To personalize your shopping experience
- To conduct surveys or request reviews

### 3.4 Legal and Security Purposes

- To comply with legal obligations under South African law
- To prevent fraud and unauthorized transactions
- To protect our rights and property
- To ensure the security of our Site

### 3.5 Business Operations

- To analyze website usage and improve our services
- To conduct market research
- To manage our business operations

## 4. Legal Basis for Processing (GDPR Compliance)

For EU customers, we process your personal data based on:

- Contractual necessity: To fulfill orders you've placed
- Legal obligation: To comply with South African laws
- Legitimate interests: To operate our business effectively
- Consent: For marketing communications (you can withdraw at any time)

## 5. How We Share Your Information

We do not sell, rent, or trade your personal information. We may share information with:

### 5.1 Service Providers

- Payment processors: To complete transactions
- Shipping carriers: To deliver your orders
- IT service providers: To host and maintain our Site
- Marketing platforms: For email communications (with consent)

### 5.2 Legal Requirements

We may disclose information if required by:

- South African courts or law enforcement
- Regulatory authorities
- Legal processes (subpoenas, warrants)

### 5.3 Business Transfers

In the event of a merger, acquisition, or sale of assets, your information may be transferred as a business asset.

### 5.4 With Your Consent

We may share information with third parties when you explicitly consent.

## 6. Cookies and Tracking Technologies

### 6.1 What Are Cookies?

Cookies are small text files stored on your device that help us improve your browsing experience.

### 6.2 Types of Cookies We Use

- Essential Cookies: Necessary for site functionality
- Performance Cookies: Help us analyze site usage
- Functional Cookies: Remember your preferences
- Marketing Cookies: Show relevant advertisements

### 6.3 Your Cookie Choices

You can control cookies through your browser settings. However, disabling essential cookies may affect site functionality.

## 7. Data Security

We implement appropriate security

measures to protect your personal information, including:  SSL encryption for data transmission  Secure payment processing  Regular security assessments  Limited employee access to personal data  Secure data storage systems Despite our efforts, no security system is impenetrable. We cannot guarantee absolute security.

8. International Data Transfers As a South African company serving international customers, your information may be transferred to and processed in countries outside your residence. We ensure such transfers comply with applicable laws and implement appropriate safeguards.

9. Data Retention We retain your personal information only as long as necessary for the purposes outlined in this policy, or as required by South African law. Typical retention periods:  Order information: 5 years (for tax and warranty purposes)  Marketing lists: Until you unsubscribe  Website analytics: 26 months  Customer service records: 3 years

10. Your Rights and Choices

10.1 POPIA Rights (South African Customers) Under POPIA, you have the right to:  Access your personal information  Correct inaccurate information  Request deletion of your information  Object to processing  Lodge a complaint with the Information Regulator

10.2 GDPR Rights (EU Customers) Under GDPR, you have the right to:  Access, correct, or delete your data  Restrict or object to processing  Data portability  Withdraw consent  Lodge a complaint with a supervisory authority

10.3 How to Exercise Your Rights To exercise any of these rights, contact us at: Email: [customerservice@sharpestthorndesigns.co.za](mailto:customerservice@sharpestthorndesigns.co.za) Postal Address: 2989 Rampa Street, Ackerville, Emalahleni, Mpumalanga, South Africa We will respond within 30 days and may request verification of your identity.

10.4 Marketing Opt-Out You can unsubscribe from marketing emails by:  Clicking "unsubscribe" in any marketing email  Contacting our customer service  Updating your account preferences

11. Children's Privacy Our Site is not intended for children under 18. We do not knowingly collect information from children. If you believe we have collected information from a child, please contact us immediately.

12. Third-Party Links Our Site may contain links to third-party websites. This Privacy Policy does not apply to those sites. We encourage you to review their privacy policies.

13. Changes to This Policy We may update this Privacy Policy periodically. Changes will be posted on this page with an updated "Last Revised" date. We will notify you of significant changes via email or site notice.

14. Contact Information For privacy-related inquiries or to exercise your rights, contact us: Information Officer: [MR MHLANGA] Company: Sharpest Thorn Designs (Pty) Ltd Registration No: 2021/7859900/07 Physical Address: 2989 Rampa Street, Ackerville, Emalahleni, Mpumalanga, South Africa Email: [customerservice@sharpestthorndesigns.co.za](mailto:customerservice@sharpestthorndesigns.co.za) Phone: [+27 82 698 7724] South Africa Information Regulator Complaints: If you have concerns about how we handle your information, you may contact the Information Regulator: Address: JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001 Email: [complaints.IR@justice.gov.za](mailto:complaints.IR@justice.gov.za) Website: [www.justice.gov.za/inforeg](http://www.justice.gov.za/inforeg)

15. Specific Provisions for International Customers

15.1 European Union Customers For EU customers, Sharpest Thorn Designs acts as a data controller. Our representative in the EU is: [To be appointed if required].

15.2 California Consumers (CCPA) While we primarily serve South African customers, we extend certain CCPA rights to California consumers, including the right to know what personal information we collect and the right to request deletion.

15.3 Other International Customers We respect the privacy laws of your country and will handle your information in accordance with both South African law and applicable international standards.