

COFCO International South Africa – Privacy Policy

October 2021 | Version 1.1

We respect your privacy. Callouts like this are a summary of our privacy policy and contain the most important and relevant points for you. Please read the full privacy policy because it applies to you.

Introduction

Welcome to our privacy policy. We are COFCO International South Africa (Pty) Ltd (registration number 2003/030380/07).

This is our plan of action when it comes to protecting your privacy. We respect your privacy and take the protection of personal information very seriously. The purpose of this policy is to describe the way that we collect, store, use, and protect information that can be associated with you or another specific natural or juristic person and can be used to identify you or that person (**personal information**).

The purpose of this policy is to describe the way that we handle your personal information.

Audience

This policy applies to you if you are:

- an independent contractor who provides us with services in terms of an independent contractor agreement;
- a customer who has ordered or requested the goods or services that we provide; or
- a supplier or service provider that provides us with goods or services; or
- employed by us as an employee, where:
 - you are someone who works for us or a candidate employee;
 - in exchange for compensation under an employment contract (but not an independent contractor agreement);
 - at the present time.

This policy applies to you under certain circumstances.

Personal information

Personal information includes:

- certain information collected on submission; and
- optional information that you provide to us voluntarily (see below);

but excludes:

- information that has been made anonymous so that it does not identify a specific person;
- permanently de-identified information that does not relate or cannot be traced back to you specifically;

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- non-personal statistical information collected and compiled by us; and
- information that you have provided voluntarily in an open, public environment or forum including any blog, chat room, community, classifieds, or discussion board (because the information has been disclosed in a public forum, it is no longer confidential).

Personal information includes information we collect (i) automatically when you visit our website, (ii) on registration, (iii) on submission, and (iv) from you voluntarily. It excludes (i) anonymous, (ii) de-identified, (iii) non-personal statistical, and (iv) public information.

Common examples

Common examples of the types of personal information which we may collect and process include your:

- **identifying information** – such as your name, date of birth, CCTV images or identification number of any kind;
- **contact information** – such as your phone number or email address;
- **address information** – such as your physical or postal address;
- **demographic information** – such as your gender or marital status; or

Sensitive personal information

Depending on the relationship we have with you, we may also collect sensitive personal information including your:

- **financial information** – such as your bank account details;
- **sensitive demographic information** – such as your race or ethnicity;
- **medical information** – such as information about your physical or mental health;
- **criminal information** – such as information about your commission or alleged commission of any offence or about any related legal proceedings; and
- **employment information** – including your membership of a trade union

Acceptance

Acceptance required

You must accept all the terms of this policy when you order our goods or request our services. If you do not agree with anything in this policy, then:

- **as a customer** you may not order our goods or request our services;
- **as a supplier** you may not render services to us;
- **as an employee** you may not continue to work for us as our current employee; and
- **as a contractor** you may not continue to render services to us.

You may not order our goods or request our services if you do not accept this policy.

Legal capacity

You may not order our goods, request our services, provide us with services or work for us as an employee if you are younger than 18 years old or do not have legal capacity to conclude legally binding contracts.

Deemed acceptance

By accepting this policy, you are deemed to have read, understood, accepted, and agreed to be bound by all of its terms.

Your obligations

You may only send us your own personal information or the information of another data subject where you have their permission to do so.

Changes

We may change the terms of this policy at any time by updating this web page. We will notify you of any changes by sending you an email detailing the changes that we have made and indicating the date that they were last updated. If you do not agree with the changes, then you may not order our goods or services, provide us with services or work for us as an employee.

Collection

Direct and indirect

We generally collect personal information from you directly wherever possible, but we may sometimes collect it indirectly through third parties. We will comply with the relevant laws for indirect collection where we do so, which means that we may not need to ask your permission before doing so and may collect it without your knowledge and consent in those circumstances. We will do our best to ensure that third parties have the right to give your personal information to us where we use them to provide us with your personal information.

On order or request

When you order our goods or request our services from us, or when we order goods from you or request services from you, you will be asked to provide us with additional information on a voluntary basis (**goods or services information**).

Automatically

We collect some of your personal information automatically when you use our:

- **IT equipment** – including computers, printers, and any other hardware necessary to do your work;
- **IT infrastructure** – the entire organised system of IT structures, facilities, and components necessary for the operation of our organisation, including data, computer networks, and software; and
- **employee portal** – any website where we interact with current or prospective employees which may collect your IP address, browser details, and usage information to display the portal correctly, track your activities on it, or for other necessary purposes.

On submission

We may ask you to provide us with your identifying information when you submit other information to us, such as through paper-based forms or online user interfaces.

Optional details

You may also provide additional information to us on a voluntary basis (**optional information**).

Recording calls

We may monitor and record any telephone calls that you make to us, unless you specifically request us not to.

Purpose for collection

We may use or process any goods or services information, or optional information that you provide to us for the purposes that you indicated when you agreed to provide it to us. Processing includes gathering your personal information, disclosing it, and combining it with other personal information. We generally collect and process your personal information for various purposes, including:

- **goods or services purposes** – such as collecting orders or requests for and providing our goods or services;
- **commercial purposes**- such as for managing customer and supplier relationships;
- **business purposes** – such as internal audit, accounting, business planning, and joint ventures, disposals of business, or other proposed and actual transactions; and
- **legal purposes** – such as handling claims, complying with regulations, or pursuing good governance.
- **employment purposes** – such as for recruitment, paying salaries, reviewing employee performance, maintaining employee relations, or providing training.

Consent to collection

We will obtain your consent to collect personal information:

- in accordance with applicable law;
- when you provide us with any registration information or optional information.

We will get your consent to collect your personal information in accordance with applicable law when you provide us with it.

Use

Our obligations

We may use your personal information to fulfil our obligations to you.

Disclosure

Sharing

We may share your personal information with:

- other divisions or companies within the group of companies to which we belong so as to provide joint content and services like registration, for transactions and customer support and to help detect and prevent potentially illegal acts and violations of our policies.
- an affiliate, in which case we will seek to require the affiliates to honour this privacy policy;
- our goods or services providers under contract who help provide certain goods or services or help with parts of our business operations, including fraud prevention, bill collection, marketing, technology services (our contracts dictate that these goods or services providers only use your information in connection with the goods or services they supply or services they perform for us and not for their own benefit);
- credit bureaus to report account information, as permitted by law;
- banking partners as required by credit card association rules for inclusion on their list of terminated merchants (in the event that you utilise the services to receive payments and you meet their criteria);
- our contractors who help administer our employment relationship with you; and
- other third parties who provide us with relevant services where appropriate.

We may share your personal information with third parties for the purposes of fulfilling our obligations to you among other purposes.

Regulators

We may disclose your personal information as required by law or governmental audit.

Law enforcement

We may disclose personal information if required:

- by a subpoena or court order;
- to comply with any law;
- to protect the safety of any individual or the general public; and
- to prevent violation of our customer relationship terms.

We may disclose personal information to third parties if required for legal reasons.

No selling

We will not sell personal information. No personal information will be disclosed to anyone except as provided in this privacy policy.

Employees

We may need to disclose personal information to our employees that require the personal information to do their jobs. These include our responsible management, human resources, accounting, audit, compliance, information technology, or other personnel.

Change of ownership

If we undergo a change in ownership, or a merger with, acquisition by, or sale of assets to, another entity, we may assign our rights to the personal information we process to a successor, purchaser, or separate entity. We will notify you of this via email. If you are concerned about your personal information migrating to a new owner, you may request us to delete your personal information.

Security

We take the security of personal information very seriously and always do our best to comply with applicable data protection laws. We authorize access to personal information only for those employees who require it to fulfil their job responsibilities. We implement disaster recover procedures where appropriate.

Accurate and up to date

We will try to keep the personal information we collect as accurate, complete and up to date as is necessary for the purposes defined in this policy. From time to time we may request you to update your personal information. You are able to review or update any personal information that we hold on you by asking us for access to it. Please note that in order to better protect you and safeguard your personal information, we take steps to verify your identity before granting you access or making any corrections to your personal information.

Retention

We will only retain your personal information for as long as it is necessary to fulfil the purposes explicitly set out in this policy, unless:

- retention of the record is required or authorised by law; or
- you have consented to the retention of the record.

During the period of retention, we will continue to abide by our non-disclosure obligations and will not share or sell your personal information.

We may retain your personal information in physical or electronic records at our discretion.

We will only retain your personal information for as long as is necessary.

Transfer to another country

We may transmit or transfer personal information outside of the country in which it was collected to a foreign country and process it in that country. When we do transfer personal information outside of the country in which it was collected, we will only do so where:

- the third party or receiving country also ensures an adequate level of protection as required under applicable data protection law;
- we have your consent prior to the transfer; or
- the transfer is otherwise allowed under applicable data protection law.

We may transmit or transfer personal information outside of the country in which it was collected to a foreign country and process it in that country

Updating or removing

You may choose to correct or update the personal information you have submitted to us, by contacting us by phone or email.

You may choose to update or remove the personal information you have submitted to us.

Limitation

We are not responsible for, give no warranties, nor make any representations in respect of the privacy policies or practices of linked or any third party websites.

Enquiries

If you have any questions or concerns arising from this privacy policy or the way in which we handle personal information, please contact us.

Information Officer:

Michael Swanepoel email: michaelswanepoel@cofcointernational.com
tel: 021 808 1900

Deputy Information Officer:

Robyn Goldie email: robynscott@cofcointernational.com
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