

LACTALIS SOUTH AFRICA (PTY) LTD

PRIVACY POLICY

This privacy policy describes how we process information we collect and/or receive from you.

1. **INFORMATION WE COLLECT AND RECEIVE**

We collect and receive information about you in the following ways:

1.1. **Information you give us**

This includes any information that you provide to us directly, including:

- 1.1.1. when you sign-up to utilise our services;
- 1.1.2. by filling in forms on our websites, or those provided to you;
- 1.1.3. when you enter a competition, promotion or complete a survey;
- 1.1.4. by posting comments or content on our social media pages; or
- 1.1.5. when you contact us or we contact you and you provide information directly to us;
- 1.1.6. when you use websites by using cookies, web beacons and other technologies.

We collect personal information about you directly from you. However, we may sometimes collect additional information from third parties, including former employers, credit reference agencies or bureaus or other background check agencies.

1.2. **What personal information we collect**

- 1.2.1. When you register to use our services, you will be required to provide us with the following information, your:
 - 1.2.1.1. name and surname;
 - 1.2.1.2. contact number and email address;
 - 1.2.1.3. physical address;
 - 1.2.1.4. identity or passport number; and
 - 1.2.1.5. date of birth.

1.3. **Information we collect or receive when you use our website or social media platforms**

For a comprehensive list of personal information we may collect, store, and use about you, please refer to our PAIA manual.

We collect information when you use websites or social media platforms by using cookies, web beacons and other technologies. Depending on how you access and use websites, we may receive:

- 1.3.1. log information;
- 1.3.2. information we infer about you based on your interaction with products and services;
- 1.3.3. device information (for example the type of device you're using, how you access platforms, your browser or operating system and your Internet Protocol ("IP") address);
- 1.3.4. location information.

1.4. **Information from third-party sources**

We may receive additional information about you that is publicly or commercially available and combine that with the information we have collected or received about you in other ways.

1.5. **Special Personal Information**

In limited circumstances, we may collect your special personal information. When we process your special personal information we will ensure that we get your consent to do so.

2. **HOW WE USE THE INFORMATION WE COLLECT AND RECEIVE**

2.1. We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- 2.1.1. where we need to perform/execute the contract we have entered into with you;
- 2.1.2. where we need to comply with a legal obligation;

- 2.1.3. where it is necessary for legitimate interests pursued by us or a third party and your interests and fundamental rights do not override those interests; and
- 2.1.4. we may also use your personal information in the following situations, which are likely to be rare:
 - 2.1.4.1. where we need to protect your legitimate interests (or someone else's interests); and
 - 2.1.4.2. where it is needed for the proper performance of a public law duty.

2.2. **Situations in which we will use your personal information**

We process personal information primarily to allow us to perform/execute our contract with you and to enable us to comply with legal obligations. In some cases we may use your personal information to pursue legitimate interests, provided your interests and fundamental rights do not override those interests. Examples of specific situations in which we will process your personal information are listed below:

- 2.2.1. to provide you with a service which you have requested from us;
- 2.2.2. communication with you;
- 2.2.3. to improve our services;
- 2.2.4. conducting research and compiling research reports;
- 2.2.5. preparing aggregated and anonymised reports;
- 2.2.6. to manage accounts, receive services and process payments;
- 2.2.7. to assess the suitability of job applicants for employment;
- 2.2.8. meeting legal obligations in respect of employment equity and to comply with other applicable laws;
- 2.2.9. administering the contract we have entered into with you;
- 2.2.10. business management and planning, including accounting and auditing;
- 2.2.11. dealing with legal disputes involving you, or other data subjects, directors and independent contractors;

- 2.2.12. to prevent fraud;
- 2.2.13. to monitor your use of our information and communication systems to ensure compliance with our IT policies;
- 2.2.14. to ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution;
- 2.2.15. to conduct data analytics studies to review and better understand customer retention and attrition rates;
- 2.2.16. employment equity monitoring.

2.3 If you fail to provide personal information

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as paying you or providing a benefit), or we may be prevented from complying with our legal obligations.

3. HOW WE SHARE THE INFORMATION WE COLLECT AND RECEIVE

- 3.1. We don't sell your personal information to third parties for their marketing purposes.
- 3.2. We may share information with:
 - 3.2.1. our affiliates, in other words, other companies in our group;
 - 3.2.2. we may disclose your personal information to a limited number of our employees and third party service providers (other than those who we refer you to), who we assist you to interact with;
 - 3.2.3. our business partners. We may share non-personally identifiable information with select business partners;
 - 3.2.4. other parties in response to legal process or when necessary to conduct or protect our legal rights;
 - 3.2.5. companies that provide services to us. Companies that provide services to us or act on our behalf may have access to information about you. These companies are limited in their ability to use information they receive in the course of providing services to us or you; and

3.2.6. third-parties where you provide consent. In some cases, third-parties (often advertisers) may wish to attain information about you in order to promote their products to you, or for whatever other reason. We may share information with third-parties where you provide consent in the form of an explicit opt-in. Before we ask you to opt-in, we will endeavour to provide you with a clear description of what data would be shared with the third-party. Remember that once you have opted in to allow us to send your information to the third-party, we cannot control what they do with your data; therefore, be sure to investigate their privacy policies before providing permission for us to share your information.

4. YOUR RIGHTS

4.1. You have the right to ask us not to contact you for marketing purposes. You can exercise this right at any time by using any of the various "opt-out" options that we will always provide to you when we communicate with you. We won't send you marketing messages if you tell us not to but we will still need to send you service-related messages.

4.2. Our websites use cookies. If you wish to reject our cookies, you can configure your browser to do so.

4.3. We want to make sure that any data we hold about you is up to date. So, if you think your personal information is inaccurate, you can ask us to correct or remove it.

5. RETENTION OF DATA

We will retain your personal information only for as long as is necessary for the purposes set out in this privacy policy or to comply with our legal obligations, resolve disputes, and enforce our legal agreements and policies.

6. OUR COMMITMENT TO SECURITY

The security of your data is important to us. While we strive to use commercially acceptable means to protect your personal information, we cannot guarantee its absolute security. However, we do employ a number of safeguards intended to mitigate the risk of unauthorized access or disclosure of your information. We will do our best to protect your personal information and we will use up to date technology that will help us to do this. We will at all times comply with our obligation under applicable law.

7. TRANSFER OF DATA

- 7.1. We are based in and operate from South Africa.
- 7.2. We might transfer your personal information to places outside of South Africa and store it there, where our suppliers or affiliates might process it. If that happens, your personal information will only be transferred to and stored in country that has equivalent, or better, data protection legislation than South Africa or with a service provider which is subject to an agreement requiring it to comply with data protection requirements equivalent or better than those applicable in South Africa.
- 7.3. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

8. LINKS TO OTHER WEBSITES

Our website or social media platforms may contain links to and from websites, mobile applications or services of third parties, advertisers or affiliates. Please note that we are not responsible for the privacy practices of such other parties and advise you to read the privacy statements of each website you visit which collects personal information.

9. CHANGES TO THIS PRIVACY POLICY

We may update this privacy policy from time to time. Any changes that we may make to our privacy policy will be posted on our website and will be effective from the date of posting.

10. ACCESS TO YOUR PERSONAL INFORMATION

- 10.1. You may at any time request:
 - 10.1.1. confirmation that we hold your personal information;
 - 10.1.2. access to your personal information;
 - 10.1.3. the identities or categories of third parties to whom we have disclosed your personal information; or
 - 10.1.4. that we correct or delete any personal information that is incomplete, misleading, inaccurate, excessive or out of date.
- 10.2. Requests may be made in writing to the Head of Legal Mzotando.Mtikitiki@za.lactalis.com

11. COMPLAINTS

- 11.1. Should you believe that we have utilised your personal information contrary to POPIA, you undertake to first attempt to resolve any concerns with us.
- 11.2. If you are not satisfied with such process, you may have the right to lodge a complaint with the Information Regulator, using the contact details listed below:

E-mail address: POPIAComplaints@inforegulator.org.za
Physical address JD House
27 Stiemens Street
Braamfontein
Johannesburg, 2001

12. IO CONTACT DETAILS

If you have any comments or questions about this Privacy Policy or how we handle your Personal Information, please contact the Information Officer.

Information Officer:	Mzotando.Mtikitiki
Street Address	Strand Road, Stellenbosch, 7600
Telephone	+27 21 809 1510
Fax	+27 21 887 7159
Email	Mzotando.Mtikitiki@za.lactalis.com