

THE PROTECTION OF PERSONAL INFORMATION ACT (POPIA)

CLIENT/ USER PRIVACY PROTOCOLS POLICY

Preamble

The purpose of this policy is to advise the client / user (data subject) of Ceres Fruit Growers (Pty) Ltd and Ceres Group (RF) (Pty) Ltd services, both electronic and otherwise, why data is collected and processed, what data is in focus as well as how it is processed. Ceres Fruit Growers (Pty) Ltd and Ceres Group (RF) (Pty) Ltd are committed to full compliance with the POPI Act insofar as the utilisation and disclosure of data subject personal information (PI) is concerned. Hence, technical and operational measures have been put in place to protect data subject privacy and Ceres Fruit Growers (Pty) Ltd and Ceres Group (RF) (Pty) Ltd invites all data subjects and/ or requesters to engage with its **Information Officer (IO)** in respect of any matter related hereto.

Scope of application

This policy applies to data subjects under the POPI Act and its principles extend to the Promotion of Access to Information Act (PAIA) in respect of requesters of records held by Ceres Fruit Growers (Pty) Ltd and Ceres Group (RF) (Pty) Ltd. PI applies to both natural and juristic persons. Data subjects and requesters are invited to engage with the Ceres Fruit Growers (Pty) Ltd / Ceres Group (RF) (Pty) Ltd **IO** about any matter pertaining to the POPIA and PAIA, including but not limited to updating PI, deletion of PI and complaints in respect of how PI is being processed. The **“Information Officer” portal** on the website facilitates these types of engagement.

About Ceres Fruit Growers (Pty) Ltd and Ceres Group (RF) (Pty) Ltd

Ceres Fruit Growers (Pty) Ltd is one of South Africa’s largest apple and pear packing and storage facilities and is a significant employer of choice in the Ceres valley. Since 1923 we have come to work to add value to our grower shareholders, improve the lives of our people, and work in harmony with our environment. More details in this regard can be obtained in the **“Who we are”** link to its website.

Definition of Personal Information (PI)

“Personal information” means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to—

- (a) information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;
- (b) information relating to the education or the medical, financial, criminal or employment history of the person;
- (c) any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
- (d) the biometric information of the person; (e) the personal opinions, views or preferences of the person;
- (f) correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;

(g) the views or opinions of another individual about the person; and

(h) the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person;

Purpose of Collecting and Processing PI

Ceres Fruit Growers (Pty) Ltd and Ceres Group (RF) (Pty) Ltd processes PI for various purposes including for –

- Facilitating transactions with data subjects
- Collecting data for statistical purposes to improve its services
- Fulfilling its contractual obligations to its clients and client contacts
- Complying with the provisions of statute and regulations
- Attending to the legitimate interests of data subjects
- Identifying prospects for enhanced service delivery and business sustainability
- Providing data subject information to Ceres Fruit Growers (Pty) Ltd / Ceres Group (RF) (Pty) Ltd partners in order for Ceres Fruit Growers (Pty) Ltd / Ceres Group (RF) (Pty) Ltd partners to use the information to the benefit of data subjects. These Ceres Fruit Growers (Pty) Ltd / Ceres Group (RF) (Pty) Ltd partners who are recipients of PI are business organizations who are permitted to use the information only for the benefit of data subjects.
- Confirm and verify data subject identity or to verify that they are authorised users for security purposes;
- Conduct market or customer satisfaction research
- Audit and record keeping purposes
- In connection with legal proceedings.

Lawful Basis

In respect of the processing of PI as provided for above, Ceres Fruit Growers (Pty) Ltd and Ceres Group (RF) (Pty) Ltd will adhere to the conditions for the lawful processing of PI, based on its desire to provide data subjects services in their best interests as well as a legitimate interest of Ceres Fruit Growers (Pty) Ltd and Ceres Group (RF) (Pty) Ltd to achieve its business objectives.

Period of holding Personal Information

Ceres Fruit Growers (Pty) Ltd and Ceres Group (RF) (Pty) Ltd endeavours to provide the most accurate information possible to stakeholders, including data subjects. Ceres Fruit Growers (Pty) Ltd and Ceres Group (RF) (Pty) Ltd seeks to verify the accuracy of its information as frequently as possible and to remove information that it learns to be inaccurate. Thus, Ceres Fruit Growers (Pty) Ltd and Ceres Group (RF) (Pty) Ltd intends to process the information it has about data subjects for so long as it is accurate or until the data subject instructs Ceres Fruit Growers (Pty) Ltd and Ceres Group (RF) (Pty) Ltd to refrain from processing it – **in order to instruct Ceres Fruit Growers (Pty) Ltd and Ceres Group (RF) (Pty) Ltd to refrain from collecting and/ or processing PI click here (<http://www.cfg.co.za/paia/>) to access the Information Officer portal.**

Notwithstanding the above, Ceres Fruit Growers (Pty) Ltd and Ceres Group (RF) (Pty) Ltd shall hold PI for such period as may be required in terms of statutes such as the Companies Act and various labour laws.

Data Subject Rights

Data subjects have the right to request that Ceres Fruit Growers (Pty) Ltd and Ceres Group (RF) (Pty) Ltd provide them with access to their PI, to rectify or correct their personal information, erase PI or restrict the processing of PI, including refraining from sharing it or otherwise providing it to any third parties. Data subjects also have the right to raise complaints with the Information Regulator. The afore-going rights may be subject to certain limitations pursuant to applicable law. **In order to access any of these rights, click here (<http://www.cfg.co.za/paia/>) to access the Information Officer portal.**

Sources of Personal Information (PI)

Ceres Fruit Growers (Pty) Ltd and Ceres Group (RF) (Pty) Ltd gathers PI from several sources, which include directly from data subjects, publicly available sources such as websites, social media, commercial transactions with Ceres Fruit Growers (Pty) Ltd and Ceres Group (RF) (Pty) Ltd, referrals, prospects, partner agreements, training engagements, conferences and the like. Given that PI can be extracted and/ or obtained from several sources and consolidated into one system of record, it may be difficult or impossible to identify the exact source of one particular piece of information.

Categories of Personal Information (PI) collected and processed

Ceres Fruit Growers (Pty) Ltd and Ceres Group (RF) (Pty) Ltd collects information about data subjects who may be clients, client contacts, prospective clients and prospective client contacts. It also collects information on its employees and suppliers as well as third parties that are part of its scope of operation.

In respect of clients, client contacts, prospective clients and prospective client contacts Ceres Fruit Growers (Pty) Ltd and Ceres Group (RF) (Pty) Ltd profiles business organizations and the contacts who work for the said organisations and it may have some or all of the following categories of personal information on data subjects, historical or current –

- Name and surname
- Identity Number
- Equity, Gender & Disability status
- Contact details (email, mobile)
- Birth date
- Position held and responsibilities
- Areas of interest in respect of Ceres Fruit Growers (Pty) Ltd offerings
- Record of services used
- Email correspondence and attachments
- Organisation details
- Office address
- Office contact details
- Organisation email Address
- Organisation and data subject Social media URL's
- Other information that is available in the public domain.

We collect and process your personal information mainly to contact data subjects for the purpose of understanding their requirements and delivering services accordingly. Where possible, we will inform data subjects what information they are required to provide to Ceres Fruit Growers (Pty) Ltd / Ceres

Group (RF) (Pty) Ltd and what information is optional, as well as the consequences of not providing the said information.

Disclosure of information

Ceres Fruit Growers (Pty) Ltd and Ceres Group (RF) (Pty) Ltd may disclose data subject PI to its service providers who are involved in the delivery of products or services data subjects. Ceres Fruit Growers (Pty) Ltd and Ceres Group (RF) (Pty) Ltd has agreements in place to ensure that it complies with the privacy requirements as required by the POPI Act.

Ceres Fruit Growers (Pty) Ltd and Ceres Group (RF) (Pty) Ltd may also disclose data subject PI:

- Where it has a duty or a right to disclose in terms of law and/ or industry codes;
- Where it believes it is necessary to protect its rights.

Information Security

Ceres Fruit Growers (Pty) Ltd and Ceres Group (RF) (Pty) Ltd is legally obliged to provide adequate systems, technical and operational protection for the PI that it holds and to prevent unauthorized access to as well as prohibited use of PI. Ceres Fruit Growers (Pty) Ltd and Ceres Group (RF) (Pty) Ltd will therefore on a regular basis review its security controls and related processes to ensure that the PI of data subjects remains secure.

Ceres Fruit Growers (Pty) Ltd and Ceres Group (RF) (Pty) Ltd has conducted an impact assessment across all of its functions and used the findings thereof to manage risk optimally as well as to provide iterative improvements on an ongoing basis. Ceres Fruit Growers (Pty) Ltd and Ceres Group (RF) (Pty) Ltd policies and procedures cover the following aspects -

- Physical security;
- Computer and network security;
- Access to personal information;
- Secure communications;
- Security in contracting out activities or functions;
- Retention and disposal of information;
- Acceptable usage of personal information;
- Governance and regulatory issues;
- Monitoring access and usage of private information;
- Investigating and reacting to security incidents.

Ceres Fruit Growers (Pty) Ltd and Ceres Group (RF) (Pty) Ltd also ensures that it contracts with Operators as required by POPI and it requires appropriate security, privacy and confidentiality obligations of these operators in order to ensure that personal information is kept secure. The same protocols apply to any party to whom Ceres Fruit Growers (Pty) Ltd and Ceres Group (RF) (Pty) Ltd may pass PI on to for the purposes mentioned herein.

How to contact us - Head Office and Information Officer

Our Head Office physical address is -

3 Bon Chretien Street, Ceres, 6835, South Africa

The information officer is:

Albert Goosen

Email – information.officer@cfg.co.za

Mobile – 072 342 8143

Or **click here** (<http://www.cfg.co.za/paia/>) to go to the Information Officer portal to access specific engagement options.