

LAEVELD AGROCHEM (PTY) LTD
REGISTRATION NUMBER 1991/004865/07



PRIVACY NOTICE

DATE OF REVISION: 25/08/2022

1. INTRODUCTION

- 1.1. When you interact with Laeveld Agrochem (Pty) Ltd. ("**LAC**" / "**we**" / "**us**" / "**our**"), we may collect information about you when you do so. We respect your privacy, and we take great care in protecting it. Your privacy and the security of your information is important to us, and we want to make sure you understand how your information will be Processed.
- 1.2. This Privacy Notice describes how we collect, use, disclose, and store your information as well as the type of information we collect, why that information is collected, the circumstances under which that information will be shared with others, the security measures that we have implemented to protect your information and your right to obtain access to and correct the information in our possession or under our control.

2. TERMS USED

- 2.1. The following terms have the meanings assigned to them in this Privacy Notice unless the context requires otherwise:
 - 2.1.1. "**Applicable Law**" means the Protection of Personal Information Act 4 of 2013 as well as any other applicable data protection legislation in respect of the jurisdictions where such law applies;
 - 2.1.2. "**Personal Information**" means information relating to an identifiable, living, natural person, and where it is applicable an identifiable existing juristic person, including any correlative meaning as may be contemplated in the Applicable Law;
 - 2.1.3. "**Processing**" means any operation or activity or any set of operations, whether or not by automatic means, concerning Personal Information, including but not limited to collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation, use, transmission, distribution or making available, merging or linking as well as any other correlative activity as may be contemplated in the Applicable Law. The term "**Process**" and "**Processed**" shall have the same meaning;

3. APPLICATION

- 3.1. This Privacy Notice sets out the basis on which we will Process your Personal Information that we collect from you or any other source, or that you provide to us, when utilising our services, visiting our websites ("**Website**"), using our online login facilities ("**Portal**"), completing our surveys, participating in our social media platforms, or any similar data collection point.

4. OUR COMMITMENT

- 4.1. We are committed to conducting our business in accordance with the law. We will only Process your Personal Information in accordance with Applicable Law or otherwise with your consent and will always strive to keep your information confidential where possible.
- 4.2. We apply the following principles in order to protect your privacy:
 - 4.2.1. We only collect the Personal Information that is necessary;
 - 4.2.2. We only use Personal Information for the purposes specified in this Privacy Notice unless you are advised otherwise;
 - 4.2.3. We do not keep Personal Information longer than needed for lawful purposes; and
 - 4.2.4. We only share your Personal Information as specified in this Privacy Notice and/or permitted in terms of Applicable Law or otherwise as agreed with you.

5. POPI AND OTHER APPLICABLE LAW

- 5.1. For the purpose of the Protection of Personal Information Act 4 of 2013, the responsible party is LAC. For the purpose of the General Data Protection Regulation, 2016/679 the data controller is LAC.
- 5.2. The details of our Information Officer for the purposes of the Acts is as follows:

Chief Information Officer

Name: L. Allers
 Tel: 012 940 4398
 Email: privacy@laeveld.co.za

Deputy Information Officer

Name: M. Visser
 Tel: 012 940 4398
 Email: privacy@laeveld.co.za

- 5.3. The address of the responsible party/controller is as follows:

National or Head Office

Postal Address: Private Bag 33823, Postnet Suite 32462 Menlyn Link, 0063
 Physical Address: 410 Rigel Avenue, Erasmusrand, Pretoria
 Telephone: 012 940 4398
 Email: privacy@laeveld.co.za
 Website: www.laeveld.co.za

6. INFORMATION WE MAY COLLECT FROM YOU

- 6.1. We may collect and process the following data about you:

6.1.1. **Information you give us.** You may give us information about you by filling in forms on our Website or by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you register to use our Portal and when you report a problem with our Website or Portal. The information you give us may include your name, address, e-mail address and phone number, financial and credit card information, personal description and photograph. As a supplier, vendor, client, stakeholder, we obtain Personal Information directly from you when you interact with LAC or a representative of LAC. With reference to suppliers, vendors, clients, and other stakeholders, we generally Process the following Personal Information, as may be necessary to conduct our business, and retain it as part of our records:

- 6.1.1.1. Organisation's name and contact details;
- 6.1.1.2. Names, titles and contact details of relevant persons and officers;
- 6.1.1.3. Agreements and related information;
- 6.1.1.4. Financial information, including invoices and bank details;
- 6.1.1.5. Official documentation, including newsletters and statements;
- 6.1.1.6. Communicable disease (such as COVID-19) screening information of visitors to facilities owned or controlled by LAC or persons who interact with LAC staff, agents and contractors; and
- 6.1.1.7. Correspondence.

- 6.1.2. **Information we collect about you.** With regard to each of your visits to our site or Portal we may automatically collect the following information:
- 6.1.2.1. Technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
 - 6.1.2.2. Information about your visit, including the full Uniform Resource Locators (URL); clickstream to, through and from our site (including date and time); services/products you viewed or searched for; page response times, page errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.
- 6.1.3. **Information we receive from other sources.** We may receive information about you if you use services provided by our partners and affiliates entities within the LAC group of companies or where you have authorised us to collect information from selected third parties. In this case we will have informed you when we collected that data that it may be shared internally and combined with data collected on our Website or Portal. We are also working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies) and may receive information about you from them.
- 6.1.4. **Cookies.** Depending on the type of cookie we use, cookies also allow us to make our Website and Portal more user friendly, for example, permanent cookies allow us to save the user's password so that you do not have to re-enter your details every time you visits our Website or Portal. Cookies may be used by us to understand the users of our Website and Portal. Cookies allow us to understand who has seen which pages and/or notices and/or advertisements, to determine the type and frequency that such information should be displayed to the user. You can usually adjust your browser so that your device does not accept cookies. If you do this, you will still be able to browse around the sit, however certain functionality may not be available.
- 6.1.5. **Submission of Personal Information on behalf of another.** Kindly take note that if you provide information on behalf of someone else on our Website or Portal, you are acting as the responsible party, and we assume that your are Processing that Personal Information lawfully in adherence with Applicable Law.

7. IS THE SUPPLY OF INFORMATION VOLUNTARY OR MANDATORY

- 7.1. Supplying certain types of information is voluntary and you will be given the opportunity to "opt-out" of supplying such information, however other types of information are mandatory to enable us to process requests by you for products and/or services or to conduct business with us.
- 7.2. Whenever our intention is to target you with digital advertising or direct marketing the supply of your information is always optional, we will make that clear to you and ask you to opt-in and provide specific information intended to be used for that purpose.

8. CONSEQUENCE OF FAILURE TO PROVIDE THE INFORMATION

- 8.1. In respect of any information which is necessary in order to provide products and/or render services to you or otherwise conduct our business, in the event you:
 - 8.1.1. Refuse to provide your Personal Information which we request;

- 8.1.2. Do not consent to us handling your Personal Information; or
- 8.1.3. Revoke any consent regarding the handling of your Personal Information by us which you have previously given,

then such refusal or revocation of previously given consent may prevent us from providing products and/or render services to you or otherwise conduct our business with you.

9. USES MADE OF THE INFORMATION

9.1. We generally Process your Personal Information to conduct our business and any other lawful purpose or legitimate interest related to our business.

9.2. We use information held about you in the following ways:

9.2.1. **Information you give to us.** We will use this information to:

- 9.2.1.1. Carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;
- 9.2.1.2. Provide you with information about other services we offer that are similar to those that you have already acquired or enquired about;
- 9.2.1.3. Provide you with information about goods or services we feel may interest you and are aligned with our product and service offerings. We will only contact you with information about goods and services similar to those which were the subject of a previous sale or negotiations of a sale to you;
- 9.2.1.4. Ensure that content from our Website or the Portal is presented in the most effective manner for you and for your device;
- 9.2.1.5. Deal with enquiries and complaints made by or about you relating to our Website or Portal.

9.2.2. **Information we collect about you.** We will use this information:

- 9.2.2.1. To administer our Website, Portal and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- 9.2.2.2. To improve our Website or Portal to ensure that content is presented in the most effective manner for you and for your computer;
- 9.2.2.3. To allow you to participate in interactive features of our service, when you choose to do so;
- 9.2.2.4. As part of our efforts to keep our site safe and secure;
- 9.2.2.5. To measure or understand the effectiveness of any advertising we may serve to you and others, and to deliver relevant advertising to you;
- 9.2.2.6. To make suggestions and recommendations to you and other users of our Website or Portal about products or services that may interest you or them.

9.2.3. **Information we receive from other sources.** We may combine this information with information you give to us and information we collect about you. We may use this

information and the combined information for the purposes set out above (depending on the types of information we receive).

- 9.3. Records of Personal Information will not be retained for longer than is necessary for operational or archiving purposes for which the information was collected or to comply with legal obligations or resolve disputes, unless retention of record is required or authorised by law. Records of other information or deidentified information may be retained for historical, statistical or research purposes, subject to us establishing appropriate safeguards against the records being used for any other purpose and or we have de-identified the record(s).

10. SHARING OF YOUR PERSONAL INFORMATION

- 10.1. We may share your Personal Information with any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in the Companies Act, 71 of 2008.
- 10.2. We will generally share your relevant Personal Information, as may be necessary, with regulatory and other relevant public and private bodies and entities or other third parties with the sole purpose of fulfilling our obligations to you, including with:
- 10.2.1. Business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you or as required by law;
 - 10.2.2. Our professional agents, contractors and service providers, such as our auditors and legal advisers,
 - 10.2.3. Service Providers that provide information Processing services to us;
 - 10.2.4. Persons / entities providing services to us on a need-to-know basis (e.g., employee benefits providers, medical scheme, provident fund);
 - 10.2.5. Advertisers and advertising networks that require the data to select and serve relevant adverts to you and others. We do not disclose information about identifiable individuals to our advertisers, but we may provide them with aggregate information about our users (for example, we may inform them that 500 men aged under 30 have clicked on their advertisements on any given day).
 - 10.2.6. Analytics and search engine providers that assist us in the improvement and optimisation of our Website or Portal.
 - 10.2.7. In the event that we sell any business or assets, in which case we may disclose your Personal Information to the prospective buyer of such business or assets.
 - 10.2.8. If we are under a duty to disclose or share your Personal Information in order to comply with any legal obligation, or in order to enforce or apply our terms of use applicable to our Website or Portal or the terms and conditions of supply of our products and services to you and other agreements;
 - 10.2.9. To protect our rights, property, or safety, or the rights, property or safety of our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction;
 - 10.2.10. As otherwise advised when we collect the information with your consent or as may be as required in terms of the law, including to protect our rights, property or safety of our business, employees, our clients, the public or others.
- 10.3. As requires by Applicable Law, the above third parties shall be required to enter into a non-disclosure agreement to process and protect your Personal Information in accordance with our instructions.

11. WHERE WE STORE YOUR PERSONAL INFORMATION

- 11.1. The data that we collect from you may be transferred to, and stored at a destination outside the Republic of South Africa or the European Union. It may also be processed by staff operating outside the Republic of South Africa or the European Union who work for us or for one of our suppliers/service providers. Such staff may be engaged in, among other things, the fulfilment of your order, the Processing of your payment details and the provision of support services. By submitting your Personal Information, you agree to this transfer, storing or Processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Notice and in a manner consistent with Applicable Law.
- 11.2. All information you provide to us is stored on our secure servers. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

12. SECURITY OF YOUR PERSONAL INFORMATION

- 12.1. implement reasonable and appropriate technical and organisational measures to ensure the security, confidentiality and integrity of your Personal Information as required by Applicable Law.
- 12.2. We will, on an on-going basis, continue to review our security controls and related processes to ensure that your Personal Information remains secure.
- 12.3. Our security policies and procedures cover:
 - 12.3.1. Physical security;
 - 12.3.2. Computer and network security;
 - 12.3.3. Access to Personal Information;
 - 12.3.4. Secure communications;
 - 12.3.5. Security in contracting out activities or functions;
 - 12.3.6. Retention and disposal of information;
 - 12.3.7. Acceptable usage of Personal Information;
 - 12.3.8. Governance and regulatory issues;
 - 12.3.9. Monitoring access and usage of private information;
 - 12.3.10. Investigating and reacting to security incidents.
- 12.4. When we contract with third parties, we impose appropriate security, privacy and confidentiality obligations on them to ensure that Personal Information that we remain responsible for, is kept secure. We will ensure that anyone to whom we pass your Personal Information agrees to treat your information with the same level of protection as we are obliged to.
- 12.5. Due to the ever-changing risks associated with the online transmission of data, we cannot guarantee the security of your data transmitted to our Website or Portal and any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to prevent unauthorised access. In the event of a security compromise, we shall inform the affected data subjects and the South African Information Regulator (where applicable) as soon as possible, within the constraints of Applicable Laws.

13. YOUR RIGHTS

- 13.1. **Right to object:** You have the right to object to us using your Personal Information.
- 13.2. **Withdraw consent:** Where we have obtained your consent to process your Personal Information for certain activities, you may withdraw your consent at any time.
- 13.3. **Direct Marketing:** You have the right to ask us, at any time, not to process your Personal Information for direct marketing purposes by any means, whether digital or any other medium. We will always inform you and obtain your express consent (before collecting your data) if we would like to use your data for direct marketing.
- 13.4. **Access to information:** You have a right to see/access your Personal Information that we keep about you. You may instruct us to provide you with any Personal Information we hold about you upon receipt of a written request.
- 13.5. **Deletion or correction of information:** You have the right to request the deletion or correction of your Personal Information that we keep about you. You may request that we delete any Personal Information we hold about you.
- 13.6. The exercise of any of the above rights will be subject to the retention requirements of prevailing legislation and Applicable Law. We may also refuse or limit the exercise of such right in accordance with Applicable Law, including circumstances where such information is necessary for:
 - 13.6.1. The exercising of the right to freedom of expression and information;
 - 13.6.2. Compliance with a legal obligation or performance of a task carried out in the public interest;
 - 13.6.3. The establishment of, exercise of, or defense against legal claims.
- 13.7. Any objection to Processing or withdrawal of consent to Processing may affect our ability to provide you with our products and/or services or our ability to conduct business with you.
- 13.8. In order to exercise your rights or should you feel that your Personal Information has been violated, please send an email to our information office at **privacy@laeveld.co.za**.
- 13.9. Where requests are found to be repetitive in nature, manifestly unfounded or excessive, we may refuse an access request. If a request is refused we will inform you of the decision and provide reasons for the refusal.
- 13.10. You also have the right to lodge a complaint to the Information Regulator of South Africa at the following address:

Website: <https://inforegulator.org.za/complaints/>

Email: POPIAComplaints@inforegulator.org.za.

Postal Address P.O Box 31533, Braamfontein, Johannesburg, 2017

Physical Address JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001.

14. CHANGES TO THIS PRIVACY NOTICE

- 14.1. LAC reserves the right to revise or supplement this Privacy Notice from time to time to reflect, amongst others, any changes in our business or the law.
- 14.2. Any updates or changes will be published on our Website and be available at our offices.
- 14.3. Any revised version of the Privacy Notice will be effective as of the date of posting on the Website.