



SOUTH AFRICAN SUGAR ASSOCIATION
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SASA'S PRIVACY POLICY RELATING TO THE USE OF SASA WEBSITES AND SASA MOBILE APPLICATIONS (POLICY)

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1. Introduction

SASA respects the constitutional right to privacy therefore it takes your privacy seriously by ensuring that Personal Information is handled in accordance with this Policy and is in compliance with the Protection of Personal of Personal Information No.4 of 2013 (POPIA). This policy sets out which information is collected about you on the SASA Platforms, how that information is used by SASA, how it is protected and how long Your Personal Information is stored.

Please read this policy carefully before submitting any Personal Information to SASA.

2. Definitions

For the purposes of this Privacy Policy:

- **Account** means a unique account created for You to access our Platforms or parts of our Platforms.
- **SASA** (referred to as either "We", "Us" or "Our" in this Privacy Policy) refers to the South African Sugar Association, and its subsidiaries, 170 Flanders Drive, Mount Edgecombe, Durban, KwaZulu – Natal, 4300.
- **Child** means a natural person under the age 18 years who is not legally competent, without the assistance of a competent person, to take any action or decision in respect of any matter concerning him-or herself.
- **Competent person** means any person who is legally competent to consent to any action or decision being taken in respect of any matter concerning a child.
- **Consent** means any voluntary, specific and informed expression of will in terms of which permission is given for the processing of personal information.
- **Cookies** are small files that are placed on Your computer, mobile device or any other device by a website, containing the details of Your browsing history on that website among its many uses.
- **Device** means any device that can access our Platforms such as a computer, a cellphone or a digital tablet.
- **Information Officer** means the head of a private body as contemplated in section 1, of the Promotion of Access to Information Act
- **Information Regulator** means the Information Regulator established in terms of section 39.
- **Personal Information** means any information that relates to an identified or identifiable individual.

- **Platform/s** refers to the SASA websites, SASA Grower Website, STC Website and SASA mobile and web-based applications.
- **Service Provider** means any natural or legal person who processes the data on behalf of SASA. It refers to third-party companies or individuals employed by SASA to facilitate the Platforms, to perform services related to the Platforms or to assist SASA in analysing how the Platforms are used.
- **Usage Data** refers to data collected automatically, either generated by the use of the Platforms or from the Platform infrastructure itself (for example, the duration of a page visit).
- **You/Your** means the individual or other legal entity (or on behalf of which such individual is accessing or using the Platform, as applicable) accessing or using the Platforms.

3. What is Personal Information

Personal Information, when used in this Policy, means information that can identify You as an individual or is capable of identifying You. By Personal Information, we don't mean general, statistical, aggregated or anonymised information. This information includes:

- Your gender as may be required for statistical purposes or by law;
- Your marital status, nationality or social origin;
- Your age, physical or mental health and well-being, disability, religion, conscience, belief, culture, and language;
- Your education or any medical conditions;
- Your financial information (like your income and expenses, loan repayments, investments, assets or Your financial needs);
- any identifying number, symbol (like account, identity or passport numbers);
- Your email address, physical address or telephone number (as this may be needed for us to communicate with You);
- Your location and online identifiers [this can be Internet Protocol (IP) addresses or geolocations]
- Your employment history (this is specifically relevant when you apply for credit);
- biometric information (eg fingerprints, and facial or voice recognition); and
- Your personal opinions or views
- Cane Deliveries

4. Consent

It must be noted that by submitting any Personal Information on SASA platforms, You provide Consent to the processing of Your Personal Information as set out in this policy.

5. What Personal Information is collected and how we collect it

We collect your Personal Information in the following ways:

(a) Collected directly from You:

The Personal Information is collected directly from You when You enter or send Us Your Personal Information to create an account and login to any of the Platforms or when You enter Your Personal Information on the contact page of any of the Platforms.

The Personal Information that is collected from You includes:

- Contact Details such as Your name, email address, contact number;
- Account login credentials, such as usernames and passwords, password hints and similar security information; and
- Comments, feedback, and other information You provide to us including search query data and questions or information You send to SASA

(b) Collected from using Our Platforms

We may also collect information that Your browser sends whenever You visit any of the Platforms. When using the Platforms, Personal Information may be collected automatically about how You and Your device interact with the SASA Platforms, including:

- *Usage Data*

Usage Data may include information such as Your Device's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of the Platforms that You visit, the time and date of Your visit, the time spent on those pages, unique device identifiers and other diagnostic data. When You access the Platforms by or through a mobile device, We may collect certain information automatically, including, but not limited to, the type of mobile device You use, Your mobile device unique ID, the IP address of Your mobile device, Your mobile operating system, the type of mobile Internet browser You use, unique device identifiers and other diagnostic data.

- *Tracking Technologies and Cookies*

We use Cookies and similar tracking technologies to collect and track information such as activity on Our Platforms, to improve and analyse and store certain information. The technologies We use may include:

Cookies or Browser Cookies. A cookie is a small file placed on Your Device. You can instruct Your browser to refuse all Cookies or to indicate when a Cookie is being sent. However, if You do not accept Cookies, You may not be able to use some parts of Our Platforms. Unless You have adjusted Your browser setting so that it will refuse Cookies, Our Platforms may use Cookies.

6. How do we use Your Personal Information

SASA may use Your Personal Information for the following purposes:

- For Legislative and business requirements;
- To provide and maintain the SASA Platforms, including to monitor the usage of the Platforms.

- To manage Your account: to manage Your registration as a user of Our Platforms. The Personal Data You provide can give You access to different functionalities on the Platforms that are available to You as a registered user.
- To prevent and detect criminal activity, fraud and misuse of or damage to Our Platforms or networks and to prosecute those responsible.
- To contact You: To contact You by email, telephone calls, SMS, or other equivalent forms of electronic communication, such as a mobile application's push notifications regarding updates or informative communications related to the functionalities, products or contracted services, including the security updates, when necessary or reasonable for their implementation.
- To provide You with news and general information about other goods, services and events which we offer that are similar to those that you have already purchased or enquired about unless You have opted not to receive such information.
- To manage Your requests: To attend and manage Your requests to Us.
- For other purposes: We may use Your information for other purposes, such as data analysis, identifying usage trends and to evaluate and improve our Platforms, products, services, marketing and your experience.

7. When may We share information with third parties

We may share Your Personal Information with third parties in the following situations:

- **With Service Providers:** We may share Your Personal Information with SASA's Service Providers to monitor and analyse the use of Our Platforms, to contact You.
- **With Affiliates:** We may share Your Personal Information with Our affiliates, in which case We will require those affiliates to honor this Policy. Affiliates include SASA's subsidiaries other companies that We control or that are under common control with Us.
- **Law Enforcement:** Under certain circumstances, SASA may be required to disclose Your Personal Information if required to do so by law or in response to valid requests by public authorities (e.g. a court, fraud detection agencies).
- **With Your consent:** We may disclose Your Personal Information for any other purpose, only with Your Consent.

8. Retention of Your Personal Information

SASA will retain Your Personal Information only for as long as it is necessary for the purposes set out in the ***Policy on retention, storage, deletion and destruction***, as well as in terms of this policy.

We will retain and use Your Personal Information to the extent necessary to comply with Our legal obligations (for example, if we are required to retain Your data to comply with applicable laws), resolve disputes, and enforce Our legal agreements and policies. We may keep Your Personal Information for longer than required if You have agreed to this or We are lawfully allowed to do so.

SASA will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the

security or to improve the functionality of SASA Platforms, or We are legally obligated to retain this data for longer time periods.

If We need to keep Your Personal Information for longer than required, and more specifically for historical, statistical or research purposes, We will do so with the appropriate safeguards in place to prevent the records from being used for any other purpose.

Your Personal Information may be kept for varying periods from the end of Our relationship, depending on regulatory requirements. We will take all reasonable steps to destroy or de-identify the personal information that we hold when it is no longer required.

9. Security

We take steps to protect Your Personal Information from unauthorised access and against unlawful processing, accidental loss, destruction and damage. We implement technical and organisational measures to seek to ensure a level of security appropriate to the risk to the Personal Information We process. These measures are aimed at ensuring the integrity, confidentiality, and availability of Personal Information.

Where You have chosen a password which allows You to access certain parts of the SASA Platforms, You are responsible for keeping this password confidential. We advise you not to share Your password with anyone. Unfortunately, the transmission of Personal Information via the internet is not completely secure and no method of transmission over the internet, or method of electronic storage, is 100% secure. Therefore, although we will take steps to protect Your Personal Information, we cannot guarantee the absolute security of Your Personal Information. Should there be a data breach, You will be notified of the data compromise using the contact details that You have provided.

10. Children's Privacy

We will only process Personal Information of a Child with the Consent of a Competent Person. We do not knowingly collect personally identifiable information from anyone under the age of 18. If You are a parent or guardian and You are aware that Your child has provided Us with Personal Information, please contact Us. If We become aware that We have collected Personal Information from anyone under the age of 18 without verification of parental consent, We will take steps to remove that information from Our servers.

11. Links to other websites

SASA Platforms may contain links to other websites that are not operated by SASA. If You click on a third- party link, You will be directed to that third party's site. We strongly advise You to review the Privacy Policy of every site You visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third- party sites or services.

12. Privacy Preferences

If You would like us to stop Processing Your Information for marketing purposes, please use the “opt out” mechanisms such as "unsubscribe" or other means provided within the communications that You receive, or by contacting SASA’s Information Officer at the email address set out below.

13. Your Responsibilities

To ensure that We always have the most updated information, please ensure that Your details remain updated at all times.

14. Your Rights

You have the right to:

- Contact SASA to find out which Personal information We hold
- Request SASA to correct, delete or destroy Your Personal Information
- Withdraw Your Consent for any direct marketing in which you had previously consented to receiving

These rights can be exercised in terms of the ***Policy on the Lawful Processing of Personal Information*** and the ***Manual in terms of the Promotion of Access to Information***.

15. Changes to this Policy

We may update this Policy from time to time. We will notify You of any changes by posting the new policy on Our website.

You are advised to review this Policy periodically for any changes. Changes to this Policy are effective when they are posted on this page.

16. Contact Us

If You have any questions about this Policy, You can contact SASA’s Information Officer- Ezra Pillay by e-mail to informationofficer@sasa.org.za.

17. How to lodge complaint with the Information Regulator

The Information Regulator is tasked with the enforcement of POPIA in South Africa. Should You have a complaint relating to SASA Processing Your Personal Information, You can lodge a complaint with the Information regulator on POPIAComplaints@inforegulator.org.za

18. Authorisation

This Policy Document was approved by the Executive Committee of SASA on [insert date] and signed by the Executive Director on behalf of the committee.

| Name | Date | Signature |
|------|------|-----------|
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19. Review

This Policy Document is to be reviewed yearly.

| Version | Date of Approval |
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