





UCL COMPANY (PTY) LTD

Protection of Personal Information Policy

COMPANY GUIDELINES

—

ALL OPERATING DIVISIONS

Approved by: CHIEF EXECUTIVE OFFICER  Date: 04-08-2021	REVIEW DATE : 01/08/2021	POLICY NO : UCL/02/40/01
Verified by: Company Secretary  Date: 04-08-2021	REV No. : 1	EFFECTIVE DATE : Date of signature of CEO
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1. INTRODUCTION

- 1.1 UCL Company (Pty) Ltd (“UCL”), is a company, situated in Dalton, KwaZulu-Natal, specialising in the manufacture of wattle tannin extracts, sugar and pine lumber, and is required to comply with the Protection of Personal Information Act, No. 4 of 2013, as amended (“POPI Act”).
- 1.2 The POPI Act necessitates UCL to fully disclose and inform its debtors, employees and growers (hereinafter collectively referred to as “**contracting parties**”), of the manner in which their personal information is collected, utilised, stored and destroyed.
- 1.3 The objective of this policy is to clearly set out and inform all contracting parties of the manner in which their personal information is collected, processed and stored.
- 1.4 UCL reserves the right to amend this policy from time to time and undertakes to make the latest revised version available for inspection by its contracting parties at all times. The latest version of this policy shall be the applicable version and shall supersede all previous versions thereof, unless indicated otherwise.

2. COLLECTION OF PERSONAL INFORMATION

- 2.1 UCL collects and processes personal information from its contracting parties in order to comply with requirements as set out in the Compensation for Occupational Injuries and Diseases Act, No 61 of 1997, Occupational Health and Safety Act 85 of 1993 as amended, Unemployment Insurance Act No. 63 of 2001, Basic Conditions of Employment Act no. 75 of 1997, as amended, National Credit Act No. 34 of 2005 and for general record purposes and for Union Membership queries.
- 2.2 The contracting parties will at all times be informed of the information they are required to provide and will, on inquiry, be informed for what specific reasons they are required to provide such information for purposes of transparency and full disclosure.
- 2.3 The contracting parties who are private persons can be expected to provide the following personal information:
 - 2.3.1 Full names and surname;
 - 2.3.2 Identity number;
 - 2.3.3 Physical Home address;
 - 2.3.4 Postal addresses;
 - 2.3.5 Details of employment;
 - 2.3.6 Home, work and cell phone contact numbers; and
 - 2.3.7 Email address.

- 2.4 The contracting parties who are juristic persons can be expected to provide the following information:
- 2.4.1 Full registered name;
 - 2.4.2 Trading name (if any);
 - 2.4.3 Registration Number;
 - 2.4.4 VAT Registration Number;
 - 2.4.5 Postal Address;
 - 2.4.6 Street Address;
 - 2.4.7 Telephone and Cell phone contact numbers;
 - 2.4.8 Email address;
 - 2.4.9 Type of Juristic person;
 - 2.4.10 Name, Address and contact numbers of the Partners or directors or like;
 - 2.4.11 Accountants or Auditors contact details; and
 - 2.4.12 Registered office of their Auditors.
- 2.5 In addition, UCL's employees may be required to provide UCL with information regarding their family background, health, previous employment and their education history and any other information which UCL believes to be reasonably necessary in order for them to employ their employees and provide them with a safe working environment.
- 2.6 The debtors and raw material suppliers can expect to have questions posed regarding their asset value, annual turnover, location, landlord details, mortgage loans, book debts and debtors, customers, service providers, cessions, security and the financial status of their owners, directors, members or the like. These questions may be necessary to ensure UCL does not place itself at risk by contracting with the individuals.
- 2.7 The majority of the personal information collected is recorded by means of a hard copy form which the contracting party may be requested to fill out.
- 2.8 Any supporting documents containing personal information will be safely stored, together with the personal information form, in the contracting party's file, which file will be stored by UCL.
- 2.9 UCL does not sell or collect personal information for any marketing purposes.
- 2.10 UCL does not, nor will it ever, distribute any personal information to third parties without obtaining the necessary consent from the respective contracting party unless such

personal information is already regarded as public information, or UCL is required to do so by law.

3. UTILISATION AND DISCLOSURE OF PERSONAL INFORMATION

3.1 UCL guarantees that all personal information collected by it will only be used for the purpose in relation to which it was collected and agreed upon by the parties.

3.2 The purpose of collecting the contracting parties' personal information will vary, subject to the cause of the relationship between the contracting party and UCL. The information shall, however, generally only be used to ensure that UCL is in a position to contract with them, to be in a position to contact a next of kin or any related person in the event of an emergency and to comply with specific legislative and regulatory requirements in law. UCL confirms that such personal information shall at all times be requested for a specific and lawful purpose which can be defined, should the contracting party require them to do so.

3.3 The POPI Act, under chapter 3, specifically states under what conditions personal information may be processed. UCL confirms the following conditions:

3.3.1 Contracting parties consent

3.3.1.1 All contracting parties will be requested to consent to UCL obtaining their personal information. UCL does not foresee a scenario under which it will contract with minors but undertakes to ensure that the relevant consent from such minor's Guardians is obtained should such a situation arise.

3.3.1 Necessity of processing

3.3.1.1 To place UCL in a suitable position to employ persons, sub contract to other parties and run a profitable wattle, sugar and pine business, which may include but is not limited to passing on information to third parties.

3.3.1.2 UCL confirms that all processing of personal information is necessary for UCL to perform its duties and conclude the contracts entered into with the contracting parties.

3.3.1.3 UCL does not utilise a third party for storage facilities or processing of personal information, should this change and a third party be contracted to store or process the personal information collected by UCL, UCL undertakes to inform all contracting parties thereof.

3.3.1.4 UCL may be required to disclose its employees' personal information to a third party for Union Membership, Unemployment Insurance claims or Compensation claims in terms of the Compensation for Occupation Injuries and Diseases Act. In order to ensure compliance with the relevant confidentiality and privacy conditions, such disclosure shall only occur if UCL is called upon to provide the

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information and UCL shall not volunteer such information unless they are satisfied that good grounds have been shown for why the information is needed.

- 3.3.1.5 UCL may be required to disclose contracting parties' personal information to a third party such as an Agricultural Union or a company whose business is linked to that of UCL and where they require the personal information to perform their duties and conclude the contracts entered into with them.
- 3.3.1.6 UCL undertakes to ensure that all third parties privy to a contracting party's personal information will be instructed to keep such information confidential and shall have POPI Act policies in place indicating the manner in which they will abide by the POPI Act.
- 3.3.1.7 Any disclosure of personal information to third parties is only affected once the relevant contracting parties' consent has been obtained in writing.
- 3.3.1.8 UCL reserves the right to disclose personal information in terms of law where it is necessary to protect its rights.

4. STORAGE AND SAFEGUARDING OF PERSONAL INFORMATION

- 4.1 The POPI Act requires UCL to effectively protect and process personal information in its possession and further to prevent unauthorised access and use of such personal information. UCL continuously undertakes to evaluate and review its security measures and processes to adequately protect all stored personal information.
- 4.2 UCL currently has the following systems in place in order to ensure that a contracting parties personal information is securely stored and held:
 - 4.2.1 Most personal information collected from a contracting party is done in hard copy by requesting the contracting party to fill out a form;
 - 4.2.2 The personal information is thereafter captured on the company computers with the help of Syspro and Microsoft Excel. The company computer systems are password protected, have antivirus and malware protection as well as a network firewall which are updated on a regular basis;
 - 4.2.3 The form is thereafter filed in a file, and all files are securely locked in a secure records cabinet in the company strong room or in the companies Fire Protected safes;
 - 4.2.4 Only a limited number of employees have access to the safe and as a result access to the personal information stored there;
 - 4.2.5 Access to the personal information is also restricted to a fixed list of UCL employees;
 - 4.2.6 UCL stores all personal information for the duration of the contract or employment with the relevant contracting party. Once the contract or employment agreement has

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ceased UCL destroys all personal information held; and

- 4.2.7 Where required in terms of law to keep personal information after the finalisation of a contract, UCL keeps the documentation for the time period specified in terms of the applicable law.

5. CONTRACTING PARTIES ACCESS, VERIFICATION AND CORRECTION OF PERSONAL INFORMATION

- 5.1 In terms of the POPI Act, contracting parties have the right at all reasonable times to access their personal information which is held by UCL. UCL undertakes to provide the contracting parties with all personal information should they be called to do so, unless they are required to retain portions of the personal information in terms of law, in which instance a copy of all retained personal information shall be made available to the contracting party.
- 5.2 Contracting parties are at all times encouraged to ensure that their personal information is up to date and UCL may request a verification, update, amendment or deletion of their personal information provided such verification, update, amendment or deletion can be justified.
- 5.3 Contracting parties have a right at any time to object to the processing of their personal information. In the event of a contracting party objecting to the processing of their personal information UCL reserves the right to terminate any contract entered into between themselves and the contracting party where the processing of such personal information would be necessary for the finalisation or continuation of the contract.
- 5.4 UCL records that it reserves the right to verify all personal information provided by requesting supporting documents, CIPC searches and/ or credit checks.

6. CONTACT DETAILS

- 6.1 Contracting Parties can at all reasonable times contact UCL using the following details:

Name:	Zama Sibuyi
Telephone Number:	033-501-1600
Physical Address:	16 Noodsberg Road Dalton 3236
Postal Address:	P.O. Box 1 Dalton 3236
e-mail Address:	sibuyiz@ucl.co.za