



KLEIN KAROO GROUP

*(GROUP OF COMPANIES INCORPORATED IN THE REPUBLIC OF SOUTH AFRICA)
HEREINAFTER REFERRED TO AS 'KLEIN KAROO GROUP'*

PRIVACY POLICY

LAST UPDATED
JULY 2021

READ THIS POLICY CAREFULLY BEFORE COMMUNICATING WITH THE KLEIN KAROO GROUP, BROWSING ITS WEBSITES & OTHER ELECTRONIC PLATFORMS OR USING ANY OF THE SERVICES OFFERED BY THE KLEIN KAROO GROUP. YOUR CONTINUED COMMUNICATION WITH THE KLEIN KAROO GROUP OR THE USE OF ITS WEBSITES AND PLATFORMS INDICATE THAT YOU HAVE BOTH READ AND CONSENT TO THE TERMS OF THIS POLICY. DO NOT COMMUNICATE WITH THE KLEIN KAROO GROUP OR USE ITS WEBSITES OR ELECTRONIC PLATFORMS IF YOU DO NOT ACCEPT THESE TERMS. ALL SECTIONS OF THIS POLICY ARE APPLICABLE TO ANYONE WHO COMMUNICATE WITH KLEIN KAROO GROUP, UNLESS A PARTICULAR SECTION EXPRESSLY STATES OTHERWISE.

1. PREAMBLE

This is the privacy policy for the Klein Karoo Group (KKG) and applies to all entities in the group as listed in Schedule 1. It further applies to the use of all our Websites and other Electronic Platforms, including mobile sites, mobile applications, emails or any other technology or services you use to access our Services and Products.

KKG subscribes to the principles for processing personal information contained in POPIA and the auxiliary legislation referred to therein. We endeavour to ensure the quality, accuracy, security and confidentiality of Personal Information in our possession.

2. INTERPRETATION AND DEFINITIONS

Interpretation

“We”, “us” or “our” in this privacy policy refers to the Klein Karoo Group as set out in Schedule 1.

The words of which the initial letter is capitalized have meanings as defined below. The following definitions shall have the same meaning regardless of whether they appear in singular or in plural.

Definitions

For the purposes of this Privacy Policy:

Account	if applicable, means a unique account created for You to access our Services and Products or any part or aspect thereof;
Company	Klein Karoo Group (also referred to as “KKG” herein), as set out in Schedule 1, from 145 Park Road Oudtshoorn, Western Cape, 6625 that may be contacted as set out in Section 3;
Cookies	are small files that are placed on your computer, mobile device or any other device used to access our Websites or other Electronic Platforms, containing the details of your browsing history on that particular Website or Electronic Platforms;
Country	refers to the Republic of South Africa;

Device	means a device that is used to access our Services or Products through our Websites or other Electronic Platforms or that is used to communicate with us, such as a computer, a cell phone or a digital tablet;
Personal Information	is any information that relates to an identified or identifiable living individual or existing juristic person, as further defined in POPIA. This includes information about You that is personally identifiable like the a name, address, date of birth, age, gender, email address, company name, company registration number, contact details, phone number(s) and other unique information such as service preferences and contact preferences that are not otherwise publicly available;
POPIA	refers to the Protection of Personal Information Act, No. 4 of 2013, as may be amended from time to time;
Services & Products	refers to the services and products advertised and displayed on our Websites and other Electronic Platforms;
Service Provider	means any natural or juristic person who processes data on behalf of KKG. It refers to third-party operators, companies or individuals employed or contracted by KKG to facilitate the delivery of Service and Products to and on behalf of KKG, who provide services related to the Services and Products or to assist KKG in analysing data relating to the Services and Products and the use of our Websites and other Electronic Platforms to access it;
Third-party Social Media Service	refers to any website or other electronic social network through which You can log in or create an account to use our Websites and other Electronic Platforms;
Usage Data	refers to data collected automatically, either generated by the use of our Websites and other Electronic Platforms or from your application of our Services or Products itself (for example, the duration of a page visit, IP addresses, unique device identifiers and other diagnostics data and location information).
Website	refers to the website/s of KKG



You/Your means the individual, company, or other legal entity on behalf of which such individual, as applicable, is accessing or using the KKG Websites, Electronic Platforms, Services and Products.

3. INTRODUCTION

This Policy explains the procedures and governing principles on how we process your Personal Information with regards to the collection, receipt, usage and disclosure, electronically and manually, when using our Websites and other Electronic Platforms or accessing our Services and Products. In adopting this Privacy Policy, we wish to balance our legitimate business interests and your reasonable expectation of privacy.

Although absolute security cannot be guaranteed, KKG implemented, reasonable technical, administrative and operational security measures to protect your Personal Information against accidental or intentional manipulation, loss, misuse, destruction or unauthorised access to or disclosure of the information we process.

We will comply with POPIA when processing your Personal Information and will continue to maintain and improve security measures consistent with legal and technological developments.

In some circumstances we operates as a “responsible party”, with regards to the processing of your Personal Information (as defined in POPIA) and are therefore responsible for the legal processing of your Personal Information. In other circumstances we operates as an “operator”, with regards to the processing of your Personal Information on behalf of a third-party responsible party (as defined in POPIA) and in such circumstances the privacy policy and terms of use of such third-party shall apply.

We use your Personal Information to improve KKG and its service delivery. By using our Websites, Electronic Platforms, Services and Products, You agree to the collection and use of Personal Information in accordance with this Privacy Policy.

By agreeing to the terms contained in this Privacy Policy, You consent to the use of your Personal Information in relation to:

- Our Websites, Electronic Platforms, Services and Products;
- Informing You of changes made to our Websites, Electronic Platforms, Services and Products;

- Responding to any queries or requests You may have;
- Developing a more direct and substantial relationship with You for the purposes described in this clause;
- Developing an online user profile;
- For security, administrative and legal purposes;
- For direct marketing with the option *'to opt out'*.

Your information will not be stored for longer than is necessary for the purposes described herein or as required by applicable legislation.

If you are under the age of 18 years, you must always get consent from your parent or guardian before you use or access our Websites, Electronic Platforms, Services and Products, since you are not legally able to consent to this Privacy Policy without your parent's or guardian's consent. Please note that we may check whether your parent or guardian has given permission to use or access our Websites, Electronic Platforms, Services and Products and consequently sharing your Personal Information.

Please contact the Information Officer referred to below regarding your Personal Information that is processed by KKG.

You have the right to lay a complaint at any time with the Information Regulator of South Africa. The Company would, however, appreciate the chance to deal with your concerns before You approach the Information Regulator's Office, accordingly, please contact the Company in the first instance to assist You.

If you are dissatisfied with our resolution of your complaint, you have the right to refer it to the Information Regulator, the supervisory authority for protection of personal information in South Africa.

General enquiries email: [**inforeq@justice.gov.za**](mailto:inforeq@justice.gov.za)

Complaints email: [**complaints.IR@justice.gov.za**](mailto:complaints.IR@justice.gov.za)

To view the Company's Promotion of Access to Information Act (PAIA) manual, visit our website for the link.

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The contact details of KKG's head Information Officer are as follow:

Josephine Oosthuizen

Telephone Number: +27 44 203 5151

Fax Number: +27 44 203 5231

Physical Address:

145 Park road
Oudtshoorn
6625

Postal Address:

PO Box 241
Oudtshoorn
6620

E-mail:

joosthuizen@kleinkaroo.com

Website Address:

www.kleinkaroo.com

4. PERSONAL INFORMATION WE COLLECT FROM YOU

Should you decide to register with or function as a user on our Websites or other Electronic Platforms, engage with KKG and/or use any of the KKG's Services or Products, You thereby expressly consent to, and opt-in to KKG collecting, collating, processing, and using the following types of Personal Information about You. We only collect and use the minimum Personal Information we need in order to provide and improve Tour experience of our Websites, Electronic Platforms, Services and Products.

Personal Information may include, but is not limited to:

- Email and/or physical address
- First name and Last name
- Fixed line or Mobile phone numbers
- Usage Data

4.1. Information provided by You or from a responsible party authorised by You:

KKG processes Personal Information which we either processes as responsible party, or which is received from another responsible party to whom You have provided your Personal Information with your consent that it may be shared with us as the Operator.

We collect your Personal Information through direct interactions with You and when You:

- submit an enquiry form and/or contact KKG or request that we contact You;
- When You engage or interact with KKG, for example through social media, e-mails, letters and phone calls;
- When You visit or browse our Websites;
- When You as a Service Provider, conclude a contract with us to provide services to KKG;
- When You complete any of KKG's documents, including our client forms, standard terms and conditions, surveys, promotional competitions or employment contracts, sign up for an account or subscribe or register to access or use any of our Websites, Electronic Platforms, Services and Products;
- When You make use or purchase any of KKG's various Services or Products.

If it is legally required KKG will obtain your consent before collecting your Personal Information for the purposes of conducting its business or delivering of the Services or Products.

The third parties from whom we may collect your Personal Information include, but are not limited to, the following:

- Affiliated companies, subsidiaries and/or appointed third parties (such as authorised agents, partners, contractors and suppliers) of KKG, for any of the purposes identified in this Privacy Policy;
- Your spouse, dependants, partners, employer, joint applicant or account holder and other similar sources;
- Individuals You have authorised, to share your Personal Information;
- Attorneys, tracing agents, debt collectors, other persons that assist with the enforcement of agreements and credit.

4.2. Information that is collected automatically:

KKG receives and stores information which is transmitted automatically from your Device when You browse the internet and access our Websites or other electronic Platforms. This information includes Usage Data (that is collected automatically), information from cookies (which are described in clause 9 below), browser type, operating system used by You, type of mobile device You use, your mobile device unique ID, embedded web links, and other commonly used information-gathering tools, unique device identifiers and other diagnostic data. These tools collect certain standard information that your browser sends to websites such as your browser type and language, access times, and

the address from which You arrived at the websites.

4.3. Information from Third-Party Social Media Services:

KKG may allow You to create an account and log in to access our Services and Products through the following third-party Social Media Services:

- Google
- Facebook
- Twitter
- Instagram

If You decide to register through or otherwise grant KKG access to a Third-Party Social Media Service, we may collect Personal Information that is already associated with your Third-Party Social Media Service's account, such as your name, your email address, your activities or your contact list associated with that account.

You may also have the option of sharing additional information with us through your Third-Party Social Media Service's account. If You choose to provide such Personal Information, during registration or otherwise, You are giving us permission to use, share, and store it in a manner consistent with this Privacy Policy.

Should your Personal Information change, please update it by providing us with updates of your Personal Information as soon as reasonably possible to enable us to update it. KKG is under no obligation to ensure that your Personal Information or other information supplied by You is correct.

You warrant that the Personal Information disclosed to KKG is directly from You as the user on the Website or Electronic Platform or in connection to the Services or Products, and all such Personal Information is lawfully yours to provide. You also warrant that any Personal Information provided to KKG from a third-party responsible party, was attained from You lawfully and provided to the Company with your express consent to the relevant responsible party to do so.

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5. WHEN DO WE COLLECT YOUR PERSONAL INFORMATION

KKG will only process your Personal Information for lawful purposes relating to our business if:

- You have consented thereto;
- A person legally authorised by You, the law or a court, has consented thereto;
- It is necessary to conclude or perform under a contract KKG has with You;
- If KKG is legally required or permitted to;
- It is required to protect or pursue your, our or a third party's legitimate interest; and/or
- You are a child, and a competent person (such as a parent or guardian) has consented thereto on your behalf.

6. HOW WE USE YOUR PERSONAL INFORMATION

Any processing of your Personal Information will be for KKG's legitimate business purposes and as a necessary function of your engagement with us. You have expressly consented to this by using the Websites, Electronic Platforms, Services or Products of KKG. KKG will not, without your express consent:

6.1. use your Personal Information for any purpose other than as set out below:

- 6.1.1. in relation to the provision and monitoring of the Services and Products to You and/or access to the Websites and Electronic Platforms of KKG, including, but not limited to, opening, managing and maintaining your accounts, contacts, agreements or relationship with us;
- 6.1.2. For security and identity verification, and to check the accuracy of your Personal Information;
- 6.1.3. to fulfil a contract with You, which includes the delivery of orders for Services and Products;
- 6.1.4. to contact You through any form of electronic or other communication as may be requested by You;
- 6.1.5. for internal record keeping of responsible third parties and the development of metrics of third-party searches;

- 6.1.6. to contact You with news, special offers and general information about other goods, services, events and functionalities which we offer that are similar to those that you have already purchased or enquired about (unless You have opted out from receiving marketing material from us);
 - 6.1.7. to conduct affordability assessments, credit assessments and credit scoring (where applicable) and to develop credit models and credit tools; and/or
 - 6.1.8. to improve the Websites and Electronic Platforms of KKG by, for example, monitoring your browsing habits, or tracking your activities on the Websites and Electronic Platforms; or
 - 6.1.9. for other purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our Services and Products, marketing and your experience; or
 - 6.1.10. Comply with any legal or regulatory obligations such as criminal investigation purposes, tax or financial laws.
- 6.2.** disclose your Personal Information to any third party other than set out below:
- 6.2.1. to the employees of KKG and/or Service Providers who assist us to interact with You via our Websites and Electronic Platforms, email or any other method, for your use of the Services and Products, and thus need to know your Personal Information in order to assist us to communicate with You in a proper and efficient way;
 - 6.2.2. to external responsible parties who already have your express consent to process and/or attain such Personal Information from and/or with us;
 - 6.2.3. to the professional service providers of KKG (such as the insurers or lawyers of KKG where we believe that it is required under the contractual relationship with the Company's service provider to do so);
 - 6.2.4. to law enforcement authorities, government officials, fraud detection agencies, regulatory authorities, local and/or international tax authorities, credit bureaux, trustees, executors or curators appointed by a court of law or other third parties when KKG believe that it is legally required to do so or when the company believe in good faith that the disclosure of the Personal Information is necessary to prevent physical harm or financial loss, to report or support the investigation into suspected illegal activity or the contravention of an applicable law or to investigate violations of this Privacy Policy;

- 6.2.5. to the Service Providers of KKG (under contract with us) who help with parts of our business operations (fraud prevention, marketing, technology services etc). However, KKG's contracts dictate that these Service Providers may only use your information in connection with the services they perform for us, not for their own benefit and under the same standards we operate; and
- 6.2.6. Other parties that provide content, advertising services or functionality on our Websites and Electronic Platforms. These third parties include i) advertising service providers which help us and our advertising customers provide advertisements that are tailored to users' interests, ii) audience-measurement companies which help us measure the overall usage of our Websites and Electronic Platforms and compare that usage with other online services, and iii) social networking services such as Facebook, Twitter, LinkedIn and Instagram that you may select to use to register for and log into some of our services and share things you find on our Websites and Electronic Platforms with your social network. We do not control the privacy practices of these or any other third party services and recommend you read the privacy policies of these services before connecting to them. These third parties may collect or receive information about your use of our Websites and Electronic Platforms, including through the use of cookies, web beacons and other technologies, and this information may be collected over time and combined with information collected on various websites and online services.

We also share our research and statistical information with various third parties. However, this information does not include your personal information, cannot be linked to you and you cannot be identified from these statistics.

We will not use your Personal Information for any other purpose without your permission.

We keep your information for as long as we need it to provide our Websites and Electronic Platforms, Services or Products to you, and are required or allowed by law or the contract between you and us, or you have agreed to us keeping your information.

7. YOUR RIGHTS

- 7.1 You have the right to ask us not to contact you for marketing purposes. Use any of the various "opt out" options that will be provided when we send you marketing communications, alternatively you may contact the Information Officer.

- 7.2 You also have the right to request access to the information we have collected about you and request that we correct or update any incorrect or incomplete information or delete your information (where there is no good reason for us to continue to process it). Such request can be submitted by using the data subject access request form found **HERE**. For any personal information held by any third-party responsible party, You must approach that responsible party for the realisation of your personal information rights with them, and not with KKG.

8. LINKS TO OTHER WEBSITES & SHARING YOUR INFORMATION

- 8.1 Our Websites and Electronic Platforms may contain links to other websites, mobile applications and/or services of third parties that are not operated by us. 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, since the connection will enable such third party to collect and share information about you.

KKG have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services and have not evaluated these parties and their practices.

- 8.2 Your privacy is important to us. We will never sell, exchange, share or rent your Personal Information to any unauthorized third party without your permission, other than within the scope of this privacy policy.

If at any stage, after you have given us your consent, you no longer wish us to use or share your personal information with an affiliate party; you may at any stage withdraw your consent. By choosing to withdraw your consent with affiliated third parties there may be an impact on our offering to you, and it will be explained to you on your request to withdraw your consent.

9. COOKIES PROVISIONS

- 9.1 The Websites and Electronic Platforms of KKG may use of “**cookies**” to automatically collect information and data through the standard operation of the internet servers. Cookies are small text files a website can use (and which we may use) to recognise repeat users, facilitate the user’s on-going access to and use of a website and allow a website to track usage behaviour and compile aggregate data that will allow the website

operator to improve the functionality of the website and its content, and to display more focused advertising to a user by way of third party tools.

- 9.2 The type of information collected by cookies is not used to personally identify you. If you do not want information collected through the use of cookies, there is a simple procedure in most browsers that allows you to deny or accept the cookie feature. Please note that cookies may be necessary to provide you with certain features available on our website, and thus if you disable the cookies on your browser you may not be able to use those features, and your access to our website will therefore be limited. If you do not disable “**cookies**”, you are deemed to consent to our use of any personal information collected using those cookies, subject to the provisions of this Privacy Policy.
- 9.3 For more information on the exact cookies and technical data used, please contact the Information Officer who will gladly provide a full technical breakdown of same cookies and technical data.

10. CHANGES TO THIS PRIVACY POLICY

This version of the Privacy Policy was last updates on 1 July 2021 and replaces any preceding privacy policies.

We reserve the right, in our sole discretion to amend (including without limitation, by the addition of new terms and conditions) this Privacy Policy from time to time.

You are advised to review the Privacy Policy whenever you visit or use our platforms for any such amendments. Save as expressly provided to the contrary in this Privacy Policy, the amended version of the Privacy Policy shall supersede and replace all previous versions thereof. Changes to this Privacy Policy are effective when they are posted on our platforms.

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SCHEDULE 1

1. Klein Karoo (Pty) Ltd
2010/011129/07
2. Klein Karoo Saad (Pty) Ltd
2003/003815/07
3. Klein Karoo Saad Produksie (Pty) Ltd
2004/011315/07
4. Nexusag 11 (Pty) Ltd
5. Agrofors (Pty) Ltd
2004/019997/07
6. Klein Karoo Agri (Pty) Ltd
2014/157677/07
7. Reinders Garage (Pty) Ltd
2015/298887/07
8. Klein Karoo International (Pty) Ltd
1961/000721/07
9. Ostriswell (Pty) Ltd
2002/000422/07
10. CapeKaroo International (Pty) Ltd
1998/011059/07
11. Klein Karoo Europe BVBA
12. Reptile Trading (Pty) Ltd
2001/001224/07