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## TWK GROUP PRIVACY STATEMENT

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The purpose of this document (“**Privacy Statement**”) is to inform the reader of how TWK Agriculture Holdings Proprietary Limited and all of its subsidiaries (**the “TWK Group”**) manages and processes (any operation or set of operations performed on data by any means such as collecting, recording, organization, storage, adaptation, or alteration of personal information etc.) personal information. The manner in which the TWK Group manages Personal Information (personal data, as defined in the data protection laws, includes, but is not limited to, names, postal address, email address, telephone number, date of birth etc.), is subject to the Electronic Communications and Transactions Act 25 of 2002; Protection of Personal Information Act 4 of 2013 and the European Union General Data Protection Regulations (“**Data Protection Laws**”).

When users (individuals who make use of any the TWK Group websites and/or applications) interact with the TWK Group, submit information to the TWK Group, or sign up for any products and/or services offered by the TWK Group, all personal information, which may be collected through our website or other channels, is treated as confidential and private. The TWK Group manages the user's personal information in the following ways:

- By collecting personal information;
- Using such personal information;
- Sharing (amongst ourselves) the users' personal information; and
- Disclosing such personal information to the TWK Group's authorised service providers as well as relevant third parties in the manner set forth in this Privacy Statement.

The TWK Group may from time to time update this document to ensure that it is consistent with future developments, industry trends and/or any changes in legal or regulatory requirements.

### 1. Collection Of Personal Information

1.1 Generally, the TWK Group collects user Personal Information in the following ways:

- 1.1.1 Upon submission of an application form or other forms relating to any of the TWK Group's products and services;
- 1.1.2 When interacting with the TWK Group's customer service officers (via telephone calls, letters, face-to-face meetings, and emails);
- 1.1.3 When making use of any the TWK Group service i.e., websites and/or applications;
- 1.1.4 Upon submission of a request for the TWK Group to contact them, or request to be included in an email or other mailing lists;
- 1.1.5 When there is a response to the TWK Group promotions, initiatives or to any request for additional Personal Data;
- 1.1.6 When contacted by or respond to the TWK Group marketing representatives and customer service officers;
- 1.1.7 When the TWK Group receives references from business partners and third parties;
- 1.1.8 When the TWK Group seeks information from third parties in connection with the products and services applied for; and
- 1.1.9 Upon submitting Personal Information to the TWK Group for any other reason.

1.2 When a user browses the TWK Group websites, it is generally done anonymously. The TWK Group does not automatically collect Personal Information unless such information is provided, or login credentials are used.

1.3 If the TWK Group is provided with any Personal Information relating to a third party (e.g., information about a spouse, children, parents and/or employees), by submitting such information, a user confirms that the consent of the third party to provide the TWK Group with such personal information has been obtained.



- 1.4 Users must ensure that all Personal information submitted to the TWK Group is complete, accurate, true, and correct. Failure to do so may result in the TWK Group's inability to provide users with the products and services requested.

## **2. Purposes For the Collection, Use and Disclosure of Personal Information**

- 2.1 Generally, the TWK Group collects, uses, and discloses Personal Information of users for the following purposes:

- 2.1.1 To respond to queries and requests;
- 2.1.2 To manage the administrative and business operations of the TWK Group and comply with internal policies and procedures;
- 2.1.3 To facilitate business asset transactions (which may extend to any mergers, acquisitions, or asset sales) involving any of the Companies;
- 2.1.4 To match any Personal Information held, relating to any of the purposes listed herein;
- 2.1.5 To resolve complaints and handle requests and/or enquiries;
- 2.1.6 To prevent, detect, investigate a crime, analyse, and manage commercial risks;
- 2.1.7 To provide media announcements and responses;
- 2.1.8 To monitor or record phone calls and customer-facing interactions for quality assurance, employee training and performance evaluation and identity verification purposes;
- 2.1.9 For legal purposes (including but not limited to obtaining legal advice and dispute resolution);
- 2.1.10 To conduct investigations relating to disputes, billing, suspected illegal activities or fraud;
- 2.1.11 To meet or comply with any applicable rules, laws, regulations, codes of practice or guidelines issued by any legal or regulatory bodies which are binding on the TWK Group (including but not limited to responding to regulatory complaints, reporting to regulatory bodies, and conducting audit checks, due diligence, and investigations); and
- 2.1.12 For purposes which are reasonably related to the aforementioned.

- 2.2 In addition to the above, the TWK Group collects, uses, and discloses Personal Information of users for the following purposes:

- 2.2.1 As a customer or an employee of an organisation which is a customer of the TWK Group;
- 2.2.2 Opening or continuation of accounts and establishing or providing users with the products and services subscribed to;
- 2.2.3 Facilitating the continuation or termination of user subscription to the TWK Group products and services;
- 2.2.4 Facilitating the daily operation of the products and services (including but not limited to billing, customer service, customer verification, technical support, network maintenance and troubleshooting);
- 2.2.5 Facilitating third party services if purchased, obtained, administered, or processed through the TWK Group;
- 2.2.6 Managing and executing the TWK Group service level agreements with users;
- 2.2.7 Processing of payment instructions, direct debit facilities and/or credit facilities requested by users;
- 2.2.8 Enforcement of repayment obligations (including but not limited to debt collection, filing of claims and retrieval of payments from losses made by service partners);
- 2.2.9 Administering and processing any insurance claims and payments arising under the respective policies;
- 2.2.10 Credit and internal risk management (including but not limited to performing credit checks and disclosures to law enforcement agencies);
- 2.2.11 Generation of internal reports (including but not limited to annual, operational and management reports);



- 2.2.12 Processing referral payments and commission fees to the TWK Group's external partners;
- 2.2.13 Administering fee adjustments, refunds, and waivers;
- 2.2.14 Notifying users of their entitlements under loyalty and reward programmes with the TWK Group;
- 2.2.15 Analysing user experience with the TWK Group products and services so as to help us improve, review, develop and efficiently manage the products and services offered; and
- 2.2.16 For purposes which are reasonably related to the aforementioned.
- 2.3 Furthermore, where permitted under the Data Protection Laws:
  - 2.3.1 the TWK Group may also collect, use, and disclose Personal Information of users for the following additional purposes:
    - 2.3.1.1 For analytics and tracking, including facilitating the sale of analytical data;
    - 2.3.1.2 To conduct market research and surveys to enable the TWK Group to understand and determine customer location, preferences, and demographics in order to develop special offers and marketing programmes in relation to the TWK Group products and services, and to improve our service delivery and customer experience;
    - 2.3.1.3 To provide additional products, services, and benefits to users, which include promotions, loyalty, and reward programmes from the TWK Group
    - 2.3.1.4 To match Personal Information with other data collected for other purposes and from other sources (including third parties) in connection with the provision, marketing or offering of products and services by the TWK Group;
    - 2.3.1.5 For leads generation and management of marketing the TWK Group's products and services;
    - 2.3.1.6 To administer contests, competitions, and marketing campaigns, and personalize user experience;
    - 2.3.1.7 To communicate advertisements involving details of the TWK Group's products and services, special offers and rewards, either to general customers, or to communicate advertisements which the TWK Group has identified as being of interest to specific users (this includes but is not limited to upselling, cross selling, and telemarketing);
    - 2.3.1.8 To organise promotional events and corporate social responsibility projects; and
    - 2.3.1.9 For purposes which are reasonably related to the aforementioned.
- 2.4 In relation to particular products and services or user interactions, the TWK Group may also specifically notify users of other purposes for which personal information is collected, used, or disclosed.
- 2.5 Users have a choice to withdraw consent for receiving marketing or promotional materials/communication. Users may contact the TWK Group using the Head Office contact details found on the main website [www.twkagri.com](http://www.twkagri.com) or per email [popia@twkagri.com](mailto:popia@twkagri.com)
- 2.6 Once the TWK Group receives confirmation that a user wishes to withdraw consent for marketing or promotional materials/communication, it may take up to 30 (thirty) working days for the withdrawal to be reflected on the system. Therefore, users may continue to receive marketing or promotional materials/communication during that period of time. It may be noted that even upon withdrawal of consent for the receipt of marketing or promotional materials, the TWK Group may still contact users for other purposes in relation to the products and services held by users or subscriptions to the TWK Group.

### 3. Processing Of Personal Information

- 3.1 By providing Personal Information to the TWK Group, users acknowledge that the information has been collected from them directly and there is consent for the TWK Group to process such information.



- 3.2 Where users submit Personal Information (such as name, address, telephone number and email address) via the TWK Group website (e.g., through completing any online form) the following principles are observed in the processing of such information:
- 3.2.1 the TWK Group will only collect Personal Information for a purpose consistent with the purpose for which it is required. The specific purpose for which information is collected will be apparent from the context in which it is requested.
  - 3.2.2 the TWK Group will only process Personal Information in a manner that is adequate, relevant, and not excessive in the context of the purpose for which it is processed.
  - 3.2.3 Personal Information will only be processed for a purpose compatible with that for which it was collected unless the user has agreed to an alternative purpose in writing or the TWK Group is permitted in terms of national legislation of general application dealing primarily with the protection of Personal Information.
  - 3.2.4 the TWK Group will keep a record of all Personal Information collected and the specific purpose for which it was collected for a period of 1 (one) year from the date on which it was last used.
  - 3.2.5 the TWK Group will not disclose user Personal Information relating to any third party, unless prior written consent from the user is obtained, or where the TWK Group is required to do so by law.
  - 3.2.6 If Personal Information is released with the consent of the user, the TWK Group will retain a record of the information released, the third party to which it was released, the reason for the release and the date of release, for a period of 1 (one) year from the date on which it was last used.
  - 3.2.7 the TWK Group will destroy or delete any Personal Information that is no longer needed by the TWK Group for the purpose it was initially collected, or subsequently processed.

#### **4. Disclosure Of Personal Information**

- 4.1 the TWK Group will take reasonable steps to protect Personal Information of users against unauthorised disclosures. Subject to the provisions of any applicable law, Personal Information may be disclosed for the purposes listed above (where applicable) to the following:
- 4.1.1 The TWK Group's related corporations and employees to provide content, products, and services to address user questions and requests in relation to customer accounts, subscription, and billing arrangements with the TWK Group as well as products and services;
  - 4.1.2 Companies providing services relating to insurance and consultancy to the TWK Group;
  - 4.1.3 Agents, contractors, or third-party service providers who provide operational services to the TWK Group, such as courier services, telecommunications, information technology, payment, printing, billing, payroll, processing, technical services, training, market research, call centre, security, or other services to the TWK Group;
  - 4.1.4 Vendors or third-party service providers in connection with marketing promotions and services offered by the TWK Group;
  - 4.1.5 Other telecommunications, content, or other service providers to facilitate their provision of content or services, or for interconnection, inter-operability, system operation and maintenance and billing between service providers;
  - 4.1.6 Collection and repossession agencies in relation to the enforcement of repayment obligations for debts;
  - 4.1.7 Credit bureaus for the purpose of preparing credit reports or evaluation of creditworthiness;
  - 4.1.8 External banks, credit card companies and their respective service providers;
  - 4.1.9 The TWK Group's professional advisers such as auditors and lawyers;



- 4.1.10 Relevant government regulators, statutory boards or authorities or law enforcement agencies to comply with any laws, rules, guidelines and regulations or schemes imposed by any governmental authority; and
- 4.1.11 Any other party to whom users authorise the TWK Group to disclose Personal Information to.

## 5. Use Of Cookies

- 5.1 the TWK Group uses cookies (a small piece of information that is placed on a user's computer when visiting certain websites) for the following purposes:
  - 5.1.1 To enable certain features and functions on websites, e.g., remembering user-id, favourite channel selections, browsing and other service preferences;
  - 5.1.2 To build up a profile of how users experience the website;
  - 5.1.3 To improve the efficiency of the TWK Group website;
  - 5.1.4 To administer services to users and advertisers; and
  - 5.1.5 To establish usage statistics.
- 5.2 Most internet browsers provide users with the option of turning off the processing of cookies (please see the **"help"** section of the browser), but this may result in the loss of functionality, restrict use of the website and/or delay or affect the way in which it operates.
- 5.3 Advertisements on the TWK Group website may be provided by third party advertisers and their agencies. These may generate cookies to track how many people have seen a particular advertisement (or use the services of third parties to do this), and to track how many people have seen it more than once. the TWK Group does not control these third parties and their cookie policies. Should users have any questions about the TWK Group's Data Privacy Policy, they may contact the TWK Group.
- 5.4 the TWK Group is not responsible for the Personal Information policies (including Personal Information protection and cookies), content or security of any third-party websites linked to the Website.

## 6. Queries

- 6.1 If a user:
  - 6.1.1 Would like to withdraw consent to any use of their Personal Information as set out in this Privacy Statement, they may contact the business unit executive that manages their account.
  - 6.1.2 Would like to obtain access and make corrections to their Personal Information records, they may contact the business unit executive that manages their account.
- 6.2 If your Personal Information has been provided to the TWK Group by a third party (e.g., a referrer), users should contact that organisation or individual to make such queries, complaints, and access correction requests to the TWK Group on their behalf.
- 6.3 If a user withdraws their consent to any or all use of Personal Information, depending on the nature of such a request, the TWK Group may not be in a position to continue to provide its products and services to users. In addition, the TWK Group may not administer any contractual relationship in place, which in turn may also result in the termination of any agreements with the TWK Group and may result in the user being in breach of contractual obligations or undertakings. The TWK Group legal rights and remedies in such event are expressly reserved.

## 7. Governing Law

- 7.1 This Privacy Statement and use of the Website shall be governed in all respects by the laws of South Africa.