

AGRI FINANCE FACILITY (PTY) LTD
POLICY ON THE PROTECTION OF PERSONAL
INFORMATION (POPI ACT)

Version 1.0 | 1 October 2025

1. PURPOSE

- 1.1. The policy purpose and objective are to give effect to the provisions of POPIA to safeguard personal information.
- 1.2. The policy sets out the manner in which Agri Finance Facility (Pty) Ltd (AFF) deals with employees and clients' personal information and the purpose for the said information to be used.

2. OUTCOMES / AIMS AND OBJECTIVES

The objective and goal of this policy is to:

- 2.1. Guarantee AFF commitment to protecting personal information.
- 2.2. Ensure that employee and clients' personal information in AFF's possession is adequately protected to avoid unauthorised access and use.
- 2.3. Undertake to protect personal information of all AFF directors and employees. The personal information will be used appropriately, transparently, and securely in accordance with applicable laws.

3. DEFINITIONS

- 3.1. In this document, unless contrary to the context, reference to the male gender includes the female gender, and –
- 3.2. "POPIA" means the Protection of Personal Information Act, 2013 (Act No. 4 of 2013)
- 3.3. "Information Officer" refers to the person registered with the Information Regulator who is responsible for ensuring that the organisation complies with the POPI Act
- 3.4. "Data Subject" means any person or client to whom personal information relates.
- 3.5. "Personal information" means information about a client or an identifiable individual including, but not limited to:
 - 3.5.1. Information relating to the race, gender, sex, pregnancy, marital status, national, ethnic, or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language, identity document/passport number, phone number, email address, financial information, physical address, date of birth, criminal record, and private correspondence;

- 3.5.2. Information relating to the educational or the medical, criminal or employment history of the individual or information relating to financial transactions in which the individual has been involved; and
- 3.5.3. The name of the individual, where it appears with other personal information relating to the individual or where the disclosure of the name itself would reveal information about the individual.
- 3.5.4. "Processing" means any operation or activity or any set of activities, whether or not by automatic means, concerning personal information including:
 - 3.5.4.1. The collecting, receipting, recording, organizing, collation, storing, updating or modification, retrieval, alteration, consultation or use;
 - 3.5.4.2. Dissemination by means of transmission, distribution, or making available in any other form; or
 - 3.5.4.3. Merging, linking, as well as restriction, degradation, erasure or destruction of information.
 - 3.5.4.4. "Responsible party" means any person which alone or in conjunction with others, determines the purpose of and means for processing personal information.

4. POLICY STATEMENTS AND POLICY DIRECTIVES

4.1. Rationale of Protection of Personal Information (POPI Act)

- 4.1.1. The Protection of Personal Information Act, (Act 4 of 2013) (POPIA) gives effect to the constitutional right to privacy, regulates the manner in which personal information may be processed and provides rights and remedies to protect personal information.
- 4.1.2. POPIA applies to processing of personal information in any form by a responsible party who is domiciled in South Africa or if not domiciled in South Africa, makes use of automated or non-automated means, unless the processing relates only to the forwarding of personal information.
- 4.1.3. The main rationale of POPIA is to promote the protection of personal information and to bring South Africa's privacy laws in line with international standards. It limits the rights of businesses and public bodies to collect, process, store, and share personal information and to only do so in line with the law.

4.2. Preamble to POPI Act policy

- 4.2.1. WHEREAS Section 14 of the Constitution of the Republic of South Africa (Act 108 of 1996) grants everyone the right to privacy, and the privacy right includes a right to protection against the unlawful collection, retention and use of personal information.
- 4.2.2. AND WHEREAS the Protection of Personal Information Act (Act 4 of 2013) regulates the manner in which personal information is processed by requiring responsible parties to safeguard personal information and process it responsibly.
- 4.2.3. NOW THEREFORE, AFF determines a policy on the protection of personal information which is collected and processed for purposes of the business of AFF.

4.3. Lawful processing of information

POPIA sets out the following conditions for the lawful processing of information:

- 4.3.1. Legal obligation to perform the processing of personal information.
- 4.3.2. Processing limitation – information may only be processed if it is adequate relevant and not excessive given the purpose for which it is collected.
- 4.3.3. Purpose specification – personal information must be collected for a specific, explicitly defined and lawful purpose related to the activity of the responsible party.
- 4.3.4. Further processing limitation – where information is received from a third party and passed on to the responsible party for further processing, the further processing must be compatible with the purpose for which it was initially processed.
- 4.3.5. Information quality – information must be complete, accurate, not misleading and updated where necessary.
- 4.3.6. Openness – the data subject must be informed when collecting information and the specific nature thereof.
- 4.3.7. Security safeguards - the responsible party must ensure the integrity of the personal information by taking measures to prevent the loss, damage or unauthorised destruction of the information.
- 4.3.8. Data subject specification – the data subject has the right to request a responsible person to confirm, free of charge, whether they hold personal information about them.

5. PROCEDURES

5.1. The personal information collected

5.1.1. In terms of section 10 of POPIA, personal information may only be processed if given the purpose for which it is processed, it is adequate, relevant and not excessive.

5.1.2. Consequently, AFF collects personal information for the following reasons:

5.1.2.1. Personal information of directors and employees are collected for human resources and financial purposes, and for contractual relationships with clients.

5.1.2.2. AFF collects personal information directly from data subjects. Examples of personal information collected from data subjects include but is not limited to:

5.1.2.2.1. AFF collects, inter alia, the following personal information from clients for business and contractual purposes:

- Client's name
- Registration or identity number;
- Physical and Postal addresses;
- Telephone and facsimile numbers; and
- Email addresses;

5.1.2.2.2. AFF, inter alia, collects the following personal information from directors and employees:

- Next of kin;
- Doctor's name;
- Spouse/partner contact information;
- Curriculum Vitae;
- Letters of reference;
- Employment status and history;
- Academic records;
- Banking details;
- Disciplinary information;
- Salary information; and
- Criminal records.

5.2. How personal information is used

5.2.1. Clients: for all business and contractual purposes and to plan for and determine all business risks.

5.2.2. Directors and employees:

- Investigations;
- Disciplinary processes;
- Directors and employee contracts;
- Communication with directors and employees;
- Director and employee personal information is used to establish, manage and terminate; and
- Directorship and employment.

5.2.3. According to section 11 of POPIA, personal information may only be processed if certain conditions are met, for instance:

- Consent is obtained to process personal information.
- Processing complies with an obligation imposed by law.

5.3. Disclosure of personal information

5.3.1. AFF may disclose personal information where it has a duty or a right to disclose in terms of applicable laws;

5.3.2. AFF may disclose personal information where it deems necessary to protect the esteem, dignity and the professionalism of AFF.

5.4. Safeguarding personal information

5.4.1. In terms of section 19 of POPIA, a responsible party must ensure the integrity and confidentiality of personal information in its possession or under its control by taking appropriate, reasonable technical and organisational measures to prevent: loss of, damage to or unauthorised destruction of personal information, unlawful access to or processing of personal information. POPIA requires that personal information should be adequately protected to avoid unauthorised access. Therefore, AFF continuously reviews security controls and procedures to ensure that personal information is secured.

5.4.2. The following security controls are in place to protect personal information:

- Personal information is treated as confidential and not disclosed unless required by law;
- High level Information Technology controls are in place to maintain the protection of personal information;
- High level anti-virus programs;

- Access rights in place;
- Computer passwords in place;
- Assessment of data quality controls in place to ensure the accuracy and completeness of personal information;
- A third party service provider is mandated to ensure safeguarding of registered persons personal information;
- Personal information is stored at a third-party service provider who is subject to POPIA provision in the Service Level Agreement;
- AFF internal server hard drives are protected by firewalls;
- Directors and employees sign confidentially agreements; and
- Hardcopy files are archived at a secured place.

5.5. Access and correction of personal information

5.5.1. Clients, directors and employees have a right to request for access to personal information in AFF's possession.

5.5.2. Clients, directors, and employees' personal information should be continuously updated.

5.6. Information Officer

The details of the Information Officer:

Position: Iraj Abedian

Cell: +27(0)83 261 4983

Email: abedian@agrifinancefacility.co.za

Physical Address: Building 1, Alberto Drive, Devonbosch, Stellenbosch, 7605

5.7. Amendment of the policy

Amendment to this policy will take place on an ad hoc basis or when needed. Clients, directors and employees are advised to regularly update their personal information.

6. POLICY OWNERSHIP

Policy Custodian: POPI Information Officer

Applicability: This policy applies to all permanent and contract employees of AFF

Approved by:

Board of Directors

Agri Finance Facility (Pty) Ltd

Date of Approval: 31 October 2025

Next Review Date: 21 September 2025