

**THE SOUTHERN AFRICAN GRAIN LABORATORY NPC
DIE SUIDER AFRIKAANSE GRAANLABORATORIUM NPC**

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**PRIVACY POLICY IN TERMS OF SECTION 18 OF THE PROTECTION OF PERSONAL
INFORMATION ACT 2013**

1. INTRODUCTION

- a. The Southern African Grain Laboratory NPC (hereinafter referred to as the "SAGL") is a testing laboratory which provides testing, quality assessment and analysis services of grain, oil seeds and products thereof in Southern Africa.
- b. The SAGL is obliged to comply with The Protection of Personal Information Act ("POPI").
- c. POPI requires the SAGL to inform data subjects as to how their Personal Information is used, disclosed, and destroyed.
- d. The SAGL guarantees its commitment to protecting data subjects' privacy and ensuring that their Personal Information is used appropriately, transparently, securely and in accordance with applicable laws.
- e. This Policy sets out how the SAGL deals with data subjects' Personal Information and, in addition, the purpose said information is used for. This Policy is made available on our website and on request from our Information Officer, whose details are provided in this document.
- f. Section 9 of POPI states that "Personal information may only be processed if, given the purpose for which it is processed, it is adequate, relevant and not excessive".

2. THE PERSONAL INFORMATION COLLECTED

- a. The SAGL collects and process data subject information necessary to comply with its legal obligations, to enter into a contract with a data subject, or for legitimate business purposes.

Examples of the Personal Information we collect includes, but is not limited to:

- Title, full names, contact details, including email addresses and mobile telephone numbers.
 - Correspondence addresses and address history
 - Information relating to your use of service.
 - Technical information about the products and services that data subjects use, and how they use them.
 - Financial information
- b. For the purposes of this Policy, data subjects include potential, past and existing data subjects.
 - c. The SAGL collects Personal Information in the following manner:

- Information that is supplied by data subjects by means of correspondence or request for service.
- Information that is collected or generated by the SAGL while providing services (e.g. technical information collected via cookies when the SAGL's website is used).
- Information that is obtained from third parties i.e. reference checks.

3. HOW PERSONAL INFORMATION IS USED

- Data subjects' Personal Information will only be used for the purpose for which it was collected and intended. This would include:
 - Providing services to data subjects, including general communication, verification of data subject instructions and complaints
 - To recover any money amount owed to the SAGL
 - For audit and record keeping purposes
 - Providing information to third parties if required for the management or dispute of the SAGL's services
 - In connection with legal proceedings and to comply with legal and regulatory requirements or when it is otherwise allowed by law
- According to Section 10 of POPI, Personal Information may only be processed if certain conditions are met during processing. These are listed as follows:
 - Data subjects consents to the processing: consent is obtained from data subjects during service requests
 - Processing is necessary – Personal information is required to facilitate the provision of services to data subjects
 - Processing complies with an obligation imposed by law on the SAGL
 - Processing protects a legitimate interest of the data subject – it is in the data subject's best interests to have access to full and appropriate services
 - Processing is necessary for pursuing the legitimate interests of the SAGL – in order to provide a service to our data subjects, the SAGL requires certain Personal Information from data subjects

4. DISCLOSURE OF PERSONAL INFORMATION

- The SAGL may share and obtain data subjects' Personal Information from third parties for the reasons already discussed in paragraph 3 above. The categories of organisations that the SAGL will share data subjects' Personal Information with are:
 - The SAGL's service providers, agents and sub-contractors who administer or process information on behalf of the SAGL (e.g. auditors)
 - Professional advisors
- The SAGL may also disclose data subjects' information where they have a duty or a right to disclose in terms of applicable legislation, the law or where it may be necessary to protect the SAGL's rights.
- The SAGL will never sell, rent, or trade data subjects' Personal Information

5. SAFEGUARDING DATA SUBJECTS' INFORMATION

- It is a requirement of POPI to adequately protect the Personal Information and to avoid unauthorized access and use of data subjects' Personal Information held by the SAGL. The SAGL continuously review our security controls and processes to ensure the data subjects' Personal Information is secure.

- b. The following procedures are in place to protect data subjects' Personal Information:
- A third-party service provider is mandated to ensure the safeguarding of data subjects' Personal Information
 - Recommendations made by them are actioned
 - The SAGL's Information Officer is Wiana Louw, whose details are available below and who is responsible for the encouragement of compliance with the conditions of the lawful processing of Personal Information and other provisions of POPI
 - This policy is in place throughout the SAGL and continuous training on this policy as well as the POPI Act is provided
 - Employees are required to sign Confidentiality Agreements which are considered annexures to their Employment Contracts
 - Archived data subject information is stored at third-party providers who are also governed by POPI and with whom the SAGL has Service Level Agreements
 - Hard copy files are stored at secure premises and are destroyed after 7 years
 - The SAGL's internal server hard drives are protected by firewalls
 - A Security Incident Management Register will be kept when logging and reporting any security incidents and manage said incidents. This register will be maintained by the Information Officer
 - Data subject information is processed accurately and securely according to the SAGL's quality procedures
 - Consent to process data subject information is obtained from data subjects (or a person who is authorized by the data subject to provide the data subject's Personal Information) during service requests.

6. ACCESS AND CORRECTION OF PERSONAL INFORMATION

- a. Data subjects have the right to request access to the Personal Information held by the SAGL -
- b. Data subjects also have the right to ask the SAGL to update, correct or delete their Personal Information on reasonable grounds
- c. Once a data subject objects to the processing of their Personal Information, the SAGL may no longer process said Personal Information
- d. A data subject who wishes to exercise his/her rights as set out above, may do so in writing using the contact details below. There is no fee for making such requests.
- e. A data subject has the right to lodge a complaint with the Information Regulator if they think that the SAGL has infringed any of their rights, using the contact details below.
- f. The details of our Information Officer and Offices are as follows:
- i. Information Officer Details

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| 1. Name: | Wiana Louw |
| 2. Telephone number: | 012 807 4019 |
| 3. Fax number: | 086 216 7672 |
| 4. Postal address: | PostNet Suite #391
Private Bag x1
The Willows
0041 |
| 5. Physical address: | Grain Building – Agri Hub Office Park
477 Witherite Street
The Willows
0040 |
| 6. Email address: | wiana.louw@sagl.co.za |
| 7. Website: | www.sagl.co.za |

7. AMENDMENTS TO THIS POLICY

- a. Amendments to this Policy will take place on an ad hoc basis or at least once a year.
- b. Data subjects are advised to check the SAGL's website periodically to inform themselves of any changes.
- c. Where material changes take place data subjects will be notified directly.

8. DATE OF COMPILATION AND REVISION: 24 June 2021