

DATA PROTECTION AND PRIVACY POLICY

Winfield United South Africa Group of Companies





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Operational Approvals

Name	Doc version	Designation	Approval / Change	Signature
M van der Westhuizen	1.2022	WUSA Information Officer	Approved	 <small>Mvd Westhuizen (Oct 18, 2023 09:51 GMT+2)</small>
K McArthur	2.2023	WUSA CRO	Approved	

Governance Approvals

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Jan Vermaak	2.2023	Group CEO	Approved to be presented to BOD	

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DATA PROTECTION AND PRIVACY POLICY

1. Overview

This Data Protection and Privacy Policy (“Policy”) regulates the conduct of all directors, officers, and employees of Winfield United South Africa (Pty) Ltd and its subsidiaries (“The Winfield Group”) when they handle personal information of the Group’s stakeholders. These stakeholders include customers, employees, business partners and suppliers.

This document should be read with reference to The Winfield Group’s Policies and Procedures and may change from time to time.

This data protection and privacy policy will apply to Winfield United South Africa (Pty) Ltd – Registration Number 2015/240013/07 and the following subsidiary companies:

<u>Name</u>	<u>Registration number</u>
Exportos S A (Pty) Ltd	1980/009857/07
Fountain Chemicals (Pty) Ltd	2010/021493/07
Villa Crop Protection (Pty) Ltd	1992/002474/07
Crop Asure (Pty) Ltd	1997/004776/07
Winfield United (Pty) Ltd	2006/016148/07
Universal Crop Protection (Pty) Ltd	1983/008184/07
Curativo (Pty) Ltd	2012/071881/07
Villa Academy (Pty) Ltd	2012/111284/07
Curativo North (Pty) Ltd	1979/005244/07
Villa 44 Valencia (Pty) Ltd	1997/002867/07
Geto Investments (Pty) Ltd	1998/013095/07
Metos SA (Pty) Ltd	2006/031440/07
Project Proficiency Academy (Pty) Ltd	2013/161915/07
InteliChem (Pty) Ltd	2011/009120/07
ProCrop (Pty) Ltd	1991/007322/07
DropSight (Pty) Ltd	2021/371456/07
InteliChem Holdings (Rf) (Pty) Ltd	2016/337623/07
InteliSeed (Pty) Ltd	2015/060531/07
Technica (Pty) Ltd	1997/018183/07
Synovatech (Pty) Ltd	2009/006105/07
InteliFert (Pty) Ltd	2014/248085/07
Intelekt Crop Solutions (Pty) Ltd	2014/042423/07
InteliGro Investments (Pty) Ltd	2002/007729/07
Meridian Agrochemical Company (Pty) Ltd	2000/010819/07
Elect Property Trust No 4	IT4327/2006
InteliGro (Pty) Ltd	1998/004580/07
Chemrent (Pty) Ltd	2006/037571/07

Full details for each company and their registered Information Officer is provided in Appendix B.

2. Introduction

It is The Winfield Group's policy to protect the privacy and information of all its stakeholders.

3. Purpose

The Winfield Group is dedicated to the fundamentals of protecting consumer privacy and as such has created this Data Protection and Privacy Policy ("Policy") to standardise information privacy and data protection practices across all its business operations.

This Policy sets out how The Winfield Group operates in South Africa and uses and protects the Personal Information (defined in clause 5) that it collects, stores, processes and disseminates from and to its Data Subjects (defined in clause 5).

This Policy also regulates the governance structure and implementation framework for the processing of such Personal Information.

4. Scope and Application

This Policy must be adhered to by:

- all employees, directors, officers, and other staff of the Winfield Group; and
- all third parties who Process the Personal Information of The Winfield Group's Data Subjects on behalf of the Winfield Group or as part of any functions or duties which they carry out (whether contractual or otherwise) for the Winfield Group ("Authorised Third Parties").

The Winfield Group employees are specifically referred to in section 13.1 and section 14 of this Policy, which deals with employee non-compliance with this Policy.

For the avoidance of any doubt, any reference to "The Winfield Group" in this document is to be considered a reference to Winfield United South Africa (Pty) Ltd and its subsidiaries listed in 1 above including but not limited to its Personnel and stakeholders, unless the context indicates otherwise.

This Policy is applicable to the processing of all Personal Information throughout the information life cycle, from the point of first collection of Personal Information until the time that such information is destroyed.

5. Definitions

<i>Child</i>	Means a person under the age of 18 (eighteen).
<i>Data Subject</i>	Means all persons whose Personal Information the Winfield Group and/or the Authorised Third Parties Processes, including all customers, employees, shareholders, suppliers, service providers and any other natural or juristic persons.
<i>Personal Information</i>	<p>Means information (whether oral, written or in electronic form) relating to any Data Subject, including but not limited to (i) views or opinions of another individual about the Data Subject; and (ii) information relating to such Data Subject's -</p> <ol style="list-style-type: none">i. race, sex, gender, sexual orientation, pregnancy, marital status, nationality, ethnic or social origin, colour, age, physical or mental health, well-being, disability, religion, conscience, belief, cultural affiliation, language and birth;ii. education, medical, financial, criminal or employment history;iii. names, identity number and/or any other personal identifier, including any number(s), which may uniquely identify a data subject, account or client number, password, pin code, customer code or number, numeric, alpha, or alpha-numeric design or configuration of any nature, symbol, e-mail address, domain name or IP address, physical address, cellular phone number, telephone number or other particular assignment;iv. blood type, fingerprint or any other biometric information;v. personal opinions, views or preferences;vi. correspondence that is implicitly or expressly of a personal, private or confidential nature (or further correspondence that would reveal the contents of the original correspondence); andvii. corporate structure, composition and business operations (in circumstances where the Data Subject is a juristic person) irrespective of whether such information is in the public domain or not;
<i>Information Officer</i>	Means any of the Winfield Group Information Officers as specified in Annexure B
<i>Process, Processing</i>	<p>Means any operation or activity or any set of operations concerning Personal Information, whether automated or not and including -</p> <ol style="list-style-type: none">viii. the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;ix. dissemination by means of transmission, distribution or making available in any other form by electronic communications or other means; orx. merging, linking, blocking, degradation, erasure or destruction;
<i>POPI Act</i>	The Protection of Personal Information Act No 4 of 2013 (South African Legislation) https://inforegulator.org.za/knowledge-base/
<i>Special Personal Information</i>	Means information concerning a Data Subject's religious, spiritual or philosophical beliefs, race or ethnic origin, trade union membership, political opinions, physical or mental health, biometric information, sexual life, or criminal behaviour of a data subject to the extent that such information relates to alleged commission of any offence or any proceedings in respect of any offence allegedly committed by a data subject.

6. The Winfield Group's Privacy Commitments

The Winfield Group has adopted the following five data privacy principles, on which this Policy is based:

6.1. Openness and Honesty

The Winfield Group should communicate honestly about any action that may impact on Data Subject Personal Information and privacy.

6.2. Choice

Data Subjects should be given the options to make meaningful decisions about their Personal Information and privacy.

6.3. Privacy by design

Respect for Personal Information and privacy is and should be a critical element in the design, development and delivery of products and services by The Winfield Group.

6.4. Laws and Standards

The Winfield Group is committed to comply with all privacy laws and regulations applicable in South Africa and all countries in which it operates.

6.5. Accountability

The Winfield Group is accountable for adhering to the privacy principles set out in this Policy in all its business dealings.

7. Policy Objective

Data protection is of high strategic risk for The Winfield Group as its failure to comply with its legal obligations to protect its Data Subjects' privacy and Personal Information could have repercussions (such as fines and penalties being imposed on The Winfield Group) and could result in The Winfield Group suffering reputational harm.

In South Africa, the PoPI Act has been enacted to regulate the processing of Personal Information.

In order to address these risks and legislative requirements, The Winfield Group will be responsible to implement and maintain systems and measures to ensure the protection of the privacy and Personal Information of all Data Subjects across all The Winfield Group businesses.

This also means that all The Winfield Group products and services must be in compliance with these requirements.

8. Data Protection Principles

The Processing of Personal Information by The Winfield Group and/or Authorised Third Parties must adhere to the following key principles, which are elaborated on in section 11 below:

1.6	Principle Explanation
<i>Legality</i>	The Processing must be lawful and should be carried out in a reasonable manner and should not be excessive.
<i>Purpose specification</i>	The Processing must be for a specific and explicitly defined purpose.
<i>Further processing limitation</i>	Any further Processing of Personal Information must be compatible with the purpose for which it was collected (i.e., if The Winfield Group and/or any Authorised Third Party wishes to Process any Personal Information outside of the stated purpose for which it was collected).
<i>Quality</i>	The information processed must be complete, accurate and where necessary, kept updated.
<i>Openness</i>	The Data Subject must be made aware of the Processing.
<i>Security</i>	The integrity and confidentiality of the Personal Information must be ensured.
<i>Data Subject participation</i>	The right of the Data Subject to access their Personal Information and where necessary request correction or deletion of the Personal Information should be guaranteed.

9. Special Personal Information and Sensitive Information

The Winfield Group and/or Authorised Third Parties will not Process any Special Personal Information unless there is a compelling reason to do so and, in such cases, such Processing will only take place with the express permission of the Information Officer and in accordance with the provisions of the below.

The Winfield Group and/or Authorised Third Parties will only Process Special Personal Information listed in section 8 to another person when:

- the consent of the Data Subject has been obtained;
- directed by an order of a court;
- it is necessary to disclose such information in order to provide products and services to the Data Subject (who is already a customer of The Winfield Group); or
- required in terms of any applicable law.

The Winfield Group and/or Authorised Third Parties may not Process any Personal Information concerning a Child and will only do so where it has obtained the consent of the parent or guardian of that Child or where The Winfield Group is permitted to do so in accordance with applicable laws.

In the event that The Winfield Group obtain or is requested to process Personal Information concerning a Child it will ensure all reasonably practicable steps have been taken to ensure the Privacy of the Child is protected.

10. The Implementation Framework

10.1. Responsibility of each business unit

All The Winfield Group's business units are required to implement the provisions of this Policy.

10.2. Work with the Information Officer

Each Winfield Group business unit and the Authorised Third Parties shall work through the office of the Information Officer as the first point of contact in its implementation of and ongoing compliance with this Policy.

10.3. Maintain Personal Information Location Register

In order to ensure effectiveness of privacy control measures it is essential that The Winfield Group knows where its Personal Information is stored. To this end, each business unit that Processes Personal Information must maintain a separate, up-to-date Personal Information location register to ensure effective management of all Personal Information Processed by that business unit.

10.4. Maintain Privacy Risk Register

In order to monitor and manage privacy risks across The Winfield Group, a Privacy Risk Register (recording all identified high privacy risks) must be maintained by all departments and business units, in which all identified risks affecting their respective departments are recorded. In this regard the register will, amongst other things, identify the risk in question, background to the risk and context, concerns and issues, steps taken to mitigate the risk and the person tasked with mitigating the identified risk.

10.5. Privacy Risk Impact Assessment

All business units that process Personal Information must, in consultation with the Information Officer, identify, prioritise, and conduct regular privacy impact assessments, which serves as an important tool for providing relevant metrics relating to risks that need to be addressed and offering a methodology for prioritizing the manner in which risks will be addressed.

10.6. All The Winfield Group products and services must comply with this Policy

All The Winfield Group Personnel and any Authorised Third Parties must adhere to this Policy and any other policies that govern privacy and the protection of Personal Information when developing products and rendering services, by identifying any privacy risks that might be posed by the product and/or service to be developed and by putting in place processes to mitigate these identified risks. The Winfield Group must ensure that relevant contracts are in place when doing business with any Authorised Third Party that processes personal information to comply with this policy.

11. Application of Data Protection Principles

11.1. Purpose Specification and Consent

The Winfield Group needs to ensure that they make Data Subjects aware of the fact that they are Processing their Personal Information and the purpose for which The Winfield Group will be Processing such Personal Information, including making the Data Subject aware of any Authorised Third Parties who may have access to the Personal Information (which may also include cross border transfers of Personal Information upon which The Winfield Group shall ensure that the privacy laws of such country is complied with). This obligation will also apply to Authorised Third Parties who collect Personal Information directly from a Data Subject.

The Winfield Group and/or Authorised Third Parties must always collect Personal Information in a fair, lawful and reasonable manner to ensure that it protects the Data Subject's privacy and Processes the Personal Information based on legitimate grounds in a manner that does not adversely affect the Data Subject(s) in question.

Where The Winfield Group and/or Authorised Third Parties collect Personal Information directly from the Data Subject and/or from third parties, and where The Winfield Group obtains Personal Information from third parties, The Winfield Group (or the Authorised Third Parties, where applicable) must ensure that it obtains the consent of the Data Subject to do so or only Processes the Personal Information without the Data Subject's consent where The Winfield Group is permitted to do so in terms of applicable laws.

The Winfield Group and/or Authorised Third Parties must obtain the Data Subject's consent prior to collecting, and in any case, prior to using or disclosing the Personal Information, unless such consent is not required, as approved by the Information Officer. The method of obtaining consent and/or confirming consent should also be approved by the Information Officer.

The Data Subject may withdraw his/her consent or object to The Winfield Group's processing of the Personal Information at any time. If the consent is withdrawn or if there is otherwise an objection against the use of or the processing of such Personal Information, The Winfield Group and/or the Authorised Third Parties must ensure that the Personal Information is no longer Processed and that the Information Officer is advised of each such instance of withdrawal or objection to the provision of consent. Request with reason for withdrawal may be sent to the Information Officer.

All withdrawn consent and/or objection against the use of or processing of personal information shall be stored in a centralized database.

The Winfield Group and/or the Authorised Third Parties must only Process Data Subject Personal Information for a specific, lawful, and clear purpose and as set out in the first paragraph of this section and must ensure that it makes the Data Subject aware of such purpose(s) as far as possible. The Winfield Group will ensure that the necessary consent to the Processing of any Personal Information will relate only to the purpose for which the Data Subject has been made aware of and The Winfield Group and/or the Authorised Third Parties will not Process any Personal Information for any other new purposes which the Data Subject has not consented to.

A record of the Data Subject's consent will be required as confirmation or acknowledgement by the Data Subject that The Winfield Group may use the Personal Information for one or more of the following purposes:

- For the purpose of The Winfield Group providing any services or products to the Data Subject from time to time;
- For the purposes of receiving services or products provided by the Data Subject to The Winfield Group from time to time;
- If a Data Subject is an employee, in the course and scope of employment by The Winfield Group;
- To respond to any correspondence that the Data Subject may send to The Winfield Group, including via e-mail or by telephone;
- To contact the Data Subject from time to time, where specific consent has been given to follow-up contacts by The Winfield Group or to be put on The Winfield Group's mailing list;
- For such other purposes to which the Data Subject may consent from time to time; and
- For such other uses authorised in terms of applicable law.

11.2. Keeping Personal Information Accurate

The Winfield Group and/or Authorised Third Parties must ensure that all Personal Information is kept as accurate, complete and up to date as far as possible and must implement appropriate system/s to manage this.

The Winfield Group may not always expressly request the Data Subject to verify and update his/her Personal Information, unless this process is specifically necessary or the circumstances under which The Winfield Group engages with the Data Subject allows for such request to be made. As a general principle, all Personal Information should be kept up to date, unless the Information Officer has provided written permission that same is not required in specific circumstances.

The Data Subjects are entitled to notify The Winfield Group from time to time of any updates required in respect of their Personal Information and to this end, The Winfield Group and the Authorised Third Parties will provide a centralized procedure through which Data Subject details can be updated.

11.3. Security measures and security breach incidents

The Winfield Group and Authorised Third Parties are required to implement and maintain physical, organisational, contractual, and technological security measures to keep all Personal Information secure, including protecting any Personal Information from loss or theft, and unauthorized access, disclosure, copying, use or modification.

The Winfield Group is required to adhere to the relevant security policies (listed in the Cyber Risk and Security Policy, as amended from time to time) for protecting Personal Information (both logically and physically).

Compliance with these security measures and safeguards does not guarantee that an appropriate level of protection is provided for purposes of this Policy and therefore the security measures will be re-assessed on a regular basis as information security techniques and the threats to security evolve and new risks are identified. This includes identifying all reasonably foreseeable risks and establishing and maintaining appropriate safeguards to address these risks on an on-going basis.

The Winfield Group's Technology team shall carry out holistic and comprehensive assessments and verification to ensure that the security safeguards have been effectively implemented within The Winfield Group.

The Winfield Group's Technology team will be responsible for the day-to-day maintenance of all relevant systems to ensure the protection of Personal Information stored and/or Processed on these systems.

Each business unit within The Winfield Group is expected to put in place systems to respond to security breaches or data loss incidents which ensures that:

- the business impact of each incident will be identified;
- The Winfield Group's reputation is protected where a fast and effective response is delivered;
- corporate liability due to lack of due diligence is mitigated; and
- regulatory requirements are met, including any relevant statutory obligations to report data losses to the Information Regulator and/or Data Subjects who might be affected. Where this is required, The Winfield Group will notify any affected Data Subject(s) and the Information Regulator in writing in the event of a security breach (or a reasonable belief of a security breach) in respect of any Data Subject Personal Information, via the office of the Information Officer. The Winfield Group must provide such notification as soon as reasonably possible after it has become aware of any security breach of Personal Information.

11.4. Authorised Third Parties' Processing Personal Information

Personal Information will only be provided to Authorised Third Parties (including where such Authorised Third Parties host or Process or access Personal Information on The Winfield Group's systems) where consent is obtained from the Data Subjects in question or in furtherance of a business need or in compliance with a legal obligation. The extent of the consent required will be determined in consultation with the Information Officer.

Where necessary or appropriate, agreements with Authorised Third Parties to whom The Winfield Group may disclose Personal Information must be concluded to ensure that they Process any Personal Information in accordance with the provisions of this Policy and the relevant laws. All such Authorised Third Parties should at the very least conclude non-disclosure agreements containing data protection provisions with The Winfield Group compelling them to treat all Personal Information in their possession as confidential and preventing such third parties from disclosing such information.

All Authorised Third Parties who Process Data Subject Personal Information must strictly adhere to the security requirements set forth in this Policy and to The Winfield Group's security policies (listed in Cyber Risk and Security Policy, as these are amended from time to time) and shall be required to maintain and where required, upgrade their systems and processes to comply with the terms of this Policy and such security policies.

The Winfield Group should carry out a due diligence of all Authorised Third Parties Processing Personal Information on behalf of The Winfield Group and this may include reviewing the facilities of such Authorised Third Parties Where Personal Information hosted by Authorised Third Parties falls into a medium or high-risk category of sensitive information as described in section 9 hereto, which determination shall be carried out by the Information Officer.

Authorised Third Parties must immediately inform The Winfield Group (via the office of the Information Officer) of any actual or suspected security breach or compromise to Personal Information in its possession. The Authorised Third Parties may be required to notify the affected Data Subject(s) and the Information Regulator, but this should only be carried out on The Winfield Group's instructions, via the office of the Information Officer.

11.5. Use of Personal Information for direct marketing purposes

The Winfield Group can use Personal Information in its possession for direct marketing purposes by means of any form of electronic communication if the Data Subject has consented to such use. The manner and procedure for recording the consent obtained in this regard shall be approved by the Information Officer.

Where no consent was obtained from the Data Subject, the use of Personal Information for direct marketing purposes is subject to ALL the following conditions:

- The information ought to have been obtained in the context of the sale of goods or services;
- It must be used to market The Winfield Group's own similar products or services; and
- The Data Subject must be given a reasonable opportunity to opt out, either when the information is or was originally collected and/or (if the Data Subject has not initially refused or opted out of such use) on occasion of each direct marketing communication.

The direct marketing communication must contain The Winfield Group's details or details of the third party who sends the communication on behalf of The Winfield Group; and the contact details to which the recipient of the message can send an opt-out request.

Any deviation from the above position must be approved by the Legal, Regulatory and Risk Departments in consultation with the Information Officer.

11.6. Data Subject Access to Information

Data Subjects are entitled to request written confirmation that The Winfield Group holds his/her/its Personal Information and to request that The Winfield Group furnishes a description thereof. Any such requests shall be dealt with via the office of the Information Officer and, in the case of South Africa, in accordance with The Winfield Group's PAIA Manual (located at <https://www.villacrop.co.za/Pages/paia>, and issued in terms of the Promotion of Access to Information Act 2 of 2000) and this Policy. The Winfield Group will provide the Data Subject with any such Personal Information to the extent required by law and in terms of the Promotion of Access to Information Act 2 of 2000. The Winfield Group may, in certain cases, refuse to grant the requested access to information.

In the case of The Winfield Group, Data Subjects may challenge the accuracy or completeness of their Personal Information in The Winfield Group's records at any time through the process set out under The Winfield Group's PAIA Manual for accessing information.

If a Data Subject successfully demonstrates that their Personal Information in The Winfield Group's records is inaccurate or incomplete, The Winfield Group must ensure that such Personal Information is amended or deleted as required (including by any Authorised Third Parties).

11.7. Data Storage and Retention

The Winfield Group and Authorised Third Parties must ensure that Personal Information, Special Personal Information and any commercially sensitive information which it Processes is stored, captured, used, disclosed and destroyed in a secure and confidential manner appropriate to the classification of the information, in accordance with The Winfield Group Data Retention and Destruction Policy.

The Winfield Group must keep the Personal Information that it Processes on behalf of Data Subjects at its various business sites in line with operating procedures determined by technology department.

Authorised Third Parties, including data storage and processing providers, may from time to time also have access to a Data Subject's Personal Information in connection with the storage and retention thereof. The Winfield Group will ensure that these Authorised Third Parties will Process the Personal Information in accordance with the provisions of this Policy, all other relevant internal The Winfield Group policies, and the POPI Act.

As is further detailed in The Winfield Group's document retention policy, the following is applicable:

- The Winfield Group may keep records of the Personal Information it has collected, correspondence or comments in an electronic or hardcopy file format. Personal Information may be processed for as long as necessary to fulfil the purposes for which that Personal Information was collected and/or as permitted or required by applicable law.
- The Winfield Group may retain Personal Information for longer periods for statistical, historical or research purposes, and should this occur, The Winfield Group must ensure that appropriate safeguards have been put in place to ensure that all recorded Personal Information will continue to be Processed in accordance with this Policy and the applicable laws.
- Once the purpose for which the Personal Information was initially collected and Processed no longer applies or becomes obsolete, The Winfield Group will ensure that it is deleted, destroyed or de-identified, so that a third party cannot re-identify such Personal Information.

11.8. Cross Border Data Transfers

The Winfield Group can send or transfer Personal Information of Data Subjects to Authorised Third Parties beyond the borders of the countries in which Personal Information is collected in order to achieve the purpose for which the Personal Information was collected and Processed, including for Processing and storage by Authorised Third Parties, if the applicable Data Subject(s) has consented to such cross-border transfer.

Where no consent has been obtained, the cross-border transfer must meet one of the following conditions (as approved by the Information Officer):

- The recipient must be subject to existing legislation in his /her/its country or to binding corporate rules or to a binding agreement that enforces and upholds Personal Information protection measures which are acceptable to The Winfield Group;
- The transfer must be necessary for the conclusion and/or performance of a contract between The Winfield Group and the Data Subject;
- The transfer must be necessary for the conclusion or performance of a contract entered, in the interest of the Data Subject, between The Winfield Group and the relevant group

- company or the Authorised Third Party; and
- The transfer must be to the benefit of the Data Subject and must take place in circumstances under which it is not reasonably possible to obtain the Data Subject's consent and where it is reasonably possible to obtain such consent; the Data Subject would be likely to give it.

The processing of Personal Information in a foreign jurisdiction may be subject to the laws of the country in which it is held, and may be subject to disclosure to the Governments, Courts of law, Enforcement or Regulatory Agencies of such other country, pursuant to the laws of such country.

12. Processing of The Winfield Group Personnel's Personal Information

The Winfield Group's HR function shall ensure that they comply with this Policy in respect of all The Winfield Group Personnel data which they have on file and collect, and which falls within the definition of Personal Information, including that HR will only collect such Personal Information of its employees as is necessary for their employment relationship with The Winfield Group. This includes information collected from the time that a potential employee applies for a job, during the interview and selection process and if such candidate is successful, all information processed during the course of their employment and on the termination of their employment.

The appropriate consent forms should be included as part of the terms of engagement and/or employment contracts concluded with each of The Winfield Group Personnel (including employees, temporary employees, independent contractors, consultants, etc.).

13. Disclosure

13.1. Employee use

The Winfield Group Personnel entrusted with the custody of Processing Personal Information in the course of their duties may only use such information in pursuit of their duties and for the purpose for which it is collected and for no other reason whatsoever. Any failure to comply with this requirement could result in disciplinary action and possible dismissal.

13.2. Disclosure of Personal Information to law enforcement and/or judicial authorities

The Winfield Group is required to provide Personal Information to law enforcement agencies and/or to judicial authorities in terms of various applicable laws. These requests or instructions are typically in the nature of court orders, subpoenas, warrants and or other judicial / law enforcement processes. Any such requests should be routed via the Information Officer and/or Legal team.

13.3. Intergroup disclosures

Any disclosure of Personal Information between the Group of companies must be carried out in compliance with the terms of this Policy, including as regards having obtained appropriate consents from the Data Subjects in question which allows for such intergroup disclosure. Provided that such disclosure complies with the terms of this Policy and any applicable laws, all Group companies who Process Data Subjects' Personal Information must ensure that it only Processes such Personal Information within the 'purpose specification' and for no other purposes.

14. Policy Violations

Non-compliance with this Policy constitutes misconduct and could, in the case of employees of The Winfield Group, result in disciplinary action in terms of The Winfield Group's Disciplinary Procedure and Code and could lead to dismissal and/or further legal action being taken against the responsible The Winfield Group employee(s).

15. Responsibility

The Board is responsible for ensuring that this Policy is accepted and implemented throughout The Winfield Group.

The Board of The Winfield Group is in turn responsible for verifying that the company and its operations in the relevant local market, comply with this Policy.

A governance structure has been implemented to manage the risks associated with The Winfield Group's Processing of Personal Information, which is set out in Annexure A hereto. The respective committees will be engaged on privacy related matters depending on the degree of risk categorization assigned to the matter at hand.

16. Monitoring and Review

This Policy will be reviewed at regular intervals when appropriate and in accordance with The Winfield Group's Privacy Management System.

17. Annexure A: Governance Structure and Processes

The following governance structure applies to The Winfield Group managing the implementation and application of this Policy:

1.7 Privacy Core Team:

1.8	Position Roles and Responsibilities
<i>Board</i>	Is the ultimate custodian of Personal Information across The Winfield Group.
<i>Information Officers</i>	<ul style="list-style-type: none">• Oversee the implementation of this Policy across The Winfield Group.• Escalate all matters relating to this Policy and other privacy issues to the Board.• Annexure B sets out the individuals appointed as Information Officers for each entity.

18. Annexure B INFORMATION OFFICERS DETAILS

LOL Holding South Africa (Pty) Ltd

Information Officer: Magaretha Maria van der Westhuizen
Information Regulator reference number: 0018621/2023-2024-IRRT/PR
Physical Address: 66 Botes Road, Glen Marais, Kempton Park
Postal Address: PO Box 10413, Aston Manor, Kempton Park, 1630
Telephone Number: (+27 11) 396 2233
Email address: popia@winfieldunited.co.za

Winfield United South Africa (Pty) Ltd

Information Officer: Magaretha Maria van der Westhuizen
Information Regulator reference number: 0000017/2022-2023-IRRT/PR
Physical Address: 65 Botes Road, Glen Marais, Kempton Park
Postal Address: PO Box 801, Kempton Park, 1620
Telephone Number: (+27 11) 396 2233
Email address: popia@winfieldunited.co.za

Exportos SA (Pty) Ltd

Information Officer: Magaretha Maria van der Westhuizen
Information Regulator reference number: 0018623/2023-2024-IRRT/PR
Physical Address: 66 Botes Road, Glen Marais, Kempton Park
Postal Address: PO Box 10413, Aston Manor, Kempton Park, 1630
Telephone Number: (+27 11) 396 2233
Email address: popia@winfieldunited.co.za

Fountain Chemicals (Pty) Ltd

Information Officer: Anso Moolman
Information Regulator reference number: 0018615/2023-2024-IRRT/PR
Physical Address: 66 Botes Road, Glen Marais, Kempton Park
Postal Address: PO Box 10413, Aston Manor, Kempton Park, 1630
Telephone Number: (+27 11) 396 2233
Email address: popia@winfieldunited.co.za

Villa Crop Protection (Pty) Ltd

Information Officer: Anso Moolman
Information Regulator reference number: 0018616/2023-2024-IRRT/PR
Physical Address: 65 Botes Road, Glen Marais, Kempton Park
Postal Address: PO Box 801, Kempton Park, 1620
Telephone Number: (+27 11) 396 2233
Email address: popia@winfieldunited.co.za

Crop Asure (Pty) Ltd

Information Officer: Magaretha Maria van der Westhuizen
Information Regulator reference number: 0018626/2023-2024-IRRT/PR
Physical Address: 66 Botes Road, Glen Marais, Kempton Park
Postal Address: PO Box 10413, Aston Manor, Kempton Park, 1630
Telephone Number: (+27 11) 396 2233
Email address: popia@winfieldunited.co.za

Villa 44 Valencia (Pty) Ltd

Information Officer: Magaretha Maria van der Westhuizen
Information Regulator reference number: 0018627/2023-2024-IRRT/PR
Physical Address: 66 Botes Road, Glen Marais, Kempton Park
Postal Address: PO Box 10413, Aston Manor, Kempton Park, 1630
Telephone Number: (+27 11) 396 2233
Email address: popia@winfieldunited.co.za

Geto Investments (Pty) Ltd

Information Officer: Magaretha Maria van der Westhuizen
Information Regulator reference number: 0018628/2023-2024-IRRT/PR
Physical Address: 66 Botes Road, Glen Marais, Kempton Park
Postal Address: PO Box 10413, Aston Manor, Kempton Park, 1630
Telephone Number: (+27 11) 396 2233
Email address: popia@winfieldunited.co.za

Metos SA (Pty) Ltd

Information Officer: Magaretha Maria van der Westhuizen
Information Regulator reference number: 0018630/2023-2024-IRRT/PR
Physical Address: 66 Botes Road, Glen Marais, Kempton Park
Postal Address: PO Box 10413, Aston Manor, Kempton Park, 1630
Telephone Number: (+27 11) 396 2233
Email address: popia@winfieldunited.co.za

Winfield United (Pty) Ltd

Information Officer: Magaretha Maria van der Westhuizen
Information Regulator reference number: 0018631/2023-2024-IRRT/PR
Physical Address: 65 Botes Road, Glen Marais, Kempton Park
Postal Address: PO Box 801, Kempton Park, 1620
Telephone Number: (+27 11) 396 2233
Email address: popia@winfieldunited.co.za

Villa Academy (Pty) Ltd

Information Officer: Magaretha Maria van der Westhuizen
Information Regulator reference number: 0018632/2023-2024-IRRT/PR
Physical Address: 66 Botes Road, Glen Marais, Kempton Park
Postal Address: PO Box 10413, Aston Manor, Kempton Park, 1630
Telephone Number: (+27 11) 396 2233
Email address: popia@winfieldunited.co.za

Project Proficiency Academy (Pty) Ltd

Information Officer: Magaretha Maria van der Westhuizen
Information Regulator reference number: 0018633/2023-2024-IRRT/PR
Physical Address: 65 Botes Road, Glen Marais, Kempton Park
Postal Address: PO Box 801, Kempton Park, 1620
Telephone Number: (+27 11) 396 2233
Email address: popia@winfieldunited.co.za

Universal Crop Protection (Pty) Ltd

Information Officer: Magaretha Maria van der Westhuizen
Information Regulator reference number: 0018634/2023-2024-IRRT/PR
Physical Address: 65 Botes Road, Glen Marais, Kempton Park
Postal Address: PO Box 801, Kempton Park, 1620
Telephone Number: (+27 11) 396 2233
Email address: popia@winfieldunited.co.za

Curativo (Pty) Ltd

Information Officer: Magaretha Maria van der Westhuizen
Information Regulator reference number: 0018636/2023-2024-IRRT/PR
Physical Address: 66 Botes Road, Glen Marais, Kempton Park
Postal Address: PO Box 10413, Aston Manor, Kempton Park, 1630
Telephone Number: (+27 11) 396 2233
Email address: popia@winfieldunited.co.za

Curativo North (Pty) Ltd

Information Officer: Magaretha Maria van der Westhuizen
Information Regulator reference number: 0018637/2023-2024-IRRT/PR
Physical Address: 66 Botes Road, Glen Marais, Kempton Park
Postal Address: PO Box 10413, Aston Manor, Kempton Park, 1630
Telephone Number: (+27 11) 396 2233
Email address: popia@winfieldunited.co.za

Meridian Agrochemical Company

Information Officer: Magaretha Maria van der Westhuizen
Information Regulator reference number: 0018640/2023-2024-IRRT/PR
Physical Address: 66 Botes Road, Glen Marais, Kempton Park
Postal Address: PO Box 10413, Aston Manor, Kempton Park, 1630
Telephone Number: (+27 11) 396 2233
Email address: popia@winfieldunited.co.za

InteliChem (Pty) Ltd

Information Officer: Prieur Ferreira van der Merwe
Information Regulator reference number: 0018663/2023-2024-IRRT/PR
Physical Address: Kathrein Wine Estate, Annandale Road, Lynedoch, 7603
Postal Address: Suite 41, Private Bag X4, Die Boord, 7613
Telephone Number: (+27 21) 881 8500
Email address: popia@winfieldunited.co.za

DropSight (Pty) Ltd

Information Officer: Prieur Ferreira van der Merwe
Information Regulator reference number: 0018630/2023-2024-IRRT/PR
Physical Address: Kathrein Wine Estate, Annandale Road, Lynedoch, 7603
Postal Address: Suite 41, Private Bag X4, Die Boord, 7613
Telephone Number: (+27 21) 881 8500
Email address: popia@winfieldunited.co.za

InteliChem Holdings (Pty) Ltd

Information Officer: Prieur Ferreira van der Merwe
Information Regulator reference number: 0018665/2023-2024-IRRT/PR
Physical Address: Kathrein Wine Estate, Annandale Road, Lynedoch, 7603
Postal Address: Suite 41, Private Bag X4, Die Boord, 7613
Telephone Number: (+27 21) 881 8500
Email address: popia@winfieldunited.co.za

InteliSeed (Pty) Ltd

Information Officer: Prieur Ferreira van der Merwe
Information Regulator reference number: 0018666/2023-2024-IRRT/PR
Physical Address: 70D Market Street, Krugersdorp, 1739
Postal Address: Postnet Suite 157, Private Bag X3, Paardekraal, 1752
Telephone Number: (+27 21) 881 8500
Email address: popia@winfieldunited.co.za

Tecnica Management Services (Pty) Ltd

Information Officer: Prieur Ferreira van der Merwe
Information Regulator reference number: 0018667/2023-2024-IRRT/PR
Physical Address: Kathrein Wine Estate, Annandale Road, Lynedoch, 7603
Postal Address: Suite 41, Private Bag X4, Die Boord, 7613
Telephone Number: (+27 21) 881 8500
Email address: popia@winfieldunited.co.za

InteliFert (Pty) Ltd

Information Officer: Prieur Ferreira van der Merwe
Information Regulator reference number: 0018668/2023-2024-IRRT/PR
Physical Address: Kathrein Wine Estate, Annandale Road, Lynedoch, 7603
Postal Address: Suite 41, Private Bag X4, Die Boord, 7613
Telephone Number: (+27 21) 881 8500
Email address: popia@winfieldunited.co.za

Intelekt Crop Solutions (Pty) Ltd

Information Officer: Prieur Ferreira van der Merwe
Information Regulator reference number: 0018669/2023-2024-IRRT/PR
Physical Address: Kathrein Wine Estate, Annandale Road, Lynedoch, 7603
Postal Address: Suite 41, Private Bag X4, Die Boord, 7613
Telephone Number: (+27 21) 881 8500
Email address: popia@winfieldunited.co.za

InteliGro Investments (Pty) Ltd

Information Officer: Prieur Ferreira van der Merwe
Information Regulator reference number: 0018670/2023-2024-IRRT/PR
Physical Address: 3 Marchand Street, Wellington, 7655
Postal Address: PO Box 85, Wellington, 7654
Telephone Number: (+27 21) 881 8500
Email address: popia@winfieldunited.co.za

InteliGro (Pty) Ltd

Information Officer: Jacques Southey
Information Regulator reference number: 0015694/2023-2024-IRRT/PR
Physical Address: 3 Marchand Street, Wellington, 7655
Postal Address: PO Box 85, Wellington, 7654
Telephone Number: (+27 21) 881 8500
Email address: popia@winfieldunited.co.za

Chemrent (Pty) Ltd

Information Officer: Prieur Ferreira van der Merwe
Information Regulator reference number: 0018671/2023-2024-IRRT/PR
Physical Address: 3 Marchand Street, Wellington, 7655
Postal Address: PO Box 85, Wellington, 7654
Telephone Number: (+27 21) 881 8500
Email address: popia@winfieldunited.co.za

Crop Asure LDA

Information Officer: Magaretha Maria van der Westhuizen
Information Regulator reference number: 0018641/2023-2024-IRRT/PR
Physical Address: Bairro Bloco1, Andar R/C, Outro, Maputo
Postal Address: PO Box 10413, Aston Manor, Kempton Park, 1630
Telephone Number: (+27 11) 396 2233
Email address: popia@winfieldunited.co.za

Crop Asure Zimbabwe

Information Officer: Magaretha Maria van der Westhuizen
Information Regulator reference number: 0018642/2023-2024-IRRT/PR
Physical Address: 61 Princess Drive, Newlands, Harare
Postal Address: PO Box 10413, Aston Manor, Kempton Park, 1630
Telephone Number: (+27 11) 396 2233
Email address: popia@winfieldunited.co.za

InteliGro Agri Namibia (Pty) Ltd

Information Officer: Jacques Southey
Information Regulator reference number: 0018619/2023-2024-IRRT/PR
Physical Address: Plot 200, Noordoewer, Namibia, 9000
Postal Address: PO Box 77, Noordoewer, Namibia, 9000
Telephone Number: (+27 21) 881 8500
Email address: popia@winfieldunited.co.za