



## GOLDEN TREE HOLDING GROUP

### EXTERNAL PRIVACY POLICY

#### 1. PURPOSE OF THIS PRIVACY NOTICE

- 1.1. Is to promote the protection of personal information processed by public and private bodies, which are regulated and controlled by the POPIA, in terms of processing which includes the collection, use and transfer of personal information. This is to provide for the rights of persons or legal entity's regarding unsolicited electronic communications and automated decision making.
- 1.2. Personal Information includes Special Personal Information and Personal Information of both natural persons and legal entities.
- 1.3. This notice applies to all external entities / persons / parties with whom We engage as part of Our business operations ("Data Subjects / You / Your") and where as part of such engagement, we may collect, use and share Your Personal Information.

#### 2. PERSONAL INFORMATION COLLECTED BY US

GOLDEN TREE HOLDING GROUP or any of its companies will be collecting personal information / information in the conduct of its business operations, mostly engages and contracts with juristic entities or individuals within the Entities.

Personal Information will be processed on the following manner.

- 2.1. **Contact Information** such as Company name, contact persons, e-mail addresses, physical address, phone and mobile numbers;
- 2.2. **Account and payment information** such as authorised account users, VAT and Income tax reference numbers, bank details, invoices and records, SWIFT and IBAN details;
- 2.3. **Verification Information** such as username, password, password reminder questions and password answers;



- 2.4. **Identifiers** such as Company registration numbers, identity numbers, Supplier/Vendor number, B-BBEE status, vehicle registration numbers, driver's license, physical addresses;
- 2.5. **Contract information** including product or services information, commercial terms of the contract, contract performance and non-performance;
- 2.6. **Tender request information** including client references, proof of insurance and tax clearance certificate of good standing, account details;
- 2.7. **Website, Mobile Applications and Social Media information:** when you access any Golden Tree Group website (or special purpose portals) including any brand websites, We collect your IP address and other technical information about your computer and website usage;
- 2.8. **Financial information** such as financial statements, credit and trade references, shareholders, trustees and sureties;
- 2.9. **Background and Credit information including** credit status and depending on the nature of the services/contract, criminal record and fraud checks;
- 2.10. **Principles Information:** where You apply for credit, the name, ID numbers, and residential addresses of Your Partners, Shareholders and Directors and details of property/is owned by Principals (Sole Owner / Partners / Members / Directors);
- 2.11. **CCTV:** we may process videos of You obtained via our CCTV surveillance systems;
- 2.12. **Recruitment information:** CV/resume, SA ID number, passport number; training records, education and work history, address, contact details, certifications/qualifications;
- 2.13. **Information relating to Individual Consumers of our Products:** such as name, phone number, email address, physical address, mobile phone number, preferred language, details of complaints, bank account details for payment of any agreed settlement amount, medical information were the basis if the claim is health related



### 3. How Personal Information is collected:

#### 3.1. *Directly collection of information from **You** when:*

- 3.1.1. Personal consultation with You as part of any onboarding process;
- 3.1.2. Negotiate and conclude an agreement with You;
- 3.1.3. You correspond with Us, such as through emails, complaints or queries via Our Head Office;
- 3.1.4. You enter any of Our Sites, Offices, Facilities and work areas (for example via CCTV);
- 3.1.5. You interact with Our support, sales and account management teams;
- 3.1.6. You render any services to Us as a third party service provider or sell or purchase Products from Us;
- 3.1.7. when You reply to a Quotation or Proforma Invoice;
- 3.1.8. You apply for credit.

#### 3.2. *We collect Personal Information **indirectly about You** from:*

- 3.2.1. other companies in the Golden Tree Holding Group of companies;
- 3.2.2. Websites, by phone, email, or through Your participation in a survey conducted through third party websites (including Our branded sites which may be managed by third parties) or through social media platforms such as Facebook, Snapchat, Instagram, LinkedIn and TikTok;
- 3.2.3. public sources and registers (such as company registers, online search engines, (title) deeds registries, public posts on social media);
- 3.2.4. third parties that We engage for the purposes of conducting its business (list providers, credit bureaux, regulators and government departments and third party service providers);
- 3.2.5. employment agencies, background check providers, former employers, credit reference agencies or other background check agencies.



#### **4. If You refuse to Provide Us with Your Personal Information**

If You refuse to provide Us with Your Personal Information, by way of illustration only:

- 4.1.1. We may not be able to onboard You as a Vendor/Customer;
- 4.1.2. We may not be able to conclude a contract to do business with You;
- 4.1.3. We may not be able to respond to enquiries or investigate a complaint received from You.

#### **5. Your personal information will be used for:**

- 5.1. To operate Our business;
- 5.2. To implement and manage relationships with You including onboarding as a Vendor or Customer, processing and fulfilling orders, sending invoices, processing payments, accounting, auditing, billing, collection and returns;
- 5.3. To provide customer services (for example, product recalls, tracking, and responding to product quality concerns);
- 5.4. Comply with any legislation or regulation which requires Us to collect the information;
- 5.5. Comply with demands or requests made by Regulators, Governmental Authorities and Law Enforcement Authorities;
- 5.6. Monitor and analyse trends, usage and activities in connection with Our products;
- 5.7. Improve Our products;
- 5.8. Ensure that we have Your up-to-date contact information;
- 5.9. Conduct internal audits and investigations;
- 5.10. Provide insurance and to process insurance claims;
- 5.11. Verify information provided by You.

#### **6. Special Personal Information**

When it is required that we need to process your Special Personal Information, it will be done in the ordinary course of our business, for a legitimate purpose, and in accordance with applicable laws.



## 7. Personal Information of Children

We do not intentionally collect Personal Information from children (minors) under the age of 18 years.

## 8. Who we may share your Personal Information With?

8.1. third-party service providers who provide services to Us, including but not limiting to supporting, operating, securing and hosting Our information technology systems, providers of customer experience services, payment processing, order fulfilment, product management, logistics and returns, debt collection, document and information storage;

8.1.2. Our professional advisors;

8.1.3. law enforcement, government officials, or other third parties as may be necessary or appropriate in connection with an investigation of fraud, intellectual property infringements, or other activity that is illegal or may expose Us to legal liability;

8.1.4. third parties (such as a potential purchaser and its professional advisors) in the event of any reorganisation, merger, divestiture, acquisition, consolidation, restructure, sale, joint venture, or other disposition of any or all of our assets.

## 9. Transfer of Personal Information to Other Countries?

9.1. We are a global organization and may transfer certain Personal Information across geographical borders to –

9.1.1. Golden Tree Holding Group companies;

9.1.2. service providers for the purposes set out in 7 above;

9.1.3. verify and undertake risk assessments of new Vendors/Customers.



9.2. Where we transfer your personal information outside of South Africa, We ensure that We do so in accordance with the requirements for lawful transfer outside of South Africa as set out in the Protection of Personal Information Act No.4 of 2013 “POPIA”).

9.3. As part of a global company, in the operation of Our business We use several centralised functions and systems across the Golden Tree Holding Group. Your personal information may be processed through these centralised functions and systems. Such Processing will be in accordance with the purpose and in the manner as set out in this Privacy Notice.

6 9.4. Examples of Golden Tree Holding Regions countries (sectors) we may transfer personal information includes Swaziland.

9.5. You consent to the transfer of your personal information outside of South Africa across geographical borders for the purposes set out in this paragraph 9.

## **10. How we keep your Personal Information Secure**

10.1. We secure the integrity and confidentiality of personal information in our possession or under our control by taking appropriate, reasonable technical and organisational measures to prevent loss of, damage to or unauthorised destruction of personal information; and unlawful access to or processing of personal information.

10.2. In order to ensure such security, we have in place policies, controls and related processes, which are reviewed and updated on a regular basis.

10.3. Our policies, controls and procedures cover for example

10.3.1. physical, technical and network security;

10.3.2. access controls and monitoring access;

10.3.3. secure storage, destruction and encryption of records of Personal Information;

10.3.4. personal information security incident reporting and remediation;



10.3.5. by way of written agreements, imposition of security and confidentiality obligations on operators and reserving the right to audit their systems to ensure compliance with such obligations.

## 11. Cookies

11.1. We may place small text files called 'cookies' on your device when you visit our website. Cookies do not contain personal information, but they do contain a personal identifier allowing us to associate your personal information with a certain device.

11.2. We use the following types of cookies on our website:

11.2.1. Non Essential cookies which are crucial to a user's experience of a website, enabling core features functions on our website;

11.2.2. Performance cookies which track how you use a website during your visit. This information is typically anonymous and aggregated and helps us understand visitor usage patterns, identify and diagnose problems users may encounter, and make better decisions in improving the overall website experience;

11.2.3. Functionality cookies which are used to collect information about your device and any settings you may configure on the Website you're visiting (like language and time zone settings). With this information, websites can provide a customized, enhanced, or optimized content and services.

11.3. Your web browser can be set to allow you to control whether you will accept or reject cookies, or to notify you each time a cookie is sent to Your browser. If your browser is set to reject cookies, websites that are cookie-enabled will not recognize you when you return to the website, and some website functionality may be lost.

11.4. **You consent to our use of cookies in accordance with this policy**

## 12. Your Rights

12.1. You have the right to –



12.1.1. request a record of your personal information. We may charge you a fee, but we will tell you the amount prior to furnishing you with the records. There will be certain circumstances, when we will not be able to disclose any personal information about you (example, to protect (a) the privacy of others; (b) confidential information of third parties; (c) the safety of others);

12.1.2. request correction of your personal information, if it is inaccurate, irrelevant, excessive, misleading or obtained unlawfully;

12.1.3. request deletion of your personal information where there is no lawful basis to retain it;

12.1.4. withdraw consent previously given in respect of the processing of your personal information. Withdraw consent may limit our or a third party's ability to carry out certain functions in respect of our commercial relationship.

12.2. We will comply with your request unless we have a reasonable explanation why we cannot comply.

12.3. Whether we disagree to correct or delete the personal information of which you asked us to, we will indicate on the personal information register that a correction was requested but was not made.

12.4. If changes to the personal information impact any earlier decisions that impact you, if reasonably practicable, we will inform all persons to whom the personal information has been disclosed of those steps.

12.5. We will notify you of the action taken by us because of your request.

12.6. All requests can be made via email at **(email address)** We will always require that You verify you are in fact the owner of such personal information.

### **13. How Long Do We Keep Your Personal Information?**

13.1. We will retain your personal information for as long as necessary to achieve the purpose for which it was collected or subsequently processed.

13.2. Personal Information may be held for longer periods where –





- 13.2.1. retention of the record is required or authorised by law;
- 13.2.2. we require the record for lawful purposes related to our functions or activities;
- 13.2.3. retention of the record is required by a contract between you and us; or
- 13.2.4. you have consented to the retention of the record.

## 14. Right to withdraw consent

14.1. In the limited circumstances where processing of your personal information is based on your consent, you have the right to withdraw such consent at any time. To withdraw your consent, please send an email to (email address)

14.2. Once we are notified that you have withdrawn your consent, we will no longer process your personal information for the purpose you originally agreed to, unless we have another lawful basis for doing so.

## 13. How to lodge a complaint with the information Regulator

You may lodge a complaint in respect of this privacy notice or any of our personal information processing activities with the Information Regulator, whose contact details are available on its website at <https://www.justice.gov.za/inforeg/> or [www.justice.gov.za](http://www.justice.gov.za)

## 16. Revisions to the Notice

We may update this privacy notice from time to time. Changes to this Privacy Notice will not necessarily be preceded by a notice posted on the website, and we encourage you to check the Privacy Notice periodically for changes.

## 17. Liability

You indemnify and hold us harmless in respect of any liability(ies) or damages whatsoever that may arise, at any time now or in the future, for claims that arise due



# Golden Tree Holding<sup>(Pty) Ltd</sup>

Concord Packaging • Reg no. 1994/10704/07  
SCP Polycloth • Reg no. 1999/14288/07

Swaziland Polypack • Reg no. 2010/022162/10  
New Tech Packaging • Reg no. 1994/006705/07

**Flexible Packaging, BOPP Bag & Woven Bag**

to your failure to comply with the provisions of any statute and/or regulations applicable to this notice and/or the processing of personal information.

**This policy is last updated on the 29<sup>th</sup> June 2021.**