



The Meridian Group Data Privacy Policy

Meridian Holdings (Pty) Ltd, its subsidiaries, joint ventures, and related companies under Meridian Group's administration ("Meridian Group") recognises the importance of protecting the personal information that you provide to us. For us, it is more than just making sure we comply with the relevant legislation; you trust us with your personal information, and we respect that trust.

This Privacy Policy explains why and how we collect, use, process and store your personal information. It also outlines your choices and your rights in relation to your personal information.

The processing of personal data must be transparent and secure, in conformity with the Protection of Personal Information Act (POPI), the Promotion of Access to Information Act (PAIA), and the privacy legislation of the countries in which Meridian Group operates.

1. What this Privacy Policy covers / apply to

This Privacy Policy applies:

- When you use any of our products, services and/or solutions;
- When you apply for a customer account to purchase from us;
- When you make use of any of our websites and any subsequent site linked to our website (i.e. Reporting Site);
- When you make use of any electronic platforms whereby services and information are provided through a service level agreement between Meridian and a third-party supplier;
- When you visit any of our branded social media pages;
- When you apply to us for a job or work placement;
- When you supply services to us where this involves any personal information; and/or
- As a result of your relationship with our clients, customers and/or employees.

2. What is Personal Information

'Personal information' is information which relates to an identified or identifiable living natural person, or a juristic person.

In the case of a living natural person, it is any information that can be used to identify you or that we can link to you. In the case of a juristic person, it is any information relating to ownership, identification, registration numbers in terms of relevant South African legislation, contact details and financial information and history.

3. Who are you sharing your Personal Information with

The following companies or brands are considered part of the Meridian Group: Meridian Holdings, Meridian Wine Merchants, Meridian Wine Distribution, Meridian Services, Meridian East Africa, Meridian Wines Kenya, Meridian Collective, Meridian Foundation, Managed People Solutions, Cape Wine Academy, and Commerce 7.

For this Privacy Policy, we will refer to the Meridian Group.

4. What Personal Information do we collect and store

We may collect the following categories and types of information considered to be personally identifiable (if either applicable to a living natural person or juristic person):

- Personal details: Name, surname, age, date of birth, gender, identity number, registration number, taxation and VAT numbers, registration to applicable liquor authorities, ownership information, disability status;
- Contact details: Phone number, mobile number, postal address, business address, delivery address, email address;
- Employment details: Job title, employer name, employee number, medical aid details, retirement annuity and pension fund details, salary figures, information provided through a CV or resume;
- Economic of Financial information: Banking details, bank statements, taxation certificates, financial statements, insurance information and references to payment history;
- Transactional information: Details of payments made to or received from you as an individual or juristic person, details of products and/or services purchased from us to supplied to us;
- Technology Based information: Browser, device and domain names and information, Internet Protocol (IP) address, geographic locations including GPS coordinates, information collected through cookies, online services and applications requiring passwords and other access and login information features, operating systems and platforms;
- Correspondence: Marketing preferences, information you provide to us for customer communications, information provided through our customer service department, and any dealings with our representative employees;
- Special Personal Information:
 - racial and ethnic information through CCTV cameras installed at our premises for security reasons;
 - criminal behaviour and history through the recruitment and hiring process;
 - information relating to your health as part of our Covid 19 screening process and protocols; and
 - information indicating religious beliefs through organising of events and asking for dietary requirements.

We do not collect the information of persons under 18. Such information is only obtained if voluntary disclosed by employees through the completion of employee contracts, retirement fund-, pension fund- or life insurance fund beneficiary details.

We do not collect credit card information. Credit card details are specifically prohibited from being stored to minimise the risk and protect our business and our customers from fraudulent transactions.

5. How we collect your Personal Information

Where you make use of and/or purchase our products and/or services (refer to point 1. What this Privacy Policy covers / apply to), we will collect personal information from various sources including (but not limited to) the following:

- Directly from or through interactions with you (i.e. through subscription to our publications and marketing emails);
- Through automated or passive interactions with you (i.e. through access to and navigating of our website or ERP system platform);
- Application for a job or work placement with us;
- Opening and purchasing through a customer account with us;

- Opening and supplying through a vendor / supplier account with us;
- Through granting access to our premises;
- Our warehousing and office facilities may be monitored by CCTV cameras;
- To enable you to facilitate the conclusion of an agreement with us;
- Legislative authorities:
 - We may collect personal information from registered legislative authorities such as, but not limited to The South African Revenue Services (SARS), The Companies and Intellectual Property Commission (CIPC),
- Third Parties:
 - We may also collect personal information from third parties such as your employing organisation, regulatory authorities, recruitment agencies, credit reporting agencies, information or service providers, and publicly available records.

6. How we use your Personal Information

We may only use your personal information for the purposes for which it was collected and agreed to with you. The core base or reasoning for the use of your personal information will be one of the following:

- Customer information:
 - to provide services or sell products to you as our customer;
 - to fulfil our contractual obligation to you;
 - to retain and make information available to you on our website and other information platforms;
 - to maintain and update our customer and potential customer databases; and/or
 - debt tracing and debt recovery.
- Supplier information:
 - to make use of your services to us or purchase a product from you;
 - to fulfil our contractual obligation to you; and/or
 - to create supplier profiles on our systems, pay suppliers, and for general supplier administration.
- Direct marketing:
 - to conduct market research surveys;
 - to offer you information and content which is more appropriately tailored for you as far as reasonably possible;
 - to provide you with the latest information about our products and services or events if you have agreed to receive such information; and/or
 - campaign tracking and reporting.
- Communications:
 - to communicate with you as a customer, supplier and/or employee. These communications will be deemed a requirement in order to carry out our instructions, requests, legal obligation and/or services to you; and/or
 - to maintain and constantly improve our relationship with you.
- Legal and regulatory obligations:
 - to comply with legal and regulatory obligations set out by applicable legislation and laws;
 - to comply with our statutory obligations, including client identification and verification as part of our screening clients and visitors' health when accessing our premises to comply with Covid-19 regulations and protocols; and/or
 - to comply with auditing and record keeping requirements.

- Employee information:
 - to comply with the employment equity act requirements; and/or
 - to transact and interact with the employee in order to perform the tasks and function required of the position fulfilled.

7. Disclosure of your Personal Information

We will not generally share your personal information with third parties (other than service providers acting on our behalf) unless we have a lawful basis or requirement for doing so.

We rely on third-party service providers to perform a variety of services on our behalf, including but not limited to: financial statement preparation, auditing, company registration and secretarial compliance, assisting with tax related queries on behalf of the company and employees, BEE certification, data analytics, valuation determinations, IT service providers and payment processing through banking services.

Any third parties with whom we share personal information are contractually required to implement appropriate data protection and security measures to protect personal information and are not permitted to use personal information for any purpose other than the purpose for which they are provided with or given access to personal information.

Under certain circumstances we are required by various laws to collect and share your personal information. These laws include, but are not limited to the below:

- Basic Conditions of Employment Act, 75 of 1997
- Income Tax Act, 58 of 1962
- Occupational Health and Safety Act, 85 of 1993
- Companies Act, 71 of 2008
- Compensation of Occupational Injuries and Diseases Act, 130 of 1993
- Skills Development Act, 97 of 1998
- Disaster Management Act, 57 of 2002
- Tax Administration Act, 28 of 2011
- Employment Equity Act, 55 of 1999
- Value Added Tax Act, 89 of 1991

8. Safeguarding your Personal Information

We store your personal information on:

- Our premises, in the form of hard copies;
- The premises of third-party service providers such as document storage service providers;
- Our servers; and/or
- On the servers of our third-party service providers, such as IT systems or hosting service providers.

We take the privacy and security of your personal information seriously. We have implemented reasonable security safeguards to protect the personal information provided to us. For example, all electronic data obtained and retained through and by our servers, operating and ERP systems are controlled, safeguarded and monitored through the implementation and adherence to our Cyber Security Policies in place.

You can play a role in protecting your information by never sharing your username, PIN or password with anyone or submitting it to a website you don't recognise. Always log off after a web session and change your password regularly. We regularly monitor our systems for possible vulnerabilities and attacks. No system is perfect so we cannot guarantee that information may not be accessed, disclosed, altered or destroyed by breach of any of our physical, technical or managerial safeguards.

Please note that any email you send to us is not encrypted and may be monitored by us. Please do not send us sensitive or confidential personal information by email.

Although we cannot prevent all security threats, we have measures in place to minimise the threat to your privacy. Should there be a data breach where your personal information is directly affected, we will follow the guidelines provided by data privacy legislation and our internal Cyber Security Policies in order to inform you.

9. Your rights to access and amend your Personal Information

You have the right to know what personal information we have about you, to correct it and to opt out of any marketing.

You have the right to:

- ask what personal information we hold about you;
- ask what information was sent to our suppliers, service providers or any other third-party;
- ask us to update, correct or delete any out-of-date or incorrect personal information we hold about you;
- unsubscribe from any direct marketing communications we may send you;
- block all cookies by setting your browser to do so;
- object to the processing of your personal information; and/or
- withdraw consent which you previously gave to the processing of your Personal Information.

It can take us up to 21 days to respond to your request and we may charge a small fee.

If you want us to delete all personal information we have about you, you will probably have to terminate all agreements you have with us. We cannot maintain our relationship with you without having some of your personal information. We can refuse to delete your information if we are required by law to keep it or if we need it to protect our rights.

10. Notification of changes to the Privacy Policy

To the extent allowed by the law, this Privacy Policy may be amended and updated from time to time at our sole discretion, without notice, provided that if we do so, we will post the revised policy on our website and we will take reasonably practicable steps to inform you of the updated Privacy Policy.

Accordingly, please check this Privacy Policy for changes periodically. If you continue to engage with us, provide products or services to us or access or use our website and/or products and services after amendments are made to the Privacy Policy and displayed on our website, you will be deemed to have accepted the updated Privacy Policy.

11. How to contact us

If you would like to access, correct, amend or delete any personal information we have about you, you are invited to contact our Information Officer through the following methods:

- Information Officer: Cobus de Villiers
- Deputy Information Officer: Martie Mulder
- Email address: privacy@groupmeridian.co.za
- Physical Address: 11 London Circle, Brackengate Business Park, Brackenfell, Western Cape
- Postal Address: PO Box 51, Brackenfell, Western Cape, 7561

We are committed to working with you to obtain a fair resolution of any complaint or concern about privacy. If, however, you believe that we have not been able to assist with your complaint or concern, you also have the right to lodge a complaint with the Information Regulator.

MERIDIAN HOLDINGS (PTY) LTD

Company Registration: 2002/015087/07 • VAT No: 4230220107
17 SPARTAN CRESCENT, EASTGATE EXTENSION 3, MARLBORO, GAUTENG, 2090
086 111 3959

DIRECTORS : L.R. CRONJE • J.A. DE VILLIERS • G.G. DITTMAR • H.F. KOEGELENBERG • G. MONTGOMERY • P.J. NEETHLING