

External Privacy Policy

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1. Introduction:

In this document, references to "Namaqua Wines RF (Pty) Ltd", "we", "us", or "the Group" are to **Namaqua Wines (RF) Pty** and its subsidiary companies (Namaqua Wines [RF] (Pty) Ltd, Vredendal Wynkelder (Pty) Ltd, Spruitdrift Kelder (Pty) Ltd, Nieu Beverages (Pty) Ltd, Namaqua Wines Distribution (Pty) Ltd)

Namaqua Wines RF (Pty) Ltd recognises its accountability in terms of the Protection of Personal Information Act (hereinafter referred to as **POPIA**), other privacy protection legislation, together with its regulations to all its clients, suppliers, service providers and other third parties. **Namaqua Wines RF (Pty) Ltd** needs to collect personal information from its clients, suppliers, service providers and other third parties to carry out its business.

To maintain a trust relationship with our Stakeholders, we are committed to complying with both the spirit and the letter of POPIA, other privacy protection legislation, and to always act with due skill, care, and diligence when dealing with personal information.

2. What is personal information:

Personal Information according to POPIA, means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to –

- a. 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, and birth of the person;
- b. Information relating to the education or the medical, financial, criminal, or employment history of the person;
- c. Any identifying number, symbol, e-mail address, telephone number, location information, online identifier, or other particular assignment to the person;
- d. The biometric information of the person;
- e. The personal opinions, views, or preferences of the person;
- f. Correspondence sent by the person that would reveal the contents of the original correspondence;
- g. The views or opinions of another individual about the person; and
- h. The name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person.

3. Where and when do we collect personal information:

Information you provide to us:



PO Box 75, Vredendal, 8160, W-Cape, South-Africa Tel: +27(0)27 213 1080 Fax: +27(0)27 213 3476

info@namaquawines.com www.namaquawines.co.za

- Clients / Suppliers / Service Providers
 - Directly from you
- Website usage:
 - Information may be collected using “cookies” which allows us to collect standard internet visitor usage information.

4. When will we process your personal information:

We will only process your personal information for lawful purposes relating to our business if the following circumstances apply:

- You have **consented** thereto;
- a person legally authorised by you, or a court, has **consented** thereto;
- It is necessary to conclude or perform under a **contract** we have with you;
- The **law** requires or permits it;
- It is required to protect or pursue your, our, or a third party's legitimate interest; and/or
- You are a child, and a competent person (such as a parent or guardian) has consented thereto on your behalf.

5. When will we process your special personal information:

Special personal information refers to the following categories of information:

- Religious and philosophical beliefs;
- Race;
- Ethnic origin;
- Trade union membership;
- Political beliefs;
- Health including physical or mental health, disability, and medical history;
- Biometric information;
- Criminal behaviour where it relates to the alleged commission of any offence or the proceedings relating to that offence.

We will process special personal information in the following instances:

- You have **consented** to the processing (in circumstances where we are legally obliged to obtain your consent); or
- It is necessary to exercise or defend a right or obligation in **law**; or
- It is necessary to comply with an international legal obligation of public interest; or
- It is for certain historical, research, or statistical purposes that would not adversely affect your privacy; or
- You have deliberately made your personal information public.

6. What information do we collect, and how do we use your information:

Kindly note that the following list is not comprehensive. It sets out the main purposes and data elements collected by **Namaqua Wines RF (Pty) Ltd.**

Data Subject Category	Purpose	Data Elements
Clients / Trade Customers / Retailers / Hospitality Clients / Distributors	• Customer onboarding and account creation • Processing wine orders and	Business Information: • Registered business name • Trading name (t/a)



	deliveries • Invoicing and statements • Debit orders and payment processing • Customer relationship management • Product supply and logistics coordination • Export administration and customs compliance • Delivery route planning and dispatching • Alcohol industry regulatory compliance • Verifying legal drinking age where applicable • Customer support and complaint resolution • Product recalls and traceability obligations • Marketing of wines, promotions and events • Loyalty programmes and promotional campaigns • Audit, governance and record keeping • Fraud prevention and credit risk assessments • Insurance and legal claims management • BEE verification and compliance • Compliance with SARS and financial legislation • Compliance with POPIA and consumer legislation	• Company registration number • VAT number • Tax number • Liquor licence details • Industry sector • Trading category (retailer, wholesaler, restaurant, hotel, distributor, exporter etc.) • Credit application information • Banking details • Purchase history and account records • Delivery instructions • Pricing agreements and discount structures • Customer account number • Payment terms • Order history • Product preferences • Marketing preferences • BEE certificate and ownership information Authorised Representatives / Contacts: • Title • Full names • Surname • Identity number/passport number (where required) • Date of birth (age verification where applicable) • Job title/position • Signature • Telephone numbers • Mobile numbers • Email addresses • Physical business address • Postal address • Delivery addresses • Province and country • GPS coordinates for delivery locations where applicable Transactional Information: • Purchase orders • Invoices • Statements • Debit order mandates • Proof of payments • Credit notes • Delivery notes • Courier tracking information • Customer correspondence • Call recordings where applicable • CCTV footage collected at premises • Website activity and online order
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		information • IP addresses and cookie information for online store users
Private Clients / Online Store Customers / Wine Club Members	• Processing online wine purchases • Home delivery of wine products • Age verification and legal compliance • Payment processing • Customer communication and support • Newsletter subscriptions • Promotional offers and wine recommendations • Event invitations and wine tastings • Loyalty programme administration • Competition entries • Product reviews and feedback management • Fraud detection and prevention • Record keeping and audits • Compliance with consumer protection legislation • Compliance with POPIA and electronic communications legislation	• Name and surname • Title • Identity number/passport number (where legally required) • Date of birth/age verification information • Email address • Mobile number • Telephone number • Delivery address • Billing address • Province and country • Payment information • Banking details where refunds are processed • Online shopping account details • Username and password credentials • Product preferences and favourites • Purchase and browsing history • Marketing preferences and consent records • Competition entry information • Social media handles where voluntarily provided • Website cookies and analytics data • IP address and device information • Customer queries and complaints • Call recordings and electronic correspondence
Service Providers / Suppliers / Contractors / Logistics Providers	• Supplier onboarding and vetting • Procurement and purchase orders • Contract management • Payment processing • Delivery coordination and logistics management • Access control to company premises • Compliance with food safety and liquor industry requirements • Due diligence and supplier risk management • BEE compliance and procurement reporting • Audit and record keeping • Insurance and legal compliance • Health and safety compliance	• Supplier company name • Trading name • Company registration number • VAT number • Tax clearance information • BEE certificate/affidavit • Banking details • Proof of bank account • Insurance documentation • Health and safety compliance documents • Contact person name and surname • Identity numbers where required • Telephone and mobile numbers • Email addresses • Physical and postal addresses • Delivery and collection addresses • Vehicle registration details for



	• Regulatory compliance and governance	- transport providers • Driver licence details where applicable • Contracts and service level agreements • Invoices and quotations • Purchase orders • Payment records • CCTV footage when accessing premises • Visitor register information
Website Users / Marketing Contacts / Competition Entrants	• Website administration and functionality • User authentication and account management • Online wine sales and e-commerce functionality • Marketing campaigns and newsletters • Analytics and website optimisation • Social media engagement • Competition administration • Customer behaviour analysis • Advertising and remarketing campaigns • Security monitoring and fraud prevention • Compliance with electronic communications legislation	• Name and surname • Email address • Contact number • Social media profile information • Competition entry details • IP address • Browser and device information • Cookie identifiers • Website browsing behaviour • Geographic location data • Marketing consent records • Communication preferences • User-generated content and reviews
Visitors to Premises / Event Attendees / Wine Tasting Guests	• Premises access control • Security and surveillance • Visitor management • Emergency and health & safety procedures • Event administration • Wine tasting bookings and reservations • Compliance with liquor legislation • Incident investigations and insurance purposes	• Full names • Identity/passport number where required • Contact details • Vehicle registration number • Visitor access records • CCTV footage • Date and time of entry and exit • Host information • Event attendance records • Dietary requirements/allergy information voluntarily disclosed
Job Applicants / Employees / Temporary Staff	• Recruitment and selection • Employment administration • Payroll and benefits administration • Skills development and training • Performance management • Occupational health and safety compliance • Regulatory and labour law compliance • Employee wellness administration • Security and access control	• Full names • Identity number/passport number • Date of birth • Gender • Nationality • Contact details • Residential and postal address • Curriculum vitae and qualifications • Employment history • Criminal checks where lawful • Credit checks where lawful • Banking details • Tax number



	• Internal investigations and disciplinary processes	• Medical aid and pension details • Emergency contact information • Driver's licence information • CCTV footage • Biometric/access control information where applicable
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7. Collection of Information by Cookies and Similar Technologies (Website Purposes)

Please note that certain information and data may be collected automatically through the normal operation of internet servers, website technologies and the use of "cookies" when you visit the [Namaqua Wines](https://niewbev.com/) and <https://niewbev.com/> website or online platforms.

Cookies are small text files stored on your device by your web browser. These technologies assist Namaqua Wines RF (Pty) Ltd in recognising returning users, improving website functionality, enhancing user experience, facilitating access to certain website features, and analysing website traffic and usage patterns.

The information collected through cookies may be used for purposes such as:

- remembering user preferences;
- improving website performance and functionality;
- enabling online ordering and account features;
- monitoring customer engagement with products and promotions;
- conducting analytics and statistical reporting;
- personalising content and marketing communications; and
- supporting targeted advertising campaigns.

Cookies do not contain harmful software and do not damage your device or files. In most cases, cookies assign a unique identifier that has no meaning outside the relevant website.

Most internet browsers allow users to manage cookie preferences, including the ability to accept, reject or delete cookies. Please note, however, that disabling cookies may limit certain functionality of the website and may affect your ability to access specific services, features or personalised content available through the website or online store.

8. How we share your information:

Third-Party Service Providers:

- Auditors
- Legal Compliance Agencies
- Regulatory bodies
- Law enforcement agents
- Government agencies

Legal Disclosures:

We may need to share your information when we believe it is required by law, legal process or to help protect the rights and safety of you, us, or others. We attempt to notify members about legal demands for their data when appropriate in our judgment unless prohibited by law or court order or when the request is an emergency. We may dispute such demands when we believe, at our discretion, that the requests are overbroad, vague, or lack proper authority, but we do not promise to challenge every demand.



9. Your rights and obligations:

Data Retention:

We keep most of your personal information while we still have a purpose, we need to provide you with services or where we are legally obligated to do so.

We will also keep your information where you have agreed for us to do so or have given your consent that we are allowed to do so.

We keep some of your information even after our business relationship has terminated, if it is reasonably necessary to comply with our legal obligations, meet regulatory requirements, resolve disputes, maintain security, prevent fraud and abuse, enforce our other user agreements, or fulfil your request to object to our processing of your information.

You have rights in connection with your personal information. You have many choices about how your information is collected, used, and shared.

In certain circumstances, by law, you have the right to:

- **Request access to your information:** You will be able to ask us what information we have about you as well as ask for a copy of this information. This should be done on request to popia@namaquawinessa.co.za. There are some exemptions, which means you may not always receive all the information we process. When we can give you a copy it might be done at a certain fee, which will also be communicated to you at the time of your query.
- **Change or correct information:** You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- **Delete information:** You can ask us to delete or remove personal information under certain circumstances.
- **Object to processing:** You can do this where we are relying on your legitimate interest, public interest, or our legitimate interest (or those of a third party) and there is something about your situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your data for direct marketing purposes or where you have given your consent for the specific processing and you want to retract your consent. Retracting your consent does not invalidate the information we lawfully processed while we had your consent to do so.
- **Request the restriction of processing:** You can ask us to suspend the processing of personal data about you, for example, if you want us to establish its accuracy or the reason for processing it.

10. Changes to our privacy notice:

Changes to the privacy notice apply to your use of our services. We may modify this privacy notice from time to time, as required by changes in legislation. When material changes are made, we will provide notice through our services, or by other means, to provide you the opportunity to review the changes before they become effective.

You acknowledge that your continued use of our services after we publish our changes to this privacy notice means that the collection, use, and sharing of your personal information is subject to the updated privacy notice.

11. Other important information:

Security:

We have put in place appropriate security measures to prevent your data from being accidentally lost, used, or accessed in an unauthorised way, altered, or disclosed. In addition, we limit access to your personal information on a business need-to-know basis, and subject to a duty of confidentiality.

Transborder information transfers:



We do not share any of our clients, suppliers, service providers and other third parties' information across borders.

12. Contact Information:

Should you have a query please send an email to: popia@namaquawinessa.co.za

Namaqua Wines (Namaqua Wines [RF] (Pty) Ltd, Vredendal Wynkelder (Pty) Ltd, Spruitdrift Kelder (Pty) Ltd, Namaqua Wines Distribution (Pty) Ltd):

Our Information Officer:

Name: Koos

Surname: Van Dyk

Email: george.h@namaquawines.com

Our Deputy Information Officer:

Name: Gerrit Eygelaar

Surname: Eygelaar

Email: george.h@namaquawines.com

Our Deputy Information Officer:

Name: George

Surname: Hayman

Email: george.h@namaquawines.com

Niew Beverages (Pty) Ltd:

Our Information Officer:

Name: GJ

Surname: Richter

Email: gjrichter@niewbev.com

Our Deputy Information Officer:

Name: Telana

Surname: van der Merwe



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info@namaquawines.com www.namaquawines.co.za

Email: telanavdm@niewbev.com

Our Deputy Information Officer:

Name: George

Surname: Hayman

Email: george.h@namaquawines.com

The Information Regulator:

You have the right to lodge a complaint with the South African Information Regulator. See the Information Regulator contact details below.

Woodmead North Office Park
54 Maxwell Drive, Woodmead,
Johannesburg

POPIA complaints: POPIAComplaints@inforegulator.org.za

PAIA complaints: PAIAComplaints@inforegulator.org.za

General Queries: enquiries@inforegulator.org.za



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