

SOUTH AFRICAN POLYPROPYLENE YARNS (PTY) LTD
THE PROTECTION OF PERSONAL INFORMATION ACT 2013 (POPI Act / POPIA)

PERSONAL INFORMATION PROTECTION POLICY

South African Polypropylene Yarns (Pty) Ltd (“SAPY”, “we”, “our”, “us”) respects your privacy and is committed to protecting your personal information in accordance with the Protection of Personal Information Act, 4 of 2013 (“POPIA”).

This Privacy Policy explains how we collect, use, disclose and safeguard your personal information when you interact with SAPY as a customer, supplier, employee, contractor, or visitor.

1. Scope

This policy applies to:

- Customers and their representatives;
- Suppliers, service providers and contractors;
- Employees and job applicants;
- Visitors to our premises; and
- Any third party who interacts with SAPY.

References to “you” or “your” mean any such party whose personal information we process.

2. Personal Information We Collect

Depending on your relationship with SAPY, we may collect the following categories of personal information:

- Identification details: names, identity or passport numbers, date of birth, registration details (for juristic persons).
- Contact details: physical addresses, email addresses, telephone numbers.
- Financial details: bank account numbers, credit references, payment information, credit card details where applicable.
- Employment and application details: qualifications, work history, references, background checks, criminal checks, medical history relevant to operational requirements, employment status, and relationship status in line with SAPY’s anti-nepotism policy.
- Beneficiary information: dependents or relatives if relevant to employment benefits.
- Compliance information: information required for B-BBEE, Employment Equity, ISO 9001:2015 and ISO 22000:2018 certifications, or other regulatory purposes.
- Security-related information: video surveillance footage, which is retained for a specific period and used strictly for security, compliance, and investigation purposes.

3. Purpose of Processing

We process your personal information only where necessary for legitimate business, legal, and compliance purposes, including to:

- Provide goods and/or services, and complete transactions with you;

- Manage supplier, contractor and customer relationships;
- Process payments and conduct credit and financial checks;
- Conduct recruitment, vetting and employment administration;
- Comply with legal and regulatory obligations;
- Maintain and demonstrate compliance with ISO 9001:2015 and ISO 22000:2018;
- Compile statistics, research, B-BBEE and Employment Equity reporting;
- Ensure the safety and security of our premises, personnel and assets through surveillance and monitoring;
- Facilitate and respond to customer or third-party audits;
- For any purpose ancillary to the above or otherwise authorised by law.

4. Audits and Access by Third Parties

- Customer and external auditor access: SAPY may grant customers or appointed external auditors access to its systems and records for compliance or certification purposes. Such parties may come across personal or confidential information protected by this policy. They are contractually and legally obliged to:
 - Only retain information relevant to the scope of the audit;
 - Not disclose such information to any other party; and
 - Not use such information for any purpose other than the audit.
- Operators and service providers: Where SAPY appoints third parties to process personal information on its behalf (e.g. IT providers, security contractors, payroll processors), such parties are bound by POPIA to ensure appropriate safeguards.

5. Consent and Lawful Processing

Your personal information will be processed lawfully in accordance with POPIA. Consent will be obtained where required, and SAPY may also process information without consent in circumstances permitted by law, such as:

- To comply with legal or regulatory obligations;
- For investigations, litigation, or law enforcement requests;
- Where the information is publicly available.

6. Cross-Border Transfers

If it is necessary to transfer your personal information outside South Africa (for example, for audits, IT hosting or compliance certification), SAPY will ensure that the receiving party is subject to binding agreements and safeguards equivalent to those required under POPIA.

7. Your Rights

You have the right to:

- Access personal information held about you;
- Request correction or deletion of inaccurate, irrelevant, excessive, or unlawfully obtained data;
- Object to or restrict processing in certain cases;
- Withdraw consent, subject to contractual and legal limitations;
- Lodge a complaint with the Information Regulator.

8. Security Safeguards

SAPY implements reasonable organisational and technical measures to secure personal information, including:

- Physical premises security (fencing, access control, 24/7 CCTV, security searches, visitor protocols);
- IT and system controls to protect against unauthorised access, loss or misuse;
- ISO 9001:2015 and ISO 22000:2018 certified processes supporting data integrity, traceability and auditability.

9. Data Retention

Personal information will not be retained longer than necessary for the purpose for which it was collected, unless required by law or legitimate business need. CCTV surveillance footage is retained for a specific period unless required for investigation or legal proceedings.

10. Requests and Complaints

Any request for access to personal information, correction of records, or questions about this policy must be directed in writing to SAPY's Information Officer:

Information Officer: Customer Care

Tel: +27 67 011 4235

Email: cc@sapy.com

You may also contact the Information Regulator (www.justice.gov.za/inforeg/) if you believe SAPY has not addressed your concerns adequately.