

POPIA Section 51 Manual – Eastern Produce Estates South Africa (Pty) Ltd

Prepared in accordance with the Promotion of Access to Information Act (PAIA), No. 2 of 2000 and the Protection of Personal Information Act (POPIA), No. 4 of 2013

Introduction

EPESA is dedicated to safeguarding your privacy and promoting transparency regarding the processing of your personal information. As an agricultural company, we handle various types of personal data, including information related to farmers, suppliers, employees, and other stakeholders. This manual explains how EPESA complies with the Protection of Personal Information Act (POPIA) and the Promotion of Access to Information Act (PAIA), outlining your rights and our obligations.

1. Introduction to POPIA and PAIA

POPIA aims to protect individuals' personal information processed by organizations, including those in the agricultural sector. PAIA promotes access to information to ensure transparency. EPESA adheres to these laws by implementing appropriate policies to protect your data and provide access to information.

2. Responsible Party

EPESA (Pty) Ltd

Physical Address: Maclands Estate, Farm Morgenzon 9LT, Sibasa Road, Louis Trichardt.

Telephone: +27 15 1510000

Email: johan@epesa.co.za

Contact Person: Johan De Kock, Information Officer

The Information Officer is responsible for ensuring compliance with PAIA and POPIA, and for responding to access requests and data protection queries.

A guide on how to exercise rights under PAIA is available from the Information Regulator. This guide explains how to request access to records and outlines the rights of data subjects under POPIA.

Visit the Information Regulator's website: <https://www.justice.gov.za/inforeg/>

3. Personal Information Collected

EPESA may collect various types of personal information relevant to our agricultural operations, including:

- Names and surnames of farmers, employees, and suppliers
- Contact details (email, phone number, physical address)

- Bank account and payment details
- Certification and accreditation information
- Data related to land ownership, farm sizes, and operational details
- Personnel Records – employment contracts, performance reviews, training records
- Client Records – contracts, correspondence, service history
- Financial Records – invoices, statements, tax documentation
- Operational Records – policies, procedures, project documentation
- Legal Records – compliance documents, agreements, licenses
- Marketing Materials – brochures, newsletters, public communications
- Any other information necessary for the provision of services or compliance

Information is collected directly from individuals, farmers, and partners, or through authorized agents.

Records Automatically Available

The following records are available without a formal PAIA request:

- Company profile and contact information
- Published policies and procedures
- Marketing brochures and service descriptions
- Annual reports (if applicable)

These can be requested directly from our office.

Records Available on Request

Subject to applicable legal grounds for refusal, the following records may be requested:

- Internal policies and procedures
- Employee and client records
- Financial and operational documentation
- Legal and compliance records

Requests must be submitted using the prescribed attached Form 2 and Form C and directed to the Information Officer.

Request Procedure

To request access to a record:

1. Complete Form C (available from the Information Regulator's website).
2. Submit the form to the Information Officer via email or post.
3. Include sufficient detail to identify the record and your contact information.
4. Pay the applicable request fee (if required).
5. Await confirmation and further instructions from the Information Officer.

We will respond within the statutory timeframes and provide reasons for any refusal.

4. Purpose for Collecting Personal Data

Your personal data is collected and processed for:

- Managing farm operations and supplier relationships
- Processing payments and transactions
- Marketing agricultural products and services
- Maintaining records for certification and accreditation purposes
- Improving service delivery and operational efficiency
- Employment and HR management
- Client service delivery
- Financial administration
- Legal compliance and risk management

5. Sharing of Personal Data

EPESA may share personal information with:

- Agricultural certification bodies
- Financial institutions and payment service providers
- Regulatory authorities
- Service providers (e.g., transport, equipment suppliers)

- Other authorized third parties with your consent or as legally required

All third parties are bound by confidentiality and data protection obligations.

6. Rights of Data Subjects

We implement appropriate security measures to protect personal data and uphold the rights of data subjects, including:

- Access the personal data EPESA holds about you, suppliers, or employees
- Request the correction or deletion of your data
- Object to or restrict processing
- Withdraw consent at any time
- Lodge a complaint with the Information Regulator

Our staff are trained in data protection principles, and we regularly review our practices to ensure compliance.

Requests for access or correction should be directed to the contact details provided.

7. Security Measures

EPESA implements security protocols to protect your personal information, including:

- Physical security of documents and equipment
- Electronic data encryption
- Strict access controls
- Staff training on data protection
- Regular security audits

8. Retention Policy

Personal information will be retained only as long as necessary to fulfil the purposes for which it was collected or to comply with legal obligations. Once retention periods expire, data will be securely destroyed.

9. Access to Information under PAIA

EPESA maintains various records, such as:

- Farm management and operational records
- Employment records

- Financial and transactional documents
- Compliance and certification records

Requests for access to these records can be made in writing to the Information Officer, providing sufficient detail about the records requested. Some information may be exempt under PAIA.

10. Contact Details

For any questions, requests related to POPIA or PAIA, or to exercise your rights, contact:

Information Officer: Johan De Kock

Email: johan@epesa.co.za

Phone: +27 15 1510000

Physical Address: Maclands Estate, Farm Morgenzon 9LT, Sibasa Road, Louis Trichardt.

Alternatively, you may contact the Information Regulator at Tel: +27 10 023 5200

Toll Free: +27 80 001 7160

Address: Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg

P.O Box 31533, Braamfontein, Johannesburg, 2017, South Africa.

Website: www.inforegulator.org.za

11. Manual Availability

This manual is available:

- On our company website: <https://www.maclands.com>
- At our physical premises during office hours

12. Amendments, updates and reviews to the Manual

This manual will be reviewed annually or as required by changes in legislation or company operations. Updates will be published on our website and made available upon request.