



## PRIVACY POLICY

### Our contact details

If you have any comments or questions about this Statement, please contact the Information Officer of Tiger Brands Limited via:

The Company Secretary

3010

William Nicol Drive

Bryanston

Gauteng

2191

Tel: 011 840 3000

Details of the Group information officer: Joe Ralebepa (Chief Legal Officer)

### Introduction

This Policy covers the treatment of personally identifiable information that Tiger Brands business partners may share with it. Please take a moment to familiarise Yourself with our privacy policy and let us know if You have any questions or concerns about the Tiger Brands privacy policies and practices by sending us an email to [companysecretary@tigerbrands.com](mailto:companysecretary@tigerbrands.com). Tiger Brands respects Your privacy and will take reasonable measures to protect it, as more fully detailed below.

By submitting any personal information to Tiger Brands, you provide consent to the processing of your personal information as set out in this Statement.

The provisions of this Statement are subject to mandatory, unalterable provisions of applicable laws.

Please do not submit any personal information to Tiger Brands if you do not agree to any of the provisions of this Statement. If you do not consent to the provisions of this Statement, or parts of the Statement, Tiger Brands may not be able to provide its products and services to you.

### Tiger Brands collects your personal information in the following ways

Should You decide to register as a user on any of Tiger Brands online platforms (the Platforms), we may require You to provide us with personally identifiable information which includes but is not limited to -

- Your name and surname;
- Your email address;
- Your physical address;
- Your gender;
- Your mobile number; and
- Your date of birth,
- Your place of birth,

Depending on the nature of the transaction you wish to conclude with Tiger Brands, the following additional and essential information may be required:

- Your identity number/ passport number
- Your bank details, including credit card details;
- Your details about your employment, tax number and financial information;
- Your records of correspondence or enquiries from you or anyone acting on your behalf;
- Any details of transactions You carry out with Tiger Brands;
- Details of contracts, sales or leases you carry out with Tiger Brands;

- Sensitive or special categories of personal information, including biometric information, such as images, fingerprints and voiceprints.

Where you provide us with the personal information of third parties you should take steps to inform the third party that you need to disclose their details to us, identifying us. We will process their personal information in accordance with this Statement.

We collect data about how You use our services and products, such as the types of content You view or engage with, or the frequency and duration of Your activities. We also collect Personal Information You provide us when You sign up for a marketing newsletter, complete a survey or register for an account to buy our products. In so doing, we may ask for Personal Information as specified above. So, we may collect “special categories of Personal Information” about You with Your explicit consent.

We may also receive and store certain types of Personal Information whenever You interact with us online. For example, we use cookies and tracking technologies to obtain Personal Information when your web browser accesses our websites or advertisements and other content served by or on behalf of Tiger Brands on other websites. Your Personal Information may also be collected when You search, buy, post, participate in a contest or questionnaire or communicate with digital marketing channels. Examples of the types of Personal Information we collect include; IP address, device ID, location data, computer and connection information such as browser type and version, time zone setting, browser plug-in types and versions, operating system, purchase history and Your Personal Information may be collected – which Tiger Brands sometimes aggregates with similar information from other consumers. During some of Your internet browsing on Tiger Brands’ websites we may also use software tools to measure and collect session information, including page response times, download errors, length of visits to certain pages, page interaction information, and methods used to browse away from the page. We may also collect technical information to help us identify Your device for fraud prevention and diagnostic purposes.

We may collect Personal Information from other sources including our trusted partnerships with third-parties and where we operate Tiger Brands accounts on third-party platforms: For example, when You use the “like” functionality on Facebook or the +1 functionality on Google+. Additionally, we receive information about You and other visitors’ interactions with our advertising to measure whether our advertising is relevant and successful. We also collect information about You and Your activities from a third-party when we jointly offer services or products, or from third-party data enrichment providers (to find out more see our privacy key terms) who may deliver insights to Tiger Brands about the Personal Information we hold.

#### **Purpose for collecting Your Personal Information /Use**

- To process Your payments, if You purchase our products, to provide You with Your order status, deal with Your enquiries and requests, and assess and handle any complaints;
- To process and answer Your inquiries or to contact You to answer Your questions and/or requests;
- To develop and improve our products, services, communication methods and the functionality of our websites;
- For the purposes of competitions or promotions that You have entered;
- To communicate information to You and to manage Your registration and/or subscription to our newsletter or other communications;
- To manage our everyday business needs regarding Your participation in our contests, sweepstakes or promotional activities or request;
- To authenticate the identity of individuals contacting us by telephone, electronic means or otherwise;
- For internal training and quality assurance purposes;
- We may conduct background checks and relevant due diligence as part of the standard recruitment processes;
- To understand and assess the interests, wants, and changing needs of consumers, to improve our website, our current products and services, and/or developing new products and services; and
- To provide personalised products, communications and targeted advertising as well as product recommendations to You.
- To provide you with the services, products or offerings you have requested, and notifying you about important changes to these services, products or offerings;

- To manage your account or relationship and complying with your instructions or requests;
- To detect and prevent fraud and money laundering and/or in the interest of security and crime prevention;
- To assess and deal with complaints and requests;
- operational, marketing, auditing, legal and record keeping requirements;
- To transfer and process your personal information outside of the Republic of South Africa to such countries that may not offer the same level of data protection as the Republic of South Africa, including for cloud storage purposes and the use of any of our websites;
- To comply with applicable laws, including lawful requests for information received from local or foreign law enforcement, government and tax collection agencies;
- To record and/or monitor your telephone calls and electronic communications to/with Tiger Brands in order to accurately carry out your instructions and requests, to use as evidence and in the interests of crime prevention;
- To conduct market research and providing you with information about our products or services from time to time via email, telephone or other means (for example, events);
- where you have unsubscribed from certain direct marketing communications, to ensure that we do not send such direct marketing to you again;
- To disclosing your personal information to third parties for reasons set out in this Statement or where it is lawful to do so;
- To monitor and/or keep a record of and having access to all forms of correspondence or communications received by or sent from Tiger Brands or any of its employees, agents or contractors, including monitoring, recording and using as evidence all telephone communications between you and Tiger Brands; and
- To improve or evaluate the effectiveness of our business or products, services or offerings.

#### **Use of the Tiger Brands website**

Log Information – When You use our services, we may automatically collect and store certain information in server logs. This may include:

- Details of how You used our service, such as Your web clicks. Internet protocol address.
- Device event information such as system activity, hardware settings, browser type, browser language, the date and time of Your request and referral URL.
- Cookies that may uniquely identify Your browser or Your Tiger Brands account.

#### **Cookies**

We use various technologies to collect and store information when You visit the Website, and this may include sending one or more cookies or anonymous identifiers to Your device. Tiger Brands may use cookies to support Your use of applications on this website and monitor Your use of the Website for the purposes set out below.

*[Take note: Most web browsers accept cookies automatically, but You do not have to accept cookies as Your web browser may allow You to turn off this feature.]*

Use of the Website is also subject to our website terms and conditions, available at

<https://www.tigerbrands.com/-/media/Project/TigerBrands/DotCom/SiteTermsAndConditions/Tiger%20Brands%20Website-Terms-and-Conditions.pdf>

#### **Security**

Tiger Brands will implement and operate physical, administrative and take reasonable measures to implement technical information security controls in order to preserve confidentiality, integrity and accessibility of information assets to manage risks related to information security.

## **External links**

Our website may contain links to external websites and sources of information. This does not indicate endorsement by Tiger Brands and due care should be taken before following such links.

## **Changes/Updates to Your personal information**

Should Your personally identifiable information change, please inform us and provide us with updates to Your personal information as soon as reasonably possible to enable us to update Your personal information.

You may request access to, verify, restrict and delete Your Personal Information upon reasonable grounds. Refer to the Tiger Brands PAIA Manual for more information.

## **Tiger Brands Information Handling Practices**

Should we receive Your personal identifiable information, through the use of the Platforms Tiger Brands will:

- Use best endeavours to treat Your personally identifiable information as strictly confidential;
- Take appropriate technical and organisational measures to ensure that Your personally identifiable information is kept secure and is protected against unauthorised or unlawful processing, accidental loss, destruction or damage, alteration, disclosure or access, subject to a disclaimer that we may not have absolute controls to prevent hackers from encroaching upon the Platforms;
- Provide You with access to Your personally identifiable information to view and/or update personal details;
- Promptly notify You if we become aware of any unauthorised use, disclosure or processing of Your personally identifiable information;
- Provide You with reasonable evidence of our compliance with our obligations under this policy on reasonable notice and request; and
- Upon Your request, promptly return or destroy any and all of Your personally identifiable information in our possession or control.

## **Consent and Processing**

Where appropriate, we will ask for Your consent to process Your Personal Information . Where You have given consent for processing activities, You have the right to withdraw Your consent at any time.

We will not retain Your personally identifiable information longer than the period for which it was originally needed, unless we are required by law to do so, or You consent to us retaining such information for a longer period

In some cases, we rely on legitimate interest for processing Your Personal Information . A legitimate interest could exist for example, when You sign up for a loyalty scheme with one of our brands and we use the Personal Information collected to conduct data analytics to improve our products or services. This ground will only be used where it is necessary to achieve a legitimate interest, for example to assist in the performance of a contract, or to optimise a service, and does not outweigh Your rights as an individual. This legal basis will only be relied upon where there is no less intrusive way to process Your Personal Information . We can assure You that if legitimate interest is used as a ground for processing Your Personal Information , we will keep a record of this, and You have the right to ask for this information.

We may process Your Personal Information to perform a contract to which You are or will be a party. For example, we need to process Your Personal Information to deliver a product or a service You bought, to allow you to take part in one of our competitions, or to send You samples that You have requested.

We may process Your Personal Information when we have a legal obligation (e.g., tax or social security obligations) to perform such processing. For example, a court order or a subpoena may require us to process Personal Information for a particular purpose, or we may be compelled to process Personal Information to report suspicious transactions under the local anti-money laundering rules.

## **Information Sharing and Disclosure**

Take note that Tiger Brands sends personally identifiable information about You to other companies or people when:

- We have Your consent to share such information;

- We need to share Your information with third parties, such as banks and credit card processors, to provide the Service You have requested;
- It is appropriate to comply with law;
- It is necessary to enforce or apply the terms and conditions of our agreement with our merchant and other applicable agreements;
- It is necessary to protect the rights, property, or safety of Tiger Brands, our users, or others, which may include the exchange of information with other organizations for fraud protection and/or risk reduction. In the event that Tiger Brands is acquired, merchant account information may be one of the transferred assets;

We may also disclose your personal information to third parties in the following circumstances:

- to our subsidiaries who are contracted to provide products or services to you;
- to assess and monitor any of your applications for our products or services;
- to determine which products and services may be of interest to you and/or to send you information about such products and services, unless you object or choose not to receive such communications [Note: Please note that this is subject to the direct marketing provisions of POPIA.];
- to have a better understanding of your circumstances and needs to provide and improve our products and services;
- to any relevant person and/or entity for purposes of prevention, detection and reporting of fraud and criminal activities, the identification of the proceeds of unlawful activities and the combatting of crime;
- to any regulator or supervisory authority, including those in foreign jurisdictions, if Tiger Brands is required to do so in terms of Applicable Laws;
- to a prospective buyer or seller of any of our businesses or assets;
- to any person if we are under a duty to disclose or share your personal information in order to comply with any Applicable Laws, or to protect the rights, property or safety of Tiger Brands, Clients or other third parties; and/or
- to your agent or any other person acting on your behalf, an or an introducer.

We may transfer your information to another of the Tiger Brands entities, an agent, sub contractor or third party who carries on business in another country, including one which may not have data privacy laws similar to those of South Africa. If this happens, we will ensure that anyone to whom we pass your information agrees to treat your information with the same level of protection as if we were dealing with it.

If you do not wish us to disclose this information to third parties, please contact us at the contact details set out above. We may, however, not be able to provide products or services to you if such disclosure is necessary.

We may retain your personal information indefinitely, unless you object, in which case we will only retain it if we are permitted or required to do so in terms of Applicable Laws. However, as a general rule, we will retain your information in accordance with retention periods set out in Applicable Laws, unless we need to retain it for longer for a lawful purpose. (For example, for the purposes of complaints handling, legal processes and proceedings.)

#### **Access to, correction and deletion of your personal information**

You may request details of personal information which we hold about you under the Promotion of Access to Information Act, 2000 (“PAIA”). Fees to obtain a copy or a description of personal information held about you are prescribed in terms of PAIA. Confirmation of whether or not we hold personal information about you may be requested free of charge. If you would like to obtain a copy of your personal information held by Tiger Brands, please review our PAIA Manual located at [?] [Drafting note: Please insert a link to your PAIA manual.].

You may request the correction of personal information Tiger Brands holds about you. Please ensure that the information we hold about you is complete, accurate and up to date. If you fail to keep your information updated, or if your information is incorrect, Tiger Brands may limit the products and services offered to you or elect not to open the account.

You have a right in certain circumstances to request the destruction or deletion of and, where applicable, to obtain restriction on the processing of personal information held about you. If you wish to exercise this right, please contact us using the contact details set out above.

You have a right to object on reasonable grounds to the processing of your personal information where the processing is carried out in order to protect our legitimate interests or your legitimate interests, unless the law provides for such processing.

### **Amendments to this Privacy Policy**

We may amend this Statement from time to time for any of the following reasons:

- to provide for the introduction of new systems, methods of operation, services, products, property offerings or facilities;
- to comply with changes to any legal or regulatory requirement;
- to ensure that our Statement is clearer and more favourable to you;
- to rectify any mistake that may be discovered from time to time; and/or
- for any other reason which Tiger Brands, in its sole discretion, may deem reasonable or necessary.

Any such amendment will come into effect and become part of any agreement you have with Tiger Brands when notice is given to you of the change by publication on our website. It is your responsibility to check the website often.

### **Indemnity**

Tiger Brands takes your privacy and the protection of your personal information very seriously, and we will only use your personal information in accordance with this Statement and applicable data protection legislation. It is important that you take all necessary and appropriate steps to protect your personal information yourself (for example, by ensuring that all passwords and access codes are kept secure).

- We have implemented reasonable technical and operational measures to keep your personal information secure.
- You hereby indemnify and hold Tiger Brands harmless from any loss, damages or injury that you may incur as a result of any unintentional disclosures of your personal information to unauthorised persons or the provision of incorrect or incomplete personal information to Tiger Brands.

### **Information Regulator**

Should you believe that Tiger Brands has utilised your personal information contrary to Applicable Laws, you undertake to first attempt to resolve any concerns with us.

If you are not satisfied with such process, you may have the right to lodge a complaint with the Information Regulator, using the contact details listed below: Telephone: 012 406 4818

Fax: 086 500 3351

Email: [infoereg@justice.gov.za](mailto:infoereg@justice.gov.za)

### **Maintenance of this notice**

Latest revision: 28 February 2022

We reserve the right to update this notice on an ad hoc basis. To check for changes, please visit our website on a regular basis.