



AlcoNCP Privacy policy

Purpose

AlcoNCP (also referred to as “we”, “us” or “our” in this privacy policy) is committed to protecting your personal information by ensuring that it is collected and used properly, lawfully, and transparently.

This policy explains:

- How we obtain, use and disclose your personal information, in accordance with the requirements of the Protection of Personal Information Act 4 of 2013 (“**POPIA**”);
- How we protect your personal information; and
- Your privacy rights under POPIA.

Please also use the Glossary at the end of this privacy policy to understand the meaning of some of the terms used in this privacy policy.

Scope

This privacy policy aims to give you information on how AlcoNCP collects and processes your personal information when you, or a company that you represent, engages with us as a customer, supplier, prospective customer, website or job portal user, visitor to our premises or other stakeholder who conducts or wishes to conduct business with AlcoNCP.

Personal information is any information about an individual or company from which that person/company can be identified, either on its own or by combining it with other information. It does not include information where the identity has been removed (anonymous information).

We do not knowingly collect personal information relating to children.

This privacy policy supplements other notices and privacy policies and is not intended to override them. It should be read together with our Conditions of Sale document which can be accessed from <https://www.alconcp.co.za/downloads.html>

Please read all relevant policies so that you are fully aware of how and why we are using your information.

We will use your information only for the purposes set out in this privacy policy.

Responsibility

AlcoNCP is a manufacturer and supplier of Ethanol and related products. In respect of the circumstances to which this privacy policy applies, AlcoNCP is the responsible party.

We have appointed an Information Officer (“IO”) to deal with any issues relating to this policy, who can be contacted via e-mail at: info@AlcoNCP.com

The information we collect about you

AlcoNCP is a manufacturer and supplier of Ethanol and related products.

We collect information through various means, especially directly from you, your authorised representative or from a third party such as the credit bureau.

We will collect, store, transfer and use the following categories of personal information about you:

- **Identity information** including name, surname, title, designation, passport/ Identity information and/or driver's license (on site), CCTV footage (on site), photographs for identification and security purposes (on site), biometric information (on site)
- **Contact information** including addresses (Physical and postal) – for delivery of product and invoicing purposes; and other contact details such as telephone numbers, mobile numbers, facsimile numbers and e-mail addresses;
- **Company information** including registration certificates, BBEEE certificates, export and import licenses, company banking details (including account name and account number), directors' identity and/passports;
- **Tax information** including SARS – license for Remover of Goods (ROG), SARS registration certificates, VAT certificates;
- **Financial** information including bank account details, information related to your financial standing and credit worthiness, details about payments to and from you, details of products purchased, details of invoicing arrangements;
- **Legal information** including payment defaults, civil legal matters, and judgments against you;
- We do not collect **Special Personal information** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, and information about your health, genetic and biometric information or information criminal convictions and offences without your consent.

How we use your information

Where we need to perform the contract, we are about to enter into or have entered into with you

Example, to confirm and verify your identity or to verify that you are an authorised individual for financial transactions; to onboard you as a new customer or supplier; to process and deliver your order; establishing your credit worthiness and granting of credit terms as appropriate; to enable us to perform our obligations to you, including invoicing you and allocating payments, and receiving payments from you; conducting performance or service level reviews, managing performance and determining performance requirements; for the detection and prevention of fraud, crime, money laundering or other malpractice; determining the terms on which our business can develop into a formal contract.

Categories of information used: Identity, Contact, Financial, Tax and Company Information.

Where we need to comply with a legal obligation:

Example, interacting with SARS or other government bodies; for the detection and prevention of fraud, crime, money laundering or other malpractice.

Categories of information used: Identity, Contact, Financial, Tax, Company Information and Legal Information.

Where it is necessary for our legitimate interests (or those of a third party):

Example, to gather contact information for the supply of ethanol and related products; to provide you with a quote or proposal on our product offering; to confirm and verify your identity or to verify that you are an authorised individual for financial transactions; establishing your credit worthiness and granting of credit

terms as appropriate; invoicing you and allocating payments, and receiving payments from you; analysing data to better understand our service levels and product delivery; conducting performance or service level reviews, managing performance and determining performance requirements; for the detection and prevention of fraud, crime, money laundering or other malpractice; contacting you regarding past, current and future business; to conduct market or customer satisfaction surveys; for audit and record keeping purposes; in connection with legal proceedings, including establishing, pursuing or defending legal claims; to onboard you as a new customer or supplier; to process and deliver your order.

Categories of information used: Identity, Contact, Financial, Tax, Company, Technical, Usage, and Marketing and Communications Information.

Your legitimate interests:

Example, paying you; conducting performance or service level reviews, managing performance and determining performance requirements; contacting you regarding past, current and future business; to onboard you as a new customer or supplier; to process and deliver your order.

Categories of information used: Identity, Contact, Company, and Marketing and Communications Information.

Where we have obtained your consent to process your personal information for the specific purposes described to you:

Where you have provided such consent, you have the right to withdraw it at any time by contacting us, however you may not be able to access certain products or services if you withdraw consent.

If you fail to provide certain personal information when requested, we may be unable to meet our legal obligations or administer our contract with you. We will notify you at the time if this is the case.

Note that we may process your personal information for more than one lawful basis depending on the specific purpose for which we are using your information. Please contact us if you need further details regarding the purposes for which we process your personal information.

We will use your personal information only for the purposes for which it was collected, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us. If we need to use your personal information for a different purpose, we will notify you and explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent where it is required or permitted by law.

Disclosure of information

We may need to share your personal information with third parties including government or regulatory authorities, third-party service providers and other entities who are critical to our business or who are involved in the delivery of products to you.

We may also disclose your information to:

- third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal information in the same way as set out in this privacy policy;

- legal advisers, insurers, auditors, other professional advisors where necessary to investigate, exercise or defend claims and ensure proper functioning of our business;
- law enforcement bodies, where necessary to facilitate the prevention or detection of crime or the apprehension or prosecution of offenders;
- public authorities, regulators and government bodies, where necessary for us to comply with our legal and regulatory obligations (for example, the Information Regulator), and in some cases contractual obligations; and
- any other juristic or natural person for any authorised purpose with your express consent.

Where we do share your information with third parties, we have agreements in place to ensure that they comply with the privacy and security requirements as required by POPIA. We do not allow our third-party service providers to use your personal information for their own purposes and only permit them to process your personal information for specified purposes and in accordance with our instructions, or in terms of applicable law.

Transfer of your information outside South Africa will be subject to the necessary legal measures for safeguarding your information.

We will not sell your personal information.

Your personal information will not be disclosed except as described in this policy.

Information Security

We are legally obliged to provide adequate protection for the personal information for which we are responsible, and to prevent unauthorized access and use of personal information. We will, on an on-going basis, continue to review our security and organisational controls and related processes to ensure that your personal information remains secure.

Some of our security and organisational controls include:

- Physical security;
- Computer and network security;
- IT equipment use policies;
- Access to personal information policies;
- Secure communications;
- Retention and disposal of information procedures;
- Monitoring access and processing of personal information via audits;
- Procedures to deal with any suspected data breach (that is, where we have reasonable grounds to believe that personal information is accessed or acquired by an unauthorised person); and
- Regular training to all our personnel involved with processing of personal information.

We limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

Information accuracy

It is essential that the personal information we hold about you is accurate and current. Please let us know if your personal information changes during your relationship with us.

Information retention

We will only retain your personal information for as long as reasonably necessary to fulfil the purposes we collected it for or subsequently processed, unless: the retention of the information is required or authorised by any legal or regulatory requirements; we reasonably require the information for lawful purposes relating to one of our functions or activities (for example in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you); the retention of the information is required by a contract entered into between us; or you consent to such retention of information.

Where possible, we may de-identify your personal information so that it can no longer be associated with you, in which case, we may use such information without further notice to you.

Your personal information will be deleted or securely destroyed once the retention period has passed.

Your Rights

Under certain circumstances, you have the following rights under applicable privacy laws in relation to your personal information:

a) Access to information

You have the right to confirm, free of charge, whether or not we hold any of your personal information, and to the extent that we do hold your information, request a copy or description of the personal information we hold about you. Please refer to our Promotion of Access to Information (PAIA) manual [<https://www.alconcp.co.za/downloads.html>] which sets out how you can request access to your personal information. We will need a copy of your ID document to confirm your identity and ensure your right to access your personal information before providing details of your personal information. We may need to request other specific information from you to help us process your request. This is a security measure to ensure that personal information is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Please note that copies of your personal information may be provided subject to a payment of a legally allowable fee.

b) Correction, destruction, or deletion of your information

You have the right to ask us to update or correct your personal information which we have in our possession, where it is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully.

You also have the right to ask us to delete or remove your personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal information to comply with the law. Note, however, that we may not always be able to comply with your request of destruction or deletion for specific legal reasons which will be notified to you, if applicable, at the time of your request.

We will require proof of identity to confirm your identity before making changes to or providing you with access to any personal information we may hold about you.

c) Right to object

You have the right to object to the processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. .

d) Request restriction of processing your personal information

This enables you to ask us to suspend the processing of your personal information in the following scenarios:

- If you want us to establish the information's accuracy.
- Where we no longer need the information for the purpose for which the information was initially collected but we need it for purposes of proof.
- Where our use of the information is unlawful but you do not want us to erase it.

e) Withdraw consent

You have the right to withdraw your consent at any time where we are relying on consent to process your personal information. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

f) Submit a complaint to the Information Regulator

You have the right to submit a complaint to the Information Regulator regarding an alleged interference with the protection of your personal information. You can find details of how to do this at: [justice.gov.za/infoereg](https://www.justice.gov.za/infoereg)

g) Institute civil proceedings

You have the right to institute civil proceedings regarding the alleged interference with the protection of your personal information.

If you wish to exercise any of the rights set out above, please contact us.

Time limit to respond

We try to respond to all legitimate requests as soon as is reasonably possible. Where your request is particularly complex or you have made a number of requests, we may take some time in process the request/s. In this case, we will notify you and keep you updated

Cookies Use

We do not collect any personally identifying information via forms or any other input method on our website. Our website does not set any cookies, which are text files placed on your computer or track any user data or behaviour using cookies, or any other method.

Our webhosting service provider does not set or use any cookies on any client websites for any purpose.

However, this website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses "cookies", to help the website analyze how users use the site.

The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf.

Google will not associate your IP address with any other data held by Google.

Glossary

Information Regulator means South Africa's Information Regulator established in terms of section 39 of POPIA;

personal information means all information relating to individuals that is processed in terms of this privacy policy, and where applicable, information relating to an identifiable, existing juristic person; and includes Identity Information, Contact Information, Financial Information, Company Information, Tax Information, Legal Information, and Special Personal Information;

POPIA means the Protection of Personal Information Act, 2013, and its regulations;

process means any operation or activity or any set of operations, whether or not by automatic means, concerning personal information, including – the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use; dissemination by means of transmission, distribution or making available in any other form; or merging, linking, as well as restriction, degradation, erasure or destruction of information, and **processing** and **processed** have corresponding meanings; and

responsible party means a public or private body or any other person which, alone or in conjunction with others, determines the purpose of and means for processing personal information; and for the purposes of this privacy policy is AlcoNCP.

Policy amendments

We keep our privacy policy under regular review. We have the right to update this policy at any time. Only the current version of this policy will be displayed on our website: www.AlcoNCP.co.za