



UNICHOICE PRODUCE DIRECT (PTY) LTD
(REGISTRATION NUMBER: 2000/029974/07)
(Hereinafter referred to as “Unichoice”)

MANUAL IN TERMS OF THE PROTECTION OF PERSONAL
INFORMATION ACT NO. 4 OF 2013
(hereinafter referred to as “The Act”)

PURPOSE:

UNICHOICE is committed to protecting the privacy of Staff, Buyers and Producers and will adhere to strict compliance with the Act.

This manual sets out the privacy policy of Unichoice and provides user friendly guidelines.

1. Contact Details

- **Information Officer:**

Antro van Zyl

Polo Village Offices Unit B2,
Val de Vie Estate,
R301, Jan Van Riebeeck Drive,
Paarl, 7646
021 914 5838
antro@unichoice.co.za

- **Deputy Information Officer:**

Michelle Dreyer

Polo Village Offices Unit B2,
Val de Vie Estate,
R301, Jan Van Riebeeck Drive,
Paarl, 7646
021 914 5838
michelle@unichoice.co.za

2. The Purpose of Processing Personal Information

It is important to note that in terms of Section 13 read with Section 15 of the Act, information must be collected for a specific and explicit purpose related to the activity and functions of Unichoice.

"Processing" means:

- Any operation or activity 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.
- Merging, linking as well as restriction, degradation, erasure or destruction of information.

Unichoice will utilise the Personal Information in its care in the following ways:

- To draft and negotiate the terms of the agreement between Unichoice and its clients (hereinafter referred to as the "Producer");
- Compliance with FICA such Producer;
- To protect the legitimate interests of Unichoice and a Third Party to whom such information was supplied.

3. Categories of Data Subjects and their Personal Information

Unichoice may process records relating to its Staff, Producers and Buyers (inclusive of staff and shareholders of such entities) (hereinafter referred to as “Data Subjects”).

ENTITY TYPE	PERSONAL INFORMATION PROCESSED
Producers	Physical and postal addresses; contact details; financial information; registration number; tax related information. Information regarding the historical production of Fruit such as production capability, cultivars, past production statistics etc.
Shareholders	Physical and postal addresses; contact details; financial information; tax related information; registration number.
Staff of Unichoice	Gender; pregnancy; marital status; age; education information; financial information; employment history; ID number; physical and postal addresses; contact details.
Buyers	Physical and postal addresses; contact details; financial information; registration number; tax related information. Information regarding the historical purchase of Fruit such as amount purchased, cultivars purchased, past purchase statistics etc.

4. Data Subject Participation (Sections 23 and 25)

4.1 The Data Subject may require access to such information, and/or its correction of deletion. This may occur at a prescribed fee, and a copy of the information that Unichoice have in their possession. The information must be provided in a reasonable format and in a manner that is understandable. The Data Subject may contact Unichoice the officer appointed herein for such information.

4.2 The Data Subject may request that outdated or incorrect information be updated, or may request its deletion if, for instance, Unichoice is not authorized to process it. Unichoice must investigate, and follow, the Data Subject's instruction relating to its update or deletion, unless there are legal grounds indicating otherwise. The deletion or amendment and or refusal will be provided in writing within 7days of written request.

4.3 Unichoice must inform the Data Subject of its actions taken, and if a dispute arises the parties must reach an agreement, failing which either party may refer the matter.

4.4 All persons affected due to a change in information, must be informed.

5. Prior to Collection of Personal Information

Unichoice must inform the Data Subjects of the:

5.1 Purpose of the collection;

5.2 Information required;

5.3 Information which is voluntary (consent) and information which is mandatory (justification or authorization);

5.4 Source of collection by the Data Subject or Third Party;

5.5 Consequences of a failure to provide the information;

5.6 Recipients of information;

5.7 Category of information;

- 5.8 Name and address of Unichoice;
- 5.9 Transfer of information to another country and the security provided over the information, if any;
- 5.10 Right of access to information (PAIA);
- 5.11 Right to object to processing;
- 5.12 Right to complain to the Information Officer.

6. Prohibition on Processing of Personal Information

6.1 In accordance with Sections 26 and 27 of the Act, the following information will not be processed:

- 6.1.1 Religious or philosophical beliefs;
- 6.1.2 Race or ethnic origin;
- 6.1.3 Trade union membership;
- 6.1.4 Political persuasion;
- 6.1.5 Health or sex life;
- 6.1.6 Biometric information;
- 6.1.7 Alleged criminal offences.

6.2 The abovementioned list will not apply if:

- 6.2.1 Consent is given by the Data Subject;
- 6.2.2 It is justified in terms of law or is required for the protection of a right;
- 6.2.3 Processing is for historical, statistical or research purposes as there is a public interest or consent cannot be obtained, and safeguards are provided to prevent a breach of the right to privacy;
- 6.2.4 Information has become public knowledge due to the intention of the Data Subject;
- 6.2.5 The Information Officer has authorized the process; or
- 6.2.6 Sections 28 and 33 have been complied with (the specific authorization provisions).

7. Trans-border flows of Personal Information

Section 72 regulates transborder transfers of Personal Information. However, Unichoice does not provide Personal Information of Producers to Buyers in a foreign country as Unichoice is an intermediary agent.

8. General Description of Information Security Measures

Unichoice has put the following security measures in place, in order to protect information obtained.

- Firewalls;
- Virus protection software and update protocols;

- Logical and physical access control;
- Secure setup of hardware and software which captures the IT infrastructure;

9. Remedies Available if Request for Personal Information is Refused

Should a request for access to personal information be refused:

9.1 Within 10 days of receipt of rejection of such notice, the Requestor may apply to the Information Office to review such decision.

9.2 The request should clearly state the grounds for such review.

9.3 Should the Information Officer fail to provide the documents as envisioned, the Requestor may report the matter to the Regulator at infoereg@justice.gov.za.