



Function	Compliance
Document	Information and Privacy Policy
Document type	Policy
Applicable to	Group and all Divisions
Issued by	Deena Naicker, Chief Business Services and Risk Officer
Approved by	Deena Naicker, Chief Business Services and Risk Officer
Version date	June 2021
Version number	1

1. INTRODUCTION

- 1.1 RCL FOODS believes that the ability to access, store, and share information becomes increasingly critical in a modern society and fundamentally affects the effectiveness and efficiency of the organisation. We also acknowledge that the protection of information is important to mitigate risks to privacy, confidentiality and intellectual rights.
- 1.2 In South Africa, the Protection of Personal Information Act ("**POPIA**") was enacted to promote the right to privacy enshrined in the Constitution, while at the same time protecting the flow of information and advancing the right of access to and protection of information. The purpose of the Promotion of Access to Information Act ("**PAIA**") is to promote a society in which the people of South Africa have effective access to information to enable them to more fully exercise and protect all of their rights.
- 1.3 As a responsible South African corporate citizen, we are committed to implementing rules and procedures to ensure that Personal Information is collected and processed with care and in compliance with POPIA and all other applicable laws regarding information protection principles, practices and guidelines.

2. OUR APPROACH

- 2.1 We will always strive collect Personal Information in a fair, lawful and reasonable manner and strive to process Personal Information based on legitimate grounds for the intended purpose.
- 2.2 Information is retained in electronic or hardcopy format. We will implement reasonable measures to ensure that the security of Personal Information is preserved and to prevent its loss, alteration or access by unauthorised third parties. The responsibility for records management and record systems that facilitate the use of records and information are shared by all employees.
- 2.3 We acknowledge that incidents may occur under which the Personal Information of a Data Subject has been accessed or acquired by an unauthorised person. RCL FOODS will implement reasonable measures to ensure that data breaches are identified, evaluated and contained and will address any data breach in accordance with POPIA.
- 2.4 Employees will gain access to and become acquainted with Personal Information of Data Subject, such as other employees, suppliers and customers. We will implement reasonable measures, including training and awareness initiatives, to ensure that employees are aware of, and perform their duties in accordance with the rules and procedures described in the POPIA framework.



3. IMPLEMENTATION

- 3.1 The Chief Business Services and Risk Officer is appointed as Information Officer for RCL FOODS and all wholly owned subsidiaries of RCL FOODS. The Information Officer is responsible for the preparation and implementation of a framework which must set out the internal rules and procedures adopted to ensure compliance with this policy, POPIA and PAIA.
- 3.2 The framework shall include (i) a POPIA and PAIA Manual (published on our Website at <https://rclfoods.com/information-manual-of-rcl-foods/>) which describes how we will collect and use the Personal Information of external parties (including suppliers and customers); and (ii) an Internal POPIA Manual (published on the Intranet), which describes how we will collect and use Personal Information of employees; and (iii) a POPIA Rules and Procedures Manual which describes the processes to be implemented to drive compliance with POPIA.
- 3.3 The Information Officer must (i) establish a dedicated function, to be referred to as the Information Office, to coordinate the implementation of this policy and the POPIA framework; and (ii) ensure that the Information Office is adequately resourced to fulfil its duties. He/she may also appoint Deputy Information Officers or Privacy Champions with the responsibility for execution of the POPIA framework within a business unit or function.
- 3.4 Any request for access to information must be processed in accordance with our POPIA and PAIA Manual, and the remainder of the POPIA framework.

4. REPORTING

- 4.1 Employees have a duty to immediately report any breach of the POPIA framework or a suspected data breach to the Information Officer.
- 4.2 Deputy Information officers and Privacy Champions shall report to the Information Officer regarding the discharge of their duties. The Information Officer and the Information Office shall regularly report to the Governance Committee regarding the implementation and effectiveness of the POPIA framework.

5. MONITORING

- 5.1 The Information Office and the Group Internal Audit function shall collaborate to monitor the adequacy and effectiveness of the RCL FOODS POPIA framework. The RCL Executive Committee or the Board has the discretion to request further independent assurance on the implementation of the POPIA framework.
- 5.2 The custodian of this Policy shall be the Chief Business Services and Risk Officer.