

POPI (Protection of Personal Information) Policy

The relationship of Oude Molen Distillery Pty Ltd with its clients, employees and directors is based on mutual integrity and trust and it is always therefore committed to maintaining this trust by protecting the privacy of personal information and data disclosed and received from any data subject or data owner and to the best of its ability.

The Management of Oude Molen Distillery subscribes to the goals and principles of data privacy and information security in line with relevant legislation and its business strategy and objectives. Data privacy and information security is an integral component of the information management structure of Oude Molen Distillery.

Oude Molen Distillery has an obligation to ensure appropriate security of all Information Technology (IT) systems (data, equipment and processes) and personal information that it owns and/or controls on behalf of other responsible parties.

The need for data privacy and information security is driven by the following:

- Legal, statutory, regulatory and contractual obligations;
- Risk assessment; and
- Operational principles, objectives and requirements for information systems that Oude Molen Distillery has defined or developed.

This applies to:

- Any joint ventures, and/or other business organisations that are owned or controlled by Oude Molen Distillery who receive or process personal information for, or on behalf of the Company;
- The employees and independent contractors of the Company;
- Third-party agreements; and
- Personal information of external data subjects and data owners processed and/or stored by the Company.

The Oude Molen Distillery POPI policy also includes the domains and frameworks of Logical security, Physical security, Managerial security. Against the background of the aforementioned, it is therefore the focused intent of Oude Molen Distillery to incorporate all the applicable principles and regulations in this policy and to monitor and enforce compliance to its prescriptions by way of establishing the necessary mandated management, reporting and disciplinary structures to facilitate these outcomes.

Oude Molen Distillery strives to maintain confidentiality as well as ensuring that there are several key agreements in place to ensure security and privacy of information. Furthermore,

Oude Molen Distillery commits to regularly review and update those documents as circumstances warrant.

Oude Molen Distillery therefore ensures that the right policies are in place to educate employees in terms of the POPI act.

Oude Molen Distillery will retain documents, hard and soft copy format, for a period of 7 years as prescribed by the Companies Act no 71 of 2008. Thereafter, the documents will be destroyed in a suitable manner as to maintain the confidentiality of the information. Prior to destruction, the documents will be reviewed by the applicable authorized Manager.

Related legislation, principles and standards –

1. Government Legislation:

- a. Protection of Personal Information Act No. 4 of 2013;
- b. Promotion of Access to Information Act 2000;
- c. Companies Act No. 71 of 2008;
- d. King III Code of Governance Principles;
- e. Generally Accepted Privacy Principles (GAPP)
- f. ISO/SANS 27002:2008;

2. External Audits:

- a. Smeta (Partner Africa) Compliance
- b. Flocert (Fairtrade) Compliance
- c. ISO22000 compliance in process

3. Membership and certifications:

- a. ARA Member
- b. BBEE compliant
- c. AHI Employers Organisation

4. Company Policies and Standards:

- a. Company Personnel Policy and Disciplinary Code;
- b. Company E-mail Policy and Procedures;
- c. Company Acceptable Use Policy and Procedures;
- d. Company Remote Working Facilities and Mobile Device Policy;
- e. Company Social Media Policy;
- f. Company Password Policy;
- g. Non-disclosure agreements in respect of company suppliers and debtors
- h. Company Standard Terms and Conditions in terms of debtors credit application facilities;
- i. Company Employment Contracts with reference to confidentiality in line with personnel policy and disciplinary code
- j. ETI Code, code of ethics, human rights policy and recruitment policy