

# Privacy Policy

## Effective Date

Effective from 1 January 2021.

## Introduction

AGADE Holdings and its subsidiaries (collectively referred to as “AGADE Holdings”, “the Group”, “we”, “us” or “our”) are committed to protecting and processing personal information responsibly and in accordance with the Protection of Personal Information Act, 4 of 2013 (“POPIA”), the Electronic Communications and Transactions Act (“ECTA”), the Consumer Protection Act (“CPA”) and all applicable South African laws.

By accessing this website, placing orders, submitting enquiries, subscribing to marketing communication or interacting with AGADE Holdings in any manner, you consent to the collection and processing of personal information as described in this policy.

## Information We Collect

We may collect and process:

- Full names
- Telephone numbers
- Email addresses
- Physical and delivery addresses
- Billing information
- Company information
- Order history
- Communication records
- Device and browser information
- IP addresses
- Website interaction data
- Marketing preferences
- Payment confirmation information

## Purpose of Processing

Personal information may be processed for:

- Order processing and fulfilment

- Refrigerated delivery logistics
- Customer communication and support
- Account administration
- Marketing and promotional communication
- CRM and customer relationship management
- Internal reporting and analytics
- Security and fraud prevention
- Legal and regulatory compliance
- Operational and infrastructure management
- Hospitality and wholesale account servicing

### **Legal Basis for Processing**

We process information where:

- Consent has been provided
- Processing is necessary for contractual performance
- Processing is required by law
- Processing supports legitimate operational interests

### **Sharing of Information**

Information may be shared with:

- AGADE Holdings subsidiaries and operating entities
- Payment processors and financial institutions
- Refrigerated logistics and delivery providers
- CRM, hosting and technology service providers
- Professional advisors, auditors and insurers
- Regulatory authorities where legally required

We do not sell personal information to third parties.

### **Information Security**

Reasonable technical, organisational and administrative safeguards are implemented to protect information against unauthorised access, disclosure, misuse, alteration or destruction.

### **Retention of Information**

Information is retained only for as long as reasonably necessary to fulfil operational, contractual, accounting, legal or regulatory requirements.

**Marketing Communication**

Customers may receive promotional communication relating to AGADE Holdings and its subsidiaries. Users may opt out of marketing communication at any time.

**Cookies and Tracking**

Our websites may use cookies, analytics and tracking technologies to improve website performance, analyse usage patterns and support advertising activities.

**Your Rights**

You may request:

- Access to your personal information
- Correction of inaccurate information
- Deletion where legally permissible
- Restriction of processing
- Withdrawal of marketing consent

**Information Officer**

Information Officer: Leon Goosen

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