



SAWIPB

*South African Wine Industry
Professional Body*

UNDERTAKING IN TERMS OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 NO. 4 OF 2013

INTRODUCTION AND PURPOSE

South African Wine Industry Professional Body (SAWIPB) was established as Professional Body to support, represent and advance the Wine industry on a sustainable and ever-growing basis.

SAWIPB respects clients' and their employees' rights to privacy and is committed to the lawful processing of their Personal Information, in accordance with the Protection of Personal Information Act ("POPIA") and any other applicable privacy legislation.

This policy establishes a general standard for the appropriate protection of personal information (POPI) supplied to SAWIPB, it provides principles regarding the rights of individuals to privacy and to reasonable safeguards of their personal information.

All employees, contractors, consultants, temporary and other workers at SAWIPB, including all personnel affiliated with third parties must adhere to this policy.

WHAT IS PERSONAL INFORMATION?

Personal information refers to any information that identifies an individual or specifically relates to members, or employees stored or processed on platforms managed by SAWIPB. Personal information includes, but is not limited to, the following information about members and / or employees:

- Marital status
- National origin
- Age
- Language
- Birth place
- Education
- Relevant financial history
- Identifying number (like an employee number, identity number or passport number)
- E-mail address; physical address (like residential address, work address or your physical location); telephone number
- Race; gender

- Medical history; criminal history; employment history
- Personal views, preferences and opinions
- Another's views or opinions about members and employees (feedback)
- Full names and initials

USE

SAWIPB will only process personal information for lawful purposes relating to our business if the following applies:

- If we have consented thereto
- If a person legally authorised by members and employees, the law or a court, has consented thereto
- If the law requires or permits it
- If it is required to protect or pursue members and/or employees, our or a third party's legitimate interest

SAWIPB will only use Personal Information for purposes related to the reason it was collected, or where we have lawful justification to do so. We will only use Personal Information with individuals' consent, or where collection is necessary to comply with the obligations contained in a service agreement/contract entered into between clients and SAWIPB, or in pursuing our legitimate interest, or those of third parties with whom we conduct legitimate business.

WHEN AND FROM WHERE DO WE OBTAIN and USE PERSONAL INFORMATION

By providing SAWIPB with Personal Information or granting us access thereto, individuals and clients consent to us communicating with them, whether it be electronically or in any other manner or form, with regards to any matters pertaining to the products or services that SAWIPB was contracted for.

- We collect personal information from our members and employees when they capture or submit information relating to the SAWIPB's business
- We collect information about members based on how they engage or interact with us such as via our support desk, emails, letters, telephone calls and surveys
- We collect personal information from completed forms ie contact and billing information
- We collect information pertaining to learning and development needs, programmes and other opportunities offered to enhance the skills base of our members

Personal information is processed for the following reasons:

- to provide members with products, information and opportunities to enhance their competence and ability to function as practitioners;
- to market products, and services to members;
- to respond to enquiries and complaints;
- to comply with legislative, regulatory, risk and compliance requirements (including directives, sanctions and rules), voluntary and involuntary codes of conduct and industry agreements or to fulfil reporting requirements and information requests;
- to conduct market and behavioural research;
- for customer satisfaction surveys, promotional offerings.

- to enable members to take part in and make use of value-added products and services;
- for any other related purposes.

RETENTION AND STORAGE

SAWIPB will not retain Personal Information for longer than is necessary, taking into consideration the purpose for which it was collected or for other lawfully permissible reasons, including where retention is required by legal, regulatory or contractual obligations, or for historical or statistical purposes. Personal Information will be appropriately destroyed, deleted or de-identified should it be no longer required or permitted to be retained, unless SAWIPB has a justifiable and lawful reason for retaining it.

To enable SAWIPB to store and retain information for the relevant purpose, it is important to ensure that it is accurate and up to date. Inaccurate or no longer relevant information needs to be updated using the relevant channels or interfaces. Any person has the right to request details of the type/nature of the information which is held about the person.

SECURITY MEASURES

SAWIPB strives to secure the integrity and confidentiality of Personal Information in its possession or under its control by taking appropriate, reasonable technical and organisational measures to prevent unlawful access to or processing of, loss of, damage to or unauthorised destruction of Personal Information.

Where Personal Information is processed by an operator or third party, such Operator or third party will be required to treat such Personal Information as confidential and will be obliged not to disclose it, unless required by law or in the course of the performance of their contractual duties. They will also be required to establish and maintain the appropriate security measures contained in POPIA. Non disclosure agreements will be required by such third parties and operators.

Security measures include hosting, access controls, password access, and a full footprint of user log ins.

NOTIFICATIONS OF CHANGES

This Privacy Policy may be amended from time to time, and hence users are encouraged to review the Policy regularly.

USER RIGHTS

Access

All registered users have the right, after providing adequate proof of identity and following the correct procedures described in this clause, to request from SAWIPB:

- whether SAWIPB holds Personal Information about such person; and
- the records or a description of the Personal Information held by SAWIPB.

Correction

Users have the right to request SAWIPB to:

- correct or delete Personal Information about them that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully; or
- destroy or delete a record of Personal Information that SAWIPB is no longer authorised to retain in accordance with the provisions of POPIA.

Withdrawal of consent or objection to processing

Users have the right to withdraw their consent given to SAWIPB to process their Personal Information, and to object to SAWIPB processing their Personal Information, unless legislation permits such processing.

COMPLAINTS

Should a user have a complaint regarding their Personal Information they may direct complaints by means of official correspondence to sawipb@sawine.co.za.

If members or employees are not satisfied with the internal resolution of their complaint regarding Personal Information, they have the right to lodge a complaint with the Information Regulator: inforeg@justice.gov.za.