NOTICE OF COMPLIANCE AND PRIVACY POLICY
CUSTOMERS
In terms of the Protection of Personal Information Act 4 of 2013 ("POPIA")

1. INTRODUCTION AND SCOPE

Ziqenye Food Services (Pty) Ltd (hereinafter "the Company", "we", "us" or "our") strive to ensure that personal information is processed in accordance with the conditions of lawful processing set out in POPIA.

This Notice and Privacy Policy apply to the processing of personal information of customers (whether natural or juristic persons) with whom the Company contracts or engages.

This Notice explains:

- how and why personal information will be collected;
- how the information will be used and protected (including the possible use of artificial intelligence tools);
- when and with whom the information will be shared; and
- what choices you have about how the information is collected, used and shared.

By entering into or continuing a commercial relationship with the Company, you acknowledge that you have read and understood this Privacy Notice.

2. PERSONAL INFORMATION WE COLLECT

We may collect and process the following categories of personal information (the list is not exhaustive and not every item will be collected in every instance):

- Identity and contact information – names, company or entity names, registration numbers, directors' or members' details, physical and postal addresses, telephone numbers and e-mail addresses;
- Statutory and government identifiers – VAT, income tax, PAYE, UIF numbers, national identity numbers and driver's license numbers (where relevant);
- Financial and banking information – bank account details, annual financial statements, bank statements, credit bureau information and payment history;
- Commercial and operational information – details of goods or services supplied, invoices, delivery and logistics data, purchase history and insurance claim information;
- Background and due-diligence information – information obtained from CIPC, the Deeds Office, SearchWorks™, Marisit, credit bureau and similar sources;
- Employment and professional information – occupation, title, licenses, professional memberships and authorisations;
- Technical and online identifiers – device identifiers, cookie IDs, IP addresses and browser activity; and
- Audio, visual or other sensory information – CCTV footage or recordings made on our premises or during business interactions, where applicable.

Where you provide personal information of your employees or contractors, you confirm you are authorised to do so and have informed them of this Notice.

3. HOW WE COLLECT PERSONAL INFORMATION

We collect personal information:

- directly from you when you complete forms, submit documentation, invoices or correspondence, or communicate with us;

- from third-party sources such as credit bureaus, CIPC, the Deeds Office, SearchWorks™, Marisit and similar service providers, where permitted by law;
- from other companies within our group of companies;
- through automated means such as cookies and similar technologies; and
- from operational systems used in the logistics, shipping, clearing or cold-storage chain where necessary for the performance of the relevant contract.

4. PURPOSES OF PROCESSING AND LEGAL BASES

We process personal information only for specific, explicitly defined and legitimate purposes. The principal purposes and corresponding legal bases under section 11 of POPIA include:

4.1 **Contractual necessity (section 11(1)(b))**

Processing necessary for the conclusion or performance of a contract, including onboarding and maintaining customer records, processing orders, delivery, invoices and payments, coordinating logistics and managing the commercial relationship.

4.2 **Legal obligation (section 11(1)(c))**

Processing necessary to comply with tax, customs, exchange-control, companies, financial-intelligence, food-safety, cold-chain and other regulatory obligations.

4.3 **Legitimate interests (section 11(1)(f))**

Processing necessary for pursuing our legitimate interests, including conducting due-diligence, credit and risk assessments on customers; auditing and improving operations; business analysis and forecasting; placing and administering insurance cover and managing claims; enforcing contractual rights; and protecting the rights, property and safety of the Company, its customers, suppliers and other persons.

4.4 **Use of Artificial Intelligence (AI) tools**

In carrying out the purposes described above (particularly due diligence, credit and risk assessments, onboarding, monitoring of the commercial relationship, fraud detection and operational improvement), the Company may use artificial intelligence (AI) and automated tools to assist with the processing of personal information. Only AI tools approved by the Company and operated under business terms with appropriate security and data-protection settings will be used.

AI is used to support, not replace, human professional judgment. Any decision that has legal or similarly significant effects on you will involve appropriate human review and will not be based solely on automated processing, in accordance with section 71 of POPIA.

By continuing a commercial relationship with the Company you acknowledge that AI-assisted processing may occur for the legitimate purposes set out in this Notice.

4.5 **Direct Marketing**

We may send you direct marketing communications (including price lists, product or service promotions and related offers) by email, WhatsApp or other electronic means. You may opt out of receiving such communications at any time by contacting the Information Officer using the details below and requesting to be removed from our marketing lists. We will not send you unsolicited electronic direct marketing in contravention of section 69 of POPIA.

5. SHARING OF PERSONAL INFORMATION

We may share personal information with other group companies, service providers and operators (under written agreements), insurers and brokers, credit bureaus, attorneys or debt collectors, IT, cloud hosting and AI service providers, regulators and law-enforcement agencies where required by law, and other parties in the logistics or supply chain where necessary for contract performance. We will not sell your personal information.

6. TRANSBORDER INFORMATION FLOWS

We may transfer personal information outside South Africa, including in the ordinary course of international shipping and logistics, and through the use of cloud-based and AI service providers who may store or process information outside South Africa. Any such transfer will only take place in accordance with section 72 of POPIA (adequate protection, binding agreement, or other permitted ground).

7. RETENTION

We retain personal information only for as long as necessary to achieve the purpose for which it was collected, or as required or permitted by law. When no longer required, we will destroy, delete or de-identify it in a manner that prevents reconstruction in an intelligible form, subject to any legal retention obligations.

8. SECURITY SAFEGUARDS

We implement appropriate, reasonable technical and organisational measures to protect personal information against accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access, having regard to the nature of the information and the risks presented by the processing. While we take all reasonable steps, no method of transmission or storage is completely secure. We accept liability only to the extent required by POPIA or other applicable law.

9. YOUR RIGHTS

Subject to the limitations in POPIA, you have the right to request access to, correction, destruction or deletion of your personal information; to object to processing on reasonable grounds; to withdraw consent where processing is based on consent; to lodge a complaint with the Information Regulator; and to institute civil proceedings. Requests should be directed to the Information Officer (details below). You are responsible for ensuring that information you provide remains accurate and up to date.

10. COMPLAINTS TO THE INFORMATION REGULATOR

Information Regulator (South Africa):

Website: https://inforegulator.org.za
Email: enquiries@inforegulator.org.za
Tel.No.: 0800 017 160 / 010 023 5200
Address: Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191.

11. CONTACT DETAILS – INFORMATION OFFICER / ENQUIRIES

All queries, access requests, objections or complaints regarding the processing of personal information should be directed to:

Department: Legal / Information Officer
Address: C/o Springfield Road and Luke Avenue, Charlo, Gqeberha

Telephone: 041 368 7161
Information Officer: Liezl Landman
Email: legal@fbserv.co.za
Alternative Email: sh@fbserv.co.za

12. CHANGES TO THIS NOTICE

We may amend this Privacy Notice from time to time. The updated version will be made available on our website or provided by other reasonable means. Continued engagement with the Company after the effective date of any amendment will constitute acknowledgement of the revised Notice.