

## **Supplier Privacy Notice**

V3 Update 2 September 2020

Mondi South Africa (Pty) Limited, Head Office Located at Merebank Mill, Travencore Drive,  
Merebank 4052, South Africa  
1967/013038/07

This notice provides you with information on how the Mondi Group, in particular Mondi South Africa (Pty) Limited, Head Office Located at Merebank Mill, Travencore Drive, Merebank 4052, South Africa, or other Mondi entities in South Africa you are in contact with, ("we" or "us") will process your personal information. We respect your privacy and take the protection of personal information very seriously. The purpose of this notice is to describe the way that we collect, store, use, and protect information that can be associated with you or another specific natural or juristic person and can be used to identify you or that person (personal information).

### **1. Purposes for which we process your information**

We will process, including collect, your personal information (as set out in point 2 below) for the following purposes:

- a) supply chain collaboration;
- b) strategic sourcing;
- c) procurement;
- d) contract lifecycle management;
- e) spend analysis;
- f) supplier management;
- g) financial supply chain management;
- h) invoice management;
- i) dynamic pricing;
- j) ensuring the health and safety of our employees and visitors;
- k) payments;
- l) Fraud prevention; and
- m) supplier discovery.

We collect this information either directly from you, from our distribution partners, or your employer.

The provision of personal information is voluntary. However, if you do not provide your personal information, we may not be able to perform relevant business processes, including sales and distribution processes.

### **2. Processed information categories and legal basis of the processing**

We process your personal information on the basis that (i) processing is necessary for pursuing our legitimate interests (according to section 11(1)(f) of the Protection of Personal Information Act, No. 4 of 2013 ("POPIA")), which lies in achieving the purposes as set out in point 1 above, (ii) processing is necessary to carry out actions for the conclusion or performance of a contract to which the you are a party (according to section 11(1)(b) of POPIA), or (iii) processing complies with an obligation imposed by law on us (according to section 11(1)(c) of POPIA).

We process the following personal information (for specific natural or juristic person and can be used to identify you or that person):

- a) Master data
  - Name
  - Addresses
  - Contact numbers
  - Email address
  - Other contact details of the supplier
  - Supplier primary contact person's name and contact information
  - Job position and role / qualifications
  - Independent contractor / labour broker / personal service provider
  - Language
  - Public liability insurance / Workman compensation
  - Additional information necessary to ensure the health and safety of our employees and visitors (e.g., necessary protective gear, body height and shoe size, travel history, questionnaires)
  - Partner roles of the suppliers needed for invoicing and ordering
  - Identification / company registration number
  - BBBEE status
  - SAP vendor number
  - Information on the use of any online services provided by any Mondi Group company, including IP address, authentication data (e.g., username and password), URLs visited, time and date of the use of an online service or a particular feature thereof, name and version of the client software used, location data, and the webpage (URL) visited before accessing the online service
- b) Accounting and payment information
  - VAT & Income tax numbers
  - Tax clearance pin
  - Tax code
  - Country key
  - Bank key
  - Bank account type and number
  - Name of the account holder
  - Account key
  - Bank category
  - Reference details
  - SWIFT code / IBAN / Routing number
  - Bank name, branch and address
  - Attachment of confirmation documents
  - Terms of payment
  - Accounting correspondence
- c) Supplier classification
  - Category
  - Vendor portfolio
  - Product categories
  - Main product category
  - Additional product categories
  - Vendor category.
- d) Declared conflict or potential conflict of interest
- e) Information on goods and/or services offered by supplier
  - quantity and quality of offered goods and/or services
  - other commercial terms of the offer

- f) Contract information
  - commercial terms of the contract
  - legal terms of the contract
  - any other contractual documentation
  - information about contract performance and instances of non-performance

### **3. Retention periods**

Your personal information will only be kept for as long as we reasonably consider necessary for achieving the purposes set out in point 1 above and as is permissible under applicable laws. We will, in any case, retain your personal information for as long as there are statutory retention obligations or potential legal claims are not yet time-barred.

### **4. Your rights in connection with your personal information**

Under applicable law, you have, among others, the rights (under the conditions set out in applicable law): (i) to check whether and what kind of personal data we hold about you and to request access to and the right to rectify the information collected (ii) in certain circumstances, to object to the processing of personal information, in the prescribed manner, on reasonable grounds relating to your particular situation, unless legislation provides for such processing or to object for the purposes of direct marketing; or (iii) to lodge a complaint with the Information Regulator. The address of the Information Regulator is 33 Hoofd Street Forum III, 3<sup>rd</sup> Floor Braampark, Braamfontein, Johannesburg. The relevant email address is: [Inforeg@justice.gov.za](mailto:Inforeg@justice.gov.za).

### **5. Your obligations**

You may only send us your own personal information or the information of another data subject where you have their permission to do so.

### **6. Sharing**

We may share your personal information with:

- other divisions or companies within the group of companies to which we belong so as to provide joint content and services like registration, for transactions and customer support, to help detect and prevent potentially illegal acts and violations of our policies, and to guide decisions about our products, services, and communications (they will only use this information to send you marketing communications if you have requested their goods or services);
- an affiliate, in which case we will seek to require the affiliates to honour this privacy notice;
- our goods or services providers under contract who help provide certain goods or services or help with parts of our business operations, including fraud prevention, bill collection, marketing, technology services (our contracts dictate that these goods or services providers only use your information in connection with the goods or services they supply or services they perform for us and not for their own benefit);
- credit bureaus to report account information, as permitted by law;
- banking partners as required by credit card association rules for inclusion on their list of terminated merchants (in the event that you utilise the services to receive payments and you meet their criteria); and
- other third parties who provide us with relevant services where appropriate.

Some of the recipients referred to above are located or process personal information outside of your country. The level of data protection in another country may not be equivalent to the one in your country. Therefore, we take measures to guarantee that all recipients provide an adequate level of data protection. We do this for example by entering into appropriate data transfer agreements based on

Standard Contractual Clauses (2010/87/EC and/or 2004/915/EC). Such agreements are accessible upon request by email.

## **7. Regulators**

We may disclose your personal information as required by law or governmental audit.

## **8. Law enforcement**

We may disclose personal information if required:

- by a subpoena or court order;
- to comply with any law;
- to protect the safety of any individual or the general public; and
- to prevent violation of our supplier relationship terms.

## **9. No selling**

We will not sell personal information. No personal information will be disclosed to anyone except as provided in this privacy notice.

## **10. Marketing purposes**

We may disclose aggregate statistics (information about the customer population in general terms) about the personal information to advertisers or business partners.

## **11. Security**

We take the security of personal information very seriously and always do our best to comply with applicable data protection laws. Our hosting company will host our website in a secure server environment that uses a firewall and other advanced security measures to prevent interference or access from outside intruders. We authorize access to personal information only for those employees who require it to fulfil their job responsibilities. We implement disaster recovery procedures where appropriate.

## **12. Accurate and up to date**

We will try to keep the personal information we collect as accurate, complete and up to date as is necessary for the purposes defined in this notice. Please note that in order to better protect you and safeguard your personal information, please inform us of any required corrections to your personal information.

## **13. Limitation**

We are not responsible for, give no warranties, nor make any representations in respect of the privacy policies/notices or practices of any third parties.

## 14. Enquiries

If you have any questions or concerns arising from this privacy notice or the way in which we handle personal information, please contact the Mondi South Africa Information Officer:

### **Ed Montocchio**

Chief Information Officer  
South Africa

### **Mondi**

Merebank Mill  
Travancore Drive, Merebank, 4052  
P.O. Box 31024, Merebank, 4059, South Africa  
Tel: +27 (0)31 4512164, Fax: +27 (0)31 4512735  
Cell: +27 (0)82 8069023  
E-mail: [Ed.Montocchio@mondigroup.com](mailto:Ed.Montocchio@mondigroup.com)  
[www.mondigroup.com](http://www.mondigroup.com)

Mondi South Africa (Pty) Ltd 1967/013038/07