



## Marketing and Sales Privacy Notice

V2.0 Updated 29 September 2021

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 your personal information (as set out in point 2 and Annex 1 below) for the following purposes:

- performing direct marketing via electronic and non-electronic means as well as advertising;
- business opportunity management and tracking of opportunities;
- analysis of customer satisfaction (where "customer" refers to our direct customers as well as end-customers);
- performing sales processes, compliance with sanctions (e.g., trade sanctions) and other regulatory requirements;
- managing of our relationships with (potential) customers, including the analysis of (potential) customers' business needs and how they use our products and services;
- making available certain online services to customers and further optimizing and developing such services, and analysing the usage of such services and generating access statistics;
- business analytics and statistical analysis, including the aggregation of data in order to analyse market trends and anticipate (potential) customer demand;
- analysing and forecasting (potential) customer demand;
- documenting interactions (e.g., meetings, phone calls, e-mail conversations) with (potential) customers;
- management of the entire sales process;
- ensuring the health and safety of our employees and visitors;
- sending product samples and promotional material;
- carry out credit checks and order bank codes with any licensed credit bureau and credit grantors for the purposes of obtaining insurance and as is necessary for pursuing Mondi's legitimate interests; performing of prize draws and sweepstakes; and
- organization of and invitation to fairs, events, conferences, etc.

We collect your personal information either directly from you, from our service partners, distributors, your employer, or from public sources (e.g., social media, public Internet sources, public attendance lists of conferences or books).

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 marketing and sales processes.

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

In some cases, we may process the following categories of your personal information on the basis of your consent according to section 11(1)(a) of the Protection of Personal Information Act, No. 4 of 2013 ("POPIA"), for which we may ask you in a separate process:

- Name, company name and employer, job title, email address and telephone number, to the extent that they are used for direct marketing purposes.

We also process the categories of your personal information as set out in Annex 1 on the basis that: (i) processing is necessary to carry out actions for the conclusion or performance of a contract to which the you are party (according to section 11(1)(b) of POPIA); (ii) the processing complies with an obligation imposed by law on the us (in accordance with section 11(1)(c) of POPIA); and/or (iii) the processing is necessary for pursuing our legitimate interests (according to section 11(1)(f) of POPIA), which lies in achieving the purposes as set out in point 1 above.

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;
- language;
- country
- identification or registration number;
- VAT number;
- associated (potential) customer (employer);
- company address (registered and trading), e-mail address, phone number, fax, and other contact information;
- roles/functions at (potential) customer; and
- department.
- nature of Business;
- date of incorporation and date trading commenced;
- web address;
- if renting premises, contact details of landlord/owner;
- contact details of the purchasing department and person responsible for payment;
- name of holding, subsidiaries and associated companies;
- contact details of trade references

### b) Relationship data

- professional and personal interests;
- career information;
- meeting notes;
- receipt of and reaction to marketing and sales initiatives;
- information on participation in prize draws and sweepstakes (e.g. prize awarded);
- history of previous interactions with any Mondi Group company;
- 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;
- history of orders placed and / or inquiries made;
- customer category;
- correspondence; and
- 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)

- c) Commercial information
- scope of power of attorney for the (potential) customer;
  - history of commercial transactions with any Mondi Group company;
  - contracts entered into on behalf of the customer;
  - contractual documentation;
  - information about contract performance and instances of non-performance; and
  - information about the expiration and termination of the contract.

### 3. Transfer of your personal information

For the purposes set out above, we may transfer some of your personal information to the following recipients:

- IT service providers that we use;
- Mondi group entities;
- Customer satisfaction study providers and agencies that are doing for us the online marketing;
- marketing agencies;
- travel agencies and service providers for visa applications;
- distribution partners;
- logistics/fulfilment partners;
- wholesalers; and
- possibly recorded with a Credit Bureau and shared with credit grantors.

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 [e-mail](#).

### 4. 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.

### 5. 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 information 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: [Infoereg@justice.gov.za](mailto:Infoereg@justice.gov.za).

### 6. Regulators

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



## **7. 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.

## **8. No selling**

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

## **9. 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 recover procedures where appropriate.

## **10. 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 policy. 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.

## **11. Limitation**

We are not responsible for, give no warranties, nor make any representations in respect of the privacy policies or practices of 3<sup>rd</sup> parties.

## **12. 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)