



PRIVACY POLICY

1. INTRODUCTION

We at Beck Family Estates (Pty) Ltd t/a Steenberg Wines ("Steenberg", "we", "us", "our") understand that you place trust in our brands and that this extends to how we collect, store, and use your personal information. This Privacy Policy ("Policy") explains how we collect, use, disclose, store, and otherwise process your personal information when you visit our website at www.steenbergfarm.com (the "Website"), or when you otherwise contact us.

We are committed to safeguarding your personal information in compliance with the Protection of Personal Information Act 4 of 2013 ("POPIA") of South Africa. We have implemented organizational, physical, and technical measures designed to protect your personal information from unauthorized access, use, or disclosure.

Please read this Policy carefully. By accessing or using our Website and engaging with us for bookings and purchases, or otherwise, you acknowledge and agree to the practices described herein.

2. WHO ARE WE

Beck Family Estates owns and operates Steenberg Wines.

3. WHO THIS PRIVACY POLICY APPLIES TO

This Privacy Policy applies to the use of the Steenberg Website and any services we offer through this Website. If you access and make use of any of the services or buy any products on the Website, you agree to our Privacy Policy.

4. WHAT PERSONAL INFORMATION WE COLLECT

We collect personal information directly from you when you use our Website. The types of personal information we collect may include:

Identification and contact information:

⇒ Full name, email address, telephone number, postal or billing address.

- ⇒ Employment details (e.g. company name, job title) if relevant to your inquiry or transactions.

Transaction and financial information if you transact with us through the Website:

- ⇒ Payment details (e.g. credit card information, bank transfer information).
- ⇒ Purchase history (e.g. products ordered, date/time of orders).

Usage information:

- ⇒ IP address, browser type, operating system, referral URLs, and pages visited.
- ⇒ Information collected through cookies or similar technologies.

Other voluntary information:

- ⇒ Any information you provide to us in communications (email, phone, website forms).

As a producer and supplier of wines, our Website is not intended for persons under the age of 18, and we do not knowingly collect or process the personal information of individuals under the age of 18.

5. HOW WE COLLECT PERSONAL INFORMATION

Our website collects personal identifying information of the user when you enter your information to access any services that we provide, products that we sell, or promotions that we run through our website. Whenever you voluntarily enter your information to make use of any of the services on our website, you consent to us processing and storing the information to enable us to respond to your enquiries or deliver a service to you. The information that we collect will be collected directly from you and will not be obtained from any third parties without your consent.

Our servers may also automatically collect information about the device that you use to access our website. The information includes usage information related to our website, such as the browser software that you use, the operating system that you are running, the website that referred you to our website, and your Internet Protocol address. This information is used for analytical purposes to enable us to improve the use and traffic on our websites.

We collect your personal information in the following ways:

- ⇒ When you browse, register or make purchases or bookings on our Website.
- ⇒ When you sign up for newsletters, promotions, competitions, or to become a member of a club.
- ⇒ When you contact us via forms, phone, email, or live chat.
- ⇒ When you interact with our social media channels.



- ⇒ Through cookies and tracking technologies used on our Website.

6. WHY WE COLLECT PERSONAL INFORMATION

We collect, process and store your personal information to communicate with you, to market our products, or to provide you with access to our services and products.

We only process personal information where we have a lawful basis. This typically includes:

- ⇒ Order fulfilment: We process your personal information to process package, deliver and track your online purchases on the Website.
- ⇒ Booking fulfilment: We process your personal information to reserve and fulfil your bookings.
- ⇒ Customer service: We process your personal information to respond to enquiries, complaints or support requests.
- ⇒ Marketing and promotions: We process your personal information to send you offers, newsletters, and promotional content where you have consented. When we collect or process your information for marketing purposes, you will always be given the choice to either opt-in to receive our marketing related information, or to opt-out of receiving any marketing communication. We do not automatically process your information for marketing purposes if you have not decided to opt-in when sharing your personal information with us.
- ⇒ Club membership: We process your personal information to administer the memberships of becoming a member of any of our clubs, and to send them special promotions and club benefits.
- ⇒ Personalisation: We process your personal information to improve your browsing and shopping experience by recommending products based on your preferences.
- ⇒ Analytics and research: We process your personal information to understand customer trends and our Website's performance.
- ⇒ Legal and Regulatory compliance: We process your information to comply with our legal obligations, such as age verification, accounting and liquor regulations.

If we need to process your personal information for a purpose other than that for which it was collected, we will obtain your consent or ensure that the new purpose is compatible with the original purpose under POPIA.

7. WHY WE SHARE YOUR PERSONAL INFORMATION

We do not share your personal information if it is not required provide a service or share marketing information to you. To ensure that we can provide the best services and products, we sometimes have to share your personal information. We share your personal information with the following



parties.

Internal personnel:

- ⇒ Your information will be shared with our employees in various departments and authorized agents who act on our behalf. They need access to the information to respond to your enquiries or to provide services to you (e.g., order processing, customer service, reservations).

Third-party service providers:

- ⇒ Suppliers
- ⇒ Logistics and delivery companies
- ⇒ Payment processors, banks, or financial institutions
- ⇒ IT service providers, website hosting, information storage, or analytics services (e.g., Google Analytics)
- ⇒ Professional advisers (e.g., auditors, legal counsel), where necessary

Public and regulatory Authorities:

- ⇒ Government agencies, regulators, or law enforcement when required by law, legal process, or to protect our rights or the rights of others.

Business Transactions:

- ⇒ We will not share your personal information with third parties for their own marketing purposes unless we have obtained your explicit consent.

8. YOUR RIGHTS

You have the right to:

- ⇒ ask what personal information we have about you;
- ⇒ ask what personal information was sent to our suppliers, service providers, or any other third party;
- ⇒ ask us to update, correct, or delete any out-of-date or incorrect personal information we have about you;
- ⇒ unsubscribe from any marketing communications we may send you;
- ⇒ object to the processing of your personal information; and



⇒ lodge a complaint about our practices with the Information Regulator.

Sometimes it might take us a while to comply with your request, as we are required to follow certain procedures, but rest assured that we will try our very best to assist you with your request as quickly as possible.

9. HOW LONG WE RETAIN YOUR PERSONAL INFORMATION

We retain your personal information only for as long as necessary to fulfil the purpose(s) for which it was collected or to comply with legal, regulatory, or internal policy requirements. Where no fixed retention period is legally required, we will delete or anonymize information once it is no longer needed by us, unless otherwise required by law.

We will also delete your personal information if you request that we delete it. Kindly note that we might not be able to provide any services or products to you, if we are no longer allowed to store and process your personal information.

10. CROSS-BORDER INFORMATION TRANSFERS

In certain cases, we may process or store your information in countries outside South Africa, for example, if we use cloud services or communicate with international shipping partners. We ensure that these countries offer the same level of information protection as South Africa.

Where we make such transfers, we will take appropriate measures to ensure that your personal information is secure and treated in line with this Policy and POPIA requirements. Such measures may include standard contractual clauses or other recognized legal mechanisms.

11. AUTOMATED DECISION-MAKING AND PROFILING

We do not use your personal information for automated decision-making or profiling that produces legal or similarly significant effects.

12. SECURITY MEASURES

We are committed to securing your personal information by implementing appropriate technical and organisational safeguards, including:

- ⇒ SSL encryption of all website traffic
- ⇒ Using secure payment gateways
- ⇒ Regular cybersecurity testing



- ⇒ Role-based access control to sensitive personal information
- ⇒ Employee and third-party supplier confidentiality agreements and data protection awareness.

Despite these safeguards, no system is impenetrable. We cannot guarantee the absolute security of your personal information, but we will act swiftly and lawfully in the event of a data breach.

13. THIRD-PARTY LINKS

This Website may contain links to other websites not controlled by us. We are not responsible for the privacy practices or content of such sites. Please review their privacy policies before providing them with your personal information.

14. CHANGES TO THIS PRIVACY POLICY

We may amend or update this Privacy Policy from time to time. The latest version will always be published on our Website with the "Last Updated" date above. We encourage users to periodically review this page.

15. CONTACT US

Ultimately, we've taken complying with POPIA seriously, because we care about preventing harm to you. If you have questions, concerns, or requests regarding this Privacy Policy or your personal information, please contact our Information Officer. [details to be added]

If you believe we have not addressed your concerns or have violated your rights, you may lodge a complaint with the **Information Regulator**.

