

# BERNHEIM WINES (PTY) LTD TA DICKENS FAMILY WINES

## PRIVACY POLICY

### EFFECTIVE UPON 18 MAY 2022

ENSURE THAT YOU READ THIS POLICY BEFORE BROWSING THE WEBSITE OR UTILISING OUR SERVICES. THE CONTINUED USE OF THIS WEBSITE AND/OR OUR SERVICES CONFIRM THAT YOU HAVE READ AND AGREED TO THE TERMS OF THIS PRIVACY POLICY.

#### 1. SCOPE

---

This policy is developed in compliance with the Protection of Personal Information Act of 2013 (hereafter referred to as “The Act”), Government Gazette No. 37067 (published on 26 November 2013), the Promotion of Access to Information Act (No. 2 of 2000), Government Gazette No. 20852 (published on 03 February 2000) and the Regulations relating to the Protection of Personal Information, 2018.

The Privacy Policy applies to all **personal information** (as defined below) **processed** (as defined below) by the website. We are committed to protecting the privacy of all our website visitors. The purpose of this policy is to inform visitors of what personal information will be processed, how the personal information will be collected and the purpose for which the personal information is collected.

#### 2. WHO IS THE RESPONSIBLE PARTY OF THE INFORMATION?

---

Company name: Bernheim Wines (Pty) Ltd TA Dickens Family Wines  
Company address: 241 Boschenmeer Golf Estate, Paarl, 7646  
Company telephone number: 0846553340

#### 3. WHAT IS PERSONAL INFORMATION?

---

3.1 Personal information is any information relating to an identifiable, living individual or business. It includes, but is not limited to:

- Identifiers such as: a name, identity number, staff number, account number, tax number, physical address or any other “assignment” to the person used to identify them.
- Demographic information such as: race; gender; sex; pregnancy; marital status; national, ethnic or social origin; colour; sexual orientation; age; physical or mental health or well-being; disability; religion; conscience; belief; culture; language and birth.
- Financial information such as: bank and other account numbers; bank statements; salary information; financial statements.
- Usernames and passwords.
- Background information such as: education; financial, employment, medical or criminal history.
- Biometric information: this refers to techniques of identification that is based on physical, physiological or behavioural characterisation such as blood typing, fingerprinting, DNA analysis, retinal scanning and voice recognition.
- A person’s personal opinions, views and preferences.
- Correspondence sent by the person that is of a private or confidential nature and any further correspondence that would reveal the contents of the original correspondence.
- Views or opinions about a person (such as interview notes and preferences).

3.2 The following personal information may be processed by us for legitimate reasons:

- Your full name and surname
- Your age
  
- Your ID number
- Payment details
- Shipping address
- Opt-in consent for marketing
- Opt-out requests for marketing
- Account details
- Correspondence
- Details of transaction
- Usernames and password
- Email addresses
- Customer ID
- Information pertaining to time spent on our website and your preferences
- Social media handles
- Search queries
- Contact number
- Your opinions and views
- Your preferences
- Your business name

#### 4. WHERE DO WE GET YOUR PERSONAL INFORMATION FROM?

---

Personal information is obtained on this website in the following ways:

4.1 Information provided by you directly through:

- The completion of forms
- The registration to platforms or subscription on platforms
- Entering of a competition or promotion
- The purchasing of products/services
- The creation of a user profile
- The completion of surveys
- The posting of comments
- The purchasing of goods
- Contacting us or otherwise supplying information

4.2 Information collected when you visit our website:

This information is processed without you supplying same. This is done through technologies such as:

- Cookies: These are small bits of data which is stored by the server on the device used to browse the website. The cookie records the user's preferences and actions which enables the web application to create an experience tailor made for that user. The cookie will record and store information such as items purchased, links clicked and pages visited.
  
- Online Analytics: these are web analytics services provided by companies such as Google. The Online Analytics will use tracking technology to establish website activity. The duration of your visit, pages visited

per session and bounce rate of the user is recorded. The information is used to establish the effectiveness of marketing, design and functionality of the website as it is an accurate reflection of user behaviour.

- Log Files: information such as your IP address, information concerning your computer's operating system, language settings, your browser and the website from which you visited us may be recorded when you visit the website. The information is used to establish website trends and make necessary changes.
- Information from third parties: We may receive information that is publicly or commercially available.

## 5. HOW DO WE PROCESS YOUR PERSONAL INFORMATION?

---

5.1 Processing is defined as any operation or activity or any set of operations, whether or not by automatic means, concerning personal information, including:

- The collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;
- Dissemination by means of transmission, distribution or making available in any other form; or
- Merging, linking, as well as restriction, degradation, erasure or destruction of information.

5.2 We process your information in the following ways:

- Collection of personal information
- Receipt of personal information
- We record your information
- We store information where necessary
- Information is updated as required
- Information is modified when necessary
- Information is retrieved
- Information is shared with third parties such as service providers

## 6. WHAT ARE THE REASONS FOR THE PROCESSING OF YOUR PERSONAL INFORMATION?

---

6.1 Your personal information is processed for the reasons below:

- To provide you with services and/or products offered on our website and requested by you.
- To allow you to create a username and profile.
- To manage your account or relationship and to comply with your instruction or requests.
- For data analysis to establish your preferences to enable us to deliver content that we believe will be relevant to you.
- To confirm and verify your identity or to verify that you are an authorised user for security purposes.
- To manage our contractual relationship with you.
- To respond to queries, requests or comments made by you.
- To analyse and improve the functioning of our website.
- To process payments, accounting, auditing and delivery of products.
- To provide you with promotional material and inform you of competitions and products if you have opted in to receive this information.
- To communicate with users.
- To provide you with the opportunity to participate in competitions and promotions.
- To establish website trends, preference of our visitors and tailor our website to best cater for users.

- To provide you with an opportunity to edit/update your information on the website.
- To comply with legal obligations and legislation.
- To comply with an order of court.
- To detect and prevent fraud.
- To provide you with administrative information such as changes to terms and conditions.
- To provide you with our newsletter and/or other marketing materials and to facilitate social sharing.
- To determine the effectiveness of our promotional campaigns.
- To conduct market research and provide you with information about products or services from time to time via email, telephone or other means.
- To enhance, improve or modify our current products and services.

## **7. DISCLOSURE OF PERSONAL INFORMATION**

---

7.1 We may disclose your personal information to third parties such as service providers in order to ensure that services and/or products are provided to you. We have entered into agreements with these third parties to ensure that they comply with the provisions of the Protection of Personal Information Act when processing your data.

7.2 We may further disclose your personal information in order to:

- Comply with legislative requirements
- Comply with an order of court
- Protect our rights

## **8. RETENTION OF PERSONAL INFORMATION**

---

We may retain personal information records indefinitely. Should you wish to object to the permanent retention of your personal information, it will be retained for the period prescribed by law.

## **9. RIGHT TO ACCESS, RECTIFICATION AND DELETION OF PERSONAL INFORMATION**

---

You have the right to request access to your personal information retained by us for purposes of correcting information and deleting incorrect personal information. It is requested that you ensure that all personal information held by us is complete, accurate and current.

## **10. RIGHT TO WITHDRAW CONSENT AND OBJECT TO THE PROCESSING OF DATA OBJECTION**

---

If you have consented to the processing of personal information which is being processed by us, you have the right to withdraw such consent. You have the right to object to the processing of personal information on reasonable grounds. Should you wish to withdraw your consent or object to the processing of your personal information, you may submit the objection or withdrawal to the Information Officer at 021 862 0232.

## **11. RIGHT TO LODGE A COMPLAINT**

---

Should you feel that the processing of your data is done in a manner which does not comply with POPI, you may lodge a complaint with the Information Regulator using the details below:

Information Regulator (South Africa) Email:  
complaints.IR@justice.gov.za

## **12. SECURITY SAFEGUARDS**

---

We will take the necessary precautions to secure the integrity and confidentiality of personal information in our possession or under our control by taking appropriate and reasonable technical and organisational measures to prevent the loss, damage, destruction and unauthorised access and processing of personal information.

## **13. POLICY VERSION**

---

This Privacy Notice was last updated in June 2021. We reserve the right to modify this privacy policy at any notice, so please review it frequently.