

MPOWER HOLDINGS (PTY) LTD

Privacy Policy

Effective Date: 7 May 2026

1. Introduction

MPOWER HOLDINGS (PTY) LTD (Registration Number 2011/104748/07) ("MPower Holdings", "we", "us", or "our") respects your privacy and is committed to protecting your personal information. This Privacy Policy explains how we collect, use, disclose, store, and otherwise process your personal information when you visit our website www.mpowerholdings.co.za (the "Website"), engage with us in the course of our business as a holding company, or interact with any of our subsidiaries and group companies in circumstances where MPower Holdings is the responsible party.

This Privacy Policy is issued in accordance with the Protection of Personal Information Act, 4 of 2013 ("POPIA"), the Electronic Communications and Transactions Act, 25 of 2002 ("ECTA"), and other applicable laws of the Republic of South Africa.

By using our Website or providing us with your personal information, you acknowledge that you have read and understood this Privacy Policy and consent to the processing of your personal information as described herein.

2. Definitions

In this Privacy Policy, the following terms have the meanings ascribed to them:

- "Data Subject" means the natural or juristic person to whom personal information relates;
- "Group Company" means any subsidiary, associate, or affiliated entity of MPower Holdings, including those listed in section 3 below;
- "Operator" means a person who processes personal information for or on behalf of a Responsible Party;
- "Personal Information" means information relating to an identifiable, living natural person, and where applicable, an identifiable, existing juristic person, as defined in POPIA;
- "Processing" means any operation or activity, whether automated or not, concerning personal information, including the collection, receipt, recording, organisation, collation, storage, updating, retrieval, alteration, distribution, dissemination, or destruction of information;
- "Responsible Party" means a public or private body that, alone or in conjunction with others, determines the purpose of and means for processing personal information;
- "Special Personal Information" means personal information concerning religious or philosophical beliefs, race or ethnic origin, trade union membership, political

persuasion, health or sex life, biometric information, and the criminal behaviour of a Data Subject.

3. Who We Are and Our Group Structure

MPOWER HOLDINGS (PTY) LTD is a South African private company and a diversified holding company with a rich heritage of over 30 years in South African agriculture. The MPower Holdings group comprises multiple subsidiaries operating across crop protection, biological inputs, farming operations, meat production and processing, and related agricultural sectors.

Our group companies include, without limitation:

- Africom Agri
- Enviro Bio-Chem
- Blum Biologicals
- Nigelchem
- Didymus Farming
- Didymus Meatmasters
- QT Boran
- Farmfed Meat
- Oupa's Biltong
- Triomf RDC
- Parc Agro

MPower Holdings, together with its group companies, applies consistent standards of personal information protection across the group. Each group company is generally its own Responsible Party for personal information it collects directly. This Privacy Policy applies where MPower Holdings itself is the Responsible Party (for example, through this Website, group-level procurement, and shared services). Where a group company is the Responsible Party, that group company's own privacy notice will apply.

4. Personal Information We Collect

We may collect the following categories of personal information, depending on the nature of your interaction with us:

4.1 Information You Provide Directly

- Identifying information such as your full name, identity or passport number, and date of birth;
- Contact information such as your postal and physical address, email address, and telephone numbers;
- Employment information such as your employer, job title, and professional qualifications (where relevant to our dealings with you);

- Financial and banking information where you transact with us or supply goods or services to us;
- Information you provide when you register for an account, request information about our group companies, attend an event, complete a survey, or contact us;
- Correspondence and records of communications between us.

4.2 Information We Collect Automatically

- Technical information such as your IP address, browser type, operating system, and device identifiers;
- Usage information such as pages visited, time spent on pages, referral source, and clickstream data;
- Location information based on your IP address;
- Cookies and similar tracking technologies (please refer to our Cookie Policy for further details).

4.3 Information from Third Parties

- Information from our group companies, distributors, agents, or business partners;
- Information from credit bureaus and fraud prevention agencies (where required for credit assessments);
- Information from publicly available sources such as company registries and social media platforms.

5. Purpose of Processing Your Personal Information

We process your personal information for one or more of the following purposes:

- To provide you with information about MPower Holdings, our group companies, our activities, and our investments;
- To respond to your enquiries, requests, and complaints;
- To manage our relationships with counterparties, service providers, and business partners at a group level;
- To coordinate shared services across the group, such as finance, human resources, information technology, procurement, and legal;
- To conduct credit checks and risk assessments;
- To send you communications about MPower Holdings, our group companies, and industry developments (where you have consented or where permitted by law);
- To operate, maintain, and improve our Website and digital services;
- To comply with our legal, regulatory, and contractual obligations;
- To prevent, detect, and investigate fraud, security incidents, and other unlawful activities;
- To protect our rights, property, or safety, or the rights, property, or safety of others;
- For any other purpose with your consent or as permitted by applicable law.

6. Lawful Basis for Processing

We process your personal information on one or more of the following lawful bases as set out in POPIA:

- You have consented to the processing;
- The processing is necessary for the conclusion or performance of a contract to which you are a party;
- The processing complies with an obligation imposed by law on us;
- The processing protects a legitimate interest of the Data Subject;
- The processing is necessary for pursuing our legitimate interests or those of a third party to whom the information is supplied; or
- The processing is necessary for the proper performance of a public law duty.

7. Special Personal Information and Children

We do not ordinarily process Special Personal Information through our Website. Where we are required to process Special Personal Information (for example, in the course of employment-related matters), we will only do so where authorised by POPIA or with the explicit consent of the Data Subject.

Our Website is not intended for children under the age of 18. We do not knowingly collect personal information from children. If you become aware that a child has provided us with personal information without parental consent, please contact us so that we can take appropriate steps to delete such information.

8. Sharing and Disclosure of Personal Information

We may share your personal information with the following categories of recipients:

- Our group companies, subsidiaries, and affiliated entities, where sharing is necessary for the purposes set out in this Policy or where such companies act as Operators on our behalf;
- Operators and service providers who process personal information on our behalf, including IT, hosting, payment processing, marketing, logistics, and analytics providers;
- Professional advisors such as auditors, attorneys, accountants, and consultants;
- Regulatory and government authorities where required by law (including but not limited to the South African Revenue Service, the Companies and Intellectual Property Commission, and the Information Regulator);
- Law enforcement agencies, courts, and tribunals where necessary to comply with legal obligations or to protect our rights;
- Credit bureaus and fraud prevention agencies;
- Prospective or actual purchasers in the event of a sale, merger, restructuring, or other business transaction.

We require all third parties who process personal information on our behalf to do so in accordance with appropriate written agreements that include obligations of confidentiality and security consistent with POPIA. Where personal information is shared between MPower Holdings and its group companies, such sharing is subject to intra-group data-sharing arrangements and appropriate safeguards.

9. Cross-Border Transfers

Although MPower Holdings operates in South Africa, we make use of service providers (including cloud-based hosting, email, analytics, and productivity providers) whose infrastructure may be located outside of South Africa. As a result, your personal information may be transferred to, stored in, or processed in countries outside South Africa.

We will only transfer personal information across borders where the transfer is permitted by section 72 of POPIA, including where the recipient is subject to a law, binding corporate rules, or binding agreement that provides an adequate level of protection, or where you have consented to the transfer.

10. Information Security

We take the security of your personal information seriously and have implemented appropriate, reasonable technical and organisational measures to safeguard personal information against loss, damage, unauthorised access, alteration, disclosure, and destruction. These measures include:

- Firewalls and intrusion detection systems;
- Anti-virus and anti-malware software with regular updates;
- Encryption of data in transit and, where appropriate, at rest;
- Logical and physical access controls;
- Secure setup and maintenance of our hardware and software infrastructure;
- Staff training and confidentiality obligations across the group;
- Vendor due diligence and contractual safeguards with service providers.

Despite these measures, no method of transmission over the internet or electronic storage is completely secure. We cannot guarantee absolute security, but we will notify you and the Information Regulator of any compromise of your personal information as required by POPIA.

11. Retention of Personal Information

We retain personal information for as long as is necessary to fulfil the purposes for which it was collected, to comply with our legal, regulatory, accounting, and reporting obligations, or to establish, exercise, or defend legal claims. The retention periods will vary depending on the type of personal information and the purpose for which it is processed.

Once personal information is no longer required, we will securely destroy, delete, or de-identify it in accordance with our retention policies and applicable law.

12. Your Rights as a Data Subject

Subject to POPIA and other applicable laws, you have the following rights in relation to your personal information:

- The right to be notified that we are collecting your personal information or that your information has been accessed or acquired by an unauthorised person;
- The right to request access to the personal information we hold about you;
- The right to request the correction or deletion of inaccurate, irrelevant, excessive, out-of-date, incomplete, misleading, or unlawfully obtained personal information;
- The right to object, on reasonable grounds, to the processing of your personal information;
- The right to object to the processing of your personal information for direct marketing purposes;
- The right to withdraw your consent (where processing is based on consent) at any time;
- The right not to be subject to a decision based solely on automated processing that has legal consequences for you;
- The right to submit a complaint to the Information Regulator.

To exercise any of these rights, please contact our Information Officer using the details set out at the end of this Policy. We may require you to provide proof of identity before we are able to action your request. Where your request relates to personal information held by a specific group company, we will assist in directing your request to the appropriate Information Officer.

13. Direct Marketing

We will only send you direct marketing communications by electronic means if you have consented to receive them or if you are an existing customer of similar products or services and we have given you a reasonable opportunity to opt out.

You may opt out of receiving marketing communications from us at any time by clicking the “unsubscribe” link in any marketing email, by replying “STOP” to any marketing SMS, or by contacting our Information Officer.

14. Cookies and Tracking Technologies

Our Website uses cookies and similar tracking technologies to enhance your browsing experience, analyse Website usage, and deliver relevant content. For full details on how we use cookies, please refer to our Cookie Policy.

15. Third-Party Websites

Our Website may contain links to third-party websites, including websites operated by our group companies, plug-ins, and applications. Clicking on those links or enabling those

connections may allow third parties to collect or share data about you. Each group company operates its own website and its own privacy notice applies to those websites. We do not control third-party websites and are not responsible for their privacy practices. We encourage you to read the privacy policy of every website you visit.

16. Changes to this Privacy Policy

We reserve the right to amend this Privacy Policy from time to time to reflect changes in our business, legal requirements, or industry practices. Any changes will be posted on our Website with an updated effective date. We encourage you to review this Privacy Policy periodically to stay informed about how we are protecting your personal information.

17. Complaints

If you have any concerns or complaints about how we process your personal information, please contact our Information Officer in the first instance. We will investigate your complaint and respond as soon as reasonably possible.

If you are not satisfied with our response, you have the right to lodge a complaint with the Information Regulator at:

Authority	The Information Regulator (South Africa)
Address	JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
Postal	P.O. Box 31533, Braamfontein, Johannesburg, 2017
Complaints Email	POPIAComplaints@inforegulator.org.za
Enquiries Email	enquiries@inforegulator.org.za
Website	https://inforegulator.org.za/

18. Contact Us

If you have any questions about this Privacy Policy or wish to exercise any of your rights, please contact us:

Company	MPOWER HOLDINGS (PTY) LTD
Information Officer	Pieter Espach
Postal Address	1 Amatole Street, N4 Gateway Industrial Park, Willow Park Manor X65, Pretoria 0184, Gauteng, South Africa
Street Address	1 Amatole Street, N4 Gateway Industrial Park, Willow Park Manor X65, Pretoria 0184, Gauteng, South Africa
Telephone	+27 18 632 0050
Email	info@mpowerholdings.co.za

Website	www.mpowerholdings.co.za
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