

PRIVACY POLICY

Section 18 Notification – Protection of Personal Information Act 4 of 2013

For: Six Degrees of Global Separation (PTY) LTD (“the Responsible Party”, “we”, “us”, “our”)

Last updated: 18.06.2026

This Privacy Policy explains how we collect, use, share and protect your personal information when you visit our Website or purchase from us. It is issued in compliance with the Protection of Personal Information Act 4 of 2013 (“POPIA”), and gives effect to our notification obligations under section 18 of POPIA. It should be read together with our **Website Terms of Use** and **Online Sale of Goods Terms and Conditions**. By using the Website you acknowledge that you have read this Policy.

1. Who We Are and How to Contact Us

We are the Responsible Party for your personal information, as that term is used in POPIA. Our details are:

Full legal/registered name: Six Degrees of Global Separation (PTY) LTD

Physical/registered address: Erf 12027, Also known as, 15 Patrick Street, Voorbaai, Mossel Bay, 6506

Email: jesse@6degrees.wine | Telephone: +27(0) 82 334 4114

Information Officer

Our designated Information Officer is Jesse Esterhuizen, who may be contacted at jesse@6degrees.wine / +27(0) 82 334 4114. Our Information Officer (and any Deputy Information Officers) is registered with the Information Regulator as required by section 55 of POPIA before processing commences.

2. The Personal Information We Collect

Depending on how you interact with us, we may collect the following categories of personal information:

- Identity and age data: your name, and confirmation or proof that you are 18 years or older (which may include a date of birth or, at delivery, sight of an identity document). Age verification is required because we sell liquor and may not lawfully sell or supply it to anyone under 18.
- Contact data: email address, telephone number, and billing and delivery addresses.
- Order and transaction data: products ordered, order history, and records of communications with us.
- Payment data: we do not store full card details; payment is processed by our payment provider, and we receive only confirmation of payment and limited transaction references.
- Technical and usage data: IP address, browser type, device information, and pages visited, collected through cookies and similar technologies (see our Cookie Policy).

Where information is not collected directly from you (for example, delivery confirmations from our courier), we will tell you the source where reasonably practicable, as required by section 18(1) of POPIA.

3. Why We Process Your Information and Our Lawful Basis

We process your personal information for the following purposes, relying on the lawful bases set out in section 11 of POPIA:

- **To conclude and perform your purchase contract** – processing necessary to take steps to enter into and carry out the sale, including delivery (section 11(1)(b)).
- **To comply with the law** – verifying that you are 18 or older and keeping records required by liquor, tax and consumer-protection legislation (section 11(1)(c)).
- **For our legitimate interests** – preventing fraud and underage sales, securing our Website, and improving our products and service, where these interests are not overridden by your rights (section 11(1)(f)).
- **With your consent** – for direct marketing and certain optional cookies, where consent is required. You may withdraw consent at any time (section 11(1)(a)).

Providing identity, contact, age and payment information is necessary to fulfil an order; without it we cannot lawfully sell or deliver to you. Other information (such as marketing preferences) is voluntary.

4. Direct Marketing

We will only send you electronic marketing where the law permits, in line with section 69 of POPIA. If you are an existing customer, we may market similar products to you and you may opt out at any time. In other cases we will obtain your consent first. Every marketing message will include an easy way to unsubscribe, and we will honour any objection promptly.

5. Who We Share Your Information With

We do not sell your personal information. We share it only as necessary, with appropriate safeguards, with:

- operators that process information on our behalf, such as our website host, payment provider, courier/delivery partners, email and customer-support providers, all bound to process the information only on our instruction and to protect it (section 21 of POPIA);
- regulators, law-enforcement and other authorities where required by law, including for liquor and tax compliance; and
- our professional advisors and auditors, where reasonably necessary.

6. Cross-Border Transfers

Some of our service providers (for example, cloud hosting, payment or email services) may process information outside South Africa. Where this happens we comply with section 72 of POPIA by ensuring the recipient is subject to a law, binding agreement or rule providing an

adequate level of protection comparable to POPIA, or by relying on your consent or another lawful ground. The countries to which information may be transferred include: South Africa

7. How Long We Keep Your Information

We keep personal information only for as long as necessary for the purposes set out above, or as required by law (for example, tax and liquor-trade record-keeping obligations), after which it is securely deleted or de-identified, in line with section 14 of POPIA. Our standard retention periods are: Transaction records 5 years for SARS

8. How We Protect Your Information

We apply appropriate, reasonable technical and organisational measures to safeguard your personal information against loss, damage, and unauthorised access or processing, as required by section 19 of POPIA. These include access controls, encryption in transit where appropriate, and using reputable service providers. If a security compromise affects your personal information, we will notify you and the Information Regulator as required by section 22 of POPIA.

9. Your Rights as a Data Subject

Under POPIA you have the right to:

- be notified that we are collecting your information, and that it has been accessed by an unauthorised person;
- request access to the personal information we hold about you (subject to PAIA procedures and any prescribed fee);
- request that we correct or delete information that is inaccurate, irrelevant, excessive, out of date, or unlawfully obtained;
- object, on reasonable grounds, to the processing of your information, and to object to direct marketing at any time;
- withdraw consent where processing is based on consent; and
- lodge a complaint with the Information Regulator.

To exercise any of these rights, contact our Information Officer using the details in clause 1. We may need to verify your identity before acting on a request.

10. Children's Information

Our Website and products are intended only for persons 18 years or older. We do not knowingly market to, sell to, or collect the personal information of children. If we learn that we have collected a child's information without proper authorisation, we will delete it.

11. Cookies

We use cookies and similar technologies to operate the Website, remember your preferences, and understand how the Website is used. You can control non-essential cookies through the consent banner and your browser settings. Full details are set out in our Cookie Policy.

12. PAIA Manual

In addition to this Policy, we maintain a manual under the Promotion of Access to Information Act 2 of 2000 ("PAIA"), which describes the records we hold and how to request access to them. It is available on request from our Information Officer.

13. Complaints to the Information Regulator

If you believe we have not handled your personal information lawfully, you may complain to us first, and you also have the right to complain to:

The Information Regulator (South Africa)

JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

General enquiries: enquiries@inforegulator.org.za | POPIA complaints: POPIAComplaints@inforegulator.org.za

Website: inforegulator.org.za

14. Changes to This Policy

We may update this Policy from time to time by posting the revised version on the Website, with a new "last updated" date. Material changes will be brought to your attention where reasonably practicable. Your continued use of the Website after an update constitutes acceptance of the revised Policy.

This document is a template prepared for adaptation to the Responsible Party's specific circumstances. It is provided for drafting purposes and does not constitute legal advice. The bracketed, highlighted fields must be completed, the Information Officer must be registered with the Information Regulator, and a PAIA Manual should be in place. Confirm the final document with a qualified attorney before the Website goes live.