

Privacy Notice

Ball Straathof (Pty) Ltd | Registration number 2000/029724/07 | Version 1.0, effective 22 October 2026

This notice explains how Ball Straathof (Pty) Ltd, including our Kirchhoffs, Gro-Pak, RAW and other brands ("we", "us", "our"), collects, uses, shares and protects personal information, as required by the Protection of Personal Information Act 4 of 2013 (POPIA). It applies to our customers and their staff, consumers who contact us, suppliers, breeders, service providers and visitors to our premises and website. Our employees and job applicants receive a separate notice.

Under POPIA, personal information includes information about identifiable companies and other juristic persons, as well as individuals.

1. Who is responsible for your information

Ball Straathof (Pty) Ltd is the responsible party. If you have any questions about this notice or how we handle your information, please contact our Information Officer:

Information Officer	Sean Goldfain, Managing Director
Email	sean@ballstraathof.co.za
Telephone	011 794 2316
Address	1550 Printech Avenue, Honeydew, 2040 PostNet Suite No. 059, Private Bag X17, Strubensvalley, 1735

2. What information we collect

Category	Examples
Business and identity details	Company name, registration and VAT numbers; names, job titles and identity numbers of contact people, directors and sureties.
Contact details	Email addresses, telephone and WhatsApp numbers, physical, postal and delivery addresses.
Transaction information	Quotes, orders, deliveries, invoices, payments, account history, claims and returns.
Credit information	Credit applications, trade references, bank details, financial statements and credit bureau reports.
Communications	Emails, support tickets, WhatsApp messages, call notes and complaints, including photos you send us.
Marketing preferences	Your consent to, or opt-out from, marketing messages, and how you interact with them.
Website and security information	IP address, browser type and pages visited (through cookies); CCTV images and visitor records at our premises.

3. How we collect it

- Directly from you, when you open an account, place an order, contact us, attend an event or visit our premises or website.
- From third parties, such as credit bureaus, trade references, our sales agents, breeders and public registers (for example CIPC).
- Automatically, through cookies and similar technologies on our website.

If you provide information about other people (for example your staff or directors), please make sure they are aware of this notice.

4. Why we use it

We process personal information only where POPIA allows it. The table shows our main purposes and the lawful basis we rely on.

Purpose	Lawful basis (section 11 of POPIA)
Processing quotes and orders, delivering products, invoicing and collecting payment	Performance of a contract
Assessing credit applications and managing accounts	Contract; legitimate interest
Customer service, growing advice, complaints and claims	Contract; legitimate interest
Reporting sales and royalties to breeders and rights holders, and verifying compliance with plant breeders' rights	Legal obligation; legitimate interest
Phytosanitary, import, export, customs and tax requirements	Legal obligation
Marketing our products, events and promotions	Legitimate interest (existing customers) or consent
Securing our premises, systems and information	Legitimate interest
Establishing, exercising or defending legal claims	Legitimate interest

Most of the information we ask for is needed to supply you. If you do not provide it, we may not be able to open an account, extend credit or process your order.

5. Marketing

If you are a customer, we may send you information about similar products and services by email, SMS or WhatsApp. If you are not a customer, we will only do so with your consent. Every message tells you how to opt out, and you can unsubscribe at any time by replying "STOP", using the unsubscribe link, or contacting us. Opting out of marketing does not affect service messages about your orders and account.

6. Who we share it with

We do not sell personal information. We share it only where necessary, with:

- plant breeders and rights holders, for royalty reporting and licence compliance;
- companies in the Ball Horticultural group;
- couriers, freight forwarders and clearing agents;
- credit bureaus, credit insurers, debt collectors and attorneys;
- service providers who host or support our systems and communications, such as Microsoft 365, our ERP provider, Freshdesk and WhatsApp (Meta);
- banks, auditors and professional advisers; and
- government and regulatory bodies where the law requires it, such as SARS and the Department of Agriculture.

Service providers who process information on our behalf must keep it confidential and secure under written agreements, as section 21 of POPIA requires.

7. Transfers outside South Africa

Some of the recipients above are outside South Africa, including breeders in Europe and the United States, Ball Horticultural Company in the United States, and cloud service providers whose servers may be abroad. We transfer information only as permitted by section 72 of POPIA: where the recipient is bound by laws, binding corporate rules or an agreement that provide adequate protection, where the transfer is needed to perform our contract with you, or with your consent.

8. How we protect it

We use reasonable technical and organisational measures to protect personal information, including firewalls and encrypted connections, access controls, anti-malware protection, multi-factor authentication, secure backups, physical security at our premises and confidentiality obligations for staff and service providers. If a security compromise occurs that affects your information, we will notify you and the Information Regulator as POPIA requires.

9. How long we keep it

We keep personal information only for as long as we need it for the purposes above, or as long as the law requires. In general, we keep transaction and accounting records for at least five years after the end of the relevant tax year, as required by tax legislation, and plant breeders' rights and royalty records for the duration of the relevant licence plus [five] years. Marketing information is kept until you opt out. When information is no longer needed, we delete, destroy or de-identify it securely.

10. Your rights

You have the right to:

- ask whether we hold personal information about you, and request access to it;
- ask us to correct or delete information that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or unlawfully obtained;
- object to our processing of your information on reasonable grounds, and to direct marketing at any time;
- withdraw any consent you have given; and
- lodge a complaint with the Information Regulator.

To exercise these rights, contact our Information Officer. The forms you can use, and the procedure for requesting access to records, are in our PAIA and POPIA Manual, available at <https://ballstraathof.co.za/filer/canonical/1792648714/69/>. We may ask you to verify your identity before we act on a request.

Information Regulator: Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191 | Tel: 010 023 5200 | enquiries@inforegulator.org.za | <https://inforegulator.org.za>

11. Cookies

Our website uses cookies to make it work properly and to understand how it is used. You can manage non-essential cookies through the cookie banner on our website. You can also block or delete cookies in your browser settings, although some parts of the website may then not work as intended.

12. Children

Our products and services are not directed at children, and we do not knowingly collect personal information about children under 18 without the consent of a competent person.

13. Changes to this notice

We may update this notice from time to time. The latest version, with its effective date, will always be on our website.