FARMLINK CAPITAL (PTY) LTD, TRADING AS LOAMI

PAIA and POPIA Manual

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This manual is published under section 51 of the Promotion of Access to Information Act, 2000 (PAIA). It explains how to ask for records held by FarmLink Capital (Pty) Ltd, which trades as Loami, what records we hold, and how we process personal information under the Protection of Personal Information Act, 2013 (POPIA).

1. About PAIA and this manual

PAIA gives effect to the constitutional right of access to information. It allows anyone to request access to records held by a private body where the record is required to exercise or protect a right, subject to the grounds for refusal set out in the Act.

This manual helps you to:

- understand what records we hold and which are available without a formal request;
- make a request for access to a record, and know what it costs;
- understand how we process personal information, and how to object to processing or ask for information to be corrected or deleted.

2. Our details

Name	FarmLink Capital (Pty) Ltd, trading as Loami
Registration number	2025/745758/07
Registered and postal address	Plot 59B, Boschkop, Pretoria, Gauteng, 0054

Telephone	079 881 6323
Email	desk@loami.africa
Website	www.loami.co.za
Head of the private body	Tiaan Venter, Director

FarmLink Capital is a wholly owned subsidiary of AgriLink Holdings (Pty) Ltd. Loami is a product and trading name of FarmLink Capital and is not a separate company.

3. Information Officer

All requests under PAIA, and all requests and objections under POPIA, should be sent to our Information Officer:

Sean Moodley, Information Officer

Email: sean@farmlinkcapital.co.za

Telephone: 079 881 6323

Postal address: Plot 59B, Boschkop, Pretoria, Gauteng, 0054

4. The Information Regulator's guide

The Information Regulator has published a guide on how to use PAIA and POPIA, as section 10 of PAIA requires. It explains your rights and how to exercise them, and is available in all official languages.

You can get the guide from the Information Regulator's website, or inspect a copy at our office during normal business hours. You can also contact the Regulator directly:

Information Regulator (South Africa)

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

PO Box 31533, Braamfontein, Johannesburg, 2017

Website: inforegulator.org.za

Enquiries: enquiries@inforegulator.org.za · 010 023 5200

PAIA complaints: PAIAComplaints@inforegulator.org.za

POPIA complaints: POPIAComplaints@inforegulator.org.za

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5. Records available without a request

We have not published a notice under section 52 of PAIA. The following are, however, freely available on our website without a formal request:

- this manual;
- the Loami Privacy Policy and Terms of Use;
- information about Loami published on www.loami.co.za.

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6. Records kept under other laws

We keep records as required by the following laws, among others. Some of these records are available only to the people or authorities the relevant law specifies.

- Basic Conditions of Employment Act, 1997
- Companies Act, 2008
- Compensation for Occupational Injuries and Diseases Act, 1993
- Consumer Protection Act, 2008
- Electronic Communications and Transactions Act, 2002
- Employment Equity Act, 1998
- Income Tax Act, 1962
- Labour Relations Act, 1995

- Promotion of Access to Information Act, 2000
- Protection of Personal Information Act, 2013
- Skills Development Levies Act, 1999
- Tax Administration Act, 2011
- Unemployment Insurance Act, 2001, and Unemployment Insurance Contributions Act, 2002
- Value Added Tax Act, 1991

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7. Records we hold

The table below describes the subjects and categories of records we hold. Listing a category does not mean a record will be released; every request is assessed against the grounds for refusal in PAIA.

Subject	Categories of records
Company and statutory	Memorandum of incorporation, CIPC registration documents, share register, shareholder and founder agreements, minutes and resolutions of directors and shareholders
Finance and tax	Annual financial statements, accounting records, bank records, invoices, income tax, VAT and payroll tax records
People	Employment and contractor agreements, payroll and leave records, job applications, training and performance records
Loami users and farmers	Account details, organisation, farm and field information, season records, satellite measurements, Crop Health Index scores, consent records and correspondence
Waitlist and marketing	Waitlist sign ups, lead form submissions, marketing consents and opt outs, campaign records
Clients and advisory work	Client agreements, proposals, project records and correspondence relating to our agricultural data and advisory services

Suppliers and partners	Supplier, partner, reseller and service agreements, including the licence of the Loami platform from FarmLink Technologies (Pty) Ltd, and operator agreements
Information technology	System documentation, access logs, security and incident records, data processing records
Legal	Contracts, legal correspondence and legal advice, much of which is privileged

8. How we process personal information

Why we process it

- to provide Loami, including user accounts, farm Profiles and the Crop Health Index;
- to manage the Loami waitlist and send news to people who have agreed to receive it;
- to deliver our advisory and digital agriculture services to clients;
- to employ and manage staff and contractors;
- to manage relationships with suppliers and partners;
- to keep our systems secure and measure how our advertising performs, with consent where required;
- to meet our legal, tax and regulatory obligations.

Categories of data subjects and their information

Data subjects	Personal information processed
Farmers and farming entities using Loami, and the people who act for them	Names, contact details, organisation and registration details, addresses, farm and field locations and boundaries, crops, activities, yields, satellite measurements, scores, account and consent records
Waitlist members and leads	Names, email addresses, phone numbers, sign up source and date, marketing preferences
Clients and their representatives	Names, contact details, company details, agreements and correspondence

Employees, contractors and job applicants	Identity and contact details, qualifications, employment history, banking and tax details, payroll and leave records
Suppliers, service providers and partners	Company details, contact persons, banking details, agreements
Website visitors	IP address, browser and device details, and advertising cookie data where the visitor has given consent
Owners of land compared in the Crop Health Index	Geographic coordinates of land and satellite measurements only. We do not collect these owners' names or contact details

Who we may share it with

- FarmLink Technologies (Pty) Ltd, which hosts and maintains the Loami platform as our operator;
- hosting, email and technology providers, including Microsoft (Azure and Microsoft 365), Supabase on Amazon Web Services, and Resend;
- satellite data providers, which receive field coordinates only;
- Meta and Google, for advertising measurement where a visitor has accepted cookies;
- professional advisers, auditors and banks;
- the South African Revenue Service, regulators and other authorities where the law requires it;
- in future, finance providers or insurers, but only with the farmer's specific consent at that time.

We do not sell personal information.

Transfers outside South Africa

Most Loami data is stored and processed in the European Union (Ireland), by Supabase on Amazon Web Services, Microsoft Azure North Europe and Resend. Advertising data processed by Meta and Google may be transferred to the United States and other countries. Our Loami Desk mailbox is held in South Africa. We transfer personal information outside South Africa only as section 72 of POPIA permits, including where the recipient is subject to laws or binding agreements that give a level of protection substantially similar to POPIA.

How we protect it

- access to personal information is limited to people who need it for their work;
- information is encrypted in transit, and passwords are stored in hashed form;
- Loami is built and tested against the OWASP Top 10 web application security standard;
- operators that process information for us are bound by written data processing terms;
- security compromises are reported to the Information Regulator and affected people as section 22 of POPIA requires.

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9. How to request access to a record

1. Complete **Form 2 (Request for Access to Record)** prescribed under the PAIA Regulations, 2021. The form is available on the Information Regulator's website or from our Information Officer.
2. Send it to the Information Officer by email or post, using the details in section 3.
3. Include proof of your identity, and if you are acting for someone else, proof of your authority to do so.
4. Describe the record you want in enough detail for us to find it, and say in which form you want access, for example a printed copy or an electronic copy.
5. Explain which right you are exercising or protecting and why the record is required for it. This is not needed if you are asking for your own personal information.
6. Pay the request fee, if it applies (section 10).

Timelines

We will decide on your request within 30 days of receiving it, and tell you in writing. We may extend this once by up to 30 days in the circumstances PAIA allows, for example where a large number of records must be searched, and we will tell you why. If we do not respond in time, the request is regarded as refused.

Third parties

If a request concerns a record containing information about a third party, we will notify that third party and give them the opportunity to make representations before we decide, as PAIA requires.

10. Fees

The fees below are prescribed in the PAIA Regulations, 2021 for private bodies. A personal requester, who asks only for their own personal information, does not pay the request fee.

Item	Fee
Request fee	R140.00
Photocopy or printed copy, per A4 page or part of a page	R2.00
Electronic copy on a flash drive supplied by the requester	R40.00
Copy on a CD supplied by the requester	R40.00
Copy on a CD supplied by us	R60.00
Transcription of an audio record, per A4 page	R24.00
Transcription or copy of visual images	The service provider's quoted cost
Search and preparation, per hour or part of an hour, excluding the first hour	R145.00, up to a maximum of R435.00
Postage, email or other electronic transfer	Actual cost

If the search and preparation is expected to take more than six hours, we may ask for a deposit of one third of the access fee before we begin. Any deposit will be refunded if access is refused.

11. Grounds on which access may be refused

PAIA requires or allows a private body to refuse access in certain cases, including where the record:

- would unreasonably disclose personal information about a third party (section 63);
- contains a third party's trade secrets, or financial, commercial, scientific or technical information (section 64);

- would breach a duty of confidence owed to a third party (section 65);
- could endanger the life or safety of a person, or the security of property (section 66);
- is privileged from production in legal proceedings (section 67);
- contains our own trade secrets, or commercial, financial, scientific or technical information whose disclosure could harm our commercial interests (section 68);
- contains research information that would expose us, a third party or the researcher to serious disadvantage (section 69).

A record must, however, be disclosed where it would reveal a substantial contravention of the law or an imminent and serious risk to public safety or the environment, and the public interest in disclosure clearly outweighs the harm (section 70). If only part of a record may be refused, we will release the rest.

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12. If you are not satisfied

As a private body, we do not have an internal appeal procedure. If your request is refused, or you are unhappy with our fees or timelines, you may within 180 days lay a complaint with the Information Regulator, using the details in section 4, or apply to court.

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13. Your rights under POPIA

You may ask us for a record of the personal information we hold about you, using the PAIA process in section 9. You may also:

- object to the processing of your personal information, using **POPIA Form 1**;
- ask us to correct, delete or destroy your personal information, using **POPIA Form 2**.

Both forms are available from the Information Regulator's website or from our Information Officer. Loami users can also close their account and have their information deleted using the deletion request button in the app. Our Privacy Policy explains these rights in more detail.

14. Availability and updates

This manual is available on our website at www.loami.co.za/paia, and for inspection at our registered address during normal business hours. A copy can be requested from the Information Officer free of charge, or provided to the Information Regulator on request. We will review and update this manual regularly.

Loami helps farmers organise and verify their farm data. Loami is not a credit provider or financial services provider, and does not offer, arrange or advise on finance. A stronger Profile does not guarantee an offer of finance.

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