

PRIVACY NOTICE

Privacy & POPIA Notice

How KREM collects, uses, shares and protects personal information across its website and commerce operations.

Effective: 16 September 2026 **Version:** 1.0 **Entity:** Lightvale (Pty) Ltd t/a KREM Coffee

Responsible party. Lightvale (Pty) Ltd t/a KREM Coffee is responsible for the personal information described in this notice. Bushy Koekemoer is KREM's nominated Information Officer and is the contact for privacy and POPIA requests.

1. Who this notice applies to

This Privacy & POPIA Notice applies to visitors to kremcoffee.co.za, registered customers, website purchasers, business/wholesale contacts, suppliers, people who communicate with KREM, and people who opt in to KREM marketing.

2. Responsible party and contact

Lightvale (Pty) Ltd t/a KREM Coffee

Oakwood House, Palm Square Business Park, Beacon Bay, East London, 5241

Email: info@kremcoffee.co.za

Telephone/WhatsApp: 073 311 4180

Nominated Information Officer: Bushy Koekemoer via info@kremcoffee.co.za

3. Personal information KREM may process

- **Identity and contact information:** name, email address, telephone number, billing and delivery address, and account-related information.
- **Account information:** account identifiers, preferences and account activity required to operate the customer account.
- **Order and transaction information:** products ordered, order value, delivery option, returns/refunds, transaction references and payment status.
- **Payment-related information:** information needed to confirm or reconcile payment. Online payment is currently processed through Paystack. KREM may receive transaction identifiers, status information and limited payment details from the payment provider.
- **Delivery information:** recipient name, address, telephone number, courier tracking information and delivery status.
- **Website and device information:** IP address, device/browser information, session information, cookie identifiers, website interactions and analytics data.

- **Marketing information:** newsletter/WhatsApp opt-in, campaign interactions, preferences, unsubscribe/objection records and advertising/analytics identifiers.
- **Communications:** messages, complaints, reviews, return requests and other correspondence sent to KREM.

4. Why KREM processes personal information

- To create and administer customer accounts.
- To receive, verify, fulfil and deliver orders.
- To process and reconcile payments, refunds and fraud checks.
- To communicate about orders, collections, courier issues, complaints, returns and warranties.
- To operate, secure, troubleshoot and improve the website and customer experience.
- To maintain accounting, tax, transaction and legal records.
- To send newsletters, promotional messages, WhatsApp marketing and similar communications where the recipient has opted in or where another lawful basis permits the communication.
- To measure website and advertising performance through tools such as Google Analytics, Google Ads tracking, Meta/Facebook Pixel and TikTok Pixel, subject to the applicable consent and cookie settings.
- To protect KREM, customers and the public against fraud, abuse, security incidents and unlawful activity.
- To comply with legal obligations and respond to lawful requests.

5. Lawful processing

KREM processes personal information only where POPIA permits the processing. Depending on the activity, processing may be necessary to perform or conclude a contract, comply with a legal obligation, protect a legitimate interest, pursue KREM's legitimate interests where permitted, or act on valid consent.

6. Account creation and no guest checkout

The current website requires customers to create an account rather than using guest checkout. Information supplied for the account is used to administer the account, maintain transaction records and support future access to order information, subject to platform and retention limits.

7. Payments and Paystack

Online payment processing is currently facilitated by Paystack. Payment services may collect and process information under their own privacy and security terms. KREM does not intentionally require customers to send full card credentials to KREM by ordinary email or WhatsApp. KREM may retain payment status, references and information needed for accounting, fraud prevention and refunds.

8. Courier sharing

KREM shares the minimum delivery information reasonably required with The Courier Guy and related delivery service points in order to deliver the order. This may include the recipient's name, delivery address, telephone number, parcel information and delivery instructions.

9. Zoho services

KREM uses Zoho Commerce integrated with Zoho Inventory and Zoho Books. KREM is also setting up Zoho Campaigns for email marketing. These services may process customer, order, account, accounting and marketing information on KREM's behalf or as otherwise described by the relevant service terms.

10. Analytics, advertising and social platforms

KREM plans to use Google Analytics, Google Ads tracking, Meta/Facebook Pixel and TikTok Pixel. These tools may use cookies or similar technologies to collect technical, usage and advertising information. Their operation is described further in the Cookie Policy and should be controlled through the website's cookie/consent configuration where required.

11. Email, WhatsApp and abandoned-cart marketing

KREM's stated marketing policy is to use opt-in consent for newsletters and promotional communications. Marketing recipients may withdraw consent or unsubscribe at any time. KREM may also use WhatsApp marketing where the recipient has agreed to it.

Abandoned-cart reminders will only be used where the customer's contact details may lawfully be used for that purpose, including where the required consent has been obtained. Marketing communications will identify KREM and provide a practical way to stop future marketing.

12. Who KREM may share information with

- Paystack and other payment/banking service providers involved in a transaction or refund.
- The Courier Guy and delivery service points needed to fulfil an order.
- Zoho group/service providers used for commerce, inventory, accounting and campaigns.
- Google, Meta and TikTok where the relevant analytics/advertising technologies are enabled.
- Professional advisers, accountants, legal advisers, insurers or service providers where reasonably necessary.
- Regulators, law-enforcement bodies, courts or other authorities where disclosure is legally required or permitted.
- A purchaser or successor in a lawful corporate transaction, subject to appropriate safeguards.

13. Cross-border processing

Some technology and service providers may process or store personal information outside South Africa. Where POPIA section 72 applies, KREM will take reasonable steps to ensure that cross-border transfers occur on a basis permitted by POPIA, for example through appropriate legal protection, contractual safeguards, consent where appropriate, or another lawful ground.

14. How long information is kept

KREM does not keep personal information indefinitely merely because it is convenient. Records are retained for as long as reasonably necessary for the purpose for which they were collected, to administer accounts and warranties, to resolve disputes, and to meet statutory accounting, tax and record-keeping duties. South African tax rules generally require relevant business records to be kept for at least five years in the applicable circumstances, and records may need to be kept longer during an audit, investigation or dispute.

15. Security

KREM must use appropriate, reasonable technical and organisational measures to protect personal information against loss, unauthorised access, interference, modification or disclosure. KREM also relies on the security controls of its selected commerce, payment and courier providers. No internet service can promise absolute security, and customers should also protect their account credentials.

16. Your POPIA rights

- Ask whether KREM holds personal information about you and request access where permitted.
- Request correction or deletion of inaccurate, irrelevant, excessive, out-of-date, incomplete, misleading or unlawfully obtained information where POPIA permits.

- Object to processing in circumstances provided by POPIA.
- Withdraw consent where processing depends on consent, without affecting lawful processing that occurred before withdrawal.
- Object to or unsubscribe from direct marketing.
- Lodge a complaint with the Information Regulator if you believe your rights have been infringed.

17. How to make a privacy request

Email info@kremcoffee.co.za and identify the request as a POPIA/privacy request. KREM may take reasonable steps to verify the requester's identity before disclosing or changing personal information.

18. Information Regulator

If a privacy complaint cannot be resolved with KREM, a complaint may be lodged with the Information Regulator (South Africa). Current contact information includes 010 023 5200, enquiries@infoeregulator.org.za and POPIAComplaints@infoeregulator.org.za. The Regulator's eServices portal also provides an online complaints process.

19. Changes to this notice

KREM will update this notice if material processing activities, service providers or legal requirements change. The version and effective date at the top show the current published version.