



MIPAQ PERSONAL INFORMATION PROCESSING POLICY

**CUSTOMER PRIVACY & PERSONAL INFORMATION PROCESSING POLICY NOTICE WITH REGARDS
TO THE PROTECTION OF PERSONAL INFORMATION ACT 2014 (ACT NO.4 OF 2013)**

CONTENTS:

1. INTRODUCTION - PURPOSE OF THIS NOTICE AND TERMS
2. APPLICATION - WHO THIS NOTICE APPLIES TO
3. HOW WE PROCESS YOUR PERSONAL INFORMATION
4. WHAT PERSONAL INFORMATION DO WE COLLECT FROM YOU?
5. HOW WE COLLECT YOUR PERSONAL INFORMATION
6. HOW WE SHARE YOUR PERSONAL INFORMATION
7. HOW WE PROTECT YOUR PERSONAL INFORMATION
8. ACCESS BY OTHERS AND CROSS BORDER TRANSFER
9. YOUR RIGHTS: ACCESS TO INFORMATION, CORRECTION AND ERASURE
10. COMPLAINTS OR QUERIES - CONTACT US
11. ACCEPTANCE AND BINDING NATURE OF THIS DOCUMENT

1. INTRODUCTION - PURPOSE OF THIS NOTICE AND TERMS

This Notice explains how we obtain, use, protect and disclose your personal information, in accordance with the requirements of the Protection of Personal Information Act ("POPIA").

We, MIPAQ CC (Reg. No CK2003/054360/23), (herein referred to as "we", "us", "MIPAQ" or "the company") in our capacity as a Responsible Party, are committed to protecting your privacy and to ensure that your personal information is collected and used properly, lawfully and transparently.

In order to engage with you, we will have to process your Personal Information, and in doing so, will have to comply with a law known as the Protection of Personal Information Act 4 of 2013 (hereinafter referred to as "POPIA"), which regulates and controls the processing of a legal entity's and / or an individual's Personal

Information in South Africa, (hereinafter referred to as a "Data Subject"), which processing includes the collection, use and transfer of a Data Subject's Personal Information.

1.2 Please take note of the following words and phrases which will be used throughout this Notice:

- "consent", means any voluntary, specific and informed expression of will in terms of which permission is given for the processing of personal information
- "Data Subject", means the person to whom personal information relates;
- "Operator" means a person who processes personal information for a responsible party in terms of a contract or mandate, without coming under the direct authority of that party;
- "Personal Information", means Personal Information relating to any identifiable, living, natural person, and an identifiable, existing legal entity, namely the Data Subject, including, but not limited to —
 - in the case of an individual:
name, address, contact details, date of birth, ID number; gender; bank details, and financial information;
 - in the case of a legal entity:
name, address, contact details, registration details, financials and related history, B-BBEE score card, registered address, description of operations, bank details, details about your employees, business partners, customers, tax number, VAT number and other financial information.
- "processing" / "process" or "processed", means in relation to Personal Information, the collection, recording, collation, storage, updating or modification, retrieval, or use; by means of transmission, distribution or making available in any other form; merging, linking, as well as restriction, degradation, erasure or destruction of information; or sharing with, transfer and further processing, including physical, manual and automatic means. This includes all types of usage of your Personal Information by us including the initial processing when we first collect your Personal Information and any further and ongoing processing until destruction of such information when no longer required.
- "Purpose" means the reason why your Personal Information needs to be processed by us;
- "Responsible Party" means us, the person who is processing your Personal Information;
- "you" means the person or organization who will be providing us, the Responsible Party, with your Personal Information, for processing, who is known as the Data Subject under POPIA.

1.3 In terms of POPIA, MIPAQ CC will process another's Personal Information, in a lawful, legitimate and responsible manner and in accordance with the provisions, principles and conditions set out under POPIA.

1.4 In order to comply with POPIA, when processing a Data Subject's Personal Information, MIPAQ will:

- 1.4.1 provide the Data Subject with a number of details pertaining to the processing of the Data Subject's Personal Information, before such information is processed; and obtain permission or consent, explicitly or implied, from the Data Subject, to process his / her / its Personal Information, unless such processing:

- is necessary to carry out actions for the conclusion or performance of a Contract, process or transaction to which the Data Subject of the Personal Information is a party;
- is required to comply with an obligation imposed by law; or
- is for a legitimate purpose or is necessary to protect the legitimate interest (s) and / or for pursuing the legitimate interests of i) the Data Subject; ii) the Responsible Party; or iii) that of a third party to whom the Personal Information is supplied; or
- is necessary for the proper performance of a public law duty.

1.5 In accordance with the requirements of POPIA, we set out below how we, MIPAQ CC collect, use, and share your Personal Information and the reasons why we need to use and process your Personal Information.

2. APPLICATION - WHO THIS NOTICE APPLIES TO

2.1 This Notice applies to the following persons:

2.1.1 Customers and Clients- potential and actual: persons who wish to, or who currently use and or purchase our products or services, who receive marketing communications and / or who communicate with us physically, telephonically, via email or via our websites, mobile applications, or social media portals or platforms, or who come onto our premises, facilities and who enter our offices.

2.1.2 Users of our Internet based platforms: persons who use our websites, mobile applications, or social media portals or platforms whether to find out more about us, to make enquiries about us, or our products or services or where persons want to do business with us be it providing or selling to us or receiving or buying from us, certain goods and services, etc.

2.1.3 Applicants: persons who wish to apply to do business with us, including the sale or provision of goods or services to us, or who want to purchase from us certain goods or services, including persons or entities who submitting applications to do business, credit applications and / or quotations or tenders.

2.1.4 Other persons who interact with us, physically or via email or via our websites, applications, mobile applications, or social media portals or platforms, and / or who enter our offices and premises.

2.1.5 Contractors, Vendors and Service Providers - potential or actual, persons who are desirous of, or who do provide us with goods, and services, or who we provide goods and services to, including consultancy and infrastructure related services and who we interact and communicate with, either physically or via email or via our websites, applications, mobile applications, or social media portals or platforms, and / or who enter our offices and premises.

2.1.6 Regulators and Public Bodies: persons who we engage with to discharge legal and public duty obligations, including as an example SARS, National Treasury, Department of Labour, the Financial Sector Conduct Authority.

2.1.7 Business partners, whether in their capacity as an Operator or not, who provide services, goods and other benefits to us, our employees or to our customers, clients and service providers, such as medical aids, pension or provident funds, insurances, financial service providers, providers of administration related services, financial service providers, etc.

2.1.8 Recipients of marketing and promotional materials and communications, persons who have given us permission, as a customer, or in the context of a sale of our goods or services, permission to provide them with marketing materials, direct marketing materials and / or other promotional related materials and communications.

3. HOW WE PROCESS YOUR PERSONAL INFORMATION

3.1 Your Personal Information will be processed by us for the following purposes:

- To process transactions and render or provide or receive goods and services - conclusion of a contract.

To perform under any contract which has been concluded with you, including carrying out all contractual obligations, exercising all contractual rights, assessing or communicating requirements, including supplying, manufacturing, packaging, labelling and ordering and delivering requirements, and / or responding to, or submitting queries, complaints, returns or engaging in general feedback, or acting in such a manner as to personalize any goods or services, and to make recommendations related to us and / or to your operations or activities.

- Due diligence purposes - legitimate purpose.

To carry out a due diligence before we decide to engage or interact with you or to do business with you, including obtaining and verifying your credentials, including your business details, and where applicable other personal details which may include your qualifications, education and employment history, credit and financial status and history, tax status, B-BBEE status, and or any performance or vendor related history.

- Contract purposes - assessment and conclusion of a contract.

To investigate whether we are able or willing to conclude a contract with you based on the findings of any due diligence detailed above, and if the assessment is in order, to conclude a contract with you.

- Attending to financial matters pertaining to any transaction- conclusion of a contract.

To administer accounts or profiles related to you including registrations, subscriptions, purchases, billing events, payments of fees, costs and charges, and taxes, calculations, quoting, invoicing, receipt of payments or payment of refunds, reconciliations and financial management in general.

- Communications - legitimate purpose.

To make contact with you and to communicate with you generally or in respect of our or your requirements, or instructions.

- Risk assessment and anti- bribery and corruption matters-legitimate purpose.

To carry out vendor, organizational and enterprise wide risk assessments, and due diligences, in order to detect and prevent bribery, corruption, fraud and abuse, to comply with Anti Bribery and Corruption (ABC) laws, as well as to identify and authenticate your access to and to provide you with access to our goods, services or premises and generally to ensure the security and protection of all persons including employees, and persons when entering or leaving our sites and operations or facilities and / or to exercise our rights and to protect our and others' rights and / or property, including to take action against those that seek to violate or abuse our systems, services, customers or employees and / or other third parties where applicable.

- Legal obligations, litigation, insurance and public duties.

To comply with the law and legal obligations, including the requirement to register with regulators, obtain and hold permits and certificates, register for VAT, Tax, PAYE, SDL, COIDA and UIF, customs and excise, etc. and to pay levies and fees due in respect thereof, by MIPAQ CC or others, to submit legal or statutory reports or provide various regulatory or statutory notices or returns, to litigate and / or to pursue or defend legal claims or collections, to attend to insurance claims and related procedures, to respond to a request or order from a SAP official, investigator or court official, regulator, or public authority.

- Operational issues - compliance with laws and manage the contract.

To communicate, enforce and ensure you comply with our policies, including in relation to legal obligations, claims or actions or legal requirements and conducting investigations and

incident responses, including reviewing your communications in these situations in accordance with relevant internal policies and applicable law.

- Occupational health - compliance with laws.

To manage occupational health and absence and fitness for work and notifying family members in emergencies.

- Travel - contractual.

To facilitate business travel, travel-related support including conference attendance, bookings, and emergency support services.

- B-BBEE - compliance with laws.

To comply with B-BBEE and to monitor or report B-BBEE requirements, opportunities and related diversity issues, including using your details in B-BBEE reports and score cards.

- Security purposes: legitimate purpose and to comply with laws.

To permit you access to our offices, facilities, manufacturing or parking areas, as well as to controlled areas, for the purposes of monitoring via CCTV, your interaction and access in and from our facilities described above, and for general risk management, security and emergency incident control purposes as well as for data and cybersecurity purposes.

- Marketing and electronic communications related thereto – consent required.

To provide you with communications regarding us, our goods and services and or to provide you with other notifications, competitions, programs, events, or updates that you may have registered or asked for, and to send you offers, advertising, and marketing materials, including providing personalized advertising to you, save where you have opted out of this activity.

- Internal research and development purposes - consent required.

To conduct internal research and development for new content, products, and services, and to improve, test and enhance the features and functions of our current goods and services.

- Sale, merger, acquisition, or other disposition of our business - our Legitimate Interest.

To proceed with any proposed or actual sale, merger, acquisition, or other disposition of our business (including in connection with any bankruptcy or similar proceedings).

4. WHAT PERSONAL INFORMATION DO WE COLLECT FROM YOU?

In order for us to engage, transact and / or interact with you, for the purposes described above, we will have to process certain types of your Personal Information, as described below:

- Your or your employer or organization's contact information, such as full name, postal address, physical address, identity number, phone number, cell phone number, email address, and similar contact data, serial numbers of equipment, other contact information including details of your employer, such as the name of your employer or organization that you are a member of, information about your colleagues or those within your organization, your status with an organization, and similar data, which are required for various legitimate interest, contractual and / or lawful reasons.

- Account Information, including banking details, service-related information (including purchase history and account profiles), billing-related information (including payment, shipping, and billing information), and similar data, all which are required to perform contractual matters, transact with you and / or in order to provide you access to services.

- User Content, such as content of communications, suggestions, questions, comments, feedback, and other information you send to us, that you provide to us when you contact us, or that you post on our websites, applications, mobile applications, or social media portals or platforms including information in alerts, folders, notes, and shares of content), and similar

data which are required to perform contractual matters and / or in order to provide you access to services or attend to queries.

- Device & Browser Information, such as network and connection information (Including: Internet Service Provider (ISP) and Internet Protocol (IP) addresses), device and browser identifiers and information (including device, application, or browser type, version, plug-in type and version, operating system, user agent, language and time zone settings, and other technical information), advertising identifiers, cookie identifiers and information, and similar data, which are required to perform contractual matters and / or in order to provide you access to services or attend to queries or to ensure that security safeguards are in place.
- Your Image, such as still pictures, video, voice, and other similar data, which are required to perform contractual matters and / or in order to provide you access to services or attend to queries or to ensure that security safeguards are in place.
- Financial Information, such as billing address, billing contact details, and similar data, tax numbers and VAT numbers, which are required to perform contractual matters and / or in order to provide you access to services or attend to queries or to ensure that security safeguards are in place and / or which are required to comply with laws and public duties.
- Career, Education, and Employment Related Information, such as work performance and history, nationality and immigration status, demographic data, disability-related information, professional licensure information and related compliance activities, accreditations and other accolades, education history (including schools attended, academic degrees or areas of study, academic performance, and rankings), and similar data, which are required for contractual or consultancy related matters or which are required to comply with laws and public duties.
- Social Media and Online Content, such as information placed, posted or submitted in social media and online profiles, online posts, and similar data, which are required to perform contractual matters and / or in order to provide you access to services or attend to queries.

5. HOW WE COLLECT YOUR PERSONAL INFORMATION

5.1 Depending on your requirements, we will collect and obtain Personal Information about you either directly from you, from certain third parties, or from other sources which are described below:

5.1.1. Direct collection. You provide Personal Information to us when you:

- Interact and communicate with us by phone, email, text messaging, in person, or otherwise.
- Use our websites, applications, mobile applications, or social media portals or platforms.
- Enquire about, or search for our goods or services.
- When you submit a quotation or offer to do business with us by way of a tender or when you conclude a contract with us.
- When we submit a quotation, proforma invoice or offer to do business with you by way of a tender or when you conclude a contract with us.
- Create or maintain a profile or account with us.
- Submit a purchase order or company document
- Conclude a contract with us.
- Purchase our goods.
- Purchase, use, or otherwise interact with content, products, or services from third party providers who have a relationship with us.
- Create, post, or submit user content on our websites, applications, mobile applications, or social media portals or platforms.
- Request or sign up for information, including marketing material and direct marketing material.

5.1.2 Automatic collection. We collect Personal Information automatically from you when you:

- Search for, visit, interact with, or use our websites, applications, mobile applications, or social media portals or platforms.
- Access, use, or download content from us.
- Open emails or click on links in emails or advertisements from us.

5.1.3 Collection from third parties. We collect Personal Information about you from third parties, such as:

- Those who have a relationship with or that provide or publish Personal Information related to you.
- Regulators, professional or industry organizations and certification / licensure agencies that provide or publish Personal Information related to you.
- Service providers and business partners who work with us and that we may utilize to deliver certain content, products, or services.
- Marketing, sales generation, and recruiting business partners.
- SARS, SAP, Home Affairs, Credit bureaus and other similar agencies.
- Other government agencies, regulators and others who release or publish public records.
- Other publicly or generally available sources, such as social media sites, public and online websites, open databases, and data in the public domain.

6. HOW WE SHARE YOUR PERSONAL INFORMATION

6.1. We share Personal Information for the purposes set out in this Privacy Notice with the following categories of recipients:

- our employees. We may share your Personal Information amongst our employees for business and operational purposes.
- Your Organization and Contacts. We may share your Personal Information with your organization and others with whom you have a relationship in order to fulfil or perform a transaction, contract or other legal obligation, including with third parties that arrange or provide you with access to our goods or services. We may also share your Personal Information with your contacts if you are in the same organization or to facilitate the exchange of information between you and the contact(s).
- Third Party Service Providers. We may share your Personal Information with our third party service providers to perform tasks on our behalf and which are related to our relationship with you, and to assist us in offering, providing, delivering, analyzing, administering, improving, and personalizing such services or products.
- Cyber Third-Party Service Providers. We may share your Personal Information with our cyber service providers to perform tasks on our behalf and which are related to our relationship with you, including those who provide technical and/or customer support on our behalf, who provide application or software development and quality assurance, who provide tracking and reporting functions, research on user demographics, interests, and behavior, and other products or services. These service providers may also collect Personal Information about or from you in performing their services and/or functions. We may also pass certain requests from you or your organization to these service providers.
- In the Event of Merger, Sale, or Change of Control. We may transfer this Privacy Statement and your Personal Information to a third-party entity that acquires or is merged with us as part of a merger, acquisition, sale, or other change of control (such as the result of a bankruptcy proceeding).
- Regulators and law enforcement agencies. We may disclose your Personal Information to regulators and other bodies in order to comply with any applicable law or regulation, to comply with or respond to a legal process or law enforcement or governmental request.
- Other Disclosures. We may disclose your Personal Information to third parties if we

reasonably believe that disclosure of such information is helpful or reasonably necessary to enforce our terms and conditions or other rights (including investigations of potential violations of our rights), to detect, prevent, or address fraud or security issues, or to protect against harm to the rights, property, or safety of the group, our employees, any users, or the public.

7. HOW WE PROTECT YOUR PERSONAL INFORMATION

7.1 The security of your Personal Information is important to us. Considering the nature, scope, context, and purposes of processing Personal Information, as well as the risks to individuals of varying likelihood and severity, we have implemented technical and organizational measures designed to protect the security of Personal Information including but not limited to:

- Our business premises where records are kept are protected by access control, burglar alarms and armed response.
- Archived files are stored behind locked doors and access control to these storage facilities are implemented.
- All the user terminals on our internal computer network and our servers are protected by passwords which are changed on a regular basis.
- Our email infrastructure complies with industry standard security safeguards,
- Vulnerability assessments is carried out on our digital infrastructure at least on an annual basis to identify weaknesses in our systems and to ensure we have adequate security in place.
- We use a Firewall to protect the data on our local servers, and we run antivirus protection to ensure our systems are kept updated with the latest patches.
- Our staff are trained to carry out their duties in compliance with POPI, and this training is ongoing.
- It is a term of the contract with every staff member that they must maintain full confidentiality in respect of all our clients' affairs, including our clients' personal information.
- Employment contracts for staff whose duty it is to process a client's personal information, include an obligation on the staff member (1) to maintain the Company's security measures, and (2) to notify their manager/supervisor immediately if there are reasonable grounds to believe that the personal information of a client has been accessed or acquired by any unauthorised person.
- The processing of the personal information of our staff members takes place in accordance with the rules contained in the relevant labour legislation.
- The digital work profiles and privileges of staff who have left out employ are properly terminated.
- The personal information of clients and staff are destroyed as required in a manner that de-identifies the person.

7.2 Your Personal Information will be stored electronically and in some cases in hard copy in files and records, which information, for operational reasons, will be accessible to and or provided to persons employed or contracted by us on a need-to-know basis.

7.3 Once your Personal Information is no longer required because the purpose for which the Personal Information was held has come to an end, such Personal Information will be retained in accordance with our records retention schedule, which varies depending on the type of processing, the purpose for such processing, the business function, record classes, and record types. We reserve the right to retain Personal Information for the periods that the Personal Information is needed to:

- (a) fulfil the purposes described in this Notice,
- (b) meet the timelines determined or recommended by regulators, professional bodies or associations,
- (c) comply with applicable laws, legal holds, and other legal obligations (including contractual obligations), and
- (d) comply with your requests.

7.4 Please note that no method of transmission over the Internet or method of electronic storage is 100% secure. Therefore, while we strive to use commercially acceptable measures designed to protect Personal Information, we cannot guarantee its absolute security.

8. ACCESS BY OTHERS AND CROSS BORDER TRANSFER

8.1 Where necessary, MIPAQ CC may have to disclose your Personal Information to other parties, including our trading partners, agents, auditors, organs of state, regulatory bodies and / or national governmental, provincial, or local government municipal officials, or overseas trading parties or agents, but such disclosure will always be subject to an agreement agreed between ourselves and the party to whom we are disclosing your Personal Information to, which contractually obliges the recipient of your Personal Information to comply with strict confidentiality and data security conditions.

8.2 Where Personal Information and related data is transferred to a country which is situated outside South Africa, your Personal Information will only be transferred to those countries which have similar data privacy laws in place or where the recipient of the Personal Information concludes an agreement which contractually obliges the recipient to comply with strict confidentiality and data security conditions and which in particular will be to a no lesser set of standards than those imposed by POPIA.

9. YOUR RIGHTS: ACCESS TO INFORMATION, CORRECTION AND ERASURE

9.1 You as a Data Subject have certain rights, which are detailed below:

- The right of access - You may ask MIPAQ CC (free of charge) to confirm that we hold your Personal Information, or ask us to provide you with details, (at a fee) on how we have processed your Personal Information.
- The right to rectification - You have the right to ask us to update or rectify any inaccurate Personal Information which we hold of yours,
- The right to erasure (the 'right to be forgotten') -Where any overriding legal basis or legitimate reason to process your Personal Information no longer exists, and the legal retention period in relation to the archiving of the information has expired,
- The right to object to and restrict further processing - Where we do not need your consent to process your Personal Information, but you are not in agreement with such processing,
- The right to withdraw consent - Where you have provided us with consent to process your Personal Information, you have the right to subsequently withdraw your consent,
- The right to data portability - Where you want your Personal Information to be transferred to another party.

9.2. To exercise the above please inform us in writing of your intention by emailing us at admin@mipaq.co.za. We can then reply and provide the appropriate official documents to facilitate the above.

10. COMPLAINTS OR QUERIES - CONTACT US

10.1 Any comments, questions or suggestions about this Processing Notice or our handling of your Personal Information should be emailed to our Information or Deputy Information officers.

INFORMATION OFFICER
MICHAEL TRAICOS - Member
EMAIL ADDRESS: admin@mipaq.co.za
TELEPHONE: 031 5693045

For further contact details see: www.mipaq.co.za

10.2 Our offices are open 8:00 am – 4.00 pm, Monday to Friday.

10.3 Should you wish to discuss a complaint, please feel free to contact us using the details provided above. All complaints will be treated in a confidential manner.

10.4 Should you feel unsatisfied with our handling of your Personal Information, or about any complaint that you have made to us, you are entitled to escalate your complaint to the South African Information Regulator who can be contacted at <https://www.justice.gov.za/inforeg/>

11. ACCEPTANCE AND BINDING NATURE OF THIS DOCUMENT

11.1 By providing MIPAQ CC with the Personal Information which we require from you as listed under this Processing Notice:

- you acknowledge that you understand why your Personal Information needs to be processed;
- you accept the terms which will apply to such processing, including the terms applicable to the transfer of such Personal Information cross border;
- where consent is required for any processing as reflected in this Processing notice, you agree that we may process this particular Personal Information.

11.2 Where you provide us with another person's Personal Information for processing, you confirm that you have obtained the required permission from such person(s) to provide us with their Personal Information for processing.

11.3 The rights and obligations of the parties under this Processing Notice will be binding on, and will be of benefit to, each of the parties' successors in title and / or assigns where applicable.

11.4 Should any of the Personal Information concern or pertain to a legal entity whom you represent, you confirm that you have the necessary authority to act on behalf of such legal entity and that you have the right to provide the Personal Information and / or the required permissions in respect of the processing of that Organization or entities' Personal Information.