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| SECTION | RISK MANAGEMENT AND LEGAL COMPLIANCE            |            |
| SUBJECT | LEAD GROUP OF COMPANIES: POPIA - PRIVACY POLICY |            |

## 1. INTRODUCTION

We respect the privacy of all our customers and suppliers. As a result, we would like to inform you regarding the way we would use your Personal Information. We recommend you familiarize yourself with this Policy, in order to enable you to understand our approach towards the use of your Personal Information.

By submitting your Personal Information to us, you will be treated as having given your permission – where necessary and appropriate – for disclosures referred to in this policy. By giving us any information, you acknowledge that you have reviewed the terms of this Privacy Policy and Consent to Use your Personal Information (the “Customer Privacy Policy and Consent”) and agree that we may collect, use and transfer your Personal Information in accordance therewith.

If you do not agree with the terms herein, please do not provide us with any Personal Information. This Customer Privacy Policy and Consent forms part of our Terms and Conditions. It is construed in accordance and shall be governed by the laws of the Republic of South Africa.

This Policy explains how we obtain, use and disclose your personal information, as is required by the *Protection of Personal Information Act, 2013* (POPI Act). We, at the Lead Group, are committed to protecting your privacy and to ensure that your Personal Information is collected and used properly, lawfully and transparently.

## 2. THE INFORMATION WE COLLECT AND HOW WE USE IT

We collect and process your Personal Information mainly to for communication purposes, as well as to provide you with access to our products and services. In addition, we collect Personal Information for safety and security purposes, financially and/or otherwise. We will only collect information that we need for that purpose. We will use your Personal and Non-Personal Information only for the purposes for which it was collected or agreed with you, such as:

- For audit and record keeping purposes
- For monitoring customers' needs
- In connection with legal proceedings
- To personalise our service
- To suggest products and/or services (including those of relevant third parties) which we think may be in your best interest
- To carry out our obligations arising from any contracts/transactions entered into between yourselves and the Lead Group
- To conduct market- or customer satisfaction research or for statistical analysis
- To confirm and verify your identity or to verify that you are an authorised customer for security purposes
- To notify you about changes to our products and services
- To respond to your questions, queries or comments

We will also use your Personal Information to comply with legal and regulatory requirements or industry codes to which we may subscribe or which apply to us, or when it is otherwise allowed or required by law.

Where we collect Personal Information for a specific purpose, we will not keep it for longer than required to fulfil that purpose, unless we have to keep it for legitimate business- or legal reasons.

In order to protect information from accidental or malicious destruction, when we delete information, we may not immediately delete residual copies from our servers or remove information from our backup systems.

Kindly take note that we may disclose your Personal Information to our business partners and associated entities, who are involved in the delivery of equipment or services to you. We have back-to-back agreements in place in order to ensure that they comply with these privacy terms.

We may also disclose your information where we have a duty, obligation or right to disclose in terms of law or industry codes; and/or where we are of the view and opinion that it is necessary to protect our rights.

### 3. SECURITY

We are legally obliged to provide adequate protection for the Personal Information we hold and to prohibit unauthorised access and -use of personal information. We will, on an on-going basis, continue to review our security measures and related processes in order to ensure that your Personal Information remains secure. Our security policies and procedures include, *inter alia*, the following: Acceptable usage of personal information; access to personal information; computer and network security; governance and regulatory issues; investigating and reacting to security incidents; monitoring access and usage of personal information; physical security; retention and disposal of Personal Information; and secure communications.

When we contract with third parties, we impose appropriate security, privacy and confidentiality measures and obligations on them to ensure that the Personal Information that we remain responsible for, is kept secure. We will ensure that any party



to whom we pass your Personal Information agrees to treat your information with the same level of protection as we are obliged to.

#### 4. ACCESS TO YOUR PERSONAL INFORMATION

You have the right to request a copy of the Personal Information we keep about you. To do this, simply contact the relevant office or branch and specify what information you would like. We will take all reasonable steps to confirm and verify your identity before providing details of your Personal Information. Please note that such access request may be subject to a payment of a legally permissible fee.


#### 5. AMENDMENT OF YOUR PERSONAL INFORMATION

You have the right to require us to update, amend or delete your Personal Information. We will take all reasonable steps to confirm and verify your identity before affecting changes to the Personal Information we may hold about you. It is friendly requested that you take the necessary steps to keep your Personal Information as accurate and up to date as possible by notifying us of any changes we need to be aware of.

#### 6. DEFINITION OF PERSONAL INFORMATION

According to the POPI Act, "Personal Information" means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person.

The POPI Act, which contains more specific examples, can be found and accessed at [www.popia.co.za](http://www.popia.co.za).

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| POPI Compliance Officer<br>(Head of Legal)<br>Signature |  |
| Date  | 2021-06-30  |