

WOSTEVIA (RF) PTY LTD PRIVACY POLICY

PLEASE READ OUR PRIVACY POLICY CAREFULLY BEFORE BROWSING OUR WEBSITE, ELECTRONIC PLATFORMS OR USING ANY OF OUR SERVICES. BROWSING AND/OR USING OUR WEBSITE, ELECTRONIC PLATFORMS AND SERVICES IN ANY MANNER INDICATES THAT YOU HAVE BOTH READ AND AGREE TO THE TERMS OF THIS PRIVACY POLICY. PLEASE NOTE THAT YOU CANNOT USE OUR WEBSITE, ELECTRONIC PLATFORMS AND/OR SERVICES IN ANY MANNER IF YOU DO NOT ACCEPT THIS POLICY.

1. Interpretation

- 1.1. Clause headings appear in this Policy for the purposes of reference only and shall not influence the proper interpretation of the subject matter.
- 1.2. Unless the context indicates otherwise:-
 - 1.2.1. natural persons include juristic persons and vice versa;
 - 1.2.2. any gender include other genders; and
 - 1.2.3. the singular includes the plural and vice versa.
- 1.3. This Policy and the legal relations between parties under this Policy shall be determined in accordance with the laws of the Republic of South Africa.

2. Definitions

In this Policy, unless the context indicates otherwise, the following words and expressions bear the meanings as assigned to them below:-

- 2.1. “Child” - means a natural person under the age of 18 years;
- 2.2. “Consent” - means any voluntary, specific and informed expression of will in terms of which permission is given for the processing of Personal Information;
- 2.3. “Data Subject” - means the person to whom personal information relates;
- 2.4. “Government” - means the government of the Republic of South Africa;
- 2.5. “Personal Information” - means personal information as defined under POPIA and specifically includes any form of information that can be used to identify a Data Subject;
- 2.6. “Policy” - means this Privacy Policy’
- 2.7. “POPIA” - means the Protection of Personal Information Act 4 of 2013;
- 2.8. “Processing” - as defined under POPIA;
- 2.9. “Record” - as defined under POPIA;
- 2.10. “Special Personal Information” - means personal information as referred to in section 26 of POPIA;
- 2.11. “Us / We” - means Wostevia and vice versa;
- 2.12. “Wostevia” - means Wostevia (RF) (Pty) Ltd, with registration number 2016/396460/07; and
- 2.13. “You” - means the Data Subject reading this Policy.

3. Application of this Policy

- 3.1. This privacy policy applies to the Personal Information Wostevia collects in connection with:-
 - 3.1.1. our website, <https://www.wostevia.com>;
 - 3.1.2. our social media and other electronic platforms;

- 3.1.3. our events, marketing and business activities;
 - 3.1.4. our online and offline business communications and interactions;
 - 3.1.5. our professional services;
 - 3.1.6. our CCTV cameras at our offices;
 - 3.1.7. third party service providers,
 - 3.1.8. publicly available sources and information; and
 - 3.1.9. the supply of products and services to us.
- 3.2. This Policy does not apply to:-
- 3.2.1. the Personal Information that we collect about employees, interns, contractors, other personnel, applicants and candidates;
 - 3.2.2. the information practices of third party companies who we may engage with in relation to our business operations (including, without limitation, their websites, platforms and/or applications) which we do not own or control; and
 - 3.2.3. individuals that Wostevia does not manage or employ.

4. Purpose of this Policy

- 4.1. Wostevia respects your privacy and acknowledges the sensitive nature of Personal Information, and is therefore committed to protecting your Personal Information.
- 4.2. The Purpose of this Policy is to inform Data Subjects about how Wostevia collects, processes, stores and safeguards Personal Information.
- 4.3. Wostevia strives to observe and comply with its obligations under POPIA and other applicable legislation when collecting, processing, using, safeguarding and destroying Personal Information.

- 4.4. You affirm that you are lawfully entitled to provide Personal Information of any third party whose Personal Information you provide to Wostevia or any of its representatives.
- 4.5. You indemnify Wostevia and its representatives against any loss, liability, damage or expense suffered or incurred by Wostevia or its representative(s) due to your provision of Personal Information of third parties to us in an unlawful manner.

5. Privacy and Security

- 5.1. Wostevia has implemented reasonable technical and organisational measures to keep Personal Information secure and to comply with POPAI and other applicable legislation.
- 5.2. You indemnify and hold Wostevia harmless from any loss, damage or injury that you may incur as a result of:
 - 5.2.1. any security compromise of Personal Information to unauthorised persons; or
 - 5.2.2. your actions or omissions during the provision of Personal Information to Wostevia or any of its representatives.

6. Collection of Personal Information

- 6.1. Wostevia collects Personal Information as and when needed in accordance with the provisions of POPIA and any other applicable legislation.

- 6.2. Wostevia will only collect and process Personal Information from third parties to which the Data Subject consented to or to which it is legally permitted to do so without such consent.
- 6.3. Personal Information which Wostevia may collect:-
 - 6.3.1. name, address, other contract details, gender, marital status, date and place of birth, nationality, employer, job title, financial records, employment history and family details (including their relationship to you);
 - 6.3.2. identification numbers issued by government bodies or agencies (such as your ID number, tax number, driving licence number etc.);
 - 6.3.3. demographic information;
 - 6.3.4. information relevant to the provision of products and services;
 - 6.3.5. information relevant to the procurement of products and services from suppliers;
 - 6.3.6. relevant financial information;
 - 6.3.7. special or sensitive information in accordance with applicable legislation, such as about your health, racial or ethnic origin, political opinions, religious or philosophical belief, trade union membership, your generic and biometric information and information about your sex life;
 - 6.3.8. still and video images captured by CCTV at our offices;
 - 6.3.9. identity data, contact data and Special Personal Information from publicly available sources or third parties; and
 - 6.3.10. any relevant information as required by applicable laws.

7. Purpose of Processing Personal Information

- 7.1. Wostevia will only process Personal Information for specified and lawful purposes.
- 7.2. Wostevia may process Personal Information it collects for a number of lawful purposes including, without limitation:-
 - 7.2.1. to register you as a client and for credit vetting;
 - 7.2.2. to comply with requirements under applicable laws;
 - 7.2.3. to carry out instructions provided to any employee or representative of Wostevia;
 - 7.2.4. to provide you with any services, products or offerings that you may request or otherwise consent to;
 - 7.2.5. to manage marketing preferences;
 - 7.2.6. to manage our relationship with you;
 - 7.2.7. to administer and comply with any financial obligations, including external audits, payment processing functions and payment of Wostevia's suppliers' or service providers' invoices;
 - 7.2.8. to comply with lawful requests for information received from local or foreign law enforcement, government and tax collection agencies;
 - 7.2.9. for operational, marketing, auditing and record keeping requirements;
 - 7.2.10. to monitor, keep record of and have access to all forms of correspondence or communications received by or sent from any employee, director, agents, contractors or representatives of Wostevia;

- 7.2.11. to conduct research to provide you with information about Wostevia's products and services from time to time;
 - 7.2.12. to administer and protect the use of Wostevia's electronic systems and online platforms;
 - 7.2.13. to deliver relevant website content, newsletters and other information to you, and to use data analytics to improve the aforementioned;
 - 7.2.14. to disclose Personal Information to third parties as set out in this policy or where lawful to do so;
 - 7.2.15. to procure products and services;
 - 7.2.16. to respond to quotations, requests and instructions;
 - 7.2.17. to prevent, discover and/or investigate any contravention or breach of this Policy or any applicable law;
 - 7.2.18. to manage the recruitment and employment of employees, contractors, interns or any necessary recruitment under Wostevia;
 - 7.2.19. to prevent and control any disease;
 - 7.2.20. for such other purposes as consented to by the Data Subject from time to time; and
 - 7.2.21. for such other purposes as authorised or required by an applicable law, regulatory authority and/or government authority.
- 7.3. Where Wostevia is relying on a Data Subject's consent for the processing of Personal Information, the Data Subject may withdraw his/her/its consent or may object to the processing of the Personal Information at any time. However, this will not affect the lawfulness of any processing carried out prior to the withdrawal of consent or any processing justified by any legal ground under POPIA or any other applicable law.

7.4. If consent is withdrawn or if there is a legally justified objection against the use of Personal Information, Wostevia will ensure that the Personal Information is no longer processed.

8. Special Personal Information and Personal Information of Children

8.1. Wostevia acknowledges that Special Personal Information is sensitive to the Data Subject and will generally not process Special Personal Information, unless:-

8.1.1. processing thereof is carried out in conformity with the Data Subject's consent;

8.1.2. processing is required in terms of a legal obligation in law;

8.1.3. processing is for historical, statistical or research purpose, subject to stipulated safeguards;

8.1.4. the Special Personal Information has deliberately been made public by the Data Subject; or

8.1.5. specific legal authorisation applies under POPIA.

8.2. Wostevia further acknowledges that it may not process any Personal Information in connection with a child and will only do so where it has obtained the consent of the parent or legal guardian of that child or where it is permitted to do so in accordance with applicable laws.

9. Disclosure of Personal Information to Third Parties

9.1. The employees and representatives of Wostevia share Personal Information with each other in the ordinary course of business.

- 9.2. Wostevia may deem it necessary or any one or more of the purposes set out in this Policy or other lawful purposes to share Personal Information with external third parties and service providers, including, without limitation:-
- 9.2.1. service providers acting as operators or processors or responsible parties who provide information technology and system administration services (for example, data storage providers);
 - 9.2.2. professional advisors acting as operators or processors or responsible parties, including lawyers, bankers, auditors and insurers who provide relevant services;
 - 9.2.3. any person, if Wostevia is legally obligated to share Personal Information under any applicable laws;
 - 9.2.4. your agent or any person acting on your behalf;
 - 9.2.5. tracing agents, sheriffs and similar persons;
 - 9.2.6. clients and prospective clients for the purposes of proposals, quotations, providing products and services and the alike; and
 - 9.2.7. third parties who Wostevia may choose to sell, transfer or merge parts of Wostevia's business or assets.
- 9.3. It is noted that Wostevia stores, processes, uses and shares Personal Information on a cloud storage and filing system called Google Drive. Google Drive has its own security measures in place to protect the privacy of its clients and users. If a Data Subject does not want his/her/its Personal Information stored, processed, used and/or shared on this platform, it is the Data Subject's responsibility to notify Wostevia thereof.

10. Access to, Correction and Deletion of Personal Information

- 10.1. It is noted that under certain circumstances you may have some or all of the rights set out below under POPIA and other applicable data protection laws, that may be applicable in relation to your Personal Information which Wostevia holds.
- 10.1.1. Right to request access to Personal Information, including the right to receive a copy of the Personal Information.
 - 10.1.2. Right to request correction of any incomplete or inaccurate Personal Information.
 - 10.1.3. Right to deletion of Personal Information that Wostevia is not authorised to process.
 - 10.1.4. Right to object to processing of Personal Information in certain circumstances.
 - 10.1.5. Right to request restriction of processing of Personal Information.
 - 10.1.6. Right to withdraw consent at any time if Wostevia is relying on consent to process Personal Information.
- 10.2. Wostevia will take all reasonable steps to ensure that Personal Information is kept as accurate and up to date as reasonably possible subject to the purposes for which it is collected and/or processed. **Wostevia, however, expects you to notify us in writing when any Personal Information changes.**

11. Storage of Personal Information

- 11.1. Personal Information may be stored in hardcopy and/or electronic format

using Wostevia's own secure on-site server or other internally hosted technology. Personal Information may also be stored by third parties via cloud services or other technology with whom Wostevia has contracted with.

- 11.2. Wostevia's third party service providers, including data storage and processing providers, may from time to time also have access to Personal Information for purposes for which it was initially collected.
- 11.3. Personal Information may be processed in South Africa or another country where Wostevia, its affiliates and their third party service providers maintain servers and facilities. If Wostevia stores and/or transfers your Personal Information across national boundaries, it will be stored and/or transferred in compliance with applicable data protections laws.

12. Retention of Personal Information

- 12.1. Wostevia may keep records of Personal Information, correspondence, or comments it has collected in an electronic or hardcopy format.
- 12.2. Wostevia will not retain Personal Information for a period longer than is necessary to achieve the purpose for which it was collected or processed and will destroy or re-identify Personal Information as soon as reasonably practicable once the purpose has been achieved. This will not apply in the following circumstances:-
 - 12.2.1. where the retention of the record is required by an applicable law or any government authority;
 - 12.2.2. Wostevia requires the record to fulfill its functions or activities;
 - 12.2.3. retention for the record is required by a legal contract between the parties thereto;

- 12.2.4. the Data Subject has consented to such longer retention; or
 - 12.2.5. the record is retained for any other reason consistent with POPIA and any other applicable laws.
- 12.3. Where Personal Information is retained for longer periods for statistical, historical, archival or research purposes, Wostevia will ensure that appropriate safeguards have been put in place in accordance with this Policy, POPIA and any other applicable legislation.

13. Safe-Keeping of Personal Information

- 13.1. Wostevia shall take all reasonable steps to ensure the security and integrity of Personal Information in its possession or under its control with appropriate, reasonable technical and organisational measures to prevent loss, unlawful access and unauthorised destruction of Personal Information.
- 13.2. Wostevia has implemented physical, organisational, contractual and technological security measures (having regard to generally accepted information security practices or industry specific requirements) to keep Personal Information secure. Wostevia further maintains and regularly verifies that the security measures are effective and regularly updates these measures.

14. Electronic Links and Website Cookies

- 14.1. Wostevia's website, newsletters and/or marketing platforms may include links to third party websites, plug-ins and applications. Clicking on those links or enabling those communications may allow third parties to collect

or share Personal Information. Wostevia does not control these third party websites and is not responsible for their privacy policies. Consequently, we encourage you to read all applicable privacy policies.

- 14.2. Wostevia’s website cookies are used to ensure that websites function properly. You may select to not accept website cookies. If you select this option, you may be unable to access certain parts of our website. If you accept a “cookie” or fail to deny the use of “cookies”, you agree that we may use your Personal Information collected using “cookies” (subject to the provisions of this policy).

15. Complaints and Information Officers

- 15.1. If you are not satisfied with Wostevia’s use of your Personal Information or have any enquiry or complaint regarding your Personal Information, you are encouraged to contact one of our Information Officers at the contact details set out below. Should you remain dissatisfied, then you have the right to complain to the authority that supervises our processing of your Personal Information.
- 15.2. Wostevia has a Chief Information Officer and a Deputy Information Officer who oversees our data protection compliance.
- 15.2.1. You can contact our Chief Information Officer at:
Email address: richardh@wostevia.com
Contact number: +27 (0) 82 657 5553
- 15.2.2. You can contact our Deputy Information Officer at:
Email address: elizabethf@wostevia.com
Contact number: +27 (0) 73 338 7686

16. Changes to This Policy

- 16.1. Wostevia keeps this policy under regular review and reserves the right to make amendments to this Policy from time to time.
- 16.2. Any such amendments will come into effect when published it on the Wostevia website and become part of any agreement that you may have with Wostevia.
- 16.3. It is your responsibility to ensure that you obtain the latest version of this policy and to check the Wostevia website often.**