

Group Policy
Copyright PPC Ltd.

Number: Policy GPLC20.1
Revision: V20.1, effective from 01 April 2021
Owner: Kevin Ross - Group Head Legal and Compliance
Approved by: SETCO



Title: Protection of Personal Information Policy ("POPI Policy")

1. Purpose

The purpose of this policy is to:

- 1.1 Comply with the data protection laws in relation to personal data that it holds about PPC staff and other individuals.
- 1.2 Provide the conditions for the lawful Processing of Personal Information by PPC Limited and its South African subsidiaries ("PPC or the Group") in compliance with the Protection of Personal Information Act 4 of 2013 ("the POPI Act").
- 1.3 Protect personal data.

2. Scope

- 2.1 This POPI Policy applies to all Personal Information Processed by PPC Limited and its South African subsidiaries ("PPC or the Group"). This POPI Policy should be read in conjunction with, and is aimed at ensuring compliance with, Group's Compliance Framework.

2.2 Policy Statement

PPC will comply with the following principles of the POPI Act:

- 2.2.1 Collect personal information directly from a Data Subject;
- 2.2.2 Collect Personal Information for a specific, explicit and lawful purpose;
- 2.2.3 Process personal information with the consent of the Data Subject;
- 2.2.4 Do not retain Personal Information for longer than necessary, as required by law;
- 2.2.5 Facilitate that the Personal Information stored remains complete, accurate and updated.

3. Definitions

The following definitions appear in the Act and shall bear the same meaning in this POPI Policy:

- 3.1 "**Consent**" a voluntary, specific and informed expression of will in terms of which a DS agrees to the Processing of PI relating to him or her;
- 3.2 "**Data Subject**" or "**DS**" means the person to whom Personal Information relates;
- 3.3 "**Personal Information**" or "**PI**" means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person including:
 - (a) information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;
 - (b) information relating to the education or the medical, financial, criminal or employment history of the person;
 - (c) any identifying number, symbol, e-mail address, physical address, telephone number or other particular assignment to the person;
 - (d) the blood type or any other biometric information of the person;
 - (e) the personal opinions, views or preferences of the person;
 - (f) correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;

- (g) the views or opinions of another individual about the person; and
- (h) the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person.

3.4 **“Processing”** means any operation or activity or any set of operations, whether or not by automatic means, concerning personal information, including:

- (a) the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;
- (b) dissemination by means of transmission, distribution or making available in any other form; or
- (c) merging, linking, as well as blocking, degradation, erasure or destruction of information;

and the term **“Process”** shall bear the same meaning.

3.5 **“Special Personal Information”** means the following personal information pertaining to a data subject:

- (a) religious and philosophical beliefs;
- (b) trade union membership;
- (c) political persuasion;
- (d) health or sex life;
- (e) biometric information;
- (f) criminal behaviour and alleged commission of an offence
- (g) race; and
- (h) ethnic origin;

4. Policy

4.1 **Processing of Personal Information**

PPC will only Process Personal Information for lawful purposes relating to its business if the following circumstances apply:

- 4.1.1 the DS concerned has consented thereto;
- 4.1.2 a person legally authorised by the DS, the law or a court, has consented thereto;
- 4.1.3 it is necessary to conclude or perform under a contract between PPC or and the DS or the DS’s principal, provided that all legal conditions are met;
- 4.1.4 the law requires or permits it;
- 4.1.5 it is required to protect or pursue your, our or a third party’s legitimate interest.

4.2 **Processing of special personal information**

PPC may Process Special Personal Information in the following circumstances:

- 4.2.1 if the DS has consented to the Processing;
- 4.2.2 if the Processing is needed to create, use or protect a right or obligation in law;
- 4.2.3 if the Processing is for statistical or research purposes, and all legal conditions are met;
- 4.2.4 if the Special Personal Information was made public by the DS;
- 4.2.5 if the Processing is required by law; and
- 4.2.6 if racial information is Processed and the Processing is required to identify the DS.

4.3 **Collection of Personal Information**

- 4.3.1 PPC collects Personal Information:
- a) directly from the Data Subjects;
 - b) based on how Data Subjects engage or interact with PPC, such as on social media, and through e-mails, letters, telephone calls, and surveys;
 - c) from public sources (such as newspapers); and
 - d) from third parties we interact with for the purposes of conducting our business.
- 4.3.2 If the law requires it, PPC will ask a Data Subject for consent before collecting his/her/its Personal Information.
- 4.3.3 The third parties from whom PPC may collect a DS's Personal Information include, but are not limited to, the following:
- 4.3.3.1 members of PPC, any connected companies of PPC, its associates, cessionaries, delegates, assignees, affiliates or successors in title and/or appointed third parties (such as its authorised agents, partners, contractors and suppliers) for any of the purposes identified in this Privacy Policy;
 - 4.3.3.2 people authorized by the DS to share his/her/its Personal Information;
 - 4.3.3.3 PPC's service providers, agents and sub-contractors and other persons used to offer and provide services.

4.4 **Reasons for which PPC will Process Personal Information**

PPC will Process Personal Information for the following reasons:

- 4.4.1 to provide a DS with services and or to supply goods to a DS;
- 4.4.2 to respond to enquiries and complaints;
- 4.4.3 to comply with legislative, regulatory, risk and compliance requirements (including directives, sanctions and rules);
- 4.4.4 to comply with voluntary and involuntary codes of conduct and industry agreements;
- 4.4.5 to fulfil reporting requirements and information requests;
- 4.4.6 for statistical purposes;
- 4.4.7 to enable PPC to deliver documents or notices intended for a DS's attention;
- 4.4.8 to communicate with a DS and carry out a DS's instructions and requests;
- 4.4.9 for any other related purposes.

4.5 **When, how, and with whom will PPC share Personal Information?**

In general, PPC will only share Personal information if any one or more of the following apply:

- 4.5.1 if the DS has consented to this;
- 4.5.2 if it is necessary to conclude or perform under a contract we have with a DS or the DS's agent, provided all legal conditions are met;
- 4.5.3 if the law requires it; and/or
- 4.5.4 regulatory authorities and other persons the law requires us to share Personal Information with;
- 4.5.5 if PPC employs service providers, agents and sub-contractors and other persons to offer and provide services to a DS provided that the DS has consented to such disclosure.

4.6 **Under what circumstances will PPC transfer Personal Information to other countries?**

- 4.6.1 PPC will only transfer Personal Information to third parties in another country in any one or more of the following circumstances:
- 4.6.1 where Personal Information will be adequately protected under the other country's laws or an agreement with the third-party recipient;
 - 4.6.2 where the transfer is necessary to enter into, or perform, under a contract with a DS or a contract with a third party that is in the DS's interest;
 - 4.6.3 where the DS has consented to the transfer; and/or
 - 4.6.4 where it is not reasonably practical to obtain the DS's consent, the transfer is in the DS's interest.

- 4.6.5 All transfers of Personal Information to third parties in another country will happen within the requirements and safeguards of the law.
- 4.6.6 Where possible, the party Processing Personal Information in the other country will agree to apply the same level of protection as set out in this POPI Policy, or if the other country's laws provide better protection, that other country's laws would be agreed to and applied.

4.7 **Data Subjects' duties and rights regarding the Personal Information Processed by PPC**

4.7.1 **PLEASE NOTE THAT:**

- 4.7.1.1 **A Data Subject must provide proof of identity when enforcing the rights below.**
- 4.7.1.2 **The law may limit a Data Subjects right to access information.**

- 4.7.2 A DS must provide proof of identity when enforcing the rights below.
- 4.7.3 A DS has the right to request access to **his/her/its** Personal Information, **Processed by PPC**. This includes requesting:
 - 4.7.3.1 Confirmation as to whether PPC holds any Personal Information of the DS;
 - 4.7.3.2 a copy or description of the record containing the Personal Information Processed; and
 - 4.7.3.3 the identity or categories of third parties who have had access to the Personal Information.
- 4.7.4 PPC will attend to requests for access to Personal Information within a reasonable time.
- 4.7.5 Data Subjects requesting access to their Personal Information (if any) may be required to pay a reasonable fee to receive copies or descriptions of records, or information about, third parties. PPC will inform the DS of the fee before attending to the request.
- 4.7.6 Subject to the limitation set out in paragraph 4.7.7 below, Data Subjects have the right to request the correction or deletion of his/her/its Personal Information held by PPC if such Personal Information is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, obtained unlawfully, or if PPC is no longer authorised to keep it. Data Subjects address all request contemplated in this POPI Policy to PPC in writing.
- 4.7.7 If the law requires PPC to keep the Personal Information, PPC will not delete such Personal Information on request.
- 4.7.8 The deletion of certain Personal Information may lead to the termination of the business relationship between PPC and the DS concerned.
- 4.7.9 A Data Subject may object, on reasonable grounds, to the Processing of his/her/its personal information.
- 4.7.10 PPC will not be able to give effect to an objection if the Processing of Personal Information was and is permitted by law or if the DS provided consent to the Processing, and Processing was conducted in line with the DS's consent; or the Processing is necessary to conclude or perform under a contract with the DS.
- 4.7.11 A DS may withdraw its consent to the Processing of its Personal Information. If a DS withdraws consent, PPC will explain the consequences to the DS. PPC may proceed to Process Personal Information, even if the DS has withdrawn consent, if the law permits or requires it. It may take up to 15 business days for the change to reflect on PPC's systems. During this time, PPC may still Process the DS's personal information.
- 4.7.12 A DS has the right to file a complaint with PPC or any regulator with jurisdiction about an alleged contravention of the protection of its Personal Information. We will address your complaint as far as possible.
- 4.7.13 Please refer to PPC's Promotion of Access to Information Act 2 of 2000 Manual (PAIA Manual) for further information on how a DS can give effect to the rights listed above. The PAIA Manual is located on the PPC Limited website: www.ppc.co.za.

4.8 **Securing Personal Information**

PPC will take appropriate and reasonable technical and organisational steps to protect Personal Information in line with industry practices. PPC security measures, including physical, technological and procedural safeguards, will be appropriate and reasonable. This includes the following:

- 4.8.1 keeping systems secure (such as monitoring access and usage);
- 4.8.2 storing records securely;
- 4.8.3 controlling the access to PPC buildings, systems and/or records; and
- 4.8.4 safely destroying or deleting records.

4.9 **How long will PPC keep Personal Information?**

PPC will keep your personal information for as long as:

- 4.9.1 the law requires us to keep it;
- 4.9.2 a contract between the DS and PPC or a contract with a third party that is in the DS's interest, requires PPC to keep it;
- 4.9.3 the DS has consented to PPC keeping it;
- 4.9.4 PPC is required to keep it to achieve the purposes listed in this POPIA Policy;
- 4.9.5 PPC require it for statistical or research purposes;
- 4.9.6 PPC requires it for its lawful business purposes.

TAKE NOTE: PPC may keep your personal information even if you no longer have a relationship with us, if the law permits.

4.10 **PPC cookie policy**

A cookie is a small piece of data sent from PPC's websites or applications to a DS's computer or device or internet browser where it is saved. The cookie contains information to personalise a DS's experience on PPC's websites and may improve the DS's experience on the websites. The cookie will also identify a DS's device, such as the computer or smart phone.

By using PPC's websites a DS's agrees that cookies may be forwarded from the relevant website to the DS's computer or device. The cookie will enable PPC to know that the DS has visited the website before and will identify the DS.

PPC may change this privacy statement. PPC will publish all changes on its website. If you have any questions or complaints about this POPI Policy, correspondence must be address to PPC Limited at:

Street Address	148 Katherine Street Sandton 2146
Postal Address	PO Box 787416 Sandton 2146
Telephone	011 386 9000
Website	www.PPC Limited.co.za
E mail	kevin.ross@ppc.co.za
Attention	The Group Company Secretary

5. Confidentiality

- 5.1 PPC's business information, such as this Policy, is a valuable company asset and shall therefore not be distributed to people outside PPC, unless such people are specifically mentioned in Section 2 (Scope) of this document.

6. Compliance

- 6.1 Non-compliance with this Group Policy can result in disciplinary action and ultimately termination of employment and/ or result in civil or criminal proceedings. The immediate supervisor must take effective and appropriate disciplinary steps against any employee who omits to act in accordance with this policy.

7. Frequency of review and update

- 7.1 The policy owner is accountable for maintaining the correctness of the policy. Any aspects of this policy which may be unclear should be communicated through the normal management channels. Should this policy conflict with any current business practices, the policy owner should be contacted for clarity and / or guidance. Policy owners must make routine changes to an existing policy document, as and when changes in laws, standards or business requirements take effect. Group Legal & Compliance will prompt all Group Policy Owners to review and sign-off all Group Policies on an annual basis.

8. Reference to related policies, procedures and other supporting documents

- 8.1 This policy shall be read together with the PPC Code of Conduct, which can be found on the PPC Policies Portal and should be considered in the context of the prevailing laws of the jurisdiction in which this Policy applies.

9. Approval

- 9.1 This policy was approved by SETCO at their meeting of 10 November 2021.