

EXTERNAL PROCESSING NOTICE

FOR

Applicants, Business Partners, Contractors, Vendors, Service Providers, Suppliers, Customers and Clients, Marketing, Regulators and Public Bodies, Tenants.

IN TERMS OF SECTION 18 OF THE PROTECTION OF PERSONAL INFORMATION ACT 4 OF 2013

1. PURPOSE OF THIS NOTICE

- 1.1 We, The Bidvest Group Limited, situated at 18 Crescent Drive, Melrose Arch, Johannesburg, 2196, and/or the relevant subsidiary or Group company with which you apply to do business, contract, transact, communicate or otherwise engage, as applicable, are referred to in this Processing Notice as “us”, “we” or the “Group”.
- 1.2 The relevant Group entity will ordinarily be the Responsible Party in respect of the Personal Information processed for the Purposes set out in this Processing Notice.
- 1.3 The name, registered or principal business address and contact details of the relevant Group entity are available in its PAIA Manual or may be obtained using the contact details set out in clause 12.
- 1.4 In accordance with the requirements of POPIA, and because your privacy and trust is important to us, we set out below how we collect, use, and share your Personal Information and the reasons why we need to use and process your Personal Information.

2 DEFINITIONS

In this Processing Notice, the following words and phrases will have the meanings assigned thereto below:

- 2.1 **"Consent"**, means the consent, you in your capacity as Data Subject, may give to us, under certain circumstances, to process your Personal Information. This consent must be voluntary, specific, and informed. Following this, once we have explained to you why we need your Personal Information and what we will be doing with it and you have read this Processing Notice, you may then, in relation to certain uses of the information, give us your permission to use it, which permission or consent can be demonstrated by way of your actions that are representative of voluntary, specific and informed expression of will in terms of which permission is given for the Processing of Personal information;
- 2.2 **"Data Subject"**, means you, the person in relation to whom the Personal Information relates;
- 2.3 **"Operator"** means any person who processes your Personal Information on our behalf as a contractor, service provider or agent, in terms of a contract or mandate, without coming under our direct authority. These persons may include, for illustration purposes, verification agencies, call centres, payment and financial service providers, information-technology and hosting providers, cybersecurity providers, security and access-control providers, advertising and public-relations agencies, property and facilities-management providers, professional advisers, auditors, legal practitioners, logistics providers and other service providers who assist us in conducting our business or administering our relationship with you. Depending on the nature of the processing and the applicable arrangement, certain service providers or recipients may act as Operators, independent Responsible Parties or, where applicable, joint Responsible Parties.
- 2.4 **"PAIA Manual"**, means the manual that must be compiled and made available by a private body in terms of section 51 of the Promotion of Access to Information Act No.2 of 2000, as amended, detailing, amongst other things, the categories of records held by that private body and the procedure for accessing such records.
The Bidvest Group Limited PAIA Manual is available for download on The Bidvest Group Limited website.
- 2.5 **"Personal Information"**, means Personal Information relating to any identifiable, living, natural person, and an identifiable, existing juristic person, including, but not limited to:

- 2.5.1 **In the case of an individual** it includes your name, address, contact details, date of birth, gender, place of birth, identity number, passport number, bank details, details about your employment, tax number, and financial information, vehicle registration, dietary preferences , financial history, information about your next of kin and or dependants and information relating to your education or employment history; and
- 2.5.2 **Special Personal Information** includes information relating to your race, pregnancy, national, ethnic or social origin, colour, physical or mental health, disability, criminal history, including offences committed or alleged to have been committed, membership of a trade union and biometric information, such as images, fingerprints and voiceprints, blood typing, DNA analysis, retinal scanning, and voice recognition.
- 2.5.3 **In the case of a legal entity** , it includes your name, address, contact details, registration details, financial 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.
- 2.6 **"Processing" / "process" or "processed"**, means in relation to Personal Information, the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use; dissemination 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, transfer and further processing, including by physical, manual and automatic means. This is a wide definition and therefore 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 that is in accordance or compatible with the purpose of collection;
- 2.7 **"Purpose"** means the reason why your Personal Information needs to be processed by us;
- 2.8 **"Responsible Party"**, means The Bidvest Group Limited, and/or the relevant subsidiary or Group company that alone or together with others, determines the purpose of and means for processing your Personal Information.
- 2.9 **"You"** means you, the natural person or juristic person, or the representative of a juristic person, who provides us with Personal Information or whose Personal Information we process in connection with our relationship with you.

3 APPLICATION

This Processing Notice applies to the following persons:

- 3.1 **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 legal entities who submit applications to do business, credit applications and or quotations or tenders; or applicants who apply for a bursary, funding, CSI opportunity or a sponsorship from us.
- 3.2 **Business partners:** whether in their capacity as Operator/s 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, administrators, financial service providers, advertising, marketing or PR agencies, wellness or health and medical providers.
- 3.3 **Contractors, Vendors, Service Providers, Suppliers:** persons who are desirous of, or who do provide us with goods, and services, or who provide professional consulting or management services or who we provide goods and services to, including general consultancy services and any infrastructure or property 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 come onto our properties, sites, facilities and or who enter our offices, warehouses and buildings.
- 3.4 **Customers and Clients:potential and actual** - persons who are desirous of, or who do use and or purchase our products or services, who receive marketing communications and / or who communicate with us physically or via email or via our websites, applications, mobile applications, or social media portals or platforms, and / or who come onto our sites, facilities and / or who enter our offices; tenants who lease and occupy our premises or properties.

- 3.5 **Interactors:** persons who interact with us, physically or via email or via our websites, applications, mobile applications, or social media portals or platforms, or who come onto our sites and / or who enter our offices or facilities.
- 3.6 **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, or who have entered into a competition or promotion carried out by any entities in the Group, permission to provide them with marketing materials, direct marketing materials and / or other promotional related materials and communications.
- 3.7 **Regulators and Public Bodies:** persons who we engage with in order to discharge legal and public duty obligations, including SARS, National Treasury, Department of Labour, the Financial Sector Conduct Authority.
- 3.8 **Users of our Sites:** persons who use our websites, applications, mobile applications, or social media portals or platforms whether in order 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.

4. PURPOSE FOR PROCESSING YOUR PERSONAL INFORMATION

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

- 4.1 **Due diligence Purposes:** To conduct due diligence before deciding whether to engage, interact or do business with you, including obtaining and verifying your identity, credentials, qualifications, business information, financial standing, credit history, tax status, B-BBEE status, vendor performance, regulatory compliance and other information reasonably necessary to assess the proposed relationship. Where relevant, lawful and reasonably necessary for the particular relationship or service, we may also process health or medical information, or other Special Personal Information, where required to comply with applicable laws, contractual obligations, occupational health and safety requirements, insurance requirements, or other lawful Purposes.
- 4.2 **Contract Purposes:** 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.
- 4.3 **To process transactions and render or provide or receive goods and services:** 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, manufacturing, packaging, ordering, delivering, 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 or our or your operations.
- 4.4 **Attending to financial matters pertaining to any transaction:** To administer accounts or profiles related to you or your organization including registrations, subscriptions, purchases, billing events, fees, costs and charges calculations, quoting, invoicing, receipt of payments or payment of refunds, reconciliations and financial management in general.
- 4.5 **Communications:** To make contact with you and to communicate with you generally or in respect of our or your requirements, or or to respond to you in order to comply with your specified or general instructions, and or specifically through various platforms such as social media and email.
- 4.6 **Risk assessment and anti- bribery and corruption matters:** To carry out vendor, organizational and enterprise wide risk assessments, in order to detect and prevent bribery, corruption, fraud and abuse, to comply with all applicable 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.
- 4.7 **Legal obligations, litigation, insurance and public duties:** To comply with the law and our legal obligations, including the requirements 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 the

Group 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.

- 4.8 **Operational issues and in compliance with laws and to manage contracts** - 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 laws.
- 4.9 **Travel:** To facilitate business travel, travel-related support including conference attendance, bookings and emergency support services.
- 4.10 **Employment Equity and regulatory reporting** – To comply with applicable B-BBEE and related legal, regulatory or reporting obligations, including verifying, monitoring and reporting relevant ownership, management, supplier-development, procurement, demographic or other information where lawfully required.
- 4.11 **Security Purposes:** to permit 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.
- 4.12 **Historical, statistical and internal research and development Purposes :** To retain and use records for historical, statistical, internal research and development Purposes, including developing, testing and improving our products, services, systems and business processes, in accordance with applicable law.
- 4.13 **Sale, merger, acquisition, or other disposition of our business (including in connection with any bankruptcy or similar proceedings):** To comply with our legal obligations and to change our business structure we may disclose your Personal Information in connection with proceedings or investigations anywhere in the world to third parties, such as public authorities, law enforcement agencies, regulators and third parties. We may also provide relevant parts of your Personal Information to any potential acquirer of or investor in any part of the Group's business for the Purpose of that acquisition or investment.
- 4.14 **Marketing Communications:** To communicate with you regarding our goods, services, promotions, events, programmes, publications and other information that may be relevant to your relationship with us, including by electronic communications where permitted by applicable law. Where your Consent is required for direct marketing communications, we will obtain such Consent before sending those communications. You may opt out of receiving direct marketing communications at any time using the opt-out facility provided or by contacting us using the details contained in this Processing Notice.
- 4.15 **Events, advertising and public relations materials and publications:** for the Purposes of making contact with you and or attending to your enquiries and requests in relation to our advertising and public relations materials and publications and or events and functions and for providing you from time to time with information pertaining to the Group, or its subsidiary businesses' advertising and public relations materials and publications, and or events and functions and to invite you to attend functions and events or our request for your appearance in advertising and public relation materials and publications.

5. DETAILS OF THE PERSONAL INFORMATION WE COLLECT FROM YOU

We will collect your Personal Information set out below for the Purposes described in this Processing Notice.

- 5.1. The supply of certain Personal Information is mandatory for us to comply with our legal, contractual, and operational obligations. Failure to provide this information may prevent us from: (a) establishing or continuing a relationship with you; (b) engaging or transacting with you; (c) fulfilling our legal obligations; or (d) providing or receiving the relevant goods, services, opportunities or benefits. Additionally, we may request that you voluntarily provide us with Personal Information, which, while the supply of the Personal Information is not mandatory, can enhance your experience in relation to our services or product offering.
- 5.2. Where the Personal Information is collected directly from you, we will clearly indicate before collecting the Personal Information whether the supply of the Personal Information is voluntary or mandatory. In any other

case, we will clearly indicate as soon as reasonably practicable after the Personal Information has been collected whether the supply of the information is voluntary or mandatory.

5.3. We will collect the following Personal Information:

- 5.3.1. **Your or your employer or organization's contact information**, such as name, alias, address, identity number, passport number, security number, phone number, cell phone number, vehicle make and registration number, social media user ID, email address, and similar contact data, serial numbers of equipment, details regarding the possession of dangerous weapons, and other contact information including details of your employer, memberships or affiliations, 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.
- 5.3.2. **Special Personal Information and other sensitive information**, where relevant, lawful and reasonably necessary for the particular relationship or Purpose, including information relating to race or disability for B-BBEE, regulatory or statutory compliance Purposes; health, medical or fitness information for occupational health and safety, site-access, insurance or similar lawful requirements; biometric information for identity verification, access control or security Purposes; and criminal, credit or financial history for lawful verification, risk-assessment, fraud-prevention or compliance Purposes. We will only process such information where permitted by POPIA and other applicable laws.
- 5.3.3. **Account Information**, including banking details, security-related information (including user names and passwords, authentication methods, and roles), 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 and / or in order to provide you access to services.
- 5.3.4. **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.
- 5.3.5. **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.
- 5.3.6. **Usage Information and Browsing History**, such as usage metrics (including usage rates, occurrences of technical errors, diagnostic reports, settings preferences, backup information, API calls, and other logs), content interactions (including searches, views, downloads, prints, shares, streams, and display or playback details), and user journey history (including clickstreams and page navigation, URLs, timestamps, content viewed or searched for, page response times, page interaction information (such as scrolling, clicks, and mouse-overs), and download errors), advertising interactions (including when and how you interact with marketing and advertising materials, click rates, purchases or next steps you may make after seeing an advertisement, and marketing preferences), 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.
- 5.3.7. **Location Data**, such as the location of your device, your household, and similar location 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.
- 5.3.8. **Demographic Information**, such as country, preferred language, age and date of birth, marriage status, gender, physical characteristics, personal or household/familial financial status and metrics, military status, 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.
- 5.3.9. **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.

- 5.3.10. **Identity Information**, such as government-issued identification information, tax identifiers, social security numbers, other government-issued identifiers, and similar data, which are required to comply with laws and public duties.
- 5.3.11. **Financial Information**, such as billing address, credit card information, 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.
- 5.3.12. **Career, Education, and Employment Related Information**, such as job preferences or interests, work performance and history, salary history, status as a veteran, nationality and immigration status, demographic data, disability-related information, application 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 employment related matters or which are required to comply with laws and public duties.
- 5.3.13. **Health and related information**, which may constitute Special Personal Information, including occupational and health information, fitness-for-work assessments, medical certificates, disability-related information and similar information, to the extent that such information is relevant, lawful and reasonably necessary for the particular relationship, including compliance with applicable occupational health and safety requirements, contractual obligations, site-access requirements, insurance requirements or other lawful Purposes. Where applicable, occupational health practitioners or healthcare providers may process such Personal Information as independent Responsible Parties and may share with us only such Personal Information as is necessary and lawful for the relevant Purpose. Where appropriate, we will receive only confirmation of fitness, compliance or eligibility and not confidential clinical information, unless its disclosure to us is authorised or otherwise permitted or required by law.
- 5.3.14. **Social Media and Online Content**, such as information placed or posted 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 and generally for the purposes of advertising, marketing and related communications.

6. SOURCES OF INFORMATION - HOW AND WHERE DO WE COLLECT YOUR PERSONAL INFORMATION FROM?

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:

- 6.1 **direct collection:** You provide Personal Information to us when you:
- 6.1.1 use our websites, applications, mobile applications, or social media portals or platforms.
 - 6.1.2 interact with us.
 - 6.1.3 enquire about, or search for our goods or services.
 - 6.1.4 create or maintain a profile or account with us.
 - 6.1.5 conclude a contract with us.
 - 6.1.6 purchase or subscribe to our goods or services..
 - 6.1.7 use our goods or services.
 - 6.1.8 purchase, use, or otherwise interact with content, products, or services from third party providers who have a relationship with us.
 - 6.1.9 create, post, or submit user content on our websites, applications, mobile applications, or social media portals or platforms.

- 6.1.10 register for or attend one of our events, functions or locations.
- 6.1.11 request or sign up for information, including marketing material.
- 6.1.12 communicate with us by phone, email, chat, in person, or otherwise.
- 6.1.13 complete a questionnaire, survey, support ticket, or other information request form.
- 6.1.14 when you submit a quotation, or offer to do business with us, a tender or when you conclude a contract with us.
- 6.1.15 express an interest in a bursary or sponsorship.

6.2 **Automatic collection:** We collect Personal Information automatically from you when you:

- 6.2.1 search for, visit, interact with, or use our websites, applications, mobile applications, or social media portals or platforms.
- 6.2.2 use our goods or services (including through a device).
- 6.2.3 access, use, or download content from us.
- 6.2.4 open emails or click on links in emails or advertisements from us.
- 6.2.5 otherwise interact or communicate with us (such as when you attend one of our events, functions or locations, when you request support or send us information, or when you mention or post to our social media accounts).

6.3 **Collection from third parties:** We collect Personal Information about you from third parties, such as:

- 6.3.1 your organization and others with whom you have a relationship with that provide or publish Personal Information related to you, such as from our customers or from others when they create, post, or submit user content that may include your Personal Information.
- 6.3.2 regulators, professional or industry organizations and certification / licensure agencies that provide or publish Personal Information related to you.
- 6.3.3 third parties and affiliates who deal with or interact with us or you.
- 6.3.4 Service providers and business partners who work with us and that we may utilize to deliver certain content, products, or services or to enhance your experience.
- 6.3.5 marketing, sales generation, and recruiting business partners.
- 6.3.6 SAP, Home Affairs, Credit bureaus and other similar agencies.
- 6.3.7 government agencies, regulators and others who release or publish public records.
- 6.3.8 other publicly or generally available sources, such as social media sites, public and online websites, open databases, and data in the public domain.

7. **HOW WE SHARE INFORMATION**

We may share your Personal Information, where relevant and lawful, for the Purposes set out in this Processing Notice with the following categories of recipients:

- 7.1 The Group, our employees and affiliates: We may share your Personal Information with our employees, affiliates and other companies within the Group where reasonably necessary for business, operational, administrative, financial, legal, compliance, risk-management or related Purposes.

- 7.2 Your organisation and contacts: We may share your Personal Information with the organisation that you represent, your employer, colleagues, authorised representatives or other persons with whom you have a relevant relationship, where necessary to perform a contract, provide or receive goods or services, administer the relationship, comply with a legal obligation or otherwise give effect to the applicable Purpose.
- 7.3 Business partners: We may share your Personal Information with business partners with whom we jointly offer, provide, deliver, administer or improve goods, services, programmes, events or other business activities, or where necessary to refer or respond to a request made by you or your organisation.
- 7.4 Third-party content and service providers: We may share your Personal Information with third-party providers that assist us in providing, delivering, hosting, administering, analysing, improving or personalising content, goods, services, events or communications related to our relationship with you.
- 7.5 Professional advisers and service providers: We may share your Personal Information with professional advisers and service providers, including auditors, legal practitioners, accountants, insurers, financial service providers, property administrators, facilities-management providers, information-technology providers, security providers and other persons who assist us in conducting our business or fulfilling our obligations.
- 7.6 Operators and other Responsible Parties: Depending on the nature of the Processing and the applicable arrangement, a recipient may process your Personal Information as our Operator, as an independent Responsible Party or, where applicable, as a joint Responsible Party. Where a recipient acts as our Operator, it will process the Personal Information only in accordance with our instructions and the applicable contractual and legal requirements.
- 7.7 Technology and cybersecurity providers: We may share your Personal Information with technology, hosting, software, telecommunications, technical-support and cybersecurity service providers that assist us with system operation, application development, access control, security monitoring, data hosting, analytics, incident response and related services. Such providers may also collect Personal Information in the course of performing these services.
- 7.8 Advertising, marketing and public-relations providers: Where permitted by law, we may share your Personal Information with advertising, marketing, communications and public-relations service providers that assist us with campaigns, events, promotions, publications and related communications. We will only do so for the applicable lawful Purpose and subject to any Consent or opt-out requirements that may apply.
- 7.9 Other users or members of the public: Where you choose to publish, post or submit Personal Information in a public area of our websites, applications, social-media platforms, directories, reviews or other interactive services, that information may be visible to other users or members of the public.
- 7.10 Regulators, law-enforcement agencies and public bodies: We may disclose your Personal Information to regulators, courts, law-enforcement agencies, organs of state or other public authorities where required or permitted by law, or where necessary to respond to a lawful request, investigation, legal process or regulatory obligation.
- 7.11 Corporate transactions: We may disclose or transfer relevant Personal Information in connection with a proposed or actual merger, acquisition, restructuring, sale of assets, financing, insolvency proceeding or other change in control, subject to appropriate confidentiality, security and legal requirements.
- 7.12 Other lawful disclosures: We may disclose your Personal Information where we reasonably believe that the disclosure is necessary to enforce or protect our rights, investigate possible wrongdoing, prevent or detect fraud or security incidents, protect the rights, property or safety of the Group or another person, or otherwise comply with applicable law.

8. HOW WE SECURE YOUR INFORMATION

- 8.1 The security of your Personal Information is important to us. Taking into account 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 in accordance with applicable data protection laws. In this regard we will conduct regular audits regarding the safety and the security of your Personal Information.

- 8.2 Your Personal Information will be stored electronically which information, for operational reasons, will be accessible to persons employed or contracted by us on a need to know basis, save that where appropriate, some of your Personal Information may be retained in hard copy.
- 8.3 Once your Personal Information is no longer required due to the fact that the Purpose for which the Personal Information was held has come to an end, such Personal Information will be retained in accordance with the applicable Group entity's 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 calculate retention periods based upon and reserve the right to retain Personal Information for the periods that the Personal Information is needed to: (a) fulfil the Purposes described in this Processing 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.
- 8.4 Please note that notwithstanding the contents of this clause, no 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.

9. ACCESS BY OTHERS AND CROSS BORDER TRANSFER

- 9.1 Where appropriate and required by law, disclosures to Operators and service providers will be governed by written agreements containing suitable confidentiality, security and data-protection obligations. Disclosures to regulators, courts, organs of state or other public authorities may be made where required or permitted by law.
- 9.2 Where your Personal Information is transferred to a party who is in a country which is situated outside South Africa, your Personal Information will only be transferred to such a party who is subject to a law or binding agreement which provide an adequate level of protection that effectively upholds the principles for reasonable Processing of the Personal Information, that are substantially similar to the conditions for the lawful processing of Personal Information relating to a Data Subject who is a natural person and, where applicable, a juristic person, and includes provisions, that are substantially similar in relation to the further transfer of the Personal Information from the recipient to third parties who are in a foreign country .
- 9.3 However, 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.

10. YOUR RIGHTS

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

- 10.1 **The right of access-** You may ask us free of charge to confirm that we hold your Personal Information, or ask us to provide you with details, at a fee, how we have processed your Personal Information, which can be done by following the process set out under our PAIA Manual.
- 10.2 **The right to rectification or deletion:** You have the right to ask us to update or rectify any inaccurate, irrelevant, excessive, out of date, incomplete, misleading Personal Information or Personal Information obtained unlawfully, and where any overriding legal basis or legitimate reason to process your Personal Information no longer exists, and the legal retention period has expired, you may request that we delete the Personal Information.
- 10.3 **The right to object to Processing:** You may, on reasonable grounds relating to your particular situation, object to the Processing of your Personal Information where the Processing is necessary to protect your legitimate interests or is necessary for pursuing our legitimate interests or those of a third party to whom the information is supplied, unless applicable law provides otherwise.

- 10.4 **The right to withdraw Consent** or to opt out of promotional or marketing communications- where you have provided us with Consent to process your Personal Information, you have the right to subsequently withdraw your Consent.
The Bidvest Group Limited PAIA Manual and the applicable forms to exercise your rights are available for download on The Bidvest Group Limited website.

11. CHANGES TO THIS PROCESSING NOTICE

We may update this Processing Notice from time to time. Material changes will be communicated or made reasonably available through appropriate communication channels or on the relevant Group website.

12. CONTACT US

- 12.1 Any comments, questions or suggestions about this External Processing Notice or our handling of your Personal Information should be emailed to info@bidvest.co.za or information.officer@bidvest.co.za
- 12.2 NOTE: Any comments/questions/complaints received may be re-directed to the appointed Information Officer of the specific Group entity or subsidiary to which the matter relates.
- 12.3 Alternatively, you can contact us at the following postal address or telephone number:

Group Information Officer	Mrs. C. Krige	Address: Postal: P.O. Box 87274, Houghton, 2041	Tel: 011 7728700
Deputy Information Officer	Mrs F Techet	Address: Postal: P.O. Box 87274, Houghton, 2041	Tel: 011 7728700

- 12.4 Our switchboard is open 9:00 am – 16:00 pm South African Standard Time, Monday to Friday. Our switchboard team will take a message and ensure the appropriate person responds as soon as possible .

13. PROCESSING PERSONAL INFORMATION OF ANOTHER

- 13.1 If you process another person's Personal Information on our behalf, or if we provide Personal Information to you for Purposes of performing your contractual or legal obligations or protecting a legitimate interest, you must keep that Personal Information confidential and may not, unless authorised to do so, process, publish, disclose, make accessible or otherwise use it, except in the course and scope of the relevant services and only for the Purpose for which it was provided to you.
- 13.2 You must implement appropriate technical and organisational security measures to protect the Personal Information against loss, damage, unauthorised destruction, unlawful access or unauthorised Processing, and must notify us without delay of any actual or suspected security compromise.

14. COMPLAINTS

- 14.1 Should you wish to discuss a complaint, please feel free to contact us using the details provided above.
- 14.2 All complaints will be treated in a confidential manner.
- 14.3 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 submit your complaint to the South African, Information Regulator who can be contacted at:

Physical address: Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg
Telephone number: Toll-Free: 0800 017 160
Landline: 010 023 5200
Email address: enquiries@infoeregulator.org.za
Website: www.infoeregulator.org.za

15. **ACKNOWLEDGMENTS, CONSENT AND INFORMATION PROVIDED BY YOU**

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

- 15.1 You acknowledge that you understand why your Personal Information needs to be processed.
- 15.2 You acknowledge that your Personal Information may be processed and transferred, including across borders, in accordance with this Processing Notice and applicable law.
- 15.3 Where your Consent is required for any Processing referred to in this Processing Notice, we will obtain your Consent before undertaking the relevant Processing. Your voluntary participation in or use of a particular programme, product, benefit or service, may constitute Consent to us Processing the relevant Personal Information for the relevant Purpose. Where we rely on another lawful basis for Processing, including the performance of a contract, compliance with a legal obligation, the protection of legitimate interests or the performance of a public law duty, your Consent is not required.
- 15.4 Where you provide us with another person's Personal Information, you confirm that you are authorised or otherwise lawfully entitled to provide the information to us and that, where required, you have informed that person of the relevant Processing.

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