

SECURITY / ACCESS TO PREMISES PROCESSING NOTICE IN TERMS OF SECTION 18 THE PROTECTION OF PERSONAL INFORMATION ACT 4 OF 2013

IMPORTANT NOTES:

NO FIREARMS ARE PERMITTED ON THE PREMISES.

NO ONE IS ALLOWED TO CONSUME ALCOHOL OR DRUGS ON THE PREMISES.

NO ONE IS ALLOWED ONTO THE PREMISES IF UNDER THE INFLUENCE OF ALCOHOL OR DRUGS.

WE RESERVE THE RIGHT TO SEARCH YOU, AND OR TEST YOU FOR ALCOHOL OR DRUGS BEFORE YOU ARE PERMITTED ACCESS TO THE PREMISES.

ALL THE PREMISES ARE UNDER CONSTANT CCTV SURVEILLANCE.

PLEASE TAKE NOTE OF OUR STANDARD ACCESS TO PREMISES DISCLAIMER.

1. PURPOSE OF THIS STATEMENT

1.1 We, Triomf Staalwerke WC (Pty) Ltd and our subsidiaries and trading partners, including all entities part of the Triomf Staalwerke Group of Companies, collectively referred to as we, us, the Group or Triomf Staalwerke, in our capacity as a Responsible Party, in order to engage with you, 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, 2013 ("POPIA"), which regulates and controls the processing of a person's Personal Information in South Africa, which processing includes the collection, use, and transfer of a person's Personal Information.

1.2 For the purpose of this Processing Notice, please take note of the following words and phrases which will be used throughout this Processing Notice:

- **"drugs"** refer to any substance which, when taken into the body, alters the body's function either physically and/or psychologically to an extent where the individual is unable to perform, interact or render services in accordance with expected standards.
- **"consent"** means the consent, which you give to us 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, you are then, in relation to certain uses of the information, required to give us your permission to use it, which permission or consent can be express or implied, implied meaning that consent demonstrated by way of your actions;
- **"Data Subject"** means you, the person who owns and who will provide us with your Personal Information for processing, which reference is found under POPIA;

- **"Operator"** is any person who processes your Personal Information on our behalf as a sub-contractor, in terms of a contract or mandate, without coming under the direct authority of us. These persons for illustration purposes may include verification agencies, advertising and public relations agencies, call centres, service providers, auditors, legal practitioners, organs of state, government, provincial and municipal bodies;

- **"Personal Information"** means Personal Information relating to any identifiable, living, natural person, and an identifiable, existing juristic person, including, but not limited to:

- your name, address, contact details, date of birth, place of birth, identity number, passport number, bank details, details about your employment, tax number and financial information; vehicle registration; Images, either by way of CCTV devices or other electronic devices.

- **Special Personal Information** including race, gender, pregnancy, nationality, 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, fingerprinting, DNA analysis, retinal scanning and voice recognition;

- **"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 with, transfer and further processing, including 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;

- **"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 you, who will be providing us, the Responsible Party with your Personal Information, for processing.

1.3 In accordance with the requirements of POPIA, and because your privacy and trust are important to us, we set out below how we and our affiliates and associated companies (hereinafter referred to as "the Group", "we", "us", or "our") collect, use, and share your Personal Information and the reasons why we need to use and process your Personal Information.

2. APPLICATION

2.1 This Processing Notice applies to you and all persons who come onto our premises and sites, including reception and waiting rooms, offices, operational areas and facilities and parking areas (the Group / our premises).

3. WHAT INFORMATION WE NEED

3.1 In order to gain access to our facilities and offices, we have to process the following Personal Information, which pertains to you:

- **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, your status with an organization, your images and certain biometrics such as fingerprints and similar data, which are required for various legitimate interests, and / or lawful reasons.
- **Specific identifiers**, which are required in order to protect legitimate interests, comply with legal obligations or public legal duties, or in order to accommodate you in our workplaces, such as any disabilities, **certain** biometric information which may be required for access control such as fingerprints and personal details which we may record in relation to alcohol or drug testing, and **health records or related details**.
- **Children's Information**, all Personal Information collected and processed from any person under the age of eighteen (18) for the purposes of accessing the Group / our premises will only be processed with the prior permission of the child's parent or legal guardian, who will be required at all times to accompany such child around our premises which he or she is given access to.

4. PURPOSE FOR PROCESSING YOUR PERSONAL INFORMATION

4.1 Your personal information will be processed by us for the following purposes:

- to facilitate access into and out of the premises;
- to ascertain who is entering and leaving the premises;
- to monitor movements on or in the premises;
- to ensure a safe working and operating environment;
- to comply with laws, including Security, Health and Safety related laws and legal obligations;
- to manage security services;
- for the purposes of registering all persons who enter and leave the premises;
- for the purposes of managing and investigating security incidents; including accidents within the premises or attention to emergency evacuations; and
- other security measures in general.

5. SHARING AND RETAINING YOUR PERSONAL INFORMATION

5.1 Your Personal Information may under certain circumstances have to be shared with internal parties and / or third-parties for the purposes detailed above.

5.2 Your Personal Information will be disposed of within 12 (twelve) months of you leaving our premises, or saved where it may be required for a longer period. In this regard we retain personal information in accordance with our Group 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 Privacy Statement, (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.

6. ACCEPTANCE

6.1 By providing us 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, by virtue of you handing us the Personal Information, that we may process this particular Personal Information.

6.2 Where you provide us with another person's Personal Information for processing, you confirm and warrant that that you have obtained the required permission from such person (s) to provide us with their Personal Information for processing and indemnify and hold us harmless against any liability or loss which may be incurred by us or our employees as a result of any breach of such warranty.

PLEASE NOTE THAT IF THE ABOVE IS NOT ACCEPTED, WE WILL NOT BE ABLE TO GIVE YOU ACCESS TO THE PREMISES.