



RAPPA
HOLDINGS

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Rappa Holdings (Pty) Ltd and Subsidiaries

Protection of Personal Information Act Privacy Notice

2021 Ver. 1



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Rappa Holdings (Pty) Ltd and Subsidiaries Privacy Notice

Introduction:

Rappa Holdings (Pty) Ltd and Subsidiaries strongly believes that you have the right to control the use of your personal information, and that your privacy must be respected. We strictly limit the collection and processing of your personal data. We will not use personal data that you provide to us in a manner inconsistent with the purposes for which you provided it to us, as set out below.

Rappa Holdings (Pty) Ltd has three main subsidiaries:

- Rappa Resources (Pty) Ltd
- Knightsbridge Cobalt Corporation (Pty) Ltd
- 8 Mile Investments 337 (Pty) Ltd

Purpose of the Notice:

- The purpose of this notice is to inform clients and employees about the type and use of personal information the company collects, the ways in which it is collected, the sharing, protection and storage thereof.

What is Personal Information:

- The term “personal information”, as used in this notice, applies to information that may be used to identify an individual or a juristic person (i.e., for example a registered company).
- POPIA defines personal information as “information which relates to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person. The person to whom personal information relates is referred to as the “data subject”.

The following words and/or expressions shall, unless the context indicates otherwise, bear the meaning assigned to them below and in the POPI Act;

- **“Data subject”** means the person to whom Personal information relates;
- **“Employee”** means a permanent, fixed term or temporary employee of Rappa Holdings (Pty) Ltd or relevant subsidiary;
- **“Operator”** means a third party that processes Personal information in terms of a mandate or contract with Rappa Holdings (Pty) Ltd or relevant subsidiary, without coming under the direct authority of Rappa Holdings (Pty) Ltd or relevant subsidiary;
- **“Person”** means any person, company, close corporation, trust, partnership or other entity;
- **“Personal information”** means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to:
 - 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;
 - information relating to the educational, medical, financial, criminal or employment history of the person;
 - any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
 - the biometric information of the person;
 - the personal opinions, views or preferences of the person;
 - 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;
 - the views or opinions of another individual about the person; and
 - 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;
- **“Privacy Notice or Notice”** means this Notice as amended from time to time;
- **“Processing”** means any operation or activity or any set of operations, whether or not by automatic means, concerning Personal information, including:

- 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; or
- merging, linking, as well as restriction, degradation, erasure or destruction of information.

Use of Personal Information:

After obtaining consent, the personal information collected or held by Rappa may be used, stored, transferred, or disclosed or shared only for the purposes for which it was collected or agreed with you.

This may include:

- We process some sensitive personal data for Human Resource purposes, for example, about Rappa's employees as far as necessary to fulfil our duties as an employer;
- To confirm and verify your identity or to verify that you are an authorised person for security purposes; and
- For the detection and prevention of fraud, crime, money laundering or other malpractice.

We may share this information with:

- Our auditors
- Regulators, governments and law enforcement authorities

Records of personal information will be retained for the period necessary for achieving the purpose for which the information was collected.

Protecting the Data subject's Personal Information:

- Rappa uses a variety of security measures and technology to help protect personal Information of a data subject from unauthorised access, use, disclosure, alteration or destruction in line with applicable personal Information protection and privacy laws. For

example, when Rappa shares the personal information of a Data subject with external suppliers, it shall put in place a written agreement which commits the supplier to keep the Data subject's personal information confidential.

- Despite the security measures that Rappa has in place to protect personal Information of a data subject (firewalls, passwords), the data subject acknowledges that it may be accessed by an unauthorised third party, e.g., as a result of an illegal activity.

The types of personal data we may process, for the purposes described below, include:

- Only information that is adequate, necessary and relevant, such as contact information etc.
- The type of information we collect will depend on the purpose for which it is collected and used. We will only collect information that we need for that purpose.
- When personal information is collected, the company will indicate the purpose for the collection and whether the information required is compulsory or voluntary.
- Examples of personal information include, but are not limited to, contact information, financial information, bank details, information relating to race, gender, age, contact details, physical address, identity number or company registration number, name, language and nationality, in the case of the company, director information, Vat registration certificate etc.

When personal information is collected, the company will indicate the purpose for the collection and whether the information required is compulsory or voluntary.

How does Rappa collect personal information:

- The company collects information either directly from the data subject, the employer or through financial services intermediaries.
- In certain instances, Rappa may appoint third parties to collect information on its behalf. The source from which personal information was obtained, if not directly from the data subject, will be disclosed.



When will we process your personal information:

In terms of the Protection of Personal Information Act (POPIA), the justification ground which we base our processing on consist out of the following:

- The data subject or a competent person where the data subject is a child who **consents** to the processing. Kindly note that you have the right to withdraw your consent.
- The processing is **necessary** to carry out actions for the conclusion or performance of a contract to which the data subject is a party.
- The processing complies with an **obligation** imposed by law on the business.
- The processing protects a **legitimate** interest of the data subject.
- The processing is necessary for the proper performance of a **public law** duty by the business.
- The processing is necessary for pursuing the legitimate **interests** of the business or of a third party to whom the information is supplied.

How we store your personal information:

- Data processing is carried out using computers and/or IT-enabled tools, following organisational procedures and modes strictly related to the purposes indicated.
- In some cases, the data may be accessible to certain types of persons in charge, involved with the operations inside Rappa or external parties (such as third-party technical service providers, mail carriers, hosting providers,) appointed, if necessary, as data processors by Rappa.
- The company will store all the personal information in secured environments, for example on secured servers in a protected data centre, and or a locked office or safe.

Sharing your personal information:

- Rappa will only share your personal information with third parties if you have consented to such disclosure.

- Where Rappa discloses personal information to any third parties, the third party will be obliged to use that personal information only for the reasons and purposes it was disclosed for.
- We may be obliged to disclose your personal information to the extent that it is required to do so by law, in connection with any legal proceedings or prospective legal proceedings, or for the purposes of protecting the interest of clients, for example fraud prevention or to give effect to an agreement.

Your data protection rights:

- You are entitled to access your personal data by sending a written request to Suzanne Geel whom will attend to requests and administer the requests. Email: suzanne.geel@rappa.co.za.
- You may request the restriction of the processing of your personal information.
- We may charge you a fee for this service as set out in terms of Condition 8 of POPIA.
- You may also request Rappa Holdings (Pty) Ltd, or the relevant subsidiary company, to correct or supplement any of your personal data which Rappa Holdings (Pty) Ltd, or relevant subsidiary company, will undertake as soon as practicable.
- Request the destruction of your personal data - Suzanne Geel (Information Officer), who will consider your request considering any other laws or regulations prohibiting Rappa Holdings (Pty) Ltd, or relevant subsidiary company, from destroying your personal data.
- You may complain to your local data protection authority if your privacy rights are violated.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at Rappa Holdings (Pty) Ltd - Suzanne Geel or email, suzanne.geel@rappa.co.za, who will attend to requests and administer the requests if you wish to make a request.



Contact details:

Name: Suzanne Geel
Address: 1 Homestead Road, Knights, Germiston,1401
Phone Number: 087 310 4300
E-mail: suzanne.geel@rappa.co.za

How to complain:

If you have any concerns about our use of your personal information, you can make a complaint to us at Rappa Holdings (Pty) Ltd – Suzanne Geel or email suzanne.geel@rappa.co.za whom will attend to complaints and administer the complaints.

You can also complain to the Information Regulator if you are unhappy with how we have used your Information.

Information Regulator contact details are as follows:

The Information Regulator (South Africa)

33 Hoofd Street
Forum III, 3rd Floor Braampark
P.O. Box 31533
Braamfontein
Johannesburg, 2017

Complaints e-mail: complaints.IR@justice.gov.za