

Mufaro

EMPLOYEE BENEFITS

POPI & PRIVACY POLICY

Document Control

Key Document Summary

Document Status	Approved
Document Owner	Chief Executive Officer
Final Approval by	Mufaro Executive Committee
Date Approved	May 2021

1. Objective of the policy

- 1.1 Ensuring the Mufaro Employee Benefits (Pty) Ltd, hereinafter referred to as the "Company", complies with the POPI Act by responsibly collecting, processing, storing, and sharing employee's personal information.
- 1.2 Where we refer to "process", it means how we collect, use, store, make available, destroy, update, disclose, or otherwise deal with your or your employees' personal information. As a general rule we will only process this personal information if it is required to deliver or offer a service, provide a product, or carry out a transaction.
- 1.3 We may combine this personal information and use the combined personal information for any of the purposes stated in this Privacy Policy.
- 1.4 If you use our other services, goods, products, and service channels, you agree that we may process this personal information as explained under this Privacy Policy. Sometimes you may be required to provide us with consent to process this personal information.
- 1.5 The Company can change this Privacy Policy from time to time if the law or our business practices requires such change.
- 1.6 This policy establishes a general standard for the appropriate protection of personal information (POPI) within the employment environment. Furthermore, it provides principles regarding the rights of individuals to privacy and to reasonable safeguards of their personal information.

2. Application

- 2.1 All employees, contractors, consultants, temporary and other workers of the Company, including all personnel affiliated with third parties must adhere to this policy. This policy applies to information assets owned or leased by the Company, or to devices that connect to a Company network or reside at the Company site.

3. Content

3.1 What is personal information?

Personal information refers to any information that identifies **you** or specifically relates to **you**. Personal information includes, but is not limited to, the following information about **you**:

- Marital status
- National origin
- Age
- Language
- Birthplace

- Education
- Relevant financial history
- Identifying number (like an employee number, identity number, or passport number)
- E-mail address; physical address (like residential address, work address or your physical location); telephone number
- Biometric information (like fingerprints, signature, or voice)
- Race; gender; sex; pregnancy status; ethnic origin; social origin; colour; sexual orientation
- Physical health; mental health; well-being; disability; religion; belief; conscience; culture
- Medical history; criminal history; employment history
- Personal views, preferences, and opinions
- Another's views or opinions about you.
- Full names and initials

3.2 **Special Personal information**

Personal information also includes special personal information which is information about the following:

- Race (like where a Company submits reports to the Department of Labour where the statistical information must be recorded)
- Ethnic origin
- Trade union membership
- Health (like where you apply for an insurance policy)
- Biometric information (like to verify your identity); and / or your criminal activity and alleged commission of an offense.

3.3 **When will we process your personal information?**

We will only process this personal information for lawful purposes relating to our business if the following applies:

- If you have consented thereto
- If a person legally authorised by you, the law, or a court, has consented thereto.
- If it is necessary to conclude or perform under a contract we have with you
- If the law requires or permits it
- If it is required to protect or pursue your, our, or a third party's legitimate interest.

3.4 **When will we process your special personal information?**

We may process your special personal information in the following circumstances:

- If you have consented to the processing
- If the information is being used for any Human Resource or payroll related requirement
- If the processing is needed to create, use, or protect a right or obligation in law.

- If the processing is for statistical or research purposes and all legal conditions are met
- If the special personal information was made public by you
- If the processing is required by law

3.5 **When and from where we obtain personal information about you.**

- We collect personal information from the payroll or HR departments of our clients when they capture financial and non-financial information.
- We collect personal information from 3rd parties that are directly integrated with our software platform.
- We collect information about you based on your use of our products, services, or service channels (like our Platform).
- We collect information about you based on how you engage or interact with us such as via our support desk, emails, letters, telephone calls, and surveys.
- We collect personal information from completed forms i.e., contact and billing information.

If the law requires us to do so, we will ask for your consent before collecting personal information about you or your employees from third parties.

The third parties from whom we may collect your personal information include, but are not limited to, the following:

- Our partners, your employer directly, any of our other Bureau or channel partners and any connected companies, subsidiary companies, its associates, cessionary, delegates, assigns, affiliates, or successors in title and / or appointed third parties (like its authorised agents, partners, contractors, and suppliers) for any of the purposes identified in this Privacy Policy.
- Your spouse, dependents, partners, employer, and other similar sources.
- People you have authorised to share your personal information, like a person that makes a travel booking on your behalf or a medical practitioner for insurance purposes.
- Attorneys, tracing agents, debt collectors, and other persons that assist with the enforcement of agreements.
- Payment processing services providers, merchants, banks, and other persons that assist with the processing of your payment instructions, like EFT transaction partners.
- Insurers, brokers, other financial institutions, or other organisations that assist with insurance and assurance underwriting, the providing of insurance and assurance policies and products, the assessment of insurance and assurance claims, and other related purposes.
- Law enforcement and fraud prevention agencies and other persons tasked with the prevention and prosecution of crime.
- Regulatory authorities, industry ombudsman, governmental departments, local and international tax authorities.
- Trustees, Executors, or Curators appointed by a court of law.
- Our service providers, agents and sub-contractors like couriers and other persons we use to offer and provide products and services to you.
- Courts of law or tribunals.

3.6 Reasons we need to process your personal information.

We will process your personal information for the following reasons:

- To provide you with products, goods, and services such as payroll and HR services.
- To market our products, goods, and services to you.
- To respond to your enquiries and complaints.
- To comply with legislative, regulatory, risk, and compliance requirements (including directives, sanctions, and rules), voluntary and involuntary codes of conduct and industry agreements or to fulfil reporting requirements and information requests.
- To conduct market and behavioural research, including scoring and analysis to determine if you qualify for products and services or to determine your credit or insurance risk.
- To develop, test, and improve products and services for you.
- For historical, statistical, and research purposes, like market segmentation.
- To process payment instruments.
- To create, manufacture, and print payment advice (like a payslip).
- To enable us to deliver goods, documents, or notices to you.
- For security, identity verification, and to check the accuracy of your personal information.
- To communicate with you and carry out your instructions and requests.
- For customer satisfaction surveys, and promotional offerings.
- To enable you to take part in and make use of value-added products and services.
- To assess our lending and insurance risks; and / or
- For any other related purposes.

3.7 How we use your personal information for marketing purposes.

- We will use your personal information to market our technology, Payroll and HR, and financial services related products and services to you.
- We may also market non-banking or non-financial products, goods, or services to you.
- We will do this in person, by post, telephone, or electronic channels such as SMS, email, and fax.
- If you are not our customer, or in any other instances where the law requires, we will only market to you by electronic communications with your consent.
- In all cases you can request us to stop sending marketing communications to you at any time.

3.8 When, how, and with whom we share your personal information.

In general, we will only share your personal information if any one or more of the following apply:

- If you have consented to this.
- If it is necessary to conclude or perform under a contract, we have with you.
- If the law requires it; and / or

- If it is necessary to protect or pursue your, our or a third party's legitimate interest.

Where required, each member of the Company may share your personal information with the following persons. These persons have an obligation to keep your personal information secure and confidential:

- Other members of the Company, its associates, cessionary, delegates, assigns, affiliates, or successors in title and / or appointed third parties (like its authorised agents, partners, contractors, and suppliers) for any of the purposes identified in this Privacy Policy.
- Our employees as required by their employment conditions.
- Attorneys, tracing agents, debt collectors and other persons that assist with the enforcement of agreements.
- Payment processing services providers, merchants, banks, and other persons that assist with the processing of your payment instructions, like 3rd party EFT service providers.
- Law enforcement and fraud prevention agencies and other persons tasked with the prevention and prosecution of crime.
- Regulatory authorities, industry ombudsmen, governmental departments, local and international tax authorities, and other persons the law requires us to share your personal information with.
- Our service providers, agents and sub-contractors like couriers, and other persons we use to offer and provide products and services to you.
- Persons to whom we have ceded our rights or delegated our obligations to under agreements, like where a business is sold.
- Courts of law or tribunals that require the personal information to adjudicate referrals, actions, or applications.
- Trustees, Executors, or Curators appointed by a court of law.
- Participating partners in our customer loyalty reward programmes, where you purchase goods, products, and services, or spend loyalty rewards; and / or our joint venture and other partners with whom we have concluded business agreements, for your benefit.

3.9 Your duties and rights about the personal information we have about you.

You must provide proof of identity when enforcing the rights below.

You must inform us when your personal information changes.

You have the right to request access to the personal information we have about you by contacting us. This includes requesting:

- Confirmation that we hold your personal information.
- A copy or description of the record containing your personal information; and
- The identity or categories of third parties who have had access to your personal information.

We will attend to requests for access to personal information within a reasonable time. You may be required to pay a reasonable fee to receive copies or

descriptions of records, or information about third parties. We will inform you of the fee before attending to your request.

Please note that the law may limit your right to access information.

You have the right to request us to correct or delete the personal information we have about you if it is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, obtained unlawfully, or we are no longer authorised to keep it. You must inform us of your request in writing. Please refer to our PAIA Manual for further information in this regard, like the process you should follow to give effect to this right. It may take up to 15 business days for the change to reflect on our systems. We may request documents from you to verify the change in personal information.

A specific agreement that you have entered into with us may determine how you must change your personal information provided at the time when you entered into the specific agreement. Please adhere to these requirements. If the law requires us to keep the personal information, it will not be deleted upon your request. The deletion of certain personal information may lead to the termination of your business relationship with us.

You may object on reasonable grounds to the processing of your personal information.

We will not be able to give effect to your objection if the processing of your personal information was and is permitted by law; you have provided consent to the processing and our processing is done according to your consent, or the processing is necessary to conclude or perform under a contract with you.

You must inform us of any objection in writing. Please refer to our PAIA Manual for further information in this regard, like the process you should follow to give effect to this right.

Where you have provided your consent for the processing of your personal information, you may withdraw your consent. If you withdraw your consent, we will explain the consequences to you. We may proceed to process your personal information even if you have withdrawn your consent if the law permits or requires it. It may take up to 15 business days for the change to reflect on our systems, during this time we may still process your personal information.

You have a right to file a complaint with us or any Regulator with jurisdiction about an alleged contravention of the protection of your personal information by us. We will address your complaint as far as possible.

3.10 How we secure your personal information

We will take appropriate and reasonable technical and organisational steps to protect your personal information according to industry best practices. Our security measures (including physical, technological, and procedural safeguards) will be appropriate and reasonable. This includes the following:

- Keeping our systems secure (like monitoring access and usage)
- Storing our records securely
- Controlling the access to our buildings, systems and/or records
- Safely destroying or deleting records
- Ensure compliance with international ISO27001 security standards.

3.11 How long do we keep your personal information?

We will keep your personal information for as long as:

- The law requires us to keep it.
- A contract between you and us requires us to keep it.
- You have consented to us keeping it.
- We are required to keep it to achieve the purposes listed in this Privacy Policy.
- We require it for statistical or research purposes.
- A code of conduct requires us to keep it; and / or
- We require it for our lawful business purposes.

Note: We may keep your personal information even if you no longer have a relationship with us for the historical data that may be required by your employer or employee.

3.12 Under which circumstance will we transfer your information to other countries?

We will only transfer your personal information to third parties in another country in any one or more of the following circumstances:

- Where your personal information will be adequately protected under the other country's laws or an agreement with the third-party recipient.
- Where the transfer is necessary to enter into or perform under a contract with you, or a contract with a third-party that is in your interest.
- Where you have consented to the transfer; and / or
- Where it is not reasonably practical to obtain your consent, the transfer is in your interest.

This transfer will happen within the requirements and safeguards of the law. Where possible, the party processing your personal information in the other country will agree to apply the same level of protection as available by law in your country or if the other country's laws provide better protection the other country's laws would be agreed to and applied.

An example of us transferring your personal information to another country is where foreign payments take place if you purchase goods or services in a foreign country, or request that we facilitate salary payments to your employees in the countries.

3.13 Children's Privacy

Our service does not address anyone under the age of 13. We do not knowingly collect personally identifiable information from anyone under the age of 13. If you are a parent or guardian and you are aware that your child has provided the Company with Personal Data, please contact us. If we become aware that we have collected Personal Data from anyone under the age of 13 without verification of parental consent, we take steps to remove that information from our servers.

If we need to rely on consent as a legal basis for processing your information and your country requires consent from a parent, we may require your parent's consent before we collect and use that information.

3.14 Our cookie policy

A cookie is a small piece of data sent from a websites or applications to your computer or device hard drive or Internet browser where it is saved. The cookie contains information to personalise your experience on websites or applications and may improve your experience on the websites or applications. The cookie will also identify your device, like the computer or smart phone.

By using a websites or applications you agree that cookies may be forwarded from the relevant website or application to your computer or device. The cookie will enable a website to know that you have visited the website or application before and will identify you. We may also use the cookie to prevent fraud and for analytics.

4. Consequence of breach

- 4.1 An employee found to have violated this policy may be subject to disciplinary action up to and including termination of employment. A violation of this policy by a temporary worker, contractor, or vendor may result in the termination of their contract or assignment with the Company.