

Human Resources – Privacy Policy (P25)	Version: 1.0	Rev Date: N/A
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**PRIVACY
POLICY**

Document Name	Privacy Policy
Approved by	J. Helberg
Approved by	J. Webb
Implementer	J. Van den Heuvel
Document Owner	J. Van den Heuvel
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The signatures below indicate approval
of this policy

Approved by: Johan Helberg

Approved by: Johnny Webb

Version	Date of Issue	Author	Updated By	Document History
1.0	14 November 2023	Jadyn van den Heuvel		
1.1				
1.2				
1.3				

Distribution List	Distribution Body
All Management	
All Staff	

Privacy Policy

USP&E Holdings (Pty) Ltd: Privacy Policy

ABOUT OUR PRIVACY AND COOKIES POLICY

Our privacy and cookies policy gets updated from time to time. Whenever we make a change, we'll post this on our website and let you know if there is a material change.

We have revised our privacy and cookies policy, refreshing it to ensure compliance with applicable laws and regulations relating to the processing of personal information, including but not limited to the Protection of Personal Information Act, 2013 (POPIA), the POPIA Regulations, 2018, the Electronic Communications and Transactions Act, 2002 (ECTA), the Constitution of the Republic of South Africa, 1996 (Constitution), the Electronic Communications Act, 2005 (ECA), the Consumer Protection Act, 2008 (CPA), the Promotion of Access to Information Act, 2000 (PAIA), the Regulation of Interception of Communications and Provision of Communication-related Information Act, 2002 (RICA), the Protected Disclosures Act, 2000 (as amended by the Protected Disclosures Amendment Act, No. 5 of 2017), the Cybercrimes Act, 2020, and all other applicable laws, regulations, codes of practice and guidance issued and in force from time to time relating to data protection, privacy, and the processing of personal information.

Last updated: 15 November 2023

Notification of changes to Privacy Policy

We are continually improving our methods of communication and adding new functionality and features to this Website and to our existing products and services. Because of these ongoing changes, changes in the law and the changing nature of technology, our data protection practices will change from time to time. If and when our data protection practices change, we will update this privacy policy to describe our new practices. If we do, we will notify you the next time you visit this site or interact with us through any of our other communication channels. We encourage you to check this page regularly.

HOW TO USE THIS PRIVACY AND COOKIES POLICY

In this privacy policy, we explain how we collect, use, share and protect your personal information when you use our products and services and our website.

It is important to note that when you engage with us, you acknowledge that we require your personal information, as defined in PoPIA and other related regulations and need to process such personal information to provide products or services to you for purposes including to confirm, update and enhance our records, to confirm your identity and additional purposes as detailed below and in other supplementary privacy policies and statements linked to specific services that you subscribe to.

The provision of your personal information in terms of this policy is mandatory and you will not be able to continue using our products and services, should you object to providing us with such information.

WHO WE ARE

We are USP&E Global (Pty) Ltd (**hereinafter referred to as "USP&E"**)

Our registered office is 392 Main Street, Building C, First Floor, Bryanston, 2191. We are registered in the Republic of South Africa under company number 2015/345822/07.

In this privacy policy:

- "we/us" means USP&E Holdings (Pty) Ltd,
- "third party" means someone who is not you or us
- "USP&E Group" means USP&E Holdings Limited and any company or organisation in which USP&E Holdings Limited owns more than 30% of the share capital.
- "Personal information" refers to personal information about you as defined in PoPIA and includes location information, usage information, race, gender, nationality, marital status, age, physical or mental health, disability, language, education, identity number, telephone number, email, postal address, biometric information, and financial, criminal or employment history.
- "Process (or processing)" means to any operation or activity, whether automated or not, concerning personal information, including: collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation, use, dissemination by means of transmission, distribution or making available in any other form, merging, linking, as well as blocking, degradation, erasure or destruction of information.

How to contact us

Your opinion matters to us - if you have any questions about our privacy and cookie policy or your privacy settings, please submit your query to info@uspeglobal.com and a member of our dedicated team will respond to you. If you would like to mail us by post directly, send it to:

The Human Resources & Legal Team

USP&E Holdings (Pty) Ltd

The Main Straight Office Park

392 Main Street, Bryanston

2191

Our principles

We are committed to respecting your privacy. We take privacy, security and complying with data protection and privacy laws seriously.

Here are our core Privacy Commitments. We aim to put these commitments at the heart of everything we do.

PERSONAL INFORMATION WE COLLECT ABOUT YOU

The information we collect about you and how we collect it can vary depending on the products and services that you use and subscribe to, how you have used the products and services, how you have interacted with USP&E even if you aren't a customer, or what we have obtained from a third party with permission to share it with us.

To find the privacy supplements for our products and services, please go to the 'Privacy and our products and services' section of this Privacy Portal. USP&E subsidiaries may have their own privacy statements governing the customers use of the particular service or product.

USP&E will process your personal information based on:

- **The performance of your contract or to enter into the contract** and to take action on your requests. For example, the delivery of products, the routine checking of product quality, and the continuous operation and maintenance of project sites. We also need to conduct credit checks when you apply for a product or service.
- **USP&E's legitimate business interests**, for example, fraud prevention, prevention of tax evasion and financial crime, maintaining the security of our network and services, direct marketing, and the improvement of our services. Whenever we rely on this lawful basis to process your personal information, we assess our business interests to make sure they do not override your rights. Additionally, in some cases you have the right to object to this processing. For more information, visit the 'Your rights' section of this privacy policy.
- **Protecting your legitimate interests** - for example, notification of emergency services, and fraud prevention. For more information, visit the 'Your rights' section of this policy.
- **Compliance with a mandatory legal obligation**, including for example, accounting and tax requirements, which are subject to strict internal policies, procedures, and your right to restrict usage of your personal information, which control the scope of legal assistance to be provided. We are also required to also process your personal information pursuant to legislation including but not limited to the Financial Intelligence Centre Act, 38 of 2001 (FICA), the Regulation of Interception of Communications and Provisions of Communication-related Information Act 70 of 2002 (RICA), the Electronic Communications and Transactions Act, 2002 (ECTA), the Consumer Protection Act, 2008 (CPA), the Promotion of Access to Information Act, 2000 (PAIA), and the Cybercrimes Act, 2020.
- **Consent you provide** where USP&E does not rely on another legal basis (referred to above). Consent may be withdrawn at any time. When you give your consent, you will be given details on how to change your mind or visit the 'Your rights' section of this privacy policy for more information.

We will collect your personal information when you, for example:

- Buy or use any of our products and services
- Register for a specific product or service
- Subscribe to newsletters, alerts or other services from us
- Contact us through various channels, or ask for information about a product or service
- Take part in a competition, prize draw or survey
- Visit or browse our website or other USP&E Group websites
- Have given permission to other companies to share information about you
- Where your information is publicly available
- Are the customer of a business that we acquire
- Visit our business premises

We are required to take all reasonably practicable steps to ensure your personal information is complete, accurate, not misleading and updated on a regular basis. To ensure this, we will always endeavour to obtain personal information from you directly. Where we are unable to do so, we will make use of verifiable independent third-party data sources who have the necessary authority to provide us with such information. We also collect information from certain organisations, where appropriate and to the extent we have legal grounds to do so. These include fraud-prevention agencies, business directories, credit check reference/vetting agencies, billing calculating agencies and connected network providers.

We may also collect information about you on CCTV when you visit our premises or on other security cameras as part of our security and crime prevention measures.

Understanding what you want (the use of cookies)

We use cookies (small text files stored in your browser) and other techniques such as web beacons (small, clear picture files used to follow your movements on our website). This, in turn, helps us make our Website relevant to your interests and needs. They also help us find information once you have logged in or help us link your browsing information to you and your personal information, for example, when you choose to register for a service. We may use a persistent cookie (a cookie that stays linked to your browser) to record your details so we can recognise you if you visit our Website again.

Cookies by themselves cannot be used to discover your identity. Cookies do not damage your computer. You can set your browser to notify you when you receive a cookie. This enables you to decide if you want to accept it or not. If you choose not to accept cookies from our Website this may limit its functionalities or performance. For more details on how we use cookies and your rights in respect thereof, please refer to the "Our Cookies policy" section which can be accessed [here](#).

INFORMATION THAT WE PROCESS

The types of information we may process are, where applicable:

- Your name, address, phone and/or mobile number, your date of birth, gender, information about your property or household, and email address. Where you have provided us with the personal information of a third-party (for example your spouse or family member), you guarantee that such third-party has given you consent to provide us with their personal information. Where you provide us with the personal information of a person under the age of 18 years (a minor), you confirm that you have the necessary legal authority or is legally competent, to provide their personal information to us.
- Your credit or debit card information, information about your bank account and other banking information. For example, you'll have to give us this information when you open an account with us. We'll collect the personal information necessary to process a payment whenever you make a purchase.
- Your correspondence with us, such as a note or recording of a call you make to one of our contact centres, a Live Chat, an email or letter sent, or other records of any contact with us.
- Your account information, such as dates of payment owed or received, account numbers or other information related to your account or included in USP&E.
- Your preferences for particular products, services and lifestyle activities when you tell us what they are, or we assume what they are, based on how you use the products and services.
- See the 'Cookies' section for details on what we collect using cookies, web beacons and other technologies
- Photographs and images when attending any of our events or functions or accessing premises with surveillance cameras.
- Information we obtain from other sources, such as credit agencies, fraud-prevention agencies, and from other data providers. This includes demographic data and interest-based data.

HOW WE USE YOUR PERSONAL INFORMATION

We will use, process and analyse your personal information for the following purposes:

To provide you with your services

Processing your order and providing you with your products and services

- To process the products and services you've bought from us, install equipment at your property or deliver equipment to you, and keep you updated with the progress of your order.

Billing and customer care

- To bill you for using our products and services.
- Contact you if the billing information you provided us with is about to expire or we're not able to take payment.
- To respond to any questions or concerns you may have about our products or services.

Service messages

- We will contact you with customer service messages to keep you updated with current information about products and services you've taken. For example, changes to our terms and conditions.

To improve our service

Improving and innovating our products and services

- We collect anonymous, de-identified or aggregate information to improve the service we offer to everyone. None of these analytics can identify you individually or link back to you in any way.
- We conduct surveys to understand various aspects of our interaction with you, the use of our services and products and the network.

Marketing and tailoring our service to you

Marketing

- As our customer, we will contact you to keep you informed about new and existing products and services, and other promotions and we may use your personal information to run those events and promotions, only to the extent that you have not, at any stage, objected to receiving such marketing communications. We may also, with your consent, send you newsletters or white papers and occasionally invite you to participate in market research. We tailor these messages based on the products and services you've bought from us in the past and we will only provide you with marketing content regarding our own products and services that are similar to or related to the products and services previously provided to you.
- If you have given your permission, we will also contact you to let you know about products and services of USP&E Group companies.
- There are various ways that we may do this - including by email, post, phone, text, or picture messages.

Advertising online

- To deliver advertising that is relevant to you, you'll also see targeted advertising online based on the use of cookies. This is known as interest-based advertising. It can be on websites belonging to the USP&E Group, those of other organisations as well as other online media channels such as social media sites. We may also combine data collected via the cookies with other data we have collected. If you don't want any information processed through the use of cookies, check the 'Cookies' section in this Privacy Portal. It explains how to control and opt out of cookies.
- Remember that opting out of interest-based advertising doesn't stop advertisements from being displayed - it's just that they won't be tailored to your interests.
- You will also see advertising in your social media, for example in your Instagram or LinkedIn feed. If you don't want to receive this advertising, go to the relevant platform's ad settings.

Research and analytics

We use a variety of analytics methods including what is commonly referred to as "Big data analytics". Big data analytics are mathematically driven analysis techniques on large and varied data sets (that is why it is "big" data) to uncover hidden patterns and hitherto unrevealed trends.

At USP&E we take governance of big data analytics seriously. Our data scientists are required to adhere to a Code of Ethics. We have a strict use case process that requires that privacy and data protection law checks are carried out before any use case commences. We also have strict rules ensuring that personal information is protected at the appropriate stage in the process.

We use our analytics to, for example:

- Conduct market research and to carry out research and statistical analysis, including to monitor how customers use our networks, products and services;
- Frame our marketing campaigns and determine how we might personalise those;
- Provide reports to third parties (such reports don't contain information which may identify you as an individual). These can be to third parties such as content providers, research companies and advertisers or as part of USP&E analytics.

Credit checks, fraud prevention and security

We will sometimes need to profile you, for credit, fraud, and security purposes. When we conduct such profiling activities, we will do so in accordance with the provisions of the relevant legislation or lawful requirement.

Credit checks and ID

- We will carry out a credit check when you apply for a contract for any products or services with us.
- We will also use your personal information for identity verification purposes, for access to your account and for general account management. We sometimes supplement the information we collect about you with information from other sources to assess the accuracy of the information that we hold.

Fraud prevention and security

- We will process your personal and traffic data in order to protect against and detect fraud, to protect and detect misuse or damage to our networks, to recover debts or trace those who owe us money resulting from the use of our services.

HOW WE SHARE YOUR PERSONAL INFORMATION

Where applicable, we share information about you with:

- Companies in the USP&E Group, located across the globe, including but not limited to in the European Economic Area (EEA), US, Middle East and greater Africa, for reporting purposes and where they are involved in providing products and services that you have entered into agreement for
- Partners, suppliers, or agents involved in delivering the products and services you've ordered or used
- Companies who are engaged to perform services for, or on behalf of, the USP&E Group which companies may be located outside of the borders of South Africa
- Credit reference, fraud-prevention or business-scoring agencies, or other credit scoring agencies
- Debt collection agencies or other debt-recovery organisations
- Law enforcement agencies, government bodies, regulatory organisations, courts or other public authorities if we have to, or are authorised to by law
- A third party or body where such disclosure is required to satisfy any applicable law, or other legal or regulatory requirement

- Third parties for joint promotions with that third party. They'll be responsible for their own compliance with applicable privacy laws
- Third parties that we advertise with, in order to serve you advertisements online (e.g. Facebook, Google). You can opt-out of this by managing your account permissions. To do this see the 'Your Rights' section below.
- Third parties that we use to serve you marketing.

Fraud management and law enforcement

- We will release information if it's reasonable for the purpose of protecting us against fraud, defending our rights or property, or to protect the interests of our customers.
- We also may need to release your information to comply with our legal obligation to respond to the authorities' lawful demands. Your personal information shall only be provided when we in good faith believe we are obliged to do so in accordance with the law and pursuant to an exhaustive evaluation of all legal requirements.

Mergers and acquisitions

If we become involved in a proposed or actual merger, acquisition, or any form of sale of assets, we may use and disclose your personal information to third parties in connection with the evaluation of the transaction. Any acquiring company would have access to your personal information.

Third parties that we work with

Where you've purchased USP&E products and services using a third party or partner organisation, we often need to exchange information with them as part of managing that relationship and your account - for example, to be able to identify your order and be able to pay them.

If we have a contract with a service provider or contractor to provide us with services or provide a service on our behalf, and they may have access to your personal information, we don't authorise them to use or disclose your personal information except in connection with providing their services. We ensure that all our service providers and contractors align to our policies and requirements.

We collect and combine information in order to monitor your use of products and services, and that of our other customers, as well as to help us to improve the quality of our products and services.

Third-party products that you buy through your USP&E account

Where you buy a third-party product or service through your USP&E account, the contract for it is with the party selling that product or service. USP&E is only charging the amount directly to your bill as part of its arrangements with the seller (or with a third party authorised by the seller). As part of this, you're agreeing that USP&E may pass certain personal information to such parties to complete your purchase.

The seller's terms and conditions and privacy and cookies policies will apply to how it uses your personal information - please read them carefully.

INTERNATIONAL DATA TRANSFERS

We may also need to transfer your information to other USP&E group companies or service providers in countries outside South Africa, in which case we will fully comply with applicable privacy legislation. This may happen if our servers or suppliers and service providers are based outside South Africa, or if our services are hosted in USP&E group companies outside South Africa including the United Kingdom, European Economic

Area (EEA) or greater Africa and/or if you use our services and products while visiting countries outside South Africa. Countries in the United Kingdom and EEA are considered to have adequate data protection laws which are similar to those of South Africa, however, we will make sure that your information is protected and enter into appropriate agreements to achieve this.

If you are visiting this Website from a country other than South Africa the various communications will necessarily result in the transfer of information across international boundaries.

Where we transfer your personal information outside of the borders of South Africa, we will ensure that the third party recipient is subject to a law, binding corporate rules or binding agreement which provide an adequate level of protection for your personal information that are substantially similar to the data protection laws applicable to South Africa.

HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION FOR?

We may not retain your personal information any longer than is necessary for achieving the purpose for which your personal information was collected or subsequently processed, unless:

- The retention of your personal information is required or authorised by law
- We reasonably require your personal information for lawful purpose related to our function or activities
- The retention of your personal information is required by a contract that we enter into with you

KEEPING YOUR PERSONAL INFORMATION SECURE

We have specialised security teams who constantly review, improve, and ensure the implementation of appropriate, reasonable technical and organisational measures to protect your personal information from unauthorised access, accidental loss, disclosure, or destruction. We are required in terms of PoPIA to notify you and the Information Regulator, if any of your personal information has been compromised.

Communications over the internet (such as emails) aren't secure unless they've been encrypted. Your communications may go through a number of countries before being delivered, as this is the nature of the internet.

We cannot accept responsibility for any unauthorised access or loss of personal information that is beyond our control.

We'll never ask for your secure personal or account information by an unsolicited means of communication. You're responsible for keeping your personal and account information secure and not sharing it with others.

Our website may provide links to third-party websites. We cannot be responsible for the security and content of such third-party websites. You are therefore required to make sure you read that company's privacy and cookies policies before using or putting your personal information on their site.

The same applies to any third-party websites or content you connect to using our products and services.

You may choose to disclose your information in certain ways such as social plug-ins (including those offered by Google, Facebook, Twitter and Pinterest) or using third-party services that allow you to post reviews or other information publicly, and a third party could use that information.

Social plug-ins and social applications are operated by the social network themselves and are subject to their own terms of use and privacy and cookies policies. You should make sure you're familiar with these.

UNAUTHORISED THIRD PARTY ACCESS TO YOUR INFORMATION

Despite the security measures we have in place to protect your personal information, (firewalls, password access and encryption methods) you acknowledge that it may be accessed by an unauthorised third party, e.g. as a result of an illegal activity.

In the unlikely event of such access, we will notify you, where possible, via email, SMS or using the address you have provided us with, within a reasonable time of us becoming aware of such occurrence.

YOUR RIGHTS

Below we set out details on how you can exercise your rights. If you have a question or cannot find the answer, please contact our at info@uspeglobal.com.

Right to access personal information

You have the right to request a record or description of the personal information that USP&E holds about you. This includes the right to request USP&E to confirm, free of charge, whether or not we hold any personal information about you; as well as information about the categories of third parties who have, or have had, access to your personal information. To make this request as an individual or an authorised third party, visit our Subject Access Rights page of this Privacy Portal which gives details on how to do this. Alternatively, you can contact our at info@uspeglobal.com.

Right to correct personal information

You have the right to correct information held about you if it's not accurate, out-of-date, excessive, irrelevant, or misleading. If the information we hold about you is inaccurate or needs to be updated, you can contact our Customer Service team at info@uspeglobal.com.

Right to object to use of personal information

You have the right, in certain circumstances, to object to USP&E processing your personal information. In order for USP&E to provide you with products and services, USP&E is required to process your personal information and as such the provision of your personal information is mandatory and you may not object to same in order to continue using our products or services. For more information or to exercise this right, please contact our team at info@uspeglobal.com. If this relates to an automated decision performed on you (this means with no human involvement), please let us know and we will review your request.

To opt out of marketing messages

If you no longer want to receive marketing messages from USP&E, you can choose to opt out at any time. If you've previously opted in to receive personalised content based on how you use our services, you can also opt out at any time.

The easiest way to opt out is by using our marketing preferences page, found under your My USP&E account settings.

There are also various other ways to opt out:

- Contact our at info@uspeglobal.com.
- Click the link at the end of a marketing email, text or picture message to unsubscribe from that channel
- Tell the customer care agent if you receive a marketing call

- Contact our **customer care team** for guidance

If you're opted out of marketing, you may still receive service-related messages.

Please note: You may still receive marketing messages for up to 7 (seven) days after opting out while we update our records.

You may have received marketing from USP&E even if you're not a customer or have never had contact with us. This is a result of third-party marketing lists which USP&E may acquire from time to time, stating that you have given permission to be contacted by other organisations. If you've registered with us to opt out of marketing from USP&E, you shouldn't receive such communications. If you still do, we ask that you let us know immediately by contacting our customer care team at info@uspeglobal.com. This will only stop marketing from us and not stop the third parties from sharing your personal information unless you contact them directly.

How to lodge a complaint

If you want to contact us about any of your rights or should you believe that USP&E has used your personal information contrary to applicable law, you undertake to first attempt to resolve any concerns with USP&E directly. Kindly contact our customer care team at info@uspeglobal.com. We will do our best to help but if you are still unhappy, you can contact the Privacy Office at legal@uspeglobal.com. If you are not satisfied with such process, you have the right to lodge a complaint with the Information Regulator at:

The Information Regulator (South Africa)

D House
27 Stiemens Street
Braamfontein
Johannesburg
2001

Email: infoereg@justice.gov.za

Complaints email: complaints.IR@justice.gov.za

Right to restrict use of your personal information

If you feel that the personal information we hold on you is inaccurate, or you believe we shouldn't be processing your personal information, please contact our Customer Services team at info@uspeglobal.com to discuss your rights. In certain circumstances, for example where you contest the accuracy of your information, or where USP&E no longer requires your information for achieving its purpose but must maintain it for purposes of proof, you have the right to ask us to restrict processing.

Right to deletion

USP&E strives to only process and retain your personal information for as long as we need to. In certain circumstances, for example, where you indicate that your personal information is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, or obtained unlawfully, you have the right to request that we erase your personal information that we hold. If you feel that we are retaining your personal information longer



Harnessing Talent for Life

than we need, it is worth first checking that your contract with USP&E has been terminated, which you can do with info@uspeglobal.com If your contract with USP&E has been terminated, we may still have lawful grounds to process your personal information.

I acknowledge receipt of the above and state that I read and understand the Privacy Policy conditions

Employee Name: _____

Date: _____

Signed: _____