

PBT HOLDINGS LIMITED

PROTECTION OF PERSONAL INFORMATION CODE OF CONDUCT

www.pbtholdings.co.za

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1 INTRODUCTION

PBT Holdings is committed to creating an environment compliant of all applicable laws governing data protection in South Africa as well as Europe and the United Kingdom. This includes the Protection of Personal Information Act (POPIA) as well as the General Data Protection Regulation (GDPR).

2 PRINCIPLES

Our goal is to ensure that all information be treated in a transparent and professional manner in the best interest of our clients and our company. In this regard, PBT subscribes to the following eight principles regarding personal information:

- Accountability
- Processing limitation
- Purpose specification
- Further processing limitation
- Information quality
- Openness
- Security safeguards
- Data subject participation

3 CODE OF CONDUCT

PBT subscribes to the lawful processing of relevant, personal and sensitive data in a fair and transparent manner. In doing so we ensure that information captured and processed are done so with the knowledge and approval of the data subject.

We commit ourselves to adherence of this Code of Conduct and never identify or attempt to re-identify anonymised data. Where a client subscribes to a different Code of Conduct, employees must adhere to the stricter instance.

We recognise the responsibility of ensuring that all the conditions relating to POPIA and/or GDPR are in place prior to the processing of data.

We adhere to the processing limitation condition, ensuring the lawful processing of data. To meet this condition, we must:

- Process data in a way that does not risk the data subject's privacy.
- Process only relevant data with a given purpose.
- Obtain consent from the data subject before processing (and keep proof of consent).
- Protect the legitimate interest of the data subject.
- Allow data subjects to object to processing and/or withdraw consent at any time.
- Stop processing data after an objection or withdrawal of consent.

We commit to always understand the purpose of and the reason for collecting data and that such data must be collected for a specific, explicitly defined and lawful purpose. We respect the need to discard data, rendering it irretrievable, once it is no longer required for processing purposes.

Where the need arises to further process existing information, such further processing of data is only acceptable if:

- The data subject consented.
- The information came from the public record.
- The law requires further processing.
- The processing is related to national security.

We will collect and process data that is accurate and complete. Sourcing of data will be done in an open and transparent manner as clearly defined by POPIA.

We will ensure that appropriate, reasonable technical and organisational measures designed to prevent both unlawful access and the loss or damage of the personal information are in place. Directors and employees must disclose and report, directly to management and where applicable to a client, any security breaches, theft and discrimination as soon as reasonably possible.

We recognise that under law, data subjects have the right of access to their personal information, including learning what information the responsible party has, including the option to ask for a description or record. The data subject also has the right to request corrections to their record(s) when the data is out of date, incomplete, inaccurate, excessive or obtained unlawfully.

We furthermore warrant that we will comply with all applicable laws governing data protection in South Africa as well as Europe and the United Kingdom and that any violation of this Code of Conduct can result in disciplinary action, including possible termination.