PBT HOLDINGS LIMITED

PRIVACY POLICY

1 INTRODUCTION

1.1 This Privacy Policy together with our website terms and conditions (**https://www.pbtholdings.co.za/privacy-policy/** and **https://www.pbtholdings.co.za/terms-conditions/**) sets out the basis on which any Personal Data (as defined in paragraph 3.2 below) that we, PBT Holdings Limited, collect from you, or that you provide to us, will be used, stored and processed by us. Any capitalised terms used in this privacy policy that are not defined in this privacy policy shall have the meaning given to such terms in our website terms and conditions.

1.2 Any references to "**we**", "**us**" or "**our**" in this Privacy Policy shall be to PBT Holdings Limited and where applicable our affiliates and subsidiaries including without limitation PBT Holdings International BV and PBT SA Holdings Proprietary Limited; and references to "**user**", "**you**" or "**your**" in this Privacy Policy shall be to any user of this website.

2 OUR DETAILS

2.1 This Privacy Policy sets out the basis on which any Personal Data defined in paragraph 3.2) that we collect about you, or that you provide to us, will be used, stored and processed by us. Please read our Privacy Policy carefully to get a clear understanding of how we collect, use, protect or otherwise handle your Personal Data.

2.2 We, PBT Holdings Limited, a company incorporated in accordance with the laws of the Republic of South Africa, with the registration number 1936/008278/06, and with the registered address at PBT House, 2 Mew Close, Waterford Mews, Century City, Cape Town, South Africa, 7441 and where applicable our affiliates and subsidiaries including without limitation PBT Group International BV and PBT SA Holdings Proprietary Limited are the "*data controllers*" and "*responsible parties*" for purposes of applicable data protection legislation in respect of all your Personal Data that you submit to us via the websites: https://www.pbtholdings.co.za, https://www.pbtgroup.co.za/, https://www.pbtit.co.za/, https://www.cpconsulting.co.za/ and other related URLs ("**Website**") and/or that may be collected by us through any correspondence and/or communication with you. Please note paragraph 10 below as it deals with Personal Data you submit to third parties.

2.3 We operate in the information and communication technology industry and provide data analytics, data platform, data visualisation, application development, cloud solutions, software licensing and strategic consulting services (collectively, the "**Services**").

2.4 We recognize the importance of protecting your privacy in respect of Personal Data collected by us when you use the Website.

3 INFORMATION WE MAY COLLECT ABOUT YOU

3.1 When you use the Website, we may collect certain information that is not Personal Data such as your operating system, device type and make, browser type and internet service provider. This type of information does not identify you personally.

3.2 When you access the Website, we may also collect Personal Data that you provide to us. For purposes of this Privacy Policy, "**Personal Data**" shall mean any information of a personal nature by which you can be identified as an individual such as your name, postal address, email address, telephone number, home country, postal code, gender, age, financial details and/or and VAT number.

3.3 In particular, we may collect and process the following information (which may include Personal Data) about you —

3.3.1 information that you provide to us and/or allow the Website to access;

3.3.2 information about your device software and hardware, including the unique internet mobile equipment identity ("**IMEI**"), number of your mobile telephone, the unique integrated circuit card identity ("**ICCID**") number of your SIM cards in your device, your email address, personal internet protocol ("**IP**") address, mobile phone number, date and time and country of your device;

3.3.3 your geographic location information based on your mobile network operator's tower details, GPS (Global Positioning System) and/or WIFI communications network location;

3.3.4 information that we may ask you for if you report a problem with our Website;

3.3.5 details of your visits to our Website (including, but not limited to, traffic data, location data, weblogs and other communication data and the resources that you access;

3.3.6 information provided by you if you contact us, or if we contact you, and we may keep a record of that correspondence;

3.3.7 information about you when you voluntarily register with us to receive company related alerts, complete our online information request form, complete any user surveys or feedback forms and fill-in job seeker forms; and

3.3.8 your name, email address and country of residence if you would like to receive one of our newsletters or marketing materials.

3.4 The supply of your Personal Data is voluntary; however, you acknowledge that we cannot make certain Services available to you on the Website if you do not wish to supply such Personal Data.

3.5 We use cookies to collect information about your use of our Website (technical data). For more information about how we use cookies, please see our cookie policy below in section 9.

3.6 We may use third-party companies to monitor website traffic, which may, in some instances, store your information, including the Personal Data you submit to such third parties.

3.7 We only in very limited circumstances collect and process any special categories of Personal Data about you such as your race, ethnicity, biometric information or criminal records. Where we process special categories of Personal Data, we only do so where we have obtained your explicit consent or where such processing is necessary for purposes of carrying out our legal obligations and exercising specific rights in the field of employment and social security law, which includes for our South African data subjects, our compliance with the Broad-Based Black Economic Empowerment Act 53 of 2003.

4 HOW WE COLLECT YOUR PERSONAL DATA

4.1 We collect your Personal Data, so that we can provide our Services to you. We only collect as much data as we need.

4.2 We collect data in different ways on our Website, such as when you directly give us your Personal Data. This includes when —

4.2.1 you may provide certain Personal Data (such as your name, address, telephone and e-mail address) by filling in forms or by corresponding with us by e-mail or otherwise;

4.2.2 you register for e-mail alerts on the Website;

4.2.3 request information to be sent to you; and

4.2.4 complete and submit a survey; or provide feedback to us.

4.3 When you interact with our Website, we may automatically collect technical data about your equipment, browsing actions and patterns. Through analytics, we use anonymised aggregated data such as statistical or demographic data.

4.4 In limited circumstances, we may collect Personal Data from third parties or if publicly available such as from external services providers contracted by PBT Holdings to host or maintain certain sections of this Website.

5 HOW YOUR INFORMATION IS USED

5.1 We may use the information, including the Personal Data we hold about you for the following purposes —

5.1.1 to verify and keep a record of your identity;

5.1.2 to ensure that content from our Website is presented in the most effective manner for you and for your computer and/or mobile device;

5.1.3 to monitor and analyse the conduct on the Website to ensure compliance with laws, reduce the likelihood of fraud and other risk-prevention purposes;

5.1.4 in aggregate form, for internal business purposes such as generating statistics and developing our strategic and marketing plans;

5.1.5 to provide you with information on our Website that you request from us and/or to contact you about products and Services that you request from us or to market our products and Services which we feel may interest you, where you have consented to be contacted for such purposes;

5.1.6 to carry out statistical and marketing research and for forecasting;

5.1.7 to allow you to participate in interactive features of our Website, when you choose to do so;

5.1.8 to carry out any contracts that may form between us;

5.1.9 to generate reports and conduct statistical analysis about the calls you make using the Website;

5.1.10 to respond to any queries, you make;

5.1.11 to notify you about changes to our Website and/or Services;

5.1.12 to process your employment application where you have completed a job application form on our Website; and

5.1.13 to improve the Services, we offer – for example you may be asked to complete one of our online surveys.

5.2 We may use information provided by you to —

5.2.1 enforce agreements and terms and conditions between us, monitor user activity, and more effectively manage traffic on the Website;

5.2.2 provide customer services; and

5.2.3 assist you with technical difficulties.

5.3 We will only use your Personal Data for the purposes set out above, in accordance with our Website, as instructed by you and otherwise in accordance with this Privacy Policy, or where we are required or authorised by law to disclose your information to others, or have your permission to do so.

6 WHAT ARE LAWFUL GROUNDS THAT WE RELY ON TO PROCESS YOUR PERSONAL DATA?

6.1 When we process, collect or store your Personal Data, we do so on the following bases —

6.1.1 where it is necessary to process your Personal Data in connection with the performance of a contract that we have with you;

6.1.2 where we are required to use your Personal Data to comply with our legal obligations, a request from a regulator or court of law or otherwise permitted by law;

6.1.3 to pursue our legitimate interest provided that we only use your Personal Data to pursue our legitimate interests where your interests and fundamental rights or freedoms do not override those interests; and

6.1.4 for any other purpose that you have agreed with us where you have given your explicit consent for specific forms of processing of your Personal Data, which consent you may decline or revoke at any time.

6.2 We will only use your Personal Data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your Personal Data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

6.3 Please note that we may process your Personal Data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

7 SHARING OF YOUR PERSONAL DATA

7.1 We will not use your Personal Data for any purpose (other than as stated in paragraph 5 above) without your consent. We will not use or disclose your Personal Data to third parties without your consent, unless the use or disclosure is —

7.1.1 required in order to comply with applicable law, order of court or legal process served on PBT Holdings; and/or

7.1.2 disclosure is necessary to protect and defend the rights or property of PBT Holdings.

7.2 We will be entitled to disclose your Personal Data to our affiliates, agents, advisors, employees and/or third-party service providers and suppliers (including payment providers) who assist us to interact with you via our Website, mobile communications and/or email, and thus need to know your Personal Data in order to assist us and to communicate with you properly and efficiently. We will ensure that all such employees and/or third-party service providers having access to your Personal Data are bound by appropriate and legally binding confidentiality and non-use obligations in relation to your Personal Data.

7.3 We may also provide information to third party service providers who process information on our behalf to help run some of our internal business operations including email distribution, IT services and customer services.

7.4 **You understand that we may disclose or share Personal Data with third parties as outlined above to operate the Website and render our Services. If you are concerned about these arrangements, you should not use the Website.**

7.5 On rare occasions, we may be required to disclose your Personal Data due to legal or regulatory requirements. In such instances, we reserve the right to disclose your Personal Data as required in order to comply with our legal obligations, including but not limited to complying with court orders, warrants, subpoenas, service of process requirements or discovery requests.

7.6 We may also disclose data about our users to law enforcement officers or others, in the good faith belief that such disclosure is reasonably necessary to enforce this Privacy Policy, respond to claims that any content violates the rights of third-parties; or protect the rights, property, or our personal safety or the personal safety of our employees, clients or the general public.

8 PROTECTION AND RETENTION OF YOUR PERSONAL DATA

8.1 We recognize that protecting your privacy is important to you. For this reason, we are committed to protecting the Personal Data you provide in a variety of ways.

8.2 We will —

8.2.1 treat your Personal Data as strictly confidential;

8.2.2 take appropriate legal, technical and organizational measures to ensure that your Personal Data is kept secure and is protected against unauthorised or unlawful processing, accidental loss, destruction or damage, alteration, disclosure or access;

8.2.3 where legally required, promptly notify you if we become aware of any unauthorised use, disclosure or processing of your Personal Data;

8.2.4 provide you with reasonable evidence of our compliance with our obligations under this Privacy Policy on reasonable notice and request; and

8.2.5 upon your request, promptly return or destroy any and all of your Personal Data in our possession or control.

8.3 We will not retain your Personal Data longer than the period for which it was originally required, unless we are required by law to do so, or you consent to us retaining such information for a longer period. Where your information is no longer required, we will ensure it is disposed of in a secure manner and, where required by applicable law we will notify you when such information has been disposed of.

8.4 We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach or unauthorised disclosure where we are legally required to do so.

8.5 We will do our best to protect your Personal Data, and we will use technology that will help us to do this, however, the transmission of information via the Internet is not completely secure and we cannot guarantee the security of your information transmitted to our Website. Any transmission of your information on the Website is entirely at your own risk. Once your information is received by the Website, we and/or our third party service providers shall use strict procedures and security features to try and prevent unauthorised access.

9 COOKIES AND OTHER INFORMATION

9.1 We may collect information about your computer, including where available, your operating system, browser type, third-party software installed on your device, installation and uninstallation rates, the language of your device and computers manufacturer, screen size and model of the device and any other technical information for system administration and to report aggregate information to our advertisers. This statistical data about our users' browsing actions and patterns is derived from your Personal Data but is not considered Personal Data in law as does not identify any individual.

9.2 We may use cookies to manage our users' sessions and to store preferences, tracking information, and language selection. "**Cookies**" are small text files transferred by a web server to your hard drive and thereafter stored on your computer. The types of information a Cookie collects include the date and time you visited the Website, your browsing history, your preferences, and your username.

9.3 In some instances, our third-party service providers may use Cookies on the Website. We cannot control, or access Cookies used by third-party service providers. This Privacy Policy covers only Cookies used by us, and not any Cookies used by third parties.

9.4 Cookies enable us to —

9.4.1 estimate our Website's audience size and usage pattern;

9.4.2 store information about your preferences, which allows us to customize the Website according to your individual interests;

9.4.3 speed up your searches; and

9.4.4 recognize you when you return to the Website.

9.5 You have the ability to either accept or decline the use of Cookies on your computer, whether you are registered with us or not. Typically, you can configure your browser to not accept Cookies. However, declining the use of Cookies may limit your access to certain features of the Website. For example, you may have difficulty using certain interactive features of the Website. If you want to learn more about how to disable and delete cookies, please visit www.allaboutcookies.org.

10 THIRD-PARTY LINKS

10.1 We may use third-party service providers to monitor our users' interests. In addition, the Website may occasionally contain links to third-party websites. If you click on the links to third-party websites, you leave the Website.

10.2 We are not responsible for the content of these third-party websites or for the security of your Personal Data when you use the third-party websites. These third-party service providers and third-party websites may have their own privacy policies governing the storage and retention of your Personal Data that you may be subject to. They may also collect information that is not Personal Data such as your browser specification, or operating system.

10.3 This Privacy Policy does not govern Personal Data provided to, stored on, or used by these third-party providers and third-party websites. We recommend that when you enter a third party's website, you review its privacy policy as it relates to how such third parties collect, process, store and protect your Personal Data.

10.4 You agree that we are not liable for any of the following —

10.4.1 the content, security, operation, use, accuracy or completeness of any such third-party websites; or the products or services that may be offered or obtained through them; or the accuracy, completeness, or reliability of any information obtained from a third-party website;

10.4.2 the ownership or right of use of any licensor of any software provided through any third-party website;

10.4.3 any content featured on a third-party website that are accessed through the links found on the Website; and/or

10.4.4 any failure or problem that affects the products or services of a third-party website, for example any telecommunication service provider, internet service provider, electricity supplier, local or other authority.

11 YOUR RIGHTS IN RELATION TO OUR USE OF YOUR PERSONAL DATA

11.1 Subject to certain exceptions and your jurisdiction, you have rights under the relevant data protection law in relation to our use of your personal data including the right to —

11.1.1 review, request access or copies of your Personal Data which is within our custody and control together with details about how we use that information. If you think any of the Personal Data that we hold about you is inaccurate, you may also request us to correct or rectify it;

11.1.2 in certain circumstances, to require us to stop processing your Personal Data;

11.1.3 to request that we delete or erase Personal Data in certain circumstances (such as in accordance with local data retention legal obligations);

11.1.4 withdraw any consent to processing that you have given us and prevent further processing if there is no other legitimate ground upon which we can process your Personal Data;

11.1.5 restrict processing: you can require certain Personal Data to be marked as restricted for processing in certain circumstances;

11.1.6 data portability i.e. you can ask us to transmit the Personal Data that you have provided us to a third party.

11.1.7 object to automated decision-making, including profiling; and

11.1.8 lodge a complaint with the relevant data protection regulator if you think we are in breach of any applicable data protection legislation. If the General Data Protection Regulation (EU) 2016/679 ("**GDPR**") applies to you, you may contact the Data Protection Authority whose postal address is Autoriteit Persoonsgegevens PO Box 93374, 2509 AJ Den Haag, Netherlands or by calling +31 70 888 8500. If you are based within South Africa you may write to the Information Regulator (South Africa) whose physical address is 33 Hoofd Street Forum III, 3rd Floor Braampark, Braamfontein, Johannesburg, South Africa or email inforeg@justice.gov.za.

11.2 In relation to all of these rights, please email us at the email address set out in paragraph 11.4 below. Please note that we may, where permitted under applicable law, charge a small

administrative fee and/or request proof of identity. We will respond to your requests within all applicable timeframes.

11.3 In certain circumstances (for example where required or permitted by law), we might not be able to provide you with access to some of your Personal Data, but where appropriate we will notify you of the reasons for this.

11.4 You may request access to the Personal Data that we collect about you by sending an email to us at elizna.read@pbtholdings.co.za**.**

12 GENERAL

12.1 You warrant that all information (including Personal Data) that you provide to us is accurate, truthful and current information, and not to impersonate or misrepresent any person or entity or falsely state or otherwise misrepresent your affiliation with anyone or anything. Failure to adhere to this requirement will entitle PBT Holdings, among other things, to terminate your use of the Website.

12.2 You acknowledge that we may verify your identity and your Personal Data through an automated email verification process and/or with third party service providers.

12.3 If this Privacy Policy or any provision in this Privacy Policy is regulated by or subject to the GDPR or Protection of Personal Data Act, No. 4 of 2013 or other data protection legislation it is not intended that any provision of this Privacy Policy contravenes any provision of these data protection legislations. Therefore, all provisions of this Privacy Policy must be treated as being qualified, to the extent necessary, to ensure that the provisions of the other data protection legislation are complied with.

13 INTERNATIONAL DATA TRANSFERS

13.1 We are a global company with a global presence in many jurisdictions throughout the world. Your Personal Data may be shared and processed in South Africa, Netherlands or the United Kingdom including with companies within our group.

13.2 We may, from time to time, transfer, store or host your Personal Data on servers outside of your jurisdiction and store and transfer your data within the United Kingdom and South Africa. Should your Personal Data be transferred outside of your jurisdiction, we shall ensure that at least the same level of data protection will be applied in the other country where the data is being processed and/or that we and/or the service provider acts at all times in compliance with applicable privacy laws.

13.3 We will at all times ensure that appropriate security safeguards are in place to secure, protect such Personal Data and take measures to ensure that Personal Data handled will receive at least the level of protection as required by all applicable laws.

14 CHANGES TO OUR PRIVACY POLICY

We reserve the right to change this Privacy Policy from time to time, and in our sole discretion. We may send you a notice regarding material changes to this Privacy Policy, but we encourage you to frequently check this Privacy Policy for any changes. **Your continued use of the Website after any change in this Privacy Policy will constitute your acceptance of such changes.**

15 CHILDREN

The site is not intended for children and we do not knowingly or intend to collect Personal Data of children. If you are under the age of 18 (eighteen) years old do not use our Website without the consent of your legal guardian.

16 HOW TO CONTACT US

Any questions, comments and requests you may have regarding this Privacy Policy are welcomed. If you have any questions, comments and requests about this Privacy Policy, please contact us at **elizna.read@pbtholdings.co.za** with “Privacy Policy” in the subject line.

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