



Privacy Statement

Uncontrolled if printed

ADP takes your privacy and the protection of your Personal Information very seriously, and we will only use your Personal Information in accordance with this Statement and applicable data protection legislation. It is important that you take all necessary and appropriate steps to protect your Personal Information yourself (for example, by ensuring that all passwords and access codes are kept secure).

While we strive to use commercially acceptable means to protect your personal information, we cannot guarantee its absolute security. However, we do employ a number of safeguards intended to mitigate the risk of unauthorized access or disclosure of your information. We will do our best to protect your personal information and we will use appropriate technology to help us to do this. We will at all times comply with our obligation under applicable law.

You hereby indemnify and hold ADP harmless from any loss, damages or injury that you may incur as a result of any unintentional disclosures of your Personal Information to unauthorised persons or the provision of incorrect or incomplete Personal Information to ADP.

1. INTRODUCTION

For purposes of this Statement:

- 1.1. **"ADP"** or **"we"** or **"us"** means ADP Holdings, all of its subsidiaries and associate companies¹, who are subject to POPIA in South Africa. To obtain more information please look at the Company website.
- 1.2. **"Applicable Laws"** means all laws, regulations that ADP is required to comply with;
- 1.3. **"Client"**, **"Supplier"** or **"you"** means any prospective, new or existing client, vendor, Supplier or employee of ADP.
- 1.4. **"Personal information"** means information relating to an identifiable, living, natural person, and (where applicable) an identifiable, existing juristic person, including the name, race, gender, marital status, address and identifying number of a person, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person.
- 1.5. **"Processing"** is any activity that involves use of personal information. It includes any operation or activity or any set of operations, whether or not by automatic means, concerning personal information, including—
 - 1.5.1. the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;
 - 1.5.2. dissemination by means of transmission, distribution or making available in any other form; or
 - 1.5.3. merging, linking, as well as restriction, degradation, erasure or destruction of information.
- 1.6. **"Special personal information"** includes personal information concerning the religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life or biometric information of a data subject; or the criminal behaviour of a data subject to the extent that such information relates to the alleged commission by a data subject of any offence; or any

¹ As defined by International Financial Reporting Standards (IFRS)

proceedings in respect of any offence allegedly committed by a data subject or the disposal of such proceedings.

2. PURPOSE OF THIS STATEMENT

- 2.1. This Statement sets out how your Personal Information will be used by ADP and applies to any information, including Personal Information and Special Personal Information, you give to ADP or which ADP may collect from Third Parties.
- 2.2. It is important that you read this Statement carefully before submitting any Personal Information to ADP.
- 2.3. By submitting any Personal Information to ADP you provide consent to the processing of your Personal Information as set out in this Statement.
- 2.4. The provisions of this Statement are subject to mandatory, unalterable provisions of Applicable Laws;
- 2.5. Please do not submit any Personal Information to ADP if you do not agree to any of the provisions of this Statement. If you do not consent to the provisions of this Statement, or parts of the Statement, ADP may not be able to provide its products and services to you.

3. HOW TO CONTACT US

If you have any comments or questions about this Statement please contact the Information Officer at InformationOfficer@adpgroup.com/ +27 21 521 9500.

4. AMENDMENT OF THIS STATEMENT

- 4.1. We may amend this Statement from time to time for, amongst others, any of the following reasons:
 - 4.1.1. to provide for the introduction of new systems, methods of operation, services, products, property offerings or facilities;
 - 4.1.2. to comply with changes to any legal or regulatory requirement;
 - 4.1.3. to ensure that our Statement is clearer and more favourable to you;
 - 4.1.4. to rectify any mistake that may be discovered from time to time; and/or
 - 4.1.5. for any other reason which ADP, in its sole discretion, may deem reasonable or necessary.
 - 4.2. Any such amendment will be posted on our website and will be effective from the date of posting. It is your responsibility to check the website often.
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5. INFORMATION WE COLLECT AND RECEIVE

5.1. We may collect and receive Personal Information about you directly when you complete a request for our products and services, by filling in forms on our websites, or those provided to you, when you complete a survey, when you post comments or content on our social media pages, or when you contact us or we contact you, by any means, and you provide information directly to us;

5.2. We may collect and receive Personal Information about you indirectly, through an agent acting on your behalf, or an introducer, or via our website;

We may also collect your Personal Information from your appointed agent, any regulator, or other third party that may hold such information.

5.3. We may collect Personal Information from our or related entities or associates which collected your information in another country (e.g. Australia, Canada, Philippines, Botswana, Namibia, Mozambique, and the like).

5.4. What Personal Information we collect

Examples of Personal Information we may collect about you are:

5.4.1. Personal Information;

5.4.2. Special Personal Information;

5.4.3. records of correspondence or enquiries from you or anyone acting on your behalf;

5.4.4 details of transactions you carry out with us;

5.4.5 details of contracts, sales or leases you carry out with us;

5.4.6 any other Information as determined by ADP from time to time.

Where you provide us with the Personal Information of Third Parties you should take steps, prior to the disclosure to us, to inform the third party that you need to disclose their details to us, identifying us. We will process their Personal Information in accordance with this Statement.

5.5. Information we collect or receive when you use our website or social media platforms

We collect information when you use websites or social media platforms by using cookies, web beacons, and other technologies. Depending on how you access and use websites, we may receive:

5.5.1. Log information;

5.5.2. Information we infer about you based on your interaction with products and services;

5.5.3. Device information (for example the type of device you're using, how you access platforms, your browser or operating system and your Internet Protocol ("IP") address);

5.5.4. Location information.

5.6. **Information from third-party sources**

We may receive additional information about you that is publicly or commercially available and combine that with the information we have collected or received about you in other ways.

6. **HOW WE USE THE INFORMATION WE COLLECT AND RECEIVE**

6.1. We may use, transfer and disclose your Personal Information for the purposes of:

- 6.1.1. providing you with the services, products or offerings you have requested, and notifying you about important changes to these services, products or offerings;
 - 6.1.2. managing your account or relationship and complying with your instructions or requests;
 - 6.1.3. detecting and preventing fraud and money laundering and/or in the interest of security and crime prevention;
 - 6.1.4. assessing and dealing with complaints and requests;
 - 6.1.5. operational, marketing, auditing, legal and record keeping requirements;
 - 6.1.6. verifying your identity or the identify of your beneficial owner;
 - 6.1.7. transferring or processing your Personal Information outside of the Republic of South Africa to such countries that may not offer the same level of data protection as the Republic of South Africa, including for cloud storage purposes and the use of any of our websites;
 - 6.1.8. complying with Applicable Laws, including lawful requests for information received from local or foreign law enforcement, government and tax collection agencies;
 - 6.1.9. recording and/or monitoring your telephone calls and electronic communications to/with ADP in order to accurately carry out your instructions and requests, to use as evidence and in the interests of crime prevention;
 - 6.1.10. conducting market research and providing you with information about ADP's products or services from time to time via email, telephone or other means (for example, events);
 - 6.1.11. where you have unsubscribed from certain direct marketing communications, ensuring that we do not sent such direct marketing to you again;
 - 6.1.12. disclosing your Personal Information to Third Parties for reasons set out in this Statement or where it is not unlawful to do so;
 - 6.1.13. monitoring, keeping record of and having access to all forms of correspondence or communications received by or sent from ADP or any of its employees, agents or contractors, including monitoring, recording and using as evidence all telephone communications between you and ADP;
 - 6.1.14. improving or evaluating the effectiveness of ADP's business or products, services or offerings; and
 - 6.1.15. prevention and control of disease.
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- 6.2. We may from time to time (and at any time) contact you about services, products and offerings available from ADP or specific subsidiaries and associates which we believe may be of interest to you, by email, phone, text or other electronic means, unless you have indicated your preference not to be contacted in any of these manners for any of the afore-mentioned reasons.

7. DISCLOSURE AND SHARING OF THE INFORMATION WE COLLECT AND RECEIVE

- 7.1. We don't sell your Personal Information to Third Parties for their marketing purposes;
- 7.2. Your Personal Information may be shared within ADP and with selected Third Parties who process the information on ADP's behalf.
- 7.3. We may also disclose your Personal Information to Third Parties in the following circumstances:
- 7.3.1. Within ADP and to Third Parties to:
 - 7.3.1.1. assess and monitor any of your applications for ADP's products or services;
 - 7.3.1.2. determine which products and services may be of interest to you and/or to send you information about such products and services, unless you object or choose not to receive such communications, subject to the direct marketing provisions of POPIA;
 - 7.3.1.3. have a better understanding of your circumstances and needs to provide and improve ADP's products and services;
 - 7.3.2. to any regulator or supervisory authority, including those in foreign jurisdictions, if ADP is required to do so in terms of Applicable Laws;
 - 7.3.3. to any relevant person and/or entity for purposes of prevention, detection and reporting of fraud and criminal activities, the identification of the proceeds of unlawful activities and the combatting of crime;
 - 7.3.4. to a prospective buyer or seller of any of our businesses or assets;
 - 7.3.5. to any person if we are under a duty to disclose or share your Personal Information in order to comply with any Applicable Laws, in response to legal process and/or or to protect the rights, property or safety of ADP, other clients or other third parties; and/or
 - 7.3.6. to your agent or any other person acting on your behalf, an or an introducer.
- 7.4. We may transfer your information to another entity within ADP, an agent, sub-contractor or third party who carries on business in another country, including one which may not have data privacy laws similar to those of the Republic. If this happens, we will use our best endeavours to ensure that anyone to whom we transfer your personal information agrees to treat your information with the same level of protection as if we were dealing with it.
- 7.5. Your use of our website and your submission of information to us, represents your consent to the disclosure and/or sharing of your Personal Information;
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- 7.6. If you do not wish us to disclose your Personal information to Third Parties, please contact us at the contact details set out in point 2 above. We may, however, not be able to provide products or services to you if such disclosure is necessary;

8. LINKS TO OTHER WEBSITES

Our website or social media platforms may contain links to and from websites, mobile applications or services of Third Parties, advertisers or affiliates. Please note that we are not responsible for the privacy practices of such other parties and advise you to read the privacy policies/statements of each website you visit which collects Personal Information.

9. INFORMATION OF CHILDREN

We do not intend to collect and/or process any Personal Information of minors, unless we make this clear. If you do provide any Personal Information to us of children then you warrant that this is done with the consent of the child's parent or guardian to use this information as set out in this Statement.

10. CLIENTS, SUPPLIERS AND VENDORS

- 10.1. In the course of our business agreement we may collect personal information about you as a data subject to ensure that the business agreement and matters relating to the agreement can be fulfilled.
- 10.2. We may also do a due diligence on you to ensure that the requirements of our agreements and contracts can be fulfilled [Clients].
- 10.3. We may also do a due diligence on you to ensure that you meet the requirements set out in our procurement policy [Suppliers and Vendors].
- 10.4. If you provide any personal information of other persons to us, such as employees or your directors, you warrant that you are authorised to share their personal information with us for purposes set out in the Statement.

11. YOUR RIGHTS

- 11.1. You have the right to ask us not to contact you for marketing purposes. You can exercise this right at any time. We won't send you marketing messages if you tell us not to but we will still need to send you service-related messages.
- 11.2. Our websites use cookies. If you wish to reject our cookies, you can configure your browser to do so.

12. ACCESS TO, CORRECTION AND DELETION OF YOUR PERSONAL INFORMATION

- 12.1. You may request details of Personal Information which we hold about you. Fees to obtain a copy or a description of Personal Information held about you are prescribed in terms of relevant laws.
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Confirmation of whether or not we hold Personal Information about you may be requested free of charge.

- 12.2. You may request the correction of Personal Information ADP holds about you. Please ensure that the information we hold about you is complete, accurate and up to date. If you fail to keep your information updated, or if your information is incorrect, ADP may limit the products and services offered to you or elect not to transact with you.
- 12.5. You have a right in certain circumstances to request the destruction or deletion of and, where applicable, to obtain restriction on the processing of Personal Information held about you. If you wish to exercise this right, please contact us using the contact details set out in point 2 above.
- 12.6. You have a right to object on reasonable grounds to the processing of your Personal Information (where the processing is carried out in order to protect our legitimate interests or your legitimate interests), unless the law provides for such processing.

13. RETENTION OF YOUR INFORMATION

We may retain your Personal Information indefinitely unless you object, in which case we will only retain it if we are permitted or required to do so in terms of Applicable Laws.

14. COMPLAINTS

- 14.1. Should you believe that ADP has utilised your Personal Information contrary to Applicable Laws, you undertake to first attempt to resolve any concerns with ADP's Information Officer.
- 14.2. Should you remain dissatisfied, you are encouraged to engage ADP's senior management with a view to resolving the matter.
- 14.3. If you are still not satisfied with such process, you may have the right to lodge a complaint with the Information Regulator, using the contact details listed below:

Tel: 012 406 4818

Fax: 086 500 3351

Email: infoereg@justice.gov.za.
