

Privacy Policy
for
Kagiso Capital Proprietary Limited

Kagiso Capital (Pty) Ltd (Kagiso Capital) is accountable for the processing of personal information of a data subject in a safe and responsible manner.

Protecting your information is as important to us as it is to you.

This Privacy Policy informs you that Kagiso Capital collects personal information and explains why and how we collect, use and store your personal information.

The processing of personal data is in conformity with the Protection of Personal Information Act 4 of 2013 (“POPIA”).

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1. Purpose and Objectives

- i. When data subjects have day-to-day dealings with Kagiso Capital, some personal information may be obtained.
- ii. 'Personal information' is defined in POPIA. It refers to any information that can be used to identify a data subject. A data subject is any person, living or juristic, to whom the personal information relates and that engages with Kagiso Capital.
- iii. POPIA is aimed at protecting data subjects' personal information and prescribes what Kagiso Capital may and may not do with it.
- iv. As Kagiso Capital is accountable for living up to the principles set out in POPIA, it has in place privacy compliance measures which it uses to monitor and enforce its compliance with these principles.
- v. When complying with POPIA, Kagiso Capital will ensure that it acts with integrity and fairness and will always balance the rights of both, data subjects and Kagiso Capital's, in an objective manner.
- vi. This Policy must be read with the Promotion of Access to Information (PAI) Manual which is also on the website.

2. Details and Contact Information of Kagiso Capital

- i. Kagiso Capital is an investment holding company wholly owned by Kagiso Trust based in South Africa. It has its head office at 87 Central Street, Houghton Estate, Johannesburg, 2198. Its primary purpose is to ensure the longevity of the Kagiso Trust by investing in entities that innovate and transform society through meaningful investments and to diversify the investment asset base of the Trust beyond its current investments. Kagiso Capital has equity interests in several other organisations and information relating to this can be sourced on its website. To understand its objects and services view the various links on its website: <https://www.kagisocapital.com/>.
- ii. The Information Officer, Kgotso Schoeman may be reached at: popi@kagisocapital.com

3. Application

- i. This Privacy Policy may, in relation to Kagiso Capital apply under several different circumstances. These include but are not limited to :
 - When using any of its products or services
 - When we provide loans or invest in your organisation
 - When applying to be a student or for a bursary
 - When applying for work experience or for employment

- When supplying services and/or providing any personal information to fulfil the service contract
 - When we need to comply with legislation
 - and/or when any information is collected from or shared with any third parties.
- ii. This Privacy Policy applies to Kagiso Capital 's website, applications, online services, social media platforms as well as any publications or newsletters that Kagiso Capital may publish.
 - iii. When you share your information with Kagiso Capital, subject to your marketing and/or communication preferences selected on the application form or as otherwise indicated by you, you may also be sharing it with one of our subsidiaries or partners. Some personal information may also be shared with operators/contractors in order to deliver the Kagiso Capital 's services and products. If this is the case, they are bound by and adhere to this policy as well.

4. The Information Kagiso Capital Collects

- i. Kagiso Capital collects information that is directly and voluntarily provided to it.
- ii. Kagiso Capital will collect personal information from the data subject when :
 - Any person engages or supplies Kagiso Capital with or uses their services,
 - A data subject communicates with Kagiso Capital via forms, email or uses any other channel, not specifically mentioned here,
 - Any person uses the online self- serve platform,
 - A person subscribes to newsletters or responds to advertisements, competitions or requests for information.
- iii. The information that data subjects provide may include current and historical personal information including names, contact details, title, identification, employment, positions held, enquiry/complaint details and information about the organisation to which the data subject is affiliated.
- iv. Information may also be sourced from employers, regulatory authorities, recruitment agencies, credit ratings agencies, information or service providers, public records and other third parties.
- v. Kagiso Capital may also collect personal information through other dealings, including through any contact made in person, by telephone, email or online.

5. Information Collected from Other Sources

- i. Kagiso Capital may also collect information about data subjects from public sources including social media platforms.
- ii. Kagiso Capital advises data subjects to familiarise themselves with the respective privacy policies that apply to these platforms.
- iii. Kagiso Capital will process any information from these sources in accordance with the law.

6. Children's Personal Information

- i. Kagiso Capital does not collect children's personal information without the consent of their parents or guardians. If a data subject is under the age of 18, the data subject should not provide any personal information to Kagiso Capital without the written consent of their parent or guardian.
- ii. Kagiso Capital reserves the right to ask for proof of consent or proof of age if it suspects that it is engaging with a child under the age of 18 years.

7. What Kagiso Capital uses the Personal Information for

- i. Kagiso Capital use personal information to :
 - provide products and services
 - to understand your specific needs and requirements, and in order to improve the benefits, services and value offering
 - to provide you with related marketing material due to your past interaction and use of the Kagiso Capital services.
 - respond to enquiries
 - send invitations to Kagiso Capital events
 - provide you with communications in relation to the services being rendered and send updates and newsletters to keep you informed on the latest developments within Kagiso Capital and within the industry it operates in
 - enable seamless payment to our suppliers for services procured
 - ensure health and safety and
 - to use for statistical, historical and/or reporting purposes.
- ii. Kagiso Capital will not further process personal information without first assessing whether:
 - The further processing is compatible with the reasons the data subject initially provided the information; or
 - The data subject has consented to further processing of personal information; or
 - The further processing is in accordance with this notice; or
 - If it is in accordance with the law.
- iii. Kagiso Capital will not contact a data subject for unsolicited marketing purposes either telephonically, by mail, SMS or email if the data subject has not opted to receive these communications. It may however contact data subjects who have consented to be on its mailing lists. Data subjects who wish to no longer receive communication have the option to opt out.

8. Information Provided due to a Vacancy

- i. When a data subject responds to an application for a vacancy, either as an employee or volunteer, a curriculum vitae ("CV") which contains personal and special personal information is usually provided to the Kagiso Capital .
- ii. Kagiso Capital may request further personal and special personal information about education, employment, race and state of health. As part of the application, the data subject must provide their consent to use of the information to fulfil any recruitment testing assessments and activities which may be required from employers under applicable laws.
- iii. These will include the option to carry out various screening checks and to consider the data subject for other positions. In order to conduct the screening checks Kagiso Capital may share aspects of the personal information with inter alia: academic institutions, credit bureaus, medical providers, professional and trade associations, law enforcement agencies, referees and your current and previous employers.
- iv. Kagiso Capital may also gather additional information from publicly available resources such as LinkedIn, Facebook or other social or professional media platforms and collate this with the information that the applicant data subject provided to the Kagiso Capital . Where consent is not explicitly provided, Kagiso Capital reserves the right not to progress the application.
- v. Kagiso Capital will keep the personal information for as long as it is necessary during the recruitment process.
- vi. If the applicant is successful, Kagiso Capital will retain the personal information in accordance with South African legislation.
- vii. If the applicant is unsuccessful or withdraws the application, Kagiso Capital will dispose of information safely and securely.
- viii. The process also applies where bursaries and student loans are offered.

9. Legal or Contractual Obligations to Collect Information

- i. This policy is governed by the laws of the Republic of South Africa. Specifically, Kagiso Capital undertakes to comply with the provisions of POPIA and the Promotion of Access to Information Act No.2 of 2000 ("PAIA").
- ii. In so far as Kagiso Capital collects and uses personal information relating to European citizens (who may be inter alia students, employees, service providers), Kagiso Capital undertakes to uphold and comply with the data protection obligations in terms of the General Data Protection Regulation (GDPR) (EU) 2016/679 so far as it applies to Kagiso Capital and in a proportionally manner based on the type and amount of information held.
- iii. Kagiso Capital may also be legally or contractually obliged to collect information from data subjects to conduct business, for example, where Kagiso Capital is required by law to gather personal information for labour, health, tax, BBBEE, FICA, SAQA, SETA and NQF requirements.

- iv. Suppliers may be required to provide personal information for overall legal compliance including processing of payments/ accounts, identity checks, reference checks, assessment of financial records, bank account numbers, taxpayer compliance status and contact details verification.
- v. Where relevant, Kagiso Capital may advise of the details that Kagiso Capital are required to collect.
- vi. Data subjects may also request the reason for such collection of information.

10. CCTV cameras

- i. The Kagiso Capital 's offices may be monitored by CCTV cameras for safety and the prevention of crime. The footage is stored in a secure location by a third-party service provider.

11. Sharing of Information

- i. Kagiso Capital will not use or share personal information with any person outside of Kagiso Capital unless it is for a business purpose.
- ii. Kagiso Capital will not sell, rent nor provide your personal information to unauthorised entities or to third parties for their independent use without your consent.
- iii. To deliver products and services and for the efficient running of business, Kagiso Capital uses third-party service providers/operators. At times, Kagiso Capital will share data subjects' personal information with these third-party service providers/ operators. For this reason, Kagiso Capital signs and reviews confidentiality/operator agreements and ensures that they operate under strict requirements aimed at keeping personal information secure and confidential and that the said information is used for the purpose for which it is provided.
- iv. Kagiso Capital will release your personal information to a party if it believes that it is required by law or by a court or statutory body to do so. Kagiso Capital may also share personal information with banking institutions and credit providers, and governmental, judicial, regulatory and law enforcement bodies and agencies, if required.
- v. Kagiso Capital will also disclose your personal information if it believes that it is necessary to prevent or lessen any unlawful or harmful actions and to protect and defend legitimate business interests, rights or property of the Kagiso Capital.

12. Trans Border Information Flows

- i. Personal information may be stored on servers located outside of South Africa. Kagiso Capital however undertakes to ensure that the security of personal information is maintained and that POPIA is fully complied with, in so far as it is applicable.
- ii. Where the service provider or operator is outside of South Africa, we ensure that they are bound either by similar legislation or binding agreements.

13. Photographs and videos

- i. There may also be photos for example of students and events held, that is published on Kagiso Capital websites, publications, social media and other marketing material. By attending any events hosted or sponsored by Kagiso Capital you automatically permit the use of any photographs, or video footage in which you may appear at no charge.
- ii. Should you elect not to have a photo that recognizes you specifically to be used, you may at any time request a revocation, by writing to the information officer.
- iii. Where such request of revocation is granted, it will not affect any actions taken by Kagiso Capital before the decision is taken regarding such revocation.

14. Retention of Records

- i. Kagiso Capital will not retain data subjects' personal information for longer than is necessary unless consent has been received or it is required by law or it is for the purposes of a contract. Personal information that is no longer required is securely disposed of or is deidentified as soon as reasonably practicable after it is no longer authorised to be retained.

15. Security

- i. Kagiso Capital has taken every reasonable and affordable measure, to keep personal information in a secure, reliable and protected place, free from unauthorised access.
- ii. Kagiso Capital regularly monitors its information technology systems for possible vulnerabilities and cyber-attacks. To this end, Kagiso Capital deploys reasonable security safeguards.
- iii. Although Kagiso Capital has measures in place to minimise security threats, Kagiso Capital cannot guarantee data breaches will not happen and therefore also encourages data subjects to have their own security measures in place.
- iv. In the unlikely event of personal information being compromised, and where applicable, Kagiso Capital will follow the guidelines and processes provided by POPIA.

16. Data Subjects Rights

- i. Data subjects may, via the website and through an email link elect to be added to various mailing lists for communication on Kagiso Capital products and services available.
- ii. Data subjects may, also at any time and at no cost, elect to update their preferences or stop receiving the communication by clicking the "unsubscribe" link on the email.

- iii. Data subjects also have the right to know what personal information Kagiso Capital have about the said data subject, to correct it, request its deletion and to determine if Kagiso Capital has shared the personal information with third parties.
- iv. Data subjects may also object to the processing of their personal information. Any of these requests must be in writing on the prescribed form. It may take up to 5 working days to respond to a request and a small fee may be charged.
- v. If a data subject or member requires a deletion of their personal information, Kagiso Capital may need to terminate all agreements with that data subject as Kagiso Capital cannot maintain relationships without having some personal information.
- vi. Kagiso Capital also retains the right to refuse to delete some personal information if the information is required to be kept in terms of the membership contract, by law or if Kagiso Capital is required to protect its rights.

17. Requests for Information and Objections

- i. Should a data subject require more information on the Kagiso Capital 's Privacy Policy, or needs to submit a request, please contact the Kagiso Capital 's Information Officer, as per details above. You may also be provided with the required form and the fee amount if due. The Forms may also be found at <https://inforegulator.org.za/popia-forms/>.
- ii. While Kagiso Capital makes every effort to assist data subjects, should you have any further queries or be unhappy, you may also contact the Information Regulator whose contact details may be found at <https://inforegulator.org.za/> and who is mandated to oversee that personal information is managed in a responsible manner.

18. Amendments to the Policy

- i. From time to time, Kagiso Capital may amend this policy to accommodate changes in its business and/or legislative amendments.
- ii. The most current version of this Policy will be displayed on its website.
- iii. If you use the website or any of the services or products of Kagiso Capital after Kagiso Capital has displayed a change to this Policy, you will be deemed to have read and understood the change.

Kagiso Capital is committed to protecting personal information and adhering to POPIA.