

PROTECTION OF PERSONAL INFORMATION (POPIA) POLICY STATEMENT



The right to privacy is an integral human right recognised and protected in the South African Constitution, 1996 and in the Protection of Personal Information Act 4 of 2013 (“POPIA”). Given the importance of privacy, Rand Refinery is committed to effectively managing personal information in accordance with the provision of POPIA. POPIA aims to promote the protection of privacy by providing guiding principles that are intended to be applied to the processing of personal information in a context-sensitive manner. Through the provision of quality goods and services, Rand Refinery is involved in the collection, use and disclosure of certain aspects of the personal information of data subjects (i.e. clients, customer, employees and other stakeholders). A person’s right to privacy entails having control over his or her personal information and being able to conduct his or her affairs relatively free from unwanted intrusions.

Policy Purpose

The purpose of this policy is to protect Rand Refinery from the compliance risk associated with the protection of personal information in terms of POPIA, which includes:

- Breaches of confidentiality. i.e. Rand Refinery could suffer revenue losses where it is found that the personal information of data subjects has been shared or disclosed inappropriately.
- Failing to offer choice. i.e. all data subjects should be free to choose how and for what purposes Rand Refinery uses information related to them.
- Reputational damage. i.e. Rand Refinery could suffer a decline in shareholder value following an adverse event such as leaking personal information to an unauthorised person or body held by Rand Refinery.

Our Commitment

This policy demonstrates Rand Refinery's commitment to protect the privacy rights of data subjects in accordance with POPIA in the following manner:

- Through stating desired behaviour and directing compliance with the provisions of POPIA and best practices;
- By cultivating an organisational culture that recognises privacy as a valuable human right;
- By developing and implementing internal controls for the purpose of managing the compliance risk associated with the protection of personal information;
- By creating business practices that will provide reasonable assurance that the rights of data subjects are protected and balanced with the legitimate business needs of Rand Refinery;
- By assigning specific duties and responsibilities to control owners, including the appointment of an Information Officer and Deputy Information Officers, in order to protect the interest of Rand Refinery and its data subjects;
- By raising awareness through training and providing guidance to individuals who process personal information so that they can act confidently and consistently.

Policy Application

This policy and its guiding principles apply to: Rand Refinery's governing body, all business units and functional areas of Rand Refinery, all employees and interns, and all contractors, suppliers and other persons acting on behalf of Rand Refinery. The policy's guiding principles find application in all situations and must be read in conjunction with POPIA as well as Rand Refinery's PAIA Policy as required by the Promotion of Access to Information Act 2 of 2000.

Duties and Responsibilities

<p><u>Governing Body</u> Accountable to ensure that Rand Refinery meets its legal obligations in terms of POPIA. The governing body may however delegate some responsibility in terms of POPIA to management and other capable individuals. Ensure Rand Refinery appoints an Information Officer and a Deputy Information Officer where necessary.</p>	<p><u>Information Officer</u> Is responsible for: Ensuring Rand Refinery's compliance and overseeing the implementation of this policy and any applicable supporting guidelines, ensuring that POPIA induction training takes place for all employees and contractors, ensuring periodic communication awareness on POPIA responsibilities takes place, ensuring privacy notices for internal and external purposes are developed and published, handling all aspects of relationship with the Information Regulator appointed in terms of POPIA, scheduling periodic POPIA Audits.</p>
<p><u>Marketing & Communications Manager and Contracts Manager</u> Responsible for approving and maintaining the protection of personal information statements and disclaimers that are displayed on Rand Refinery's website, including those attached to communications such as emails and electronic newsletters addressing any personal information protection queries from journalists or media outlets.</p>	<p><u>Employees and other action on behalf of Rand Refinery</u> Required to: comply with the provision of this policy and associated guiding principles; treat personal information as a confidential business asset and to respect the privacy of data subjects. They may not directly or indirectly, utilise, disclose or make public in any manner to any person or 3rd party, either within the company or externally, any personal information, unless such information is already publicly known or the disclosure is necessary in order for the associate to perform his or her duties.</p>

This policy statement becomes effective from the date of approval by EXCO.

Praveen Baijnath
Chief Executive

Dean Subramanian
Chief Financial Officer

Peter Bower
General Manager: Refinery and Fabrication

Unathi Sihlahla
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