

ANB Protection of Personal Information policy

TABLE OF CONTENTS:

| | |
|---|---|
| DEFINITIONS..... | 2 |
| INTRODUCTION..... | 2 |
| PURPOSE..... | 2 |
| SCOPE..... | 2 |
| LEGISLATIVE FRAMEWORK AND REFERENCES..... | 2 |
| AIM..... | 3 |
| POLICY FRAMEWORK..... | 3 |
| ROLES AND RESPONSIBILITIES..... | 4 |
| OPERATIONAL CONSIDERATIONS..... | 4 |

1. Definitions

| Term | Definition |
|------------------------|--|
| ANB Group of Companies | The subsidiary companies and divisions of ANB Investments (Pty) Ltd. |
| Data subject | Any individual person who can be identified, directly or indirectly, via an identifier such as a name, an ID number, location data, or via factors specific to the person's physical, physiological, genetic, mental, economic, cultural or social identity. |
| Information asset | An information asset is any piece or collection of information, stored, defined and managed as a single unit so that we can understand it, share and protect it effectively and get the most value from it. |
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2. Introduction

ANB Group of Companies is fully committed to the compliance and adherence to the Protection of Personal Information Act (POPI) South Africa, Act No. 4 of 2013.

3. Purpose

This policy and compliance framework establishes measures and standards for the protection and lawful processing of personal information within our organisation and provides principles regarding the right of individuals to privacy and to reasonable safeguarding of their personal information.

4. Scope

- All employees, subsidiaries, companies, departments and individuals directly associated with us are responsible for adhering to this policy and for reporting any security breaches or incidents to the Information Officer.
- Any service provider that provides information technology services, including data storage facilities, to our organisation must adhere the requirements of the POPI Act to ensure adequate protection of personal information held by them on our behalf. Confirmation of this adherence must be obtained from relevant service providers and stored on company Sharepoint data repository.

5. Legislative Framework and References

This policy is underpinned by South African Laws, international norms and standards, and best practices.

The framework and References include the following:

- Protection of Personal Information Act No. 4 of 2013
- General Data Protection Regulation
- ANB Group of Companies Data Breach Policy
- Annexure V: General IT Policy

6. Aim

The aim of this Policy is to inform and clarify the purpose for which we will process personal information, as well as the protection of our information assets from threats, whether internal or external, deliberate or accidental, to ensure business continuation, minimise business damage and maximise business opportunities.

7. Policy Framework

7.1 Accountability

- We will take reasonable steps to ensure that personal information obtained from data subjects are stored safely and securely.

7.2 Processing limitation

- We will collect personal information directly from data subjects.
- Once in our possession we will only process or release the data subject's information with their consent, except where we are required to do so by law. In the latter case we will always inform the data subject.

7.3 Specific purpose

- We will collect personal information from data subjects to enable us to process the information for a specific purpose/ project in relation to what it was collected for.

7.4 Limitation on further processing

- Personal information will not be processed in a way that is incompatible with the purpose for which the information was collected.

7.5 Information quality

- We will to the best of our ability ensure that data subject's information is complete, up to date and accurate before we use it. To ensure we do this, we may need to request data subjects, from time to time, to update their information and confirm that it is still relevant. If we are unable to reach a data subject for this purpose, we will convert their data to anonymous historical data.

7.6 Transparency

- Where personal information is collected from a source other than directly from a data subject (for example: Social media, portals) we will ensure that the data subject is informed:
 - That their information is being collected
 - Of the individual collecting their information
 - The specific reason for the collection their information

7.7 Security safeguards

- We will ensure technical and organisational measures to secure the integrity of personal information, and guard against the risk of loss, damage or destruction thereof, ie. data access managed by Active Directory, maintenance of our secure certificates, endpoint security and group data backup solution.
- Personal information will be protected against any unauthorised or unlawful access or processing with the help of the group Active directory security structure.

- We will ensure that personal information is only used for legitimate purposes with the data subject's consent, and accessed only by authorised employees of ANB group of companies as set out by the company's IT Policy (Annex V)
- The management of breaches will also be managed as set out by the ANB Group of Companies Data Breach Policy

7.8 Participation of individuals

- Data subjects are also entitled to correct any information held by us.

8. Roles and Responsibilities

The Information Officer is responsible for:

- Conducting a preliminary assessment
- The development, implementation and monitoring of this policy and compliance framework
- Ensuring that this policy is supported by appropriate documentation
- Ensuring that documentation is relevant and kept up to date
- Ensuring this policy and subsequent updates are communicated to relevant managers, representatives, staff and associates, where applicable.

9. Operational Considerations

9.1 Monitoring

- The Information Officer is responsible for administering and overseeing the implementation of this policy and, as applicable, supporting guidelines, standard operating procedures, notices, consents and appropriate related documents and processes.
- All employees, subsidiaries, companies, departments and individuals directly associated with will be trained, according to their functions, in the regulatory requirements, policies and guidelines that govern the protection of personal information.

9.2 Operating controls

- We shall establish appropriate standard operating procedures/ policies that are consistent with this policy and regulatory requirements. This will include:
 - Allocation of Information Security responsibilities
 - Incident reporting and management
 - User identity addition or removal.
 - Information security training.
 - Data backup.

9.3 Policy compliance

- Any breach/es of this policy may result in disciplinary action as set out by General Employment Policy.

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