



## PRIVACY STATEMENT

### 1. Introduction

- 1.1. Your privacy and protection of your personal information is very important to Royal Bafokeng Platinum Limited.
- 1.2. We have developed this Privacy Statement to help you understand how we process your personal information.
- 1.3. For purposes of this Privacy Statement, “personal information”, “data subject” and “processing” will have the meanings given to them in the Protection of Personal Information Act 4 of 2013 (“POPIA”).
- 1.4. We reserve the right to amend this Privacy Statement at any time, without prior notice, by posting the amended Privacy Statement on our website.

### 2. Application of the Privacy Statement

- 2.1. This Privacy Statement applies to the processing of your personal information by us or on our behalf; these include data subjects who use our website and/or our services, service providers who provide us with products and services, clients and any other data subjects who engage with us.
- 2.2. This Privacy Statement does not apply to third party websites linked to our website, or websites that link to or advertise on our website.

### 3. Collection of Personal information

- 3.1. The personal information may be provided to us by you and/or collected by us when you engage with us and/or on your use of our services, and/or when you provide us with your products and services, and/or when you access our website or from third parties.
- 3.2. The type of personal information we collect will depend on the purpose for which it is collected and used. The specific purpose for which the information is collected will be apparent from the context in which the information is requested including but not limited to when:
  - 3.2.1. You utilise our services;
  - 3.2.2. You render services to Royal Bafokeng Platinum Limited;
  - 3.2.3. You submit enquiries to us or contact us and you may be required to provide

- your name and surname, identity or passport number, postal or street address, title, contact numbers or e-mail address;
- 3.2.4. You make use of our website or interact with us on social media - we may collect your non-personal browsing habits and click patterns, e-mail address, IP address, telephone data information or username and password;
  - 3.2.5. You apply for employment opportunities at Royal Bafokeng Platinum Limited - you may be required to provide your name and surname, identity number, employment history, criminal behaviour; and
  - 3.2.6. You visit our premises where CCTV cameras are installed.
- 3.3. Where possible, we will inform you what information is voluntary and what information is mandatory for you to provide to us and the consequences for failing to provide the requested information.
  - 3.4. We will only retain your personal information for as long as necessary for the fulfilment of those purposes as have been identified by us and/or as required by law and/or as agreed with you.

#### **4. How we use your information**

- 4.1. Personal information will only be processed for the purposes for which it was collected and/or to comply with legal and regulatory obligations and/or as authorised by law and/or with your consent.
- 4.2. The purposes for which we process personal information include, but is not limited to when:
  - 4.2.1. We respond to your enquiry;
  - 4.2.2. We render our services to you;
  - 4.2.3. We comply with legal requirements or industry codes;
  - 4.2.4. We use it for safety and security reasons; and
  - 4.2.5. We compile non-personal statistical information about browsing habits, click-patterns and access to the Royal Bafokeng Platinum Limited website.

#### **5. Disclosure of information**

- 5.1. Royal Bafokeng Platinum Limited may disclose your personal information to third parties in certain circumstances, which include, but is not limited to:
  - 5.1.1. Where we have your consent; or
  - 5.1.2. Where we are required to do so by law; or
  - 5.1.3. Our service providers who are involved in the delivery of products or services, and where we have agreements in place to ensure that they comply with these privacy terms.
- 5.2. Third parties to whom we disclose personal information include, but are not limited to:
  - 5.2.1. Service providers to Royal Bafokeng Platinum Limited; and
  - 5.2.2. Regulators, courts, tribunals and law enforcement agencies.
- 5.3. We may compile, use and share any information that does not relate to any specific individual and retain all rights to non-personal statistical information collected and

compiled by us.

## **6. Transfer of information**

- 6.1. We may need to transfer your personal information to another country for processing or storage. We will ensure that anyone to whom we pass your personal information agrees to treat your information with similar protection as provided for in POPIA.
- 6.2. We may transfer your information to other countries which do not have similar protection as provided for in POPIA, with your consent.

## **7. Information security**

- 7.1. We take appropriate and reasonable technical and organisational measures to prevent any unauthorised or unlawful access, loss of, damage to or unauthorised destruction of personal information.
- 7.2. We have implemented various policies, procedures and IT systems to safeguard personal information.
- 7.3. We regularly verify that the safeguards are effectively implemented and ensure that they are continually updated.
- 7.4. Notwithstanding paragraph 7.1 to 7.3 above, to the extent permissible by law, we shall not be liable for any loss, claim and/or damage arising from any unauthorised access, disclosure, misuse, loss, alteration or destruction of your personal information.

## **8. Data subject rights**

- 8.1. Subject to POPIA provisions, you have the right to:
  - 8.1.1. Request access to your personal information;
  - 8.1.2. Request, where necessary, the correction, destruction or deletion of your personal information;
  - 8.1.3. Object to the processing of your personal information;
  - 8.1.4. Submit a complaint to the Information Regulator regarding the alleged interference with the protection of the personal information; and
  - 8.1.5. Institute civil proceedings regarding the alleged interference with the protection of your personal information.

## **9. Contact details**

Should you have any concerns relating to this Privacy Statement, you may contact us on the details below:

**Mr Kobus Henning**  
**Information Officer**

The Pivot  
No. 1 Montecasino Boulevard  
Block C  
4<sup>th</sup> Floor

Fourways, 2055

Email address: [POPIA@bafokengplatinum.co.za](mailto:POPIA@bafokengplatinum.co.za)