

PRIVACY NOTICE

1. INTRODUCTION

In this privacy notice, references to “TDS Projects Group (Pty) Ltd”, “we”, “us”, or “the Group” are to TDS Projects Group (Pty) Ltd and its subsidiary companies.

TDS Projects Group (Pty) Ltd recognises its accountability in terms of the Protection of Personal Information Act, 4 of 2013 (“POPIA”), together with its regulations, to all its clients, suppliers, service providers and other third parties. TDS Projects Group (Pty) Ltd needs to collect personal information from its clients, suppliers, service providers and other third parties to carry out its business.

To maintain a trust relationship with our stakeholders, we are committed to complying with both the spirit and the letter of POPIA, other privacy protection legislation, and to always act with due skill, care and diligence when dealing with personal information.

This notice applies to clients and prospective clients, suppliers and service providers, business partners, website users, visitors to our premises, job applicants, employees and former employees, and any other person whose personal information we process in the course of our activities. TDS Projects Group (Pty) Ltd is the responsible party for the processing described in this notice.

2. WHAT IS PERSONAL INFORMATION

Personal Information, according to POPIA, means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to:

- Information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language, and birth of the person;
- Information relating to the education or the medical, financial, criminal, or employment history of the person;
- Any identifying number, symbol, e-mail address, telephone number, location information, online identifier, or other particular assignment to the person;
- The biometric information of the person;
- The personal opinions, views, or preferences of the person;
- Correspondence sent by the person that would reveal the contents of the original correspondence;
- The views or opinions of another individual about the person; and
- The name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person.

3. WHERE AND WHEN DO WE COLLECT PERSONAL INFORMATION

Information you provide to us:

Clients:

- Directly from you;
- Online quote request forms;
- Purchase orders; and
- Contracts.

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Suppliers:

- Invoices; and
- Contacts.

Other sources:

We may also collect personal information from publicly available sources, credit bureaus and verification providers, recruitment agencies, referees, clients, suppliers, service providers, regulators, law-enforcement bodies, our websites and electronic systems, access-control and CCTV systems, and other third parties where collection is lawful. Where reasonably practicable, we will identify the relevant source when notifying you.

4. WHEN WILL WE PROCESS YOUR PERSONAL INFORMATION

We will only process your personal information for lawful purposes relating to our business if the following circumstances apply:

- You have consented thereto;
- A person legally authorised by you, or a court, has consented thereto;
- It is necessary to conclude or perform under a contract we have with you;
- The law requires or permits it;
- It is required to protect or pursue your, our, or a third party's legitimate interest; and/or
- You are a child, and a competent person (such as a parent or guardian) has consented thereto on your behalf.

Unless we indicate otherwise, providing personal information is voluntary. It may, however, be mandatory where required by law or reasonably necessary to enter into or perform a contract, verify identity, make payment, assess an application, provide access to a site, protect health and safety or deliver goods or services. If required information is not provided, we may be unable to enter into or perform a contract, process an application or payment, grant access, comply with a legal obligation, or provide the requested goods or services.

Depending on the relationship and transaction, collection or retention may be authorised or required under POPIA, PAIA, tax and financial legislation, employment and labour legislation, occupational health and safety and mining legislation, company and commercial legislation and any other law, court order, licence condition, contractual obligation or regulatory requirement applicable to us.

5. WHEN WILL WE PROCESS YOUR SPECIAL PERSONAL INFORMATION

Special personal information refers to the following categories of information:

- Religious and philosophical beliefs;
- Race;
- Ethnic origin;
- Trade union membership;
- Political beliefs;
- Health, including physical or mental health, disability, and medical history;
- Biometric information; and
- Criminal behaviour where it relates to the alleged commission of any offence or the proceedings relating to that offence.

We will process special personal information in the following instances:

- You have consented to the processing (in circumstances where we are legally obliged to obtain your consent); or
- It is necessary to exercise or defend a right or obligation in law; or

- It is necessary to comply with an obligation of international public law; or
- It is for certain historical, research, or statistical purposes that would not adversely affect your privacy; or
- You have deliberately made your personal information public.

6. WHAT INFORMATION DO WE COLLECT, AND HOW DO WE USE YOUR INFORMATION

Kindly note that the following list is not comprehensive. It sets out the main purposes and data elements collected by TDS Projects Group (Pty) Ltd.

Depending on our relationship with you, we may also process identification and contact information; employment, recruitment, qualification and training records; remuneration, banking, tax and benefits information; health, disability, fitness-for-work and safety information; access-control, location, CCTV and device or system usage information; contractual, commercial, procurement and payment records; correspondence, complaints and investigation records; and information required for legal, regulatory, audit, fraud-prevention, security, business-continuity and record-keeping purposes. We process only information that is adequate, relevant and not excessive for the identified purpose.

Clients

DATA SUBJECT	PURPOSE	DATA ELEMENTS
Clients and prospective clients	Invoicing Debit Orders Service Delivery To contact you Audit and record keeping	Business Registration No. VAT No. Business name / trading name Banking details Title Name Surname ID No. Physical address Postal address Province Contact numbers Email addresses Business sector

Service Providers / Suppliers

DATA SUBJECT	PURPOSE	DATA ELEMENTS
Service providers and suppliers	Purchase Orders To contact you Audit and record keeping	Name Bank details Contact numbers Address

Other Data Subjects / Sources

DATA SUBJECT / SOURCE	PURPOSE	DATA ELEMENTS
Employees, former employees and job applicants	Recruitment and selection Employment administration Payroll, benefits and tax Training and competency management Health, safety and site access Performance, disciplinary and	Identity and contact details CV, qualifications and employment history References and background-screening results Banking, remuneration, tax and benefit details Medical, disability and fitness-for-work

	grievance processes Legal and regulatory compliance	information Training, licence and competency records Attendance, access-control and disciplinary records Emergency contact and dependant information
Business partners, subcontractors and representatives	Due diligence and onboarding Contract and project administration Communication and relationship management Site access, safety and security Payment, audit and record keeping	Names, roles and contact details Identity and company registration information Qualifications, licences and competency records Banking and tax information Contracts, correspondence and performance records Access-control and safety information
Visitors and persons accessing our premises or sites	Identity verification Access control and site security Health and safety management Incident investigation Emergency response	Name, identity or passport number Employer and host details Contact details Vehicle registration Entry and exit records CCTV images Induction, safety and incident information
Website users and electronic-system users	Responding to enquiries Website operation and improvement System administration and cybersecurity Fraud prevention and troubleshooting Direct marketing where lawfully permitted	Name and contact details Enquiry and correspondence content IP address and device information Browser, log and usage information Cookie or similar identifier data Marketing preferences
Credit bureaus, verification providers, recruitment agencies and referees	Identity, qualification and employment verification Credit, fraud and risk assessment Candidate sourcing and reference checking Compliance and due diligence	Identity and contact information Employment and qualification records Reference information Credit and verification results Criminal or sanction-screening results where lawful Professional registration and licence information
Public sources, regulators, government and law-enforcement bodies	Legal and regulatory compliance Licence, permit and registration verification Investigation and dispute management Fraud prevention and protection of legal rights Audit and statutory reporting	Publicly available professional and company information Court, regulatory and enforcement records Permits, licences and registrations Tax, employment and statutory records Investigation, complaint and correspondence records

7. HOW WE SHARE YOUR INFORMATION

Third-Party Service Providers:

- Regulatory bodies;
- Law enforcement agents; and
- Government agencies.

We may also disclose information, where lawful and necessary, to our subsidiary companies, professional advisers, auditors, insurers, banks, payment providers, IT and cloud-service providers, payroll and benefits administrators, recruitment and verification providers, training providers, clients, subcontractors and other operators that process information on our behalf. Operators are required to process information only on our instructions, maintain confidentiality, and implement appropriate security safeguards. We do not sell personal information.

We may need to share your information when we believe it is required by law, legal process, or to help protect the rights and safety of you, us, or others. We attempt to notify members about legal demands for their data when appropriate in our judgment, unless prohibited by law or court order or when the request is an emergency. We may dispute such demands when we believe, at our discretion, that the requests are overbroad, vague, or lack proper authority, but we do not promise to challenge every demand.

8. YOUR RIGHTS AND OBLIGATIONS

Data Retention:

We keep most of your personal information while we still have a purpose, need to provide you with services, or are legally obligated to do so. We will also keep your information where you have agreed for us to do so or have given your consent that we are allowed to do so. We keep some of your information even after our business relationship has terminated if it is reasonably necessary to comply with our legal obligations, meet regulatory requirements, resolve disputes, maintain security, prevent fraud and abuse, enforce our other user agreements, or fulfil your request to object to our processing of your information.

Your Rights:

You have rights in connection with your personal information. You have many choices about how your information is collected, used, and shared. In certain circumstances, by law, you have the right to:

- **Request access to your information:** You may ask us what information we have about you and request a copy of this information. This should be done by request to erenst.dutoit@tdsprojects.co.za. There are some exemptions, which means you may not always receive all the information we process. When we can give you a copy, it might be provided at a fee, which will be communicated to you at the time of your query.
- **Change or correct information:** You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- **Delete information:** You can ask us to delete or remove personal information under certain circumstances.
- **Object to processing:** You can do this where we are relying on your legitimate interest, public interest, or our legitimate interest (or those of a third party), and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your data for direct marketing purposes or where you have given your consent for the specific processing and you want to retract your consent. Retracting your consent does not invalidate the information we lawfully processed while we had your consent to do so.
- **Request the restriction of processing:** You can ask us to suspend the processing of personal data about you, for example, if you want us to establish its accuracy or the reason for processing it.

Requests may be submitted to the Information Officer using the contact details below. We may request reasonable proof of identity and will respond within the periods required by law. Objections and requests for correction or deletion may be made using the applicable prescribed POPIA forms. Rights are subject to lawful grounds for refusal, retention duties, and the rights of others.

9. CHANGES TO OUR PRIVACY NOTICE

Changes to this privacy notice apply to your use of our services. We may modify this privacy notice from time to time, as required by changes in legislation. When material changes are made, we will provide notice through our services, or by other means, to provide you the opportunity to review the changes before they become effective.

You acknowledge that your continued use of our services after we publish our changes to this privacy notice means that the collection, use, and sharing of your personal information is subject to the updated privacy notice.

10. OTHER IMPORTANT INFORMATION

We have put in place appropriate security measures to prevent your data from being accidentally lost, used, or accessed in an unauthorised way, altered, or disclosed. In addition, we limit access to your personal information on a business need-to-know basis and subject to a duty of confidentiality.

If we have reasonable grounds to believe that personal information has been accessed or acquired by an unauthorised person, we will investigate and take appropriate containment and remediation measures. We will notify the Information Regulator and affected data subjects as soon as reasonably possible after discovering the compromise. Notification to affected data subjects may be delayed only where a public body responsible for the prevention, detection or investigation of offences determines that notification will impede a criminal investigation.

Personal information may be transferred to or accessed in another country where this is necessary for our operations or service delivery. We will do so only where permitted by POPIA, including where the recipient is subject to a law, binding corporate rules or agreement that provides an adequate level of protection, the transfer is necessary for a contract or the implementation of pre-contractual measures, or the data subject has consented where consent is appropriate. The level of protection may differ between countries, and we will implement reasonable contractual and security safeguards.

We will use electronic communications for direct marketing only where permitted by law. You may opt out at any time using the unsubscribe facility in the communication or by contacting the Information Officer. We will retain sufficient information to record and respect an opt-out request.

We do not ordinarily make decisions that produce legal or similarly significant effects based solely on automated processing. If we do so, we will apply the safeguards required by law and provide appropriate information about the decision and the opportunity for human intervention where applicable.

11. OUR CONTACT INFORMATION

Should you have a query, please send an email to:

Responsible Party:

TDS Projects Group (Pty) Ltd
84 Sovereign Drive, Route 21 Business Park
Centurion, Pretoria, 0178

Information Officer: Erenst Du Toit

Email: Erenst.dutoit@tdsprojects.co.za

Telephone: +27 (0)12 345 3632

12. THE INFORMATION REGULATOR

You have the right to lodge a complaint with the Information Regulator if you believe that your personal information has been processed unlawfully or that we have not adequately addressed a rights request. Complaints may be submitted through the Information Regulator's eServices portal or through its official complaints channel.

Information Regulator's eServices Portal:

<https://eservices.inforegulator.org.za/>

POPIA complaints:

POPIAComplaints@inforegulator.org.za

Telephone: 010 023 5200

Toll-free: 0800 017 160

Information Regulator's Website:

<https://inforegulator.org.za/>

Email (general queries only):

enquiries@inforegulator.org.za

Physical Address:

Woodmead North Office Park
54 Maxwell Drive
Woodmead
Johannesburg