

POPI MANUAL

This manual was prepared in accordance with regulation 4 of the Protection of Personal Information Act (Act no. 4 of 2013): Regulations relating to the Protection of Personal Information

This manual applies to

VINTAGE METALS

Registration number: 2001/015112/23

(hereinafter VINTAGE METALS)

| VINTAGE METALS(PTY)LTD | |
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| PROTECTION OF PERSONAL INFORMATION MANUAL | |
| Entity | Vintage Metals |
| Introduction | Vintage Metals endeavours to meet leading standards and regulations for data protection and privacy. The Company respects and values data privacy rights of data subjects and makes sure that all personal data collected from the data subjects are processed in accordance with the general principles of transparency, legitimate purpose, and proportionality. While our reasons are founded in ethical and corporate responsibility, our privacy practices are outlined in this manual. |
| Scope | This Manual is applicable to all employees who may receive personal information of the Company; have access to personal data collected or processed by or on behalf of the Company, or who provide information to the Company. This Manual also covers the treatment of personal data gathered and used by the Company for lawful business purposes. This Manual also covers the personal data the Company shares with authorised third parties or that third parties share with the Company. |
| Purpose | <p><u>Compliance with laws and regulations</u></p> <p>The Manual defines requirements to help ensure compliance with laws and regulations applicable to the Company's collection, storage, use, transmission, disclosure to third parties, retention, disposal and destruction of personal data. This will also help ensure that applicable regulations and contracts regarding the maintenance of privacy, protection and cross border transfer of personal data are adhered to.</p> <p><u>Data management</u></p> <p>The Manual will help ensure that the Company manages personal information data in an accessible and transparent way, and help limit the use of personal data to identified business purposes for which it is collected.</p> <p><u>Security Safeguards</u></p> <p>This Manual will help ensure that all of the personal information in Company's custody is adequately protected against threats by way of its IT Security Framework.</p> |

Training and awareness

The Manual will help create an awareness of privacy requirements to be an integral part of the day-to-day operation of every employee and ensure that all employees understand the importance of privacy practices and their responsibilities for maintaining privacy. This will also help ensure that the Company's employees are fully aware of the contractual, statutory or regulatory implications of any privacy breaches. This will help ensure that all employees are aware of the processes that need to be followed for collection, lawful usage, disclosure or transfer, retention, archival and disposal of personal information.

Third party's data storage

The Manual will help ensure that all third parties collecting, storing data fulfil POPI safeguarding requirements that they satisfy the company privacy requirements by providing assurance by way of an Operators Agreement, as required by the Act.

Depending on the nature of the personal information, Vintage Metals may supply information or records to the following categories of recipients:

1. Vintage Metal's business partners;
2. other parties in response to a legal process or when necessary to conduct or protect its legal rights;
3. statutory oversight bodies, regulators or judicial commissions of enquiry making a request for data;
4. any court, administrative or judicial forum, arbitration making a request for data or discovery in terms of the applicable rules (i.e. South African Revenue Services, or another similar authority and anyone making a successful application for access in terms of PAIA);
5. other parties in connection with certain business transactions. In the event that Vintage Metals restructures or sells any of its businesses or assets, Vintage Metals may disclose data subjects' personal information to the prospective buyer of such business or assets or other transacting parties;
6. companies that provide services to Vintage Metals or act on its behalf may have access to information about data subjects. These companies are limited in their ability to use information they receive in

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| | <p>the course of providing services to Vintage Metals or data subjects; and</p> <p>7. third parties where the data subject provides consent.</p> |
| Information Officer | <p>Information officer details</p> <p>Name: Annemarie Van Zyl Telephone number: 083 230 6911 E-mail address: vintagemetals@cornergate.com</p> <p>Head office details</p> <p>Telephone number: 083 230 6911 Physical address: Unit 5, Oosterland Park, Oosterland Street, Daljosaphat</p> <p>The Information Officer has the following responsibilities:</p> <ul style="list-style-type: none"> • Developing, publishing and maintaining a POPI Manual which addresses all relevant provisions of the POPI Act, including but not limited to the following: • Reviewing the POPI Act and periodic updates as published; • Ensuring that POPI Act induction training takes place for all staff; • Ensuring that periodic communication awareness on POPI Act responsibilities takes place; • Ensuring a compliance framework is developed, implemented, monitored and maintained; • Ensuring a personal information impact assessment is done to ensure that adequate measures and standards exist to comply with the conditions for the lawful processing of personal information; • Upon request by any person, copies of the manual are provided to that person; • Upon the payment of a fee to be determined by the Regulator from time to time; • Handling all aspects of relationship with the Regulator as foreseen in the POPI Act and PAI Act. • Provide direction to any Deputy Information Officer |
| Processing Conditions | POPI is implemented by abiding by eight processing conditions. The Company shall abide by these principles in all its processing activities. |
| 1. Accountability | The Company shall ensure that all processing conditions, as set out in POPI, are complied with when determining the purpose and means of processing |

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| | <p>Personal Information and during the processing itself. The Company shall remain liable for compliance with these conditions.</p> |
| 2. Processing Limitation | <p>The processing of Personal Information is only lawful if, given the purpose of processing, the information is adequate, relevant and not excessive.</p> <p>The Company may only process Personal Information if one of the following grounds of lawful processing exists:</p> <ul style="list-style-type: none"> • The Data Subject consents to the processing; • Processing is necessary for the conclusion or performance of a contract with the Data Subject; • Processing complies with a legal responsibility imposed on the Company; • Processing protects a legitimate interest of the Data Subject; • Processing is necessary for pursuance of a legitimate interest of the Company, or a third party to whom the information is supplied; <p>The Company may only process Special Personal Information under the following circumstances:</p> <ul style="list-style-type: none"> • The Data Subject has consented to such processing; • The Special Personal Information was deliberately made public by the Data Subject; • Processing is necessary for the establishment of a right or defence in law; • Processing is for historical, statistical, or research reasons • If processing of race or ethnic origin is to comply with affirmative action laws <p>All Data Subjects have the right to refuse or withdraw their consent to the processing of their Personal Information, and a Data Subject may object, at any time, to the processing of their Personal Information on any of the above grounds, unless legislation provides for such processing. If the Data subject withdraws consent or objects to processing, then the Company shall forthwith refrain from processing the Personal Information.</p> |
| 3. Purpose Specification | <p>The Company shall only process Personal Information for the specific purposes as set out below:</p> <ul style="list-style-type: none"> • Conducting credit reference checks and assessments; • Research and funding; • Profiling data subjects for the purposes of training; • Administration of agreements; • Providing products and services to customers; |

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| | <ul style="list-style-type: none"> • Detecting and prevention of fraud, crime, money laundering and other malpractice; • Conducting market or customer satisfaction research; • In connection with legal proceedings; • Staff administration; • Keeping of accounts and records; • Complying with legal and regulatory requirements; |
| 4. Further Processing | If the further processing is for archiving purposes in the public interest or scientific and historical research or statistical purposes and the appropriate safeguards are in place and there is no risk of breaching the privacy of the data subject. |
| 5. Information Quality | The Company shall take reasonable steps to ensure that Personal Information is complete, accurate, not misleading and updated. The Company shall periodically review Data Subject records to ensure that the Personal Information is still valid and correct. |
| 6. Openness | <p>Data Subjects will be informed that their data is being processed and</p> <ul style="list-style-type: none"> • for what purpose it is being processed; • what types of disclosure are likely; and • how to exercise their rights in relation to the data. <p>Whenever data is collected, the number of mandatory fields will be kept to a minimum and Data Subjects will be informed which fields are mandatory and why.</p> |
| 7. Security Safeguards | <p>The Company IT Security Framework to be reviewed annually, as well as employee awareness on the importance of protection of client/employee information.</p> <p>Operator agreements will be entered in with all 3rd parties processing personal information on behalf of Vintage Metals and will be reviewed annually.</p> <p>Vintage Metals takes extensive information security measures to ensure the confidentiality, integrity and availability of personal information in Vintage Metals possession. Vintage Metals takes appropriate technical and organisational measures designed to ensure that personal data remains confidential and secure against unauthorised or unlawful processing and against accidental loss, destruction or damage.</p> |

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| | <p>Vintage Metals has conducted a risk assessment to ascertain the personal information landscape of the organisation, and will review the this annually.</p> <p>Vintage Metals has implemented a Incident Response Plan in the event of an incident in terms of the Act. All employees will be aware of the processes and the relevant role players on the reporting an incident.</p> |
| 8. Data Subject Participation | <p>Data Subject have the right to request access to, amendment, or deletion of their Personal Information. All such requests must be submitted in writing to the Information Officer. Unless there are grounds for refusal, the Company shall disclose the requested Personal Information:</p> <ul style="list-style-type: none"> • On receipt of adequate proof of identity from the Data Subject, or requester; • Within a reasonable time; • On receipt of the prescribed fee, if any; • In a reasonable format <p>The Company shall not disclose any Personal Information to any party unless the identity of the requester has been verified.</p> |
| Cross border data transfer | <p>There are restrictions on the sending of personal information out of South Africa as well as on the transfer of personal information back into South Africa. The applicable restrictions will depend on the laws of the country to whom the data is transferred or from where the data is returned.</p> <p>Vintage Metals will only send personal information collected within South Africa transborder:</p> <ol style="list-style-type: none"> 1. where you have instructed Vintage Metals to do so; 2. in order to comply with a legal duty; or 3. in order to work with agents and advisers who Vintage Metals uses to help run the business and services. |
| Storage of Documents | <p><u>Paper Records</u></p> <p>Personal Information records should be kept in locked cabinets, or safes;</p> <ul style="list-style-type: none"> • When in use Personal Information records should not be left unattended in areas where non-staff members may access them; • The Company shall implement and maintain a culture where all employees shall be required to clear their desks of all Personal Information when leaving their desks for any length of time and at the end of the day; |

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| | <ul style="list-style-type: none"> • Personal Information which is no longer required should be disposed of by shredding. • Any loss or theft of, or unauthorised access to, Personal Information must be immediately reported to the Information Officer <p><u>Electronic Records</u></p> <p>All electronically held Personal Information must be saved in a secure database:</p> <ul style="list-style-type: none"> • All computers, laptops and hand-held devices should be access protected with a password, fingerprint or retina scan, with the password being of reasonable complexity and changed frequently; • Electronical Personal Information which is no longer required must be deleted from the individual laptop or computer and the relevant database. The employee must ensure that the information has been completely deleted and is not recoverable. • Any loss or theft of computers, laptops or other devices which may contain Personal Information must be immediately reported to the Information Officer, who shall notify the IT department, who shall take all necessary steps to remotely delete the information, if possible |
| Destruction and retention of documents | <ul style="list-style-type: none"> • Documents may be destroyed after the termination of the retention period specified herein, or as determined by the Company from time to time. • Each department is responsible for attending to the destruction of its documents and electronic records, which must be done on a regular basis. • Files must be checked in order to make sure that they may be destroyed and also to ascertain if there are important original documents in the file. • Original documents must be returned to the holder thereof, failing which, they should be retained by the Company pending such return. • The documents must be disposed by an approved document disposal company. • Deletion of electronic records must be done in consultation with the IT Department, to ensure that deleted information is incapable of being reconstructed and/or recovered. • Retention of documents will be in line of applicable legislation that regulates that storage of certain information. |
| Access to Information | Access to our information can be done through our PAIA Manual process which is available on our website. |

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| Amendments to This Manual | Amendments to, or a review of this Manual, will take place on an ad hoc basis or at least once a year. Next date of Review – June 2022 |
| PAIA Manual | Available on our website |
| Privacy Policy | Available on our website |