

**INFORMED CONSENT NOTICE TO PROCESS PERSONAL INFORMATION
IN TERMS OF THE PROTECTION OF PERSONAL INFORMATION ACT 4 OF 2013
(POPIA)**

THIS INFORMED CONSENT NOTICE SHALL APPLY TO THE FOLLOWING PARTIES:

Santova Limited (including all of its subsidiary entities located in South Africa)

(‘Santova’)

and

All Persons, natural and juristic, who may engage with Santova from time to time

(‘Data Subject’)

I. Introduction

- I.1. POPIA regulates and controls the collection, use, transfer and processing of a Data Subject’s Personal Information and as such, Santova has a legal duty to process your/ the Data Subject’s Personal Information in a lawful, legitimate and responsible manner.
- I.2. Santova does and will from time-to-time process Personal Information for purposes of pursuing any potential and/or fulfilling any existing business contract, relationship, venture or deal between Santova and you/ the Data Subject (‘Relationship’) throughout its engagement with you/ the Data Subject.
- I.3. In terms of POPI all persons, including any Santova employee and/or trading partner who collects, manages, processes, transfers, stores and/or retains Personal Information, whether held under a document, record or in any other format has a responsibility to process such information in accordance with POPIA.
- I.4. In order to discharge this duty set out above and to engage further with you/the Data Subject, Santova requires your/the Data Subject’s express and informed permission to process the abovementioned Personal Information.
- I.5. Santova will collect Personal Information meaning:
 - I.5.1. Name, Surname, Identity Number, Language, Contact details including physical, postal and email address, telephone number;
 - I.5.2. Description of residence, business, assets, financial information, banking details;
 - I.5.3. Person’s description of health, biometric details;
 - I.5.4. Any other information as required by Santova, it’s service providers and/or third party contractors in order to provide it’s services in it’s normal course of business;
 - I.5.5. Any information on your/ the Data Subject’s requirements, needs and specifications which is or may be used for marketing purposes to ensure Santova’s service offerings and any updates are current and relevant; and
 - I.5.6. Any other information, in line with the provisions of POPIA.(‘Personal Information’)
- I.6. Santova will also collect Special Personal Information which includes medical disclosures and health information for purposes of compliance with any laws and regulations as issued by Government and as required in adhering to health and safety protocol.
- I.7. Please note that all references made to any terms as contained and defined in POPIA shall bear such meaning as ascribed in the Act, to the extent required. For ease of reference a copy of the POPIA is available upon request by the Data Subject for further review.

2. Purpose of this Informed Consent Document

- 2.1 This Informed Consent Notice further explains and sets out the following:
 - 2.1.1 what Personal Information and/or Special Personal Information will be processed by Santova;
 - 2.1.2 why Santova requires your Personal Information and/or Special Personal Information;
 - 2.1.3 what Santova will be doing with your/the Data Subject’s Personal Information and/or Special Personal Information;
 - 2.1.4 who Santova will be sharing your/the Data Subject’s Personal Information and/or Special Personal Information with;
 - 2.1.5 what Santova will do with your/the Data Subject’s Personal Information and/or Special Personal Information once the purpose of the processing required does come to an end.
- 2.2 Furthermore, unless such processing (as referred to above) is:

- 2.2.1 necessary to carry out actions for the conclusion or performance of a contract to which the Data Subject is a party;
- 2.2.2 required and complies with an obligation imposed by law on either the Data Subject or Santova;
- 2.2.3 necessary to protect the legitimate interest (s) of the Data Subject or Santova;
- 2.2.4 necessary for the proper performance of a public law duty by a public body; or
- 2.2.5 necessary for pursuing the Data Subject or Santova's legitimate interests or that of a third party to whom the Personal Information is supplied,

all processing must be done with the Data Subject's express and informed consent and permission.

3. Application of this Informed Consent Notice:

This Informed Consent Notice will apply to:

- 3.1 Santova
- 3.2 you/the Data Subject; and
- 3.3 your/the Data Subject's Personal Information and/or Special Personal Information being processed by Santova.

Please note that the above may be processed or further processed by Santova including any processing or further processing by any Operators duly appointed by Santova and/or any government departments which Santova may be required to disclose your/the Data Subject's Personal Information / Special Personal Information to, as required in terms of any applicable laws as further specified below.

4. Purpose of the Collection

4.1 The purpose of the collection of your Personal Information is to enable Santova to:

Internal business operational requirements:	<ul style="list-style-type: none"> - fulfil and perform in terms of any contract between you/ the Data Subject and Santova and give effect to the Relationship as between you/ the Data Subject and Santova; - in order for Santova to contact you/the Data Subject and attending to any of your/the Data Subject's requests and enquiries. - attend to any related and relevant financial matters in engaging and/or contracting with you/the Data Subject including any budgeting, planning, invoicing, facilitating, commercial support and/or reporting to any third parties where Santova is bound by contractual terms and/or legal obligation to provide such Personal Information and/or Special Personal Information which may include, but is not limited to, your/the Data Subject's criminal history, civil judgements noted against your/ the Data Subject's name, credit records and/or default in payment history which Personal Information and/or Special Personal Information shall be provided as and where needed for necessary business operational reasons; - conduct any risk assessment and risk profiling purposes such as investigation of any fraudulent activity, potential plagiarism, dishonesty, using another's information and holding it out as your/the Data Subject's own, any unethical conduct which may or may not involve infringement of codes of intellectual property and/or any unruly or unacceptable behaviour. - where required by any law/policy, receiving from/providing to any Regulator, the National Treasury, any credit bureau, credit provider/credit association, third party Insurers such as Credit and/or Liability, any underwriter involved and any third-party financial institutions such as Banks which Personal Information and/or Special Personal Information may relate to your/the Data Subject's criminal history, civil judgements, credit records or default history; - manage your/the Data Subject contractual relationship for the duration of the contract with Santova; - conduct any social and/or marketing purposes which may involve inviting you/the Data Subject to Santova events and/or functions for business networking and public relation reasons which may include networking forums, educational and cultural events and forums whether sponsored/organised by Santova or other third parties to ensure you are provided details of such events to attend; or - protect the legitimate interests of Santova, you/the Data Subject and any other party involved in the Relationship.
Potential related procurement and supply chain management contractual relationship:	<p>In the event that Santova shall be engaging with you for purposes of any procurement related contractual relationship then the following reasons shall apply to the processing of any of your/the Data Subject and/or any third parties' Personal Information and/or Special Personal Information as disclosed to Santova:</p> <ul style="list-style-type: none"> - assess whether you/the Data Subject is capable and able to provide Santova with the required and requested goods and/or services, whichever the case may be, which determination shall be made considering the contractual supply chain and procurement arrangement confirmed by

	<p>Santova with you/the Data Subject, in your capacity as a supplier, contractor, service provider and/or consultant (Supplier) contracting with Santova;</p> <ul style="list-style-type: none"> - where declared successful in your/the Data Subject's appointment as a Supplier with Santova, to attend to any required actions in order to conclude the Procurement Contract with you/the Data Subject including any drafting and/or vetting of the related procurement contractual documents; - to further engage in a contractual supply chain and procurement arrangement with you/the Data Subject, in your capacity as a client and/or instructing party requesting Santova assist with procurement of any goods and/or services, whichever the case may be, - for purposes of any proposed purchase from you/the Data Subject or any proposed sale to you/the Data Subject of any goods and/or services for purposes of the procurement contract and in providing any third parties with your/the Data Subject's Personal Information and/or Special Personal Information in order to evaluate the respective transaction and/or due diligence procedure, if required; or - attending to any required internal operations and procedures in rendering the procurement related services to you/the Data Subject, in your capacity as a client, or as required for purposes of managing the related procurement contractual relationship, in your capacity as a Supplier, whichever the case may be and this shall relate to any contract management services involved, attending to any financial and payment matters such as budgeting, planning, invoicing, facilitating and making payments, arranging third party payments, sending any receipts, invoices and/or statements and/or generally where required in providing any commercial support and/or communications where needed, requested or required in terms of the related procurement contractual documents.
<p>Security and access to Santova's Premises</p>	<p>This includes but is not limited to, the office comprising of any Santova operational staff areas, roads adjacent to the Santova Premises and on any grounds, which constitute the private property of Santova:</p> <ul style="list-style-type: none"> - allow you/Data Subject access to Santova's Premises and private property including Santova's offices, facilities and systems and for the purposes of managing the safety and security of Santova's Premises including its obligations to its employees to ensure the provision of security services, a safe and healthy working environment, in compliance with Santova's policies and procedures and for purposes of any security searches, seizures or vetting services which may be required; - investigate any matter which may be raised against you the Data Subject or another; - conduct any necessary risk assessments and risk profiles for any internal and/or external audits; - making contact with you/the Data Subject and providing you/the Data Subject with information and further access to Santova directors, employees and/or any other business personnel; - perform any internal necessary business operations; - prevent and detect any fraud and abuse of Santova's processes, systems, procedures and operations including the conducting of any internal and external investigations where necessary upon use of your/ the Data Subject's Personal Information and/or Special Personal Information, to the extent required, in such enquiries and hearings; or - any other legitimate and legal reason recognisable in law in the circumstances.
<p>Compliance with applicable laws:</p>	<p>comply with its lawful obligations in respect of various laws, codes, regulations and directions relating to your engagement, interaction and relationship with Santova regarding administrative laws, B-BBEE laws, business laws such as insolvency law, company laws, communication and information technology laws, environmental laws, financial and tax laws, health and safety laws, disaster management and state of emergency related laws, labour laws, public sector laws, and/or security laws.</p>
<p>Legal Services:</p>	<p>Santova may be required to process your/the Data Subject's Personal Information and/or Special Personal Information in instances involving:</p> <ul style="list-style-type: none"> - drafting of contracts or general legal documents, - internal contract management, including document management and record retention purposes in terms of Santova's policies and procedures, - legal correspondence, - legal requirements as contained in any applicable laws relevant to Santova's operations and business, - in providing any legal advice, where required, - managing legal compliance and risk within Santova, - managing and handling all litigation which has to be pursued or defended in relation to Santova, - for purposes of any disciplinary matters pursued by Santova, - in order to provide any legal compliance training within Santova,

	<ul style="list-style-type: none"> - attending to any insurance related matters as may be required to provide information to third parties affiliated with Santova in this manner, - regulation, management and control over intellectual property matters including any Copyright matters; - generally in terms of assisting with any alternative dispute resolutions matters as and when such should arise; - investigate any matter which may be raised against you the Data Subject or another; or - any other legitimate and legal reason recognisable in law in the circumstances.
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4.2 You/the Data Subject agree and give Santova express permission to process and further process any and all Personal Information and/or Special Personal Information which you/the Data Subject will or have provided to Santova which includes all Personal Information which has been requested by Santova or provided by you/the Data Subject on a voluntary basis.

4.3 Santova shall in turn undertake that it will only use your/the Data Subject's Personal Information referred to above for the purposes as set out under this Informed Consent document and for no other purposes unless with your/the Data Subject's express and prior permission.

5. Consequence of withholding consent or Personal Information

Should you/the Data Subject refuse to provide Santova with the Personal Information required for the purposes indicated above and the required consent to process the abovementioned Personal Information, Santova will be unable to engage with you/the Data Subject or enter into any further Relationship.

6. Storage and Retention and Destruction of Information

6.1 All Personal Information and/or Special Personal Information which you provide to Santova will be held and/or stored securely and held for the purpose for which it was collected, as reflected above.

6.2 Your Personal Information will be stored electronically in a centralised data base which for operational reasons, will be accessible within Santova.

6.3 Where appropriate, some information may be retained in hard copy.

6.4 In either event, storage will be secure and audited regularly to ensure its safety and the security.

6.5 Upon the Personal Information and/or Special Personal Information no longer being required due to the fact that the purpose for which the information was held has expired, such Personal Information will be safely and securely be archived for the requisite and prescribed retention period, as per the requirements of the Companies Act 71 of 2008 or as required by any other law applicable in South Africa. Thereafter all the Personal Information and/or Special Personal Information relating to you/the Data Subject shall be destroyed.

7. Access by others and cross border transfer

7.1 Santova may from time to time have to disclose your Personal Information and/or Special Personal Information to other parties, including its employees, agents, contractors, service providers, third party insurance companies, Santova's designated banks and any other third parties who have a business need to know such Personal Information and/or Special Personal Information but any such disclosure will always be subject to an agreement which shall refer to contractual obligations on the recipient of the Personal Information to comply with strict confidentiality and data security conditions.

7.2 Where Personal Information and/or Special Personal Information and related data is transferred to a country situated outside the borders of South Africa then the Personal Information and/or Special Personal Information of you/the Data Subject will only be transferred to those countries which have similar privacy laws to POPI in place or where the recipient of the Personal Information and/or Special Personal Information is bound contractually to no lesser obligations that those imposed by POPI.

8. Right to Object

You/the Data Subject have the right to object to Santova processing your/the Data Subject's Personal Information and/or Special Personal Information by contacting Santova to raise such objection. On receipt of such objection Santova will place a hold on any further processing until the cause of the objection has been resolved.

9. Accuracy of Information and Onus

POPI requires that your/the Data Subject's Personal Information and/or Special Personal Information and related details, as supplied are complete, accurate and up-to-date. Whilst Santova will always use its best endeavours to ensure that your/the

Data Subject's Personal Information and/or Special Personal Information is reliable, you/the Data Subject will need to please advise Santova of any changes to the Personal Information and/or Special Personal Information, as and when this may occur, during the Relationship.

10. Access to the Information by the Data Subject

You/the Data Subject has the right at any time to request Santova provide:

- details of any your Personal Information and/or Special Personal Information which Santova holds on; and
- details as to Santova's use of such Personal Information and/or Special Personal Information as referred to directly above,

provided that any such request above is made using the standard Promotion of Access to Information Act (PAIA) process, which procedure is accessible upon request and as contained in Santova's PAIA Manuals which is available on the Santova website at www.santova.com

11. Complaints

You/the Data Subject have the right to address any complaints regarding the processing of your/ the Data Subject's Personal Information and/or Special Personal Information to the Santova Information Officer at informationofficer@santova.com, or by contacting the Regulator.

12. For further information please contact:

Santova's Information Officer at: informationofficer@santova.com

Alternatively, please visit Santova's Data Protection information site for more information at:

<https://www.santova.com/about-santova/data-protection/>

13. Direct Marketing, Advertising and Promotional Activities

Santova will from time to time further process your/the Data Subject's Personal Information and/or Special Personal Information for the purpose of providing any Client of Santova with related notifications, communications and advertisements.

If you/the Data Subject wishes to not receive any such communications pertaining to these services and/or notifications provided by Santova, please confirm further with your Santova Representative and provide Santova with your further details regarding your marketing, advertising and promotional preferences.

14. Changes to this Consent Notice

Santova reserves the right to update this notice at any time and any such changes will be updated in a revised Notice which shall be accessible and made available to Data Subjects on the Santova website at www.santova.com. Data Subjects must please check this notice from time to time for any such updates as this Consent will be binding on you/the Data Subject if such Personal Information and/or Special Personal Information is provided to Santova after any amendments have been affected. Santova may also update you/the Data Subjects of any changes in other ways from time to time about the processing of your Personal Information and/or Special Personal Information.

15. Declaration and Informed Consent

You/the Data Subject acknowledge:

- that you have read, assessed, reviewed and confirmed the above provisions and consents to the terms as contained herein,
- that you/the Data Subject declare that all Personal Information supplied to Santova as a result thereof is accurate, up-to date, and is not misleading and is complete in all respects,
- that by providing Santova with the Personal Information upon request and as indicated above, you/the Data Subject consent and give Santova permission to process and further process your/the Data Subject's Personal Information and/or Special Personal Information as and where required,
- that if you have provided another person's Personal Information for processing, you warrant that you have obtained the required permission from such person/s for providing such Personal Information and indemnify and hold harmless Santova against any liability/loss which may be incurred by Santova/its employee as a result of a breach of this warranty, and
- that you/the Data Subject understands the purposes for which such Personal Information and/or Special Personal Information is required and for which it will be used.