

OCEANA COMMUNICATIONS AND STAKEHOLDERS PROCESSING NOTICE

1. PURPOSE OF THIS NOTICE AND TERMS

1.1 We, Oceana Group Limited (Registration number: 1939/001730/06) together with our subsidiaries and trading partners, (collectively referred to as “we”, “us”, “Oceana” or “the company” in our capacity as a Responsible Party, in order to engage with you, will have to process your Personal Information, and in doing so, will have to comply with a law known as the Protection of Personal Information Act, 4 of 2013 (hereinafter referred to as “POPIA”), which regulates and controls the processing of a legal entity’s and / or an individual’s Personal Information in South Africa, (hereinafter referred to as a “Data Subject”), which processing includes the collection, use, and transfer of a Data Subject’s Personal Information.

1.2 For the purpose of this Processing Notice, please take note of the following words and phrases which will be used throughout this Processing Notice:

- **“consent”** means the consent which you, in your capacity as a Data Subject, may have to give to us, under certain circumstances, to process your Personal Information, which consent must be voluntary, specific and informed. Following this, once we have explained to you why we need your Personal Information and what we will be doing with it, you are then, in relation to certain uses of the information, required to give us your permission to use it, which permission or consent can be express or implied; implied meaning that your consent can be demonstrated by way of your actions;
- **“Data Subject”** means you, the person who owns and who will provide us with your Personal Information for processing;
- **“Operator”** is any person who processes your Personal Information on our behalf as a contractor, in terms of a contract or mandate, without coming under the direct authority of us. These persons for illustration purposes may include verification agencies, advertising and public relations agencies, call centres, service providers, auditors, legal practitioners, and / or organs of state, including government, provincial and municipal entities and bodies;
- **“Personal Information”** means Personal Information relating to any identifiable, living, natural person, and an identifiable, existing legal entity, namely the Data Subject, including, but not limited to —
- **in the case of an individual:**



- name, address, contact details, date of birth, place of birth, identity number, passport number, bank details, details about your employment, tax number and financial information;
 - vehicle registration;
 - dietary preferences;
 - financial history;
 - information about your next of kin and or dependants;
 - information relating to your education or employment history; and
 - **Special Personal Information** including race, gender, national, ethnic or social origin, colour, disability, criminal history, including offences committed or alleged to have been committed, and biometric information, such as images and fingerprints;
- **in the case of a legal entity:**
 - name, address, contact details, registration details, financials and related history, B-BBEE score card, registered address, description of operations, bank details, details about your employees, business partners, customers, tax number, VAT number and other financial information.
- **"processing" / "process" or "processed"** means in relation to Personal Information, the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use; dissemination by means of transmission, distribution or making available in any other form; merging, linking, as well as restriction, degradation, erasure or destruction of information; or sharing with, transfer and further processing, including physical, manual and automatic means. This is a wide definition and therefore includes all types of usage of your Personal Information by us including the initial processing when we first collect your Personal Information and any further and ongoing processing until destruction of such information when no longer required;
 - **"Purpose"** means the reason why your Personal Information needs to be processed by us;
 - **"Responsible Party"** means us, the person who is processing your Personal Information;
 - **"you"** means you, the person or organization who will be providing us, the Responsible Party, with your Personal Information, for processing, who is known as the Data Subject under POPIA
- 1.3 In terms of POPIA, where a person processes another's Personal Information, such processing must be done in a lawful, legitimate and responsible manner and in accordance with the provisions, principles and conditions set out under POPIA.
- 1.4 In order to comply with POPIA, a Responsible Party processing a Data Subject's Personal Information must:



- 1.4.1 provide the Data Subject with a number of details pertaining to the processing of the Data Subject's Personal Information, before such information is processed; and
- 1.4.2 get permission or consent, explicitly or implied, from the Data Subject, to process his / her / its Personal Information, unless such processing:
- is necessary to carry out actions for the **conclusion or performance of a contract** to which the Data Subject of the Personal Information is a party;
 - is required in order to comply with an **obligation imposed by law**; or
 - is for a **legitimate purpose or is necessary to protect the legitimate interest (s) and / or for pursuing the legitimate interests** of i) the Data Subject; ii) the Responsible Party; or iii) that of a third party to whom the Personal Information is supplied; or
 - is necessary for the proper performance of a **public law duty**.
- 1.5 In accordance with the requirements of POPIA, and because your privacy and trust is important to us, we set out below how we, Oceana collect, use, and share your Personal Information and the reasons why we need to use and process your Personal Information.

2. APPLICATION

2.1 This **Stakeholder Processing Notice** applies to potential or actual Oceana Stakeholders and persons who Oceana communicates with.

3. PURPOSE FOR PROCESSING YOUR PERSONAL INFORMATION

3.1 Your Personal Information will be processed by us for the following purposes:

Communications- legitimate purpose: To communicate and / or to contact you as an Oceana Stakeholder, generally and / or specifically.

Lawfulness - YES
Consent required - NO

Legal obligations, litigation, insurance and public duties: To ensure compliance with the law and legal obligations, to submit legal or statutory reports or provide various regulatory or statutory notices or returns, to litigate and / or to pursue or defend legal claims or collections, to attend to insurance claims and related procedures, to respond to a request or order from a SAP official, investigator or court official, regulator, or public authority.



Lawfulness - YES
Consent required - NO

Operational issues - compliance with law: To communicate, enforce and ensure you comply with policies, including in relation to claims or actions or legal requirements and conducting investigations and incident response, including reviewing your communications in these situations in accordance with relevant internal policies and applicable law.

Lawfulness - YES
Consent required - NO

B-BBEE - compliance with laws: To comply with B-BBEE and monitor or report B-BBEE opportunities and related diversity issues, including but not limited to age, gender, ethnicity, nationality, religion, disability, sexual orientation, and marital or family status.

Lawfulness - YES
Consent required - NO

Security purposes: legitimate purpose and to comply with laws: To permit you access to our offices, facilities, manufacturing or parking areas, as well as to controlled areas, for the purposes of monitoring via CCTV, your interaction and access in and from our facilities described above, and for general risk management, security and emergency incident control purposes as well as for data and cybersecurity purposes.

Lawfulness - YES
Consent required - NO

Internal research and development purposes - legitimate purpose: To conduct internal research and development for new offerings, content, products, and services, and to improve, test, and enhance the features and functions of our current goods, services and offerings.

Lawfulness – YES
Consent required - NO

Sale, merger, acquisition, or other disposition of our business - our Legitimate interest- To proceed with any proposed or actual **sale, merger, acquisition, or other disposition** of our business (including in connection with any bankruptcy or similar proceedings).

Lawfulness – YES
Consent required - NO



Marketing and electronic communications related thereto – consent required:
To provide you with communications regarding us, our offerings, goods and services and / or other notifications, CSI programs, events, or updates that you may have registered or asked for, and to send you offers, invitations, advertising, and marketing materials, including providing personalized advertising and invitations to you, **save where you have opted out of this activity.**

With consent

4. WHAT PERSONAL INFORMATION OR INFORMATION DO WE COLLECT FROM YOU?

In order to engage and / or interact with you, for the purposes described above, we will have to process certain types of your Personal Information, as described below:

Your or your employer or organization’s contact information, such as name, alias, address, identity number, passport number, security number, phone number, cell phone number, vehicle make and registration number, social media user ID, email address, and similar contact data, serial numbers of equipment, details regards the possession of dangerous weapons, and other contact information including details of your employer, memberships or affiliations, such as the name of your employer or organization that you are a member of, information about your colleagues or those within your organization, your status with an organization, and similar data, which are required for various legitimate interest, contractual and / or lawful reasons.

Lawfulness - YES

Consent required - NO

Specific identifiers, such as your race (B-BBEE related), and financial, credit, deviant and criminal history (to]l=protect our legitimate interests and to perform risk assessments).

Lawfulness - YES

Consent required - NO

Opinions and views, such as content of communications, suggestions, questions, comments, feedback, and other information you send to us, that you provide to us when you contact us, or that you post on our websites, applications, mobile applications, or social media portals or platforms including information in alerts, folders, notes, and shares of content, and similar data which are required to perform contractual matters.

Lawfulness - YES



Consent required - NO

Your Image, such as still pictures, video, voice, and other similar data, which are required to perform contractual matters and / or in order to provide you access to services or attend to queries or to ensure that security safeguards are in place.

Lawfulness - YES

Consent required - NO

5. SOURCES OF INFORMATION - HOW AND WHERE DO WE COLLECT YOUR PERSONAL INFORMATION FROM

5.1 Depending on your requirements, we will collect and obtain Personal Information about you either directly from you, from certain third parties, or from other sources which are described below:

- **Direct collection:** You provide Personal Information to us when you:
 - submit a quotation, or offer to do business with us by way of a tender or when you conclude a contract with us;
 - submit a quotation, or offer to do business with you by way of a tender or when you conclude a contract with us;
 - express an interest in a CSI project or sponsorship;
 - use our websites, applications, mobile applications, or social media portals or platforms;
 - contact, communicate or interact with us by phone, email, chat, in person, or otherwise
 - create or maintain a profile or account with us;
 - purchase or subscribe to our goods or services;
 - use our goods or services;
 - purchase, use, or otherwise interact with content, products, or services from third party providers who have a relationship with us;
 - create, post, or submit user content on our websites, applications, mobile applications, or social media portals or platforms;
 - register for or attend one of our events or locations;
 - request or sign up for information, including marketing material;
 - complete a questionnaire, survey, support ticket, or other information request form.
- **Automatic collection:** We collect Personal Information automatically from you when you:
 - search for, visit, interact with, or use our websites, applications, mobile applications, or social media portals or platforms;
 - use our goods or services (including through a device);
 - access, use, or download content from us;
 - open emails or click on links in emails or advertisements from us;



REGISTERED COMPANY NAME: Oceana Group Limited REGISTRATION NUMBER: 1939/001730/06

DIRECTORS: MA Brey (Chairman), I Soomra (CEO*), H Karrim (CFO*), ZBM Bassa, PG de Beyer, PJ Golesworthy, A Jakoet, TM Mokgosi-Mwanthembe, NA Pangarker, S Pather, L Sennelo, NV Simamane COMPANY SECRETARY: A Fortune (Executive Director *)

- otherwise interact or communicate with us (such as when you attend one of our events or locations, when you request support or send us information, or when you mention or post to our social media accounts).
- **Collection from third parties:** We collect Personal Information about you from third parties, such as:
 - those who have a relationship with you or that provide or publish Personal Information related to you;
 - regulators, professional or industry organizations and certification / licensure agencies that provide or publish Personal Information related to you;
 - third parties and affiliates who deal with or interact with us or you;
 - service providers and business partners who work with us and that we may utilize to deliver certain content, products, or services;
 - marketing, advertising, communications, sales generation, and recruiting business partners;
 - SAP, Home Affairs, Credit bureaus and other similar verification agencies;
 - other government agencies, regulators and others who release or publish public records;
 - other publicly or generally available sources, such as social media sites, public and online websites, open databases, and data in the public domain.

6. HOW WE SHARE INFORMATION

We share Personal Information for the purposes set out in this Processing Notice with the following categories of recipients:

| |
|---|
| <p>Oceana employees, directors and our affiliates. We may share your Personal Information amongst our employees, directors, affiliates and the companies within Oceana for business and operational purposes.</p> <p>Lawfulness – YES Consent required – NO</p> |
| <p>Your Contacts. We may share your Personal Information with persons with whom you have a relationship and whose details you have provided to us.</p> <p>Lawfulness – YES Consent required – NO</p> |
| <p>Business Partners. We may share your Personal Information with our business partners who provide us with a variety of services or goods which you may benefit from. We may also pass certain requests from you or your organization to these business providers.</p> <p>Lawfulness – YES Consent required – NO</p> |



Third Party Content Providers. We may share your Personal Information with our third party content providers to perform tasks on our behalf and to assist us in providing, delivering, analysing, administering, improving, and personalizing content related to our relationship with you, including financial benefits etc. and may to this end pass certain requests from you or your organization to these providers.

Lawfulness – YES
Consent required – NO

Third Party Service Providers. We may share your Personal Information with our third party service providers to perform tasks on our behalf and which are related to our relationship with you, and to assist us in offering, providing, delivering, analysing, administering, improving, and personalizing such services or products.

Lawfulness – YES
Consent required – NO

Cyber Third Party Service Providers. We may share your Personal Information with our cyber service providers to perform tasks on our behalf and which are related to our relationship with you, including those who provide technical and/or customer support on our behalf, who provide application or software development and quality assurance, who provide tracking and reporting functions, research on user demographics, interests, and behavior, and other products or services. These service providers may also collect Personal Information about or from you in performing their services and/or functions. We may also pass certain requests from you or your organization to these service providers.

Lawfulness – YES
Consent required – NO

Advertisers and PR Agencies. We may share your Personal Information with advertisers, PR Agencies, advertising exchanges, and marketing agencies that we engage for advertising and PR services, to deliver advertising and PR services, and to assist us in advertising and promoting our brand and products and services. Those advertising and PR services may also target advertisements on third party websites based on cookies or other information indicating previous interaction with us and / or yourself.

Lawfulness – YES
Consent required – NO

Merger, Sale, or Change of Control Event. We may share your Personal Information to third parties who are interested in acquiring or merging with us.

Lawfulness – YES
Consent required – NO

Regulators and law enforcement agencies. We may disclose your Personal Information to regulators and other bodies in order to comply with any applicable law or regulation, to comply with or respond to a legal process or law enforcement or governmental request.



Lawfulness – YES
Consent required – NO

Other Disclosures. We may disclose your Personal Information to third parties if we reasonably believe that disclosure of such information is helpful or reasonably necessary to enforce our terms and conditions or other rights (including investigations of potential violations of our rights), to detect, prevent, or address fraud or security issues, or to protect against harm to the rights, property, or safety of the group, our employees, any users, or the public.

Lawfulness – YES
Consent required – NO

7. SECURITY OF INFORMATION

- 7.1 The security of your Personal Information is important to us. Taking into account the nature, scope, context, and purposes of processing Personal Information, as well as the risks to individuals of varying likelihood and severity, we have implemented technical and organizational measures designed to protect the security of Personal Information. In this regard we will conduct regular audits regarding the safety and the security of your Personal Information.
- 7.2 Your Personal Information will be stored electronically and in some cases in hard copy in files and records, which information, for operational reasons, will be accessible to and or provided to persons employed or contracted by us on a need to know basis.
- 7.3 Once your Personal Information is no longer required due to the fact that the purpose for which the Personal Information was held has come to an end, such Personal Information will be retained in accordance with the Oceana records retention schedule, which varies depending on the type of processing, the purpose for such processing, the business function, record classes, and record types. We calculate retention periods based upon and reserve the right to retain Personal Information for the periods that the Personal Information is needed to: (a) fulfil the purposes described in this Processing Notice, (b) meet the timelines determined or recommended by regulators, professional bodies, or associations, (c) comply with applicable laws, legal holds, and other legal obligations (including contractual obligations), and (d) comply with your requests.
- 7.4 Notwithstanding clause 7 and 8, please note that no method of transmission over the Internet or method of electronic storage is 100% secure. Therefore, while we strive to use commercially acceptable measures designed to protect Personal Information, we cannot guarantee its absolute security.

8. ACCESS BY OTHERS AND CROSS BORDER TRANSFER

- 8.1 Oceana may from time to time have to disclose your Personal Information to other parties, including Oceana subsidiaries, trading partners, agents, auditors, organs



REGISTERED COMPANY NAME: Oceana Group Limited REGISTRATION NUMBER: 1939/001730/06

DIRECTORS: MA Brey (Chairman), I Soomra (CEO*), H Karrim (CFO*), ZBM Bassa, PG de Beyer, PJ Golesworthy, A Jakoet, TM Mokgosi-Mwanthembe, NA Pangarker, S Pather, L Sennelo, NV Simamane COMPANY SECRETARY: A Fortune (Executive Director *)

of state, regulatory bodies and / or national governmental, provincial, or local government municipal officials, or overseas trading parties or agents, but such disclosure will always be subject to an agreement which will be concluded as between ourselves and the party to whom we are disclosing your Personal Information to, which contractually obliges the recipient of your Personal Information to comply with strict confidentiality and data security conditions.

- 8.2 Where Personal Information and related data is transferred to a country which is situated outside South Africa, your Personal Information will only be transferred to those countries which have similar data privacy laws in place or where the recipient of the Personal Information concludes an agreement which contractually obliges the recipient to comply with strict confidentiality and data security conditions and which in particular will be to a no lesser set of standards than those imposed by POPIA.

9. YOUR RIGHTS

- 9.1 You as a Data Subject have certain rights, which are detailed below:

- **The right of access** - You may ask Oceana (free of charge) to confirm that we hold your Personal Information, or ask us to provide you with details, (at a fee) on how we have processed your Personal Information, which request must be done by following the process set out under the Oceana PAIA Manual.
- **The right to rectification** - You have the right to ask us to update or rectify any inaccurate Personal Information which we hold of yours, which can be done by accessing the update / rectification request.
- **The right to object to and restrict further processing** - Where we do not need your consent to process your Personal Information, but you are not in agreement with such processing, you may lodge an objection to such processing by accessing the objection request.
- **The right to withdraw consent** - Where you have provided us with consent to process your Personal Information, you have the right to subsequently withdraw your consent, which can be done by accessing the withdrawal of consent request.

- 9.2 These rights may be exercised by using the relevant forms housed on the Oceana Website at: www.oceana.co.za

10. CHANGES TO THIS PRIVACY STATEMENT

- 10.1 As Oceana changes over time, this Processing Notice is expected to change as well.



- 10.2 Oceana reserves the right to amend the Processing Notice at any time, for any reason, and without notice to you other than the posting of the updated Processing Notice on the Oceana Website.
- 10.3 We therefore request that you to visit our Website frequently in order to keep abreast with any changes.

11. COMPLAINTS OR QUERIES - CONTACT US

- 11.1 Any comments, questions or suggestions about this Processing Notice or our handling of your Personal Information should be emailed to informationofficer@oceana.co.za.
- 11.2 Alternatively, you can contact us at the following postal address or telephone numbers:

Oceana Group Limited

Address: Oceana House, 9th Floor, 25 Jan Smuts Street, Foreshore, Cape Town, 8001

Switchboard: 021 410 1453

International: +27 21 410 1453

- 11.3 Our telephone switchboard is open 9:00 am – 5:30 pm GMT, Monday to Friday. Our switchboard team will take a message and ensure the appropriate person responds as soon as possible.
- 11.4 Should you wish to discuss a complaint, please feel free to contact us using the details provided above. All complaints will be treated in a confidential manner.
- 11.5 Should you feel unsatisfied with our handling of your Personal Information, or about any complaint that you have made to us, you are entitled to escalate your complaint to the South African, Information Regulator who can be contacted at www.justice.gov.za/inforeg.

12. PROCESSING PERSONAL INFORMATION

- 12.1 If you process another's Personal Information on Oceana's behalf, or which we provide to you in order to perform your contractual or legal obligations or to protect any legitimate interest, you will keep such information confidential and will not, unless authorised to do so, process, publish, make accessible, or use in any other way such Personal Information unless in the course and scope of your duties, and only for the purpose for which the information has been received and granted to you, and related to the duties assigned to you.



REGISTERED COMPANY NAME: Oceana Group Limited REGISTRATION NUMBER: 1939/001730/06

DIRECTORS: MA Brey (Chairman), I Soomra (CEO*), H Karrim (CFO*), ZBM Bassa, PG de Beyer, PJ Golesworthy, A Jakoet, TM Mokgosi-Mwanthembe, NA Pangarker, S Pather, L Sennelo, NV Simamane COMPANY SECRETARY: A Fortune (Executive Director *)

13. ACCEPTANCE AND BINDING NATURE OF THIS DOCUMENT

- 13.1 By providing Oceana with the Personal Information which we require from you as listed under this Processing Notice:
- you acknowledge that you understand why your Personal Information needs to be processed;
 - you accept the terms which will apply to such processing, including the terms applicable to the transfer of such Personal Information cross border;
 - where consent is required for any processing as reflected in this Processing notice, you agree that we may process this particular Personal Information.
- 13.2 Where you provide us with another person's Personal Information for processing, you confirm that that you have obtained the required permission from such person (s) to provide us with their Personal Information for processing.
- 13.3 The rights and obligations of the parties under this Processing Notice will be binding on, and will be of benefit to, each of the parties' successors in title and / or assigns where applicable.
- 14.4 Should any of the Personal Information concern or pertain to a legal entity whom you represent, you confirm that you have the necessary authority to act on behalf of such legal entity and that you have the right to provide the Personal Information and / or the required permissions in respect of the processing of that Organization or entities' Personal Information.

End

