

**METROFILE GROUP
EXTERNAL PRIVACY POLICY**



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i. CHANGE CONTROL – DOCUMENT CHANGE HISTORY

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Policy owner	Elmarie Smuts
Approved by	Elmarie Smuts and Naeem Gabru

ii. DOCUMENT APPROVAL

Authorised	Name & Surname	Signature	Date of approval
Group Risk Officer	Elmarie Smuts		29 October 2021
Group CIO	Naeem Gabru		29 October 2021



Thank you for visiting our website. At Metrofile we take the protection of personal information seriously and we are sensitive to your privacy interests. The purpose of this Privacy Policy is to describe how we collect, use, store and disclose personal information that data subjects provide to us, what we learn about data subjects from their visit to our website, as well as to explain the choices and rights that data subjects have regarding their personal information.

All references to 'our', 'us', 'we' or 'company' within this policy are deemed to refer to Metrofile Holdings Limited ("Metrofile"), its subsidiaries, affiliates, parent companies and any of their respective associated companies and related businesses ("Metrofile Group" or "Group").

This Privacy Policy applies to all prospective, present and past Metrofile Group stakeholders, including, but not limited to, the following:

- Visitors of our website available at: <https://www.metrofilegroup.com>
- Employees (including permanent, temporary or contract employees)
- Clients/ customers or prospective clients/ customers
- Third parties, including but not limited to, suppliers to any member of the Metrofile Group;
- Investors

All of the above collectively referred to as "you"

It should be noted that additional privacy requirements and notices, as applicable, will be included subject to the relationships that we have with you. For example, where we process the personal information of data subjects on behalf of our clients (i.e. where we are acting in the capacity as an "operator"), additional privacy requirements may be stipulated in the binding legal contract/s between us and our client. In addition, where any third party processing any personal information of our or our clients' data subjects, (ie where such third party is acting in its capacity as an operator), additional privacy requirements will be included and/or required in binding legal contracts with such supplier.

In addition, by using our website, we take that you agree to the terms of this Privacy Policy.

We reserve the right to modify, add or remove certain sections of this Privacy Policy and we encourage you to visit this Privacy Policy on a continuous basis to familiarise yourself with this Privacy Policy.

1. Collection and processing of personal information

Website:

While visiting our website or web applications/portals, you may be requested to provide certain personal information, which identifies you as an individual (including, but not limited to, your name and contact details). Such information may be collected in the following manner:

- On registration on the web applications/portals.
- When logging onto the web applications/portals we collect information about your online identifiers including your username and password to authenticate your access into the system.
- On voluntary basis when you submit an enquiry form, we request mandatory identifying information (including, your name, email address and phone number).
- On voluntary basis when you use the live chat functionality.
- On voluntary basis when you sign up for our newsletter.
- On voluntary basis when you submit an enquiry or subscribe to content on our investor relations page.

Customers, service providers, other third parties and employees:

In order for the Metrofile Group to provide the products or services procured by its customers, it requires certain of the customer's personal information. The customer's personal information will be processed by Metrofile in order to provide the products or services as defined in this Privacy Policy and applicable contracts between Metrofile and its customer.

Metrofile will process service providers/ employees' personal information only to give effect to the processing activities of personal information as noted in this Privacy Policy and applicable contracts between Metrofile and its service providers/ employees.

1.1. Consent

We will obtain your consent to collect your personal information as required by applicable law and to give effect to the processing of your information as noted in this Privacy Policy.

At any time, should you not wish to receive direct marketing from us, please inform us at marketing@metrofileholdings.co.za in order to unsubscribe. In addition, each time we send you marketing information by e-mail, SMS text messaging or any other means, we will provide an opportunity for you to unsubscribe from receiving further information from us.

1.2. Purpose for collection

We may process your personal information in a number of ways including when you:

- Visit our website, we may collect usage information which may include your IP address, geographical location, browser type and version, operating system, referral source, duration of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. This information may be processed for the purposes of analysing the use of the website and improving usability;
- Provide personal information when purchasing our products and/ or services. The information is processed for use and/ or the administration of the contract with you and in order to supply the products and/ or services you require and may include, but are not limited to, your business name, directors' and representatives' first name and surnames, credit card information, registration address and/ or business address and email address. This information is processed for the purpose of supplying our products and/ or services to you, communicating with you and establishing and maintaining a business relationship with you;
- Provide personal information in the course of a submission of an enquiry, including an enquiry pertaining to available service provider opportunities, on our website "contact us" page. The personal information is processed for the purpose of responding to your enquiry and may include, but are not limited to, your business name, directors' and representatives' first names and surnames, registration address and/or business address and email address;
- Provide personal information for a supplier or service provider opportunity in the form of request for proposal (RFP), request for quotation (RFP) and/ or request for information (RFI). The information is processed for the purpose of carrying out a proper tender process. Such information may include, but are not limited to, information about the incorporation or registered name of your business, tax information, BBBEE information, business address and business' contact person's first name, surname and/ or email address;
- We may process personal information that you provide to us for the purpose of subscribing to our email notifications and/ or newsletters. This information may be processed for the purposes of sending you relevant notifications and/ or newsletters. You may choose to opt-out of receiving these communications at any given time by notifying us or by unsubscribing from the mailing list;

- On an ad-hoc basis you may provide us with certain personal information on a voluntary basis when you fill out an enquiry form in the question section of our “contact us” page, contact us via social media, when you email us, or when you provide personal information to support a request logged by you to us for the above collection means;
- Provide personal information when we appoint or use you as a supplier or third party in order to purchase your products and/ or services. The information is processed for use and/ or the administration of the any contract with you, and to use the products and/ or services we procure from you and may include, but are not limited to, your business name, directors’ and representatives’ first names and surnames, bank details, registration address and/or business address and email address;
- Provide personal information when we enter into an employer/ employee relationship.
- Provide personal information when you become a shareholder of the company.

Note: Process includes collecting, receiving, recording, organising, collating, storing, updating, modifying, retrieving, altering, consulting or using, disseminating, distributing or making available and merging, linking, blocking, degrading, erasing, destroying personal information. Processing of personal information is also performed to comply with applicable laws.

1.3. Cookies

As many other websites, we use “cookies” (or other types of tracking software) to help us gather information from visitors to our website about you, which is not personally identifiable. For example:

- The IP address from which you access the site
- The type of browser and operating system used to access the site
- The date and time of your access to the site
- The pages you visit
- The internet address of the website from which you accessed the site

A cookie is a small data file that our server sends to your browser when you visit the site. The use of cookies helps us to assist your use of certain aspects of the site. You can delete cookies at any time or you can set your browser to reject or disable cookies. If you do disable cookies some functions on the site may not work correctly.

No information which personally identifies you will be collected through cookies. You can obtain information about how to manage cookies at www.allaboutcookies.org.

Third parties (including, but not limited to, software providers, advertisers and ad placement agencies) may also use tracking technologies by or through the site. We have no responsibility or liability for any tracking, data collection or other activities of such third parties.

2. Storage

We may keep your personal information in either electronic or hard copy form. In both cases, we take reasonable and appropriate reasonable technical and organisational measures to ensure that the personal information is protected from misuse and loss and from unauthorised access, modification or disclosure.

Moreover, we will only keep your personal information for as long as is necessary to fulfil the purposes described in this Privacy Policy, unless you have given us permission to keep it longer or we are otherwise legally permitted to do so.

3. Disclosure

We are not in the business of selling personal information and therefore we will not disclose your personal information to anyone except as provided in this Privacy Policy.

3.1. Third party disclosure

We may disclose your Personal Information to third parties where required by law, where it is necessary to give effect to a contract with you, or where we have a legal legitimate interest in doing so. Some of the instances where we may share your Personal Information with third parties, who may include:

- Other subsidiaries and entities of Metrofile Group, some of which may be located outside the borders of your jurisdiction.
- Our website hosting and software development partners, as well as other third party service providers who assist us with operating this website.
- Researchers and analytics providers.
- Third parties as required by law.

Should there be a sale, merger, consolidation, change in control, transfer of substantial assets, reorganisation or liquidation of any member of the Metrofile Group, we may transfer your information to third parties involved in the sale, merger, consolidation, change in control, transfer of substantial assets, reorganisation or liquidation.

By providing any personal information to us, you fully understand and clearly consent to the fact that we may transfer such personal information in these cases.

Note: When we share personal information with these third parties, we will require them to honour this policy, to the full extent required by applicable law.

3.2. Mandatory disclosure

We may disclose your personal information if permitted by law or required to do so by law or where we believe such action is necessary in order to protect or defend our interests or the interests of our clients or users of our site. Such instances can include disclosing your personal information to the following:

- To regulators as law or governmental audit requires;
- Law enforcement as subpoena or court order requires; or
- Other third parties as applicable law requires.

4. Security

We take protection of personal information seriously and we take precautions to keep your personal information secure. Therefore, with due regard to generally accepted information security and handling practices and procedures we seek to secure the integrity and confidentiality of personal information in our possession by taking appropriate, reasonable technical and organisational measures to prevent loss of, damage to or unauthorised destruction of personal information; and unlawful access to or processing of personal information. However, as the website is accessible via the internet, and the internet is inherently insecure, we cannot guarantee the security of information you send to us online (including that it will not be intercepted). You send information to us online at your own risk.

5. Data subject rights

As a data subject of Metrofile you have the right and responsibility to ensure that the personal information we hold about you is accurate. In the absence of evidence to the contrary, we will assume that the information you provided to us is accurate. At your request, where the law requires us to do so, you can exercise your data subject rights as per the following, subject to verification and validation of

your identity:

- Request access to your personal information that Metrofile holds about you as set out in our PAIA manual.
- Request rectification of your personal information that Metrofile holds about you.
- Request erasure, as permitted by law, of your personal information that Metrofile holds about you.
- Request restriction of processing of your personal information as permitted by law.
- Object to processing of personal information as permitted by law.
- Lodge a complaint as it pertains to the processing activities of your personal information.

In order to exercise any of the above you can contact us on Privacy@metrofilegroup.com.

6. Cross-border transfers

As is common for websites and based on our international footprint, we may automatically transfer your personal information outside of the jurisdiction in which it was collected to a foreign jurisdiction. At times, we may transfer your information to our Group companies, some of which may be located outside the borders of your jurisdiction, for business development, market research or to share it between Group companies for direct marketing purposes.

7. Governing law

As a multinational, Metrofile adheres to applicable laws where it operates.

8. Third party links

This site may contain links or references to other websites outside of our control. Please note that our Privacy statement as contained in this Privacy Policy does not apply to these sites and that we do not control the privacy practices of these other sites. We encourage you to read the privacy statements of linked or referenced sites you enter.

9. Disclaimer

The information, software, products, and services included in or available through the Metrofile website may include inaccuracies or typographical errors. Changes are periodically added to the information herein. Metrofile and/ or its suppliers may make improvements and/ or changes in the Metrofile website at any time. Advice received via the Metrofile website should not be relied upon for personal, medical, legal or financial decisions and you should consult an appropriate professional for specific advice tailored to your situation.

Metrofile and/ or its suppliers make no representations about the suitability, reliability, availability, timeliness, and accuracy of the information, software, products, services and related graphics contained on the Metrofile website for any purpose. To the maximum extent permitted by applicable law, all such information, software, products, services and related graphics are provided “as is” without warranty or condition of any kind. Metrofile and/ or its suppliers hereby disclaim all warranties and conditions with regard to this information, software, products, services and related graphics, including all implied warranties or conditions of merchantability, fitness for a particular purpose, title and non-infringement.

To the maximum extent permitted by applicable law, in no event shall Metrofile and/ or its suppliers be liable for any direct, indirect, punitive, incidental, special, consequential damages, losses, liabilities, claims or expenses (“Losses”) or any Losses whatsoever including, without limitation, Losses for loss of use, data or profits, arising out of or in any way connected with the use or performance of the Metrofile website, or any delay or inability to use the Metrofile website or related services, or the provision of or failure to provide services, or for any information, software, products, services and related graphics obtained through the Metrofile website, or otherwise arising out of the use of the Metrofile website,

whether based on contract, delict, negligence, strict liability or otherwise, even if Metrofile or any of its suppliers has been advised of the possibility of such Losses.

Because some states/ jurisdictions do not allow the exclusion or limitation of liability for consequential or incidental damages, the above limitation may not apply to you. If you are dissatisfied with any portion of the Metrofile website, or with any of these terms of use, your sole and exclusive remedy is to discontinue using the Metrofile website.

10. Contact details

For any further information regarding this Privacy Policy, or for any changes in your personal information, please contact Metrofile at Privacy@metrofilegroup.com or at the contact details provided in the “Contact Us” section on the website.

The Metrofile Group Privacy Officer can also be contacted at Privacy@metrofilegroup.com or at the contact details provided in the “Contact Us” section on the website.

Key definitions

Consent refers to voluntary agreement to some act, practice or purpose. It has two elements: knowledge of the matter agreed to, and voluntary agreement. Consent can be express or implied.

Express consent is given explicitly, either orally or in writing. Implied consent arises where consent may reasonably be inferred in the circumstances from the conduct of the individual and the organisation.

Data subject refers to the person (natural or juristic, where applicable) to whom the personal information relates.

Operator refers to a person who processes personal information for a responsible party in terms of a contract or mandate, without coming under the direct authority of that party.

Our’, ‘us’, ‘we’ or ‘company’ refers to Metrofile Holdings Limited (“Metrofile”), its subsidiaries, affiliates, parent companies and any of their respective associated companies and related businesses (“Metrofile Group” or “Group”).

Personal information refers to information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person.

Third party refers to any entity, individual, trust, partnership, or joint venture, whom is not part of the Metrofile Group organisational structure but works with Metrofile. Examples include consultants, outsourcers, etc.

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