



MANDALA CONSULTING
INTEGRATION FOR SUSTAINABILITY

Employee Privacy Notice

Purpose of this Employee Privacy Notice

This Employee Privacy Notice explains our practices as the responsible party regarding the processing of personal information relating to our employees in connection with their employment at *Mandala Consulting* (hereinafter the “**Company**”). This document is not part of the employment contract, and we may update it from time to time, e.g. in accordance with the Protection of Personal Information Act 4 of 2013 (“**POPIA**”) or other applicable law, or if we implement new systems or processes that involve the use of personal information.

What Personal Information is collected?

The Company collects and processes the following categories of personal information about you (hereinafter the “**Personal Data**”):

- **identification data**, such as your name, employee/staff ID, citizenship, date of birth, personal identification number/social security number and tax reference;
- **contact details**, such as your work and home addresses, telephone numbers, email addresses, and emergency contact details;
- **information about your job**, such as job title and code, work location, division, department, position level, employment contract, assigned tasks and projects, use of Company devices and IT tools, reporting derived from Company IT tools, registration of working hours, flexitime and holiday registration, manager's name, business travel data, ethics and compliance training data, start and end date;
- **information about your salary and benefits**, such as your basic salary, bonus and commission entitlements, insurance benefits (including information about you and your dependents that we provide to the insurer), tax code, accrued salary information, and information relating to your pension;
- **communication data/IT information**, such as IP address and user login name, emails, telephone connections; and
- **performance and disciplinary information**, such as performance reviews, evaluations and ratings, information about disciplinary allegations, the disciplinary process and any disciplinary warnings, details of grievances, and any outcome.

In addition, the Company processes the following special categories of personal information about you (collectively, "**Sensitive Personal Data**"):

- **number of sick days** for purposes of administering and providing compensation, administering the workforce (e.g., workforce planning), and compliance with applicable laws and employment-related requirements (e.g., statutory wage tracking);
- **information on work-related accidents** for purposes of administering and providing compensation (e.g., insurance compensation), and compliance with applicable laws and employment-related requirements (e.g., work safety, reporting obligations);
- **information on disability** (if provided voluntarily) for purposes of administering the workforce (e.g., accommodating the work place) and compliance with applicable laws and employment-related requirements; and
- **information on maternity leave** for purposes of administering the workforce (e.g., workforce planning), and compliance with applicable laws and employment-related requirements.

The Company stores and processes such Personal Data and Sensitive Personal Data that the Company receives from you in connection with the employment relationship. To the extent necessary, the Company also processes such Personal Data and Sensitive Personal Data that the Company lawfully received from public sources, other group companies and/or other authorised third parties (e.g. public authorities).

You are obliged to provide the Personal Data and, where applicable, Sensitive Personal Data, as part of your employment. If you do not provide the (Sensitive) Personal Data you may not be able to perform your job or receive your salary, and the Company may be required to terminate your employment.

The purpose of collecting Personal Data and Sensitive Personal Data

Sensitive Personal Data is collected, processed and used for the purposes mentioned above.

Personal Data is collected, processed and used for the following purposes:



Purpose	Categories of Personal Data Involved
<p>administering and providing compensation, benefits and other work-related allowances, including reporting of benefit entitlements and use, such as discount agreements and Company share programme entitlements, if applicable</p>	<p>identification data, contact details, information about your job, information about your salary and benefits, and performance and disciplinary information</p>
<p>administering the workforce, including managing work activities, providing promotions, producing and maintaining corporate organisation charts, matrix management, entity and intra-entity staffing and team management, managing and monitoring business travel, carrying out workforce analysis, conducting talent management and career development, providing references as requested, and administering ethics and compliance trainings, where applicable</p>	<p>identification data, contact details, information about your job, information about your salary and benefits, and performance and disciplinary information</p>
<p>complying with applicable laws and employment-related requirements along with the administration of those requirements, such as income tax and employment and immigration laws</p>	<p>identification data, contact details, information about your job, information about your salary and benefits, and performance and disciplinary information</p>
<p>ensuring compliance with applicable the Company rules, guidelines and procedures, including without limitation avoiding the use of unauthorised file share programs and the use of the Company email accounts for illegal or inappropriate purposes</p>	<p>identification data, contact details, information about your job, information about your salary and benefits, communication data/IT information, and performance and disciplinary information</p>

communicating with your designated contacts in case of an emergency	identification data and contact details
responding to and complying with requests and legal demands from regulators or other authorities in or outside of your home country	identification data, contact details, information about your job, information about your salary and benefits, communication data/IT information, and performance and disciplinary information

The legal basis for collecting Personal Data

The processing of your Personal Data is necessary for the performance of your employment contract.

Moreover, the processing of your Personal Data is necessary to comply with a legal obligation, in particular in the area of labour and employment law, social security and protection law, data protection law, tax law, and corporate compliance laws.

Finally, in certain cases, the processing of your Personal Data is necessary to fulfil or protect the legitimate interest of the Company. The legitimate interests and objectives of the Company could be in particular:

- measures to maintain operational activity (e.g. succession planning),
- measures for personnel development planning (e.g. evaluation),
- prevention of fraud, misuse of company IT systems, or money laundering,
- physical security, IT and network security,
- measures due to organizational changes, e.g. mergers and acquisitions and
- offer employee benefits such as discount agreements or share programme entitlements,
- implementation and operation of a group-wide matrix structure and group-wide information sharing, measures to maintain operational activity (e.g. succession planning), where applicable.

The Company has deemed that these interests override any interests or fundamental

rights and freedoms you may have which require the protection of personal data unless otherwise prescribed by law. Special regard is given to the reasonable expectations of you as an employee in the employment relationship, and the fact that the processing is ultimately also in your interest.

The legal basis for collecting Sensitive Personal Data

The processing of your Sensitive Personal Data is necessary for the purposes of carrying out the obligations and exercising the specific rights of the Company or you in the field of employment law and labour law and as permitted by POPIA.

Moreover, the processing of your Sensitive Personal Data is necessary for the purposes of establishing, exercising, or defending legal claims.

Your Personal Data and Sensitive Personal Data may only be processed for different purposes if this is necessary to comply with legal or regulatory obligations (e.g. transfer to courts or criminal prosecution authorities), if you have consented to the respective processing, or if the processing is otherwise lawful under applicable law. If processing for a different purpose takes place we may provide you with additional information.

Details of the Responsible Party and recipients of the Personal Data and Sensitive Personal Data

Within the Company, access to Personal Data and Sensitive Personal Data will be granted to departments and persons, e.g. superiors, HR department, works councils and other control functions on a need to know basis and to the extent required to comply with a contractual or statutory obligation.

The Company's subsidiaries and/or affiliates may receive your personal data as necessary for the purposes mentioned above, in particular in order to administer the workforce, to operate in the matrix structure, monitor and ensure compliance with applicable Company procedures, and respond to and comply with requests and legal demands. The transfer to these persons is based on our legitimate interests, such as personnel management, or for

IT support purposes.

The Company can share your Personal Data and Sensitive Personal Data with third parties acting as the Company's operators for processing your Personal Data and Sensitive Personal Data according to the purposes mentioned above. The following types of operators are used:

- Business partners who assist the Company in payroll matters, including providing systems for the processing
- Business partners who assist the Company in IT administration matters, including providing systems for the processing
- Business partners who assist the Company in employee administration matters, including providing systems for the processing
- Business partners who assist the Company in travel management matters, where applicable.
- Other recipients, typically consultants, that will assist with IT support for the above systems and assist with the processing of your Personal Data and Sensitive Personal Data on behalf of the Company.

Other authorised third parties may need to access or store Personal Data and Sensitive Personal Data if required or permitted by applicable law (e.g. governmental authorities, courts, external advisers and similar third parties that are public bodies).

Transfer of the Personal Data and Sensitive Personal Data

In certain cases, your Personal Data and Sensitive Personal Data may be transferred to outside of the Republic of South Africa ("**RSA**"). The Company ensures that such transfer will be carried out in accordance with POPIA and/or other relevant law. This entails that any party outside of RSA which comes into possession of your Personal Data and Sensitive Personal Data must ensure an adequate level of protection, for example by entering into the standard contractual clauses, or implement and comply with binding corporate rules, where applicable. If you have any inquiries in relation hereto, you are welcome to contact the Company – please see the contact information below in the '*How*

can you access your Personal Data and Sensitive Data?/Further rights' section.

Retention period

Your Personal Data is stored by the Company and/or our service providers/operators, to the extent necessary for the performance of our obligations and strictly for the time necessary to achieve the purposes for which the information is collected, in accordance with POPIA. Please note that the employment relationship is a continuing obligation existing for a longer period. When the Company no longer needs to use your personal data to comply with contractual or statutory obligations, we will remove it from our systems and records and/or take steps to properly anonymise it so that you can no longer be identified from it, unless we need to keep your information, including personal data, to comply with legal or regulatory obligations to which the Company is subject, e.g. statutory retention periods, or if we need it to preserve evidence within the statutes of limitation.

How can you access your Personal Data and Sensitive Personal Data?/Further rights

Under POPIA and any other applicable law, you may have various rights (under the conditions set out in such applicable law).

Withdrawal of consent: If you have declared your consent for any Personal Data processing activities you can withdraw this consent at any time with future effect. Such a withdrawal will not affect the lawfulness of the processing prior to the consent, or the continued processing if the law so requires.

Right of access: You may have the right to obtain from us confirmation as to whether or not (Sensitive) Personal Data concerning you is processed, and, where that is the case, to request access to this (Sensitive) Personal Data. The access information includes – inter alia – the purposes of the processing, the categories of (Sensitive) Personal Data concerned, and the recipients or categories of recipients to whom the (Sensitive) Personal Data has been or will be disclosed. However, this is not an absolute right and the interests of other persons may restrict your right of access.

You may have the right to obtain a copy of the (Sensitive) Personal Data undergoing processing. For further copies requested by you, we may charge a reasonable fee based on administrative costs.

Right to rectification: You may have the right to obtain from us the rectification of inaccurate (Sensitive) Personal Data concerning you. Depending on the purposes of the processing, you may have the right to have incomplete (Sensitive) Personal Data completed, including by means of providing a supplementary statement.

Right to erasure ("right to be forgotten"): Under certain circumstances, you may have the right to obtain from us the erasure of (Sensitive) Personal Data concerning you and we may be obliged to erase such (Sensitive) Personal Data.

Right to restriction of processing: Under certain circumstances, you may have the right to obtain from us restriction of processing your (Sensitive) Personal Data. In this case, the respective data will be marked and may only be processed by us for certain purposes.

Right to object: Under certain circumstances, you may have the right to object the processing of your (Sensitive) Personal Data by Company, on grounds relating to your particular situation, at any time. Company may be required to cease processing your personal data.

Right to data portability: Under certain circumstances, you may have the right to receive the (Sensitive) Personal Data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and you may have the right to transmit that data to another entity without hindrance from us.

If you would like to know more or wish to exercise one or more of the rights listed above, you are welcome to contact the Company through the Company's HR channel or applicable Company communication channel in accordance with the Company's internal policies and procedures.

Alternatively you may contact the Company's Information Officer at:

Mr Stefan Viljoen

Contact Number: 076 907 3277

Email address: Stefan@mandalaconsulting.co.za

Filing of complaints

In case of complaints, you also have the right to lodge a complaint with the Information Regulator regarding the processing of your Personal Data and/or Sensitive Personal Data.



Changes to the Privacy Notice

We reserve the right to change or supplement this Employee Privacy Notice at any time. To the extent the changes of Employee Privacy Notice are regarded as material and significant, you will be informed hereof, for example via email on Insite.

Last updated: July 2021



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