Dangote Cement South Africa (Pty) Ltd

PRIVACY POLICY

Version:	1 – 24 May 2021 by Phukubje Pierce Masithela Attorneys
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Approval by:	Executive Committee

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1. INTRODUCTION

1.1. South Africa's Protection of Personal Information Act, 4 of 2013 ("**POPIA**") is the law which provides for the protection of the right to privacy. The right to privacy is a constitutional right found under section 14 of the Constitution of the Republic of South Africa, 1996. POPIA has put in place minimum requirements or conditions which must be complied with by public and private bodies when processing Personal Information. It also provides persons with rights and remedies to protect their Personal Information from processing that is not in accordance with the provisions of POPIA.

1.2. As Dangote Cement South Africa (Pty) Ltd ("**DCSA**", "we", "us"), we value people's Personal Information. This Privacy Policy ("**Policy**") establishes DCSA's approach to the protection and management of Personal Information when processing that information for its own purposes or on behalf of its customers. This Policy should be read together with other subordinate policies focused on achieving compliance with POPIA.

2. DEFINITIONS

2.1. Data Subject means the person to whom Personal Information relates.

2.2. Information Officer means the Chief Executive Officer or delegated official of DCSA.

2.3. Information Regulator means the regulator in South Africa tasked with ensuring compliance with POPIA.

2.4. Operator means a person who processes Personal Information for and on behalf of the Responsible Party in terms of a contract or mandate, without coming under the direct authority of the Responsible Party.

2.5. Personal Information means information relating to an identifiable, living natural person and where applicable, an identifiable, existing juristic person as defined under POPIA.

2.6. Personal Information of Children means Personal Information concerning a natural person under the age of 18 years who is not legally competent, without the assistance of a competent person, to take any action or decision in respect of any matter concerning him or herself.

2.7. Processing includes the collection, receipt, recording, organization, collation, storage, updating, modification, retrieval, alteration, consultation or use of

Personal Information.

2.8. Responsible Party means a public or private body or any other person which, alone or in conjunction with others, determines the purpose of and means for processing Personal Information.

2.9. Special Personal Information means Personal Information concerning the religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life or biometric information of a Data Subject, or the criminal behaviour of a Data Subject.

3. PURPOSE OF THE PRIVACY POLICY

3.1. The purpose of this Policy is to set out a framework to satisfy the standards contained in POPIA.

3.2. This Policy sets out how DCSA processes Personal Information.

3.3. It also provides the standards that must be met when processing Personal Information.

4. SCOPE OF THE PRIVACY POLICY

4.1. The Policy applies to any of the following;

4.1.1. DCSA's employees, contractors, part-time and temporary workers, and any persons who are employed by other entities to perform work for or on behalf of DCSA and are granted access to Personal Information.

4.1.2. DCSA's clients, service providers, and other stakeholders who are in possession of, or have been granted access to Personal Information for which DCSA is a Responsible Party or an Operator.

5. CONTACT DETAILS

5.1. If you have any questions regarding the provisions of this Privacy Policy, your rights under this Privacy Policy or any other data privacy issues, you can contact DCSA's Information Officer and/or Deputy Information Officer at the address below, who will either deal with the matter or forward it to the appropriate person or department within DCSA.

5.1.1. Postal Address: P.O. Box 68149, Highveld, Centurion, 0169

5.1.2. Street Address: First floor, Block A, Southdowns Office Park, cnr.

Karee and John Vorster Streets, Irene, Pretoria.

5.1.3. Telephone Number: 012-684 6300

5.1.4. Fax Number: 012-684 6409

5.1.5. Email: legal@sepcem.co.za;

5.2. The Information Officer and/or Deputy Information Officer is responsible for ensuring that changes to this Policy are notified to the business units and to individuals whose Personal Information is processed by DCSA.

5.3. If you are unhappy about the way in which DCSA processed your Personal Information, please approach our Information Officer and/or Deputy Information Officer through the procedure set out in our PAIA Manual.

6. CONDITIONS FOR LAWFUL PROCESSING OF PERSONAL INFORMATION

This Policy applies in all cases where DCSA collects, uses and transfers Personal Information as a Responsible Party.

6.1. Condition 1 - Accountability

6.1.1. DCSA will always comply with any applicable legislation relating to Personal Information (e.g. in South Africa, it is POPIA) and will ensure that, where Personal Information is collected and used, this is done in accordance with such law.

6.1.2. DCSA will take measures to ensure that POPIA's conditions are complied with when it initially determines why and how it processes Personal Information and during the processing itself (section 8 of POPIA).

6.1.3. In cases where DCSA is operating in jurisdictions where there are no adequate data protection and privacy laws, it must ensure that the processing of Personal Information in these jurisdictions complies with this Policy.

6.1.4. DCSA's Information Officer and/or Deputy Information Officer will be responsible for ensuring that DCSA, its employees and service providers all comply with this Policy and with POPIA.

6.1.5. Non-compliance with POPIA presents high risks for DCSA: all employees and service providers need to take compliance seriously.

6.2. Condition 2 – Processing limitation

6.2.1. DCSA will process Personal Information lawfully and in a way that does not

infringe Data Subjects' privacy (section 9 of POPIA).

6.2.2. DCSA will only process Personal Information if it is adequate, relevant and not excessive i.e., we will only lawfully collect that amount of Personal Information that is necessary for our purposes (section 10 of POPIA). For example, it is not necessary to request visitors to provide their birth date when they sign in to access our premises.

6.2.3. We will only process Personal Information if:

6.2.3.1. we have obtained consent from the Data Subject;

6.2.3.2. we need to do so to ensure completion of a contract with a Data Subject;

6.2.3.3. another law obliges us to do so;

6.2.3.4. it protects the Data Subject's legitimate interest (e.g., giving out Personal Information to medical staff in an emergency); or

6.2.3.5. it is in our or a third party's legitimate interest (e.g., we conduct research and obtain Personal Information of a supplier that has defaulted in order to sue them).

6.2.4. We will allow a Data Subject to withdraw consent to processing or object to processing at any time. If the law permits, we will stop such processing (section 11 of POPIA).

6.2.5. We will always collect Personal Information directly from a Data Subject unless the law permits us to do so in other ways (e.g., if the information is publicly available or the Data Subject has published the Personal Information him/herself) (section 12 of POPIA).

6.3. **Condition 3 – Purpose specification**

6.3.1. DCSA will not collect Personal Information unless it is for a specific and lawful purpose and related to our activities. We will ensure that the Data Subject knows why we are collecting such information, unless the law excuses us from doing so (e.g., it may defeat the objective of a criminal investigation to do so) (section 13 of POPIA).

6.3.2. We will not keep a Data Subject's Personal Information for longer than is necessary to satisfy the purpose for which it was collected and processed. Records of Personal Information can only be retained for longer if the law requires us to do so; if we need the record to carry out our activities; if a contract with the Data Subject requires us to; or if the Data Subject has

provided us with their consent to retain the record. For further information on principles and conditions to retain or destroy a record, please see our Data Retention and Destruction Policy.

6.3.3. We will ensure that we keep records of any Personal Information, used to make a decision, about a Data Subject, for any period required by law, or for a period that will give the Data Subject a reasonable opportunity to request the information.

6.3.4. As soon as we do not have a reason to keep a record of Personal Information, we dispose of the record. When disposing of a record, we will ensure that the record cannot be reconstructed.

6.4. **Condition 4 – Further processing limitation**

6.4.1. If DCSA engages in further processing of Personal Information, it will only do so if this is compatible with the original purpose for which it was collected or if it is permitted or required by law. An example of further processing is when DCSA wishes to share Personal Information with one of its subsidiary companies or affiliates.

6.4.2. Further Processing will be regarded as compatible with the purpose of collection if:

6.4.2.1. Data Subject has consented to the further Processing.

6.4.2.2. Personal Information is contained in a public record.

6.4.2.3. Personal Information has been deliberately made public by the Data Subject.

6.4.2.4. Further Processing is necessary to maintain, comply with or exercise any law or legal right.

6.4.2.5. Further Processing is necessary to prevent or mitigate a threat to public health or safety, or the life or health of the Data Subject or a third party.

6.5. **Condition 5 – Information quality**

6.5.1. DCSA will keep Personal Information accurate and up to date.

6.5.2. Employees should, as far as reasonably practicable, follow the following

guidance when collecting Personal Information:

6.5.2.1. Personal Information should be dated when received.

6.5.2.2. A record should be kept of where the Personal Information was obtained.

6.5.2.3. Any updates or changes to Personal Information records should be dated.

6.5.2.4. If Personal Information is not necessary, it should be deleted or destroyed.

6.5.2.5. Personal Information should be stored securely using the best security measures offered by DCSA.

6.6. **Condition 6 – Openness**

6.6.1. DCSA will ensure that Data Subjects are always told in a clear and comprehensive way how their Personal Information will be used.

6.6.2. DCSA must provide Data Subjects with the following information:

6.6.2.1. What Personal Information is collected.

6.6.2.2. The purpose of collection and Processing of the Personal Information.

6.6.2.3. DCSA's name, address and contact details.

6.6.2.4. whether the supply of their information is voluntary or mandatory.

6.6.2.5. the consequences of failing to provide the information.

6.6.2.6. the relevant and applicable laws that authorise or require the collection of the information.

6.6.2.7. whether DCSA intends on transferring the information to a third country.

6.6.2.8. information about a Data Subject's rights in respect of their Personal Information (including the rights to access and rectify information, to object to the processing of their information and to lodge complaints).

6.6.2.9. the uses and disclosures made of their Personal Information (including the secondary uses and disclosures of the information).

6.6.2.10. the recipients or categories of recipients of their Personal Information.

6.6.3. This information must be provided before DCSA collects the Personal Information from the Data Subject or, if not practicable to do so at the point of

collection, as soon as possible after that.

6.6.4. Where DCSA obtains a Data Subject's Personal Information from a source other than that Data Subject, DCSA will disclose the source from which the information is collected to the Data Subject when their Personal Information is first recorded or, if it is to be disclosed to a third party, no later than the time when the data is first disclosed (see sections 17 and 18 of POPIA).

6.7. **Condition 7 – Security safeguards**

6.7.1. DCSA will implement appropriate technical and organisational measures to protect Personal Information against accidental or unlawful destruction, being lost or damaged, and from unauthorised disclosure or access.

6.7.2. **Written records**

6.7.2.1. Personal Information records should be kept in locked cabinets.

6.7.2.2. Personal Information records should not be left unattended in areas where unauthorised people may access them.

6.7.2.3. DCSA shall implement and maintain a Clean Desk Policy 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.

6.7.2.4. Personal Information which is no longer required should be disposed of by shredding.

6.7.2.5. Any loss or theft of, or unauthorised access to, Personal Information must be immediately reported to the Information Officer.

6.7.3. **Electronic Records**

6.7.3.1. All electronically held Personal Information must be saved in a secure database.

6.7.3.2. As far as reasonably practicable, no Personal Information should be saved on individual computers, laptops or hand-held devices.

6.7.3.3. All computers, laptops and hand-held devices should be access protected with a password or fingerprint scan, with the password being of reasonable complexity and changed frequently.

6.7.3.4. DCSA shall implement and maintain an Optimated Screen Policy which provides that computers or laptops will be automatically screen locked

after a certain length of time.

6.7.3.5. 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.

6.7.3.6. 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 Information Technology (IT) department, who shall take all necessary steps to remotely delete the information, if possible.

6.7.4. **Relationship with Operators**

6.7.4.1. DCSA will ensure that providers of services to DCSA also adopt appropriate and reasonable security measures.

6.7.4.2. DCSA must enter into written contracts with its Operators to ensure that the Operators process Personal Information in line with POPIA and have adequate and reasonable security safeguards to protect Personal Information they process on behalf of DCSA.

6.8. **Condition 8 – Data Subject participation**

6.8.1. Data Subjects are entitled to be supplied with a record of their Personal Information held about them by DCSA. Data Subjects have a right to make a written request to DCSA in the manner set out in our PAIA Manual.

6.8.2. Data Subjects are entitled to request rectification, deletion, blocking or completion, as appropriate, of their Personal Information, which is shown to be inaccurate or incomplete and, in certain circumstances, to object to the processing of their Personal Information.

7. PROCESSING OF SPECIAL PERSONAL INFORMATION

7.1. DCSA will only use Special Personal Information if it is necessary to use it.

7.2. DCSA will assess whether Special Personal Information is required for the proposed use and if it is absolutely necessary in the context of the business. Where DCSA is required to process Special Personal Information, specific authorisation is required based on the type of Special Personal Information concerned.

7.3. DCSA will only use Special Personal Information where the Data Subject's

express consent has been obtained, unless DCSA has an alternative legitimate basis for doing so consistent with POPIA (see sections 26 to 33 of POPIA).

8. PROCESSING OF PERSONAL INFORMATION OF CHILDREN

8.1. DCSA will only process Personal Information of Children if it is necessary to use it.

8.2. DCSA will assess whether Personal Information of Children is required for the proposed use and when it is necessary in the context of the business. DCSA will ensure that the Personal Information of Children is processed in accordance with the Conditions contained in this Privacy Policy and POPIA.

8.3. DCSA will only use Personal Information of Children where the express consent of a competent person has been obtained, unless DCSA has an alternative legitimate basis for doing so consistent with POPIA (see sections 34 and 35 of POPIA).

9. DIRECT MARKETING

9.1. DCSA will not use the Personal Information of Data Subjects for the purpose of direct marketing, unless DCSA has obtained the consent of the Data Subject or the Data Subject is an existing customer of DCSA.

9.2. DCSA can only approach a Data Subject once to obtain the required consent. If the Data Subject objects or does not provide their consent, DCSA should not send any further direct marketing communications to such Data Subject.

10. AUTOMATED DECISION MAKING

10.1. Where decisions are made by automated means, Data Subjects will have the right to know the logic involved in the decision and DCSA will take the necessary measures to protect the legitimate interests of such Data Subjects.

10.2. No evaluation of, or decision about, a Data Subject which significantly affects them can be based solely on the automated processing of Personal Information, unless measures are taken to protect the legitimate interests of such Data Subjects.

11. TRANSFERS OF PERSONAL INFORMATION OUTSIDE THE REPUBLIC

11.1. DCSA will not transfer Personal Information to third parties outside South Africa, without ensuring adequate protection for the information in accordance with the standards set out by this Privacy Policy.

11.2. In principle, transborder transfers of Personal Information to third parties are not allowed without appropriate steps being taken, such as ensuring that the third

party is subject to a law, binding corporate rules or binding agreement, which provide an adequate level of protection, signing up to appropriate contractual agreements, or obtaining the consent of Data Subjects, which will protect the Personal Information being transferred in accordance with the standards set out by this Policy.

12. RISK AND IMPLICATIONS

12.1. Information security and data protection is an integral part of DCSA's daily responsibilities. DCSA has a duty to protect all Personal Information and ensure that only authorised individuals have access to it.

12.2. Should employees fail to comply with this Policy, DCSA could be exposed to security breaches, theft of intellectual property, and/or identity fraud.

12.3. Failure to comply with this Policy may also constitute a breach of legislative and/or regulatory requirements.

13. RESPONSIBILITIES

13.1. The DCSA Exco is responsible for:

13.1.1. Approving the Policy, associated data retention policies, procedures or schedules and any subsequent changes to these documents.

13.2. **Company Secretary**

13.2.1. Ensures that contractual obligations are in line with this Policy.

13.3. **Information Officer / Deputy Information Officer**

13.3.1. Publicising the Policy and any subsequent procedure and schedule.

13.3.2. Custodianship of the Policy.

13.4. **IT Department**

13.4.1. Provide appropriate IT facilities/mechanisms to facilitate compliance with this Policy.

13.4.2. Automated retention periods for electronic Records of Personal Information.

13.5. **DCSA staff, contractors and agency workers**

13.5.1. Handling Personal Information in accordance with applicable Retention Periods.

13.5.2. Complying with this Policy and with relevant legislation.

13.6. **Heads of Department, managers and supervisors**

13.6.1. Ensuring that the Policy and subsequent schedules and procedures are implemented within their department, and ensuring all necessary resources are available.

14. IMPLEMENTATION AND ENFORCEMENT

14.1. **Training**

14.2. DCSA will provide appropriate training to employees who have permanent or regular access to Personal Information, who are involved in the collection of Personal Information or in the development of tools used to process Personal Information.

14.3. Modifications and updates to data protection and information sharing policies, legislation, or guidelines will be brought to the attention of all staff.

14.4. **Enforcement Rules**

14.5. DCSA relies on all its employees and contractors to comply with the letter and spirit of the law. Failure to comply with this Policy or any of the supporting and complementing policies, standards, and / or procedures must be construed as misconduct and may result in one or more of the actions mentioned below:

14.5.1. The restriction, suspension or termination of the user's access to the network, information, information assets and facilities, including immediate suspension of his or her access or rights pending further investigations.

14.5.2. The institution of legal proceedings by DCSA, including but not limited to criminal prosecution under applicable laws that may prevail in South Africa from time to time.

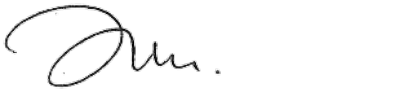
14.5.3. The taking of disciplinary steps against the user, which may lead to suspension or dismissal.

15. REVIEW AND MONITORING

15.1. All employees are responsible for monitoring their compliance with the principles

or procedures detailed in this Policy. Departmental managers and supervisors should also monitor compliance on a regular basis. Any deviations or exceptions must be approved by the Information Officer.

15.2 The Information Officer will ensure that the Policy is reviewed annually or as required and should there be material changes, approval will be sought from the Executive Committee members.



DUAN CLAASSEN
CEO
DATE: 31 July 2025