



## DATA PROTECTION POLICY

Information about employees provided to the Company in the course of recruitment and employment, including information about third parties, will be processed by the Company for business purposes and in the discharge of its legal obligations, including without limitation its employment and other supporting activities. This may include, for example, details of your name, recruitment information such as your application form and cv, references, and membership of any professional bodies, address, other contact details, date of birth, absence records, skills, work performance history, appraisals, disciplinary and training records, salary, benefits, marital status, family information, emergency contacts, information about your contract of employment, health and pension details, your bank account, your passport or other ID documents, qualifications, skills and experience. The Group is committed to the principles set out in all applicable data protection legislation.

This information is used for legitimate business purposes, including the following:

- Pre-employment checks and to decide whether to employ you
- To check that you have the legal rights to work for us
- Equal opportunity monitoring.
- Payroll operation and pension administration.
- Education and training.
- Career development and appraisals.
- Operation of contract of employment including employee benefits, plans and insurances.
- To administer and operate IT systems policies and procedures.
- To carry out related Human Resource and compliance functions.
- To assess compliance with any purpose required by law.
- If it is necessary for the legitimate interests of the Company or Group and if your interests and rights do not override ours.

Such data may also be retained in accordance with the law after the end of employment for personnel and management purposes, such as maintaining historic staff records, the provision of references, pension administration and other uses required by law.

Any questions about data protection should be addressed to the \*Chief Executive Officer in the first instance.

### Third Party Disclosure

The Company's policy is to protect employees' rights to privacy, and adequate security measures are, at all times, to be in place to ensure that there is no inappropriate access to, alteration or deletion of personal data. As such, all personal data is kept securely and released only to those third parties named below:

- The Group's auditors.
- Payroll administrators for the Group.
- Employee benefits advisers and operators.
- Those third parties to whom the Group is required to transfer data by law or regulatory requirement.
- Those third parties to whom the disclosure is designed to protect against fraud or illegal activities or to enable the Group to carry out its legitimate business activities.



All employees are required to promptly notify their line manager or supervisor of any changes to their personal details (e.g. home address or emergency contact).

### **Employees' Obligations**

Employees authorized to store/process personal data relating to Group personnel, customers, suppliers and other third parties shall ensure that it is:

- kept securely;
  - never inappropriately disclosed or transferred outside the Group;
  - adequate, relevant and not excessive for the purpose for which it is held;
  - up-to-date and accurate;
  - not kept for longer than is necessary and permanently deleted or destroyed when no longer required.
- (a) Requests for personal data should be referred to the Chief Executive Officer.
- (b) Sometimes we might share your personal data with Group companies to carry out our obligation under our contract with you or for our legitimate interests.
- (c) We require those companies to keep your personal data confidential and secure and to protect it in accordance with the law and our policies. They are only permitted to process your data for the lawful purpose for which it has been shared and in accordance with our instructions.

Signed

*Andre Labuschagne*

General Manager  
Mabiza Resources Limited

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