

POPIA PRIVACY AND DATA PROTECTION POLICY

1. INTRODUCTION

The Protection of Personal Information Act, 2013 ("POPIA") provides for 8 Data protection Information principles to comply with to ensure the protection of all data that relates to companies, employees and Clients. The Promotion of Access to Information Act, 2 of 2000 provides for access to such information and in which instances it may be refused.

2. PURPOSE

Data privacy and data protection is important to ILS SA (Pty) LTD and this Policy sets out the POPIA principles in line with existing FAIS requirements to ensure the safekeeping of all Data by ILS SA (Pty) LTD and Persons/Employees/Parties (as applicable). This Policy applies to all Data obtained via products, services, websites, events operated by ILS SA (Pty) LTD or by any other means.

3. DEFINITIONS

- Information: means any data relating to the Data Subject and include reference to personal information.
- Data Subject: means the person to whom the personal information relates to and can include Clients, employees and/or Company information.
- Processing: Any use by any means of a Data Subject's Information.

4. THE 8 POPIA PRINCIPLES

Principle 1: Accountability: ILS SA (Pty) LTD must appoint an Information Officer who will be responsible for ensuring that the 8 POPIA information principles are implemented and enforced in ILS SA (Pty) LTD

Principle 2: Processing Limitation: Only necessary Information should be collected, directly from Data Subject with their consent and the processing thereof should be for a lawful purpose.

Principle 3: Purpose specification: Personal Information should be collected for a specific purpose and the Data Subject must be made aware of the purpose for which it was collected.

Principle 4: Further processing limitation: Further processing of Personal Information must be compatible with the purpose for which the information was collected (Principle 3).

Principle 5: Information quality: Reasonable steps must be taken to ensure that all Information collected is accurate, complete, not misleading and up to date in accordance with the purpose for which it was collected (Principle 3).

Principle 6: Openness: The Party collecting the Information must be transparent and inform the Information Regulator if it is going to process the Information and ensure that the Data Subject has been made aware that his/her Information is going to be collected.

Principle 7: Security Safeguards: The integrity of the Information under the control of a party, must be secured through technical and operational measures.

Principle 8: Data Subject Participation: Data Subjects have the right (free of charge) to request confirmation from the party that holds their Information on the details they hold and may request for it to be amended/deleted.

5. PRACTICAL IMPLICATIONS OF THE POPIA DATA PROTECTION PRINCIPLES

Appointment of the Information Officer:

ILS SA (Pty) LTD has appointed an Information Officer who is a senior person in ILS SA (Pty) LTD. Such person will be responsible for ensuring that ILS SA (Pty) LTD has been properly informed and trained on ensuring the safekeeping and protection of Information in ILS SA (Pty) LTD and that the required processes are implemented to ensure compliance.

The Information Officer can be contacted at

Tel: +27 (087) 720-1054 or

Email: info@ILS SA (Pty) LTD co.za

Information Purpose:

The type of Information ILS SA (Pty) LTD collects will depend on the purpose for which the Data is collected and used.

ILS SA (Pty) LTD will collect the necessary Information from Data Subjects for various purposes, including *inter alia* the following:

- rendering suitable services for e.g. services (including the rendering of advice and intermediary services) and administrative services to Data Subjects;
- improving services and product offerings to Data Subjects;
- providing information and resources most relevant and helpful to Data Subjects;
- appointing suitable individuals/companies to provide services/products to Data Subjects; and
- ensuring compliance with legislation that requires specific information to be collected.

Access to Information:

- Data Subjects have the right to request a copy of the Information that ILS SA (Pty) LTD holds on them or their business. Should a Data Subject wish to obtain any such information, the Data Subject may request it by contacting the Information Officer on the details provided above. Any such access request may be subject to the payment of an allowable administration fee.
- ILS SA (Pty) LTD will not disclose or share Information relating to any Data Subject unless: it is specifically agreed with the Data Subject; it is already publicly available or in the interests of the public; required in terms of Law or if ILS SA (Pty) LTD believes in good faith that the Law requires disclosure thereof.
- ILS SA (Pty) LTD PAIA Manual (in terms of the Promotion of Access to Information Act, 2 of 2000) sets out the process for access by third parties to a Data Subject's Information kept by ILS SA (Pty) LTD and the instances in which it may be refused.

Collection of Information:

- General: ILS SA (Pty) LTD collects Information in various ways including but not limited to, directly from individuals (for example, when purchasing a product, solution or service, registering an account, using a product, or signing up for a newsletter), from employers, publicly available information, through cookies, and/or similar technology. Where possible, ILS SA (Pty) LTD must inform Data Subjects which information they are legally required to provide to ILS SA (Pty) LTD and which information is optional. With the Data Subject's consent, ILS SA (Pty) LTD may supplement the information with other information received from other companies and/or organizations such as the South African Revenue Services (SARS) in order to enable ILS SA (Pty) LTD to render suitable and proper services to Data Subjects.

- **User Supplied Information:** The Data Subject may be required to provide some personal information, for example, his/her name, address, phone number, email address, payment card information (if applicable), and/or certain additional categories of information as a result of using/receiving professional services, purchasing products or solutions, and using websites and related services. ILS SA (Pty) LTD will keep this information in a contact database for future reference, as needed and only for the duration as the purpose exists.
- **Marketing:** ILS SA (Pty) LTD may use certain Information provided by Data Subjects to offer them further services that ILS SA (Pty) LTD believes may be of interest to them or for market research purposes. These services are subject to prior consent being obtained from Data Subjects. If a Data Subject no longer wishes to receive further services or offers from ILS SA (Pty) LTD it may unsubscribe from the services or contact the Information Officer at the contact details provided above.
- **Usage and Web server logs:** ILS SA (Pty) LTD may track information about a Data Subject's usage and visits on ILS SA (Pty) LTD website. This Information may be stored in usage or web server logs, which are records of the activities on ILS SA (Pty) LTD services, products and/or sites. ILS SA (Pty) LTD servers automatically capture and save such Information electronically. Some examples of the Information that may collected include the Data Subject's:
 - Unique Internet protocol address;
 - Name of the Data Subject's the unique Internet Service Provider;
 - the city, state, and country from which a Data Subject accesses ILS SA (Pty) LTD website;
 - the kind of browser or computer used;
 - the number of links clicked within the site;
 - the date and time of visits to the site;
 - the web page from which the Data Subject arrived on ILS SA (Pty) LTD site;
 - the pages viewed on the site;
 - Certain searches/queries conducted on the site via ILS SA (Pty) LTD services, products and/or websites; and
 - the information collected in usage or web server logs help ILS SA (Pty) LTD to administer the services, products and sites, analyse its usage, protect the product and/or website and content from inappropriate use and improve the user's experience.
- **Cookies:** In order to offer and provide a customized and personal service through ILS SA (Pty) LTD products and websites, ILS SA (Pty) LTD may use cookies to store and help track information about the Data Subject. A cookie is a small text file sent to the Data Subject's device that ILS SA (Pty) LTD uses to store limited information about the Data Subject's use of the services, products or website. ILS SA (Pty) LTD uses cookies to provide the Data Subject with certain functionality (such as to enable access to secure log-in areas and to save the Data Subject having to re-enter Information into product, services or website forms) and to personalize ILS SA (Pty) LTD services, products or website content. Without cookies, this functionality would be unavailable.

Retaining of Information:

ILS SA (Pty) LTD may retain personal information for purposes of reporting, administration, monitoring its website or to communicate with Data Subjects. Information may be retained only to serve the purpose of collecting the Information and be deleted/destroyed/de-identified once the purposes has been fulfilled, subject to other Regulatory requirements where Information is to be kept for a specific prescribed period. Information and records of a personal nature of Clients and/or Employees will be stored for a period of 5 years before being destroyed or de-identified.

Correcting/Amending/Updating/Deletion of Information:

Data Subjects are required to inform ILS SA (Pty) LTD should there be any changes to the Information kept by ILS SA (Pty) LTD. A Data Subject may request ILS SA (Pty) LTD to correct, amend, update or delete its Information at any time when applying or making use of any products, services or solutions of ILS SA (Pty) LTD by contacting the Information Officer at the contact details provided above. ILS SA (Pty)

LTD will take all reasonable steps to confirm the Data Subject's identity before making changes to Information.

Information Security:

ILS SA (Pty) LTD shall apply the following measure to ensure security of Personal information:

- ILS SA (Pty) LTD will take all reasonable precautions to protect Information from loss, misuse, unauthorized access, disclosure, alteration and destruction;
- ILS SA (Pty) LTD will not sell, rent, or lease mailing lists with Information to third parties and will not make a Data Subject's Information available to any unaffiliated parties, except for approved agents, suppliers and contractors, or as otherwise specifically provided for, as agreed with the Data Subject in writing or as required in terms of any Law;
- ILS SA (Pty) LTD may disclose Information of a Data Subject or Information about a Data Subject's usage of ILS SA (Pty) LTD services, products, websites or mobile applications to unaffiliated third parties as necessary to enhance services, product experience to meet ILS SA (Pty) LTD obligations to content and technology providers or as required by law, subject to agreements in place that provides for the protection of Information of Data Subjects;
- ILS SA (Pty) LTD has implemented appropriate security measures to help protect Information against accidental loss and from unauthorized access, use, or disclosure. ILS SA (Pty) LTD stores Information about Data Subjects in a restricted access server with appropriate monitoring and uses a variety of technical security measures to secure Information, including intrusion detection and virus protection software. ILS SA (Pty) LTD may also store and process Information in systems located outside ILS SA (Pty) LTD premises or the Data Subject's home country. However, regardless of where storage and processing may occur, ILS SA (Pty) LTD takes appropriate steps to ensure that Information is protected as required under relevant Data Protection/Privacy laws;
- The Data Subject's access to some of ILS SA (Pty) LTD services and content may be password protected and non-disclosure of such usernames and passwords are required to ensure the safekeeping of the Data Subjects Information. It is recommended that the Data Subject sign out and close the browser of the account or service at the end of each session;
- ILS SA (Pty) LTD is legally obliged to provide adequate protection of Information, hold and prevent unauthorised access and use of Information, ILS SA (Pty) LTD is therefore committed to ensure that all Information of the Data Subject (Clients and/or Employees) will be kept safe and secure and not be disclosed to any unauthorized third parties, without the consent of the relevant Data Subject.
- ILS SA (Pty) LTD may from time-to-time transfer Information within and between various worldwide locations in compliance with the country of origin's regulations and this Policy;
- Persons/Employees/Parties (as applicable) are not allowed to disclose any Information to any unauthorized third party as it may lead to a breach, disciplinary action and possible dismissal; and
- ILS SA (Pty) LTD takes reasonable steps to protect Personal Information, which is held in a firewalled server. ILS SA (Pty) LTD cannot, however, guarantee the security of information transmitted to it electronically from Data Subjects and they do so at their own risk. ILS SA (Pty) LTD maintains administrative, technical and physical safeguards to ensure protection of information against loss, misuse or unauthorized access, disclosure, alteration or destruction of the information provided to ILS SA (Pty) LTD by the Data Subject or the Data Subjects employer. ILS SA (Pty) LTD seeks to ensure compliance with Data Protection/Privacy regulations, laws and industry best practices in respect of the security of a Data Subjects Personal Information and despite ILS SA (Pty) LTD best endeavors to ensure protection of information.

Cross-Border Transfer:

- A Data Subject's Information may be stored and processed in countries, other than the Republic of South Africa, where ILS SA (Pty) LTD may have facilities or in which ILS SA (Pty) LTD engages service providers.

- Information of Data Subjects may be transferred to countries outside of the country of the Data Subjects residence and such countries which may have protection of personal information rules that are different from those of the Republic of South Africa.
- In certain circumstances, courts, law enforcement agencies, regulatory industries or security authorities in those other countries may be entitled to access a data subjects personal information.
- Some non-European Economic Area ("EEA") countries are recognised by the European Commission in terms of the GDPR as providing an adequate level of data protection according to GDPR standards. The Republic of South Africa is not recognised by the European Commission as having the requisite GDPR standards at this time.
- If a Data Subject is based in the EEA or in non-EEA recognised country, his/hers/its personal Information may be transferred to, accessible from, and/or stored at, a destination outside the EEA (or non-EEA recognised country) in which data laws may not be as comprehensive as is in the case of countries recognised by the European Commission.
- Regardless of the location of ILS SA (Pty) LTD processing of Data Subjects Information, ILS SA (Pty) LTD continues to use and implement a range of commercially reasonable physical, technical and procedural measures to ensure that Data Subjects Information is protected appropriately and in terms of applicable laws.

Popi Complaints Procedure:

- Data Subjects may submit a complaint, in writing, to ILS SA (Pty) LTD which the Information Officer shall take such complaint seriously and will address the POPIA related complaint within a reasonable timeframe.

Disciplinary Action

- In the event that a POPIA complaint or a POPIA infringement investigation has been finalised, either internally by ILS SA (Pty) LTD or externally by the Information Regulator, ILS SA (Pty) LTD may recommend any appropriate administrative, legal and/or disciplinary action to be taken against any employee reasonably suspected of being implicated in any non-compliant activity.
- In the case of ignorance or minor negligence, ILS SA (Pty) LTD shall undertake to provide further training and awareness.
- Any gross negligence or willful mismanagement of personal information will be considered as a serious form of misconduct for which ILS SA (Pty) LTD may summarily dismiss the relevant employee or responsible person involved. Disciplinary procedures will commence where there is sufficient evidence in support of such gross negligence.

APPROVAL OF THE POPIA PRIVACY AND DATA PROTECTION POLICY

Name & Surname	Title	Signature	Date
David O'Rourke	Director		18/09/2025
Shawn Lourens	Information Officer		18/09/2025