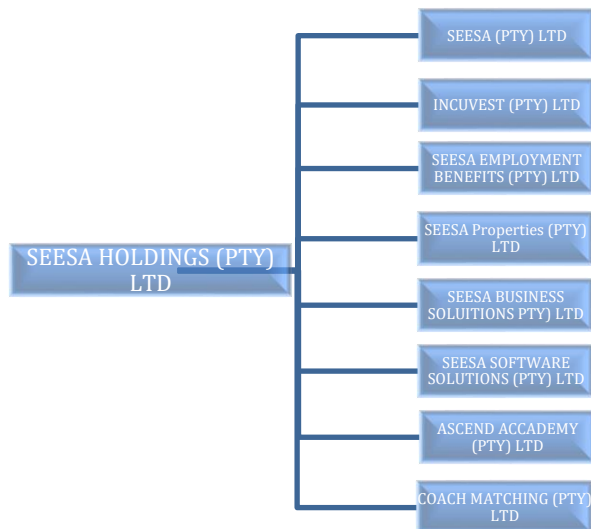


SEESA HOLDINGS (PTY) LTD HOLDINGS (PTY) LTD'S PRIVACY NOTICE

This document explains how SEESA Holdings (Pty) Ltd and its subsidiaries ("SEESA," "we," or "the Group") collect, use, and protect your personal information. If you have any questions, please contact us using the details provided at the end of this notice.



Guide to contents:

1. Introduction
2. Who we are
3. Type of personal information we collect
4. Where and when do we collect personal information
5. When will we process your personal information
6. When will we process your special personal information
7. How we use your information
8. How we share your information
9. Your rights and obligations
10. Changes to our policy
11. Other important information
12. Contact Information

1. Introduction:

SEESA is dedicated to protecting the privacy and confidentiality of your personal information. We collect personal information from our clients and their employees as well as prospective clients in order to provide them with our services. You may use our website to request information regarding our product offering, and to enquire about our existing services. This information is then stored on our online platform in order for us to connect with you.

This Privacy Notice explains how we collect, use, and share personal information when you contact us through our website or otherwise.

2. Who we are:

SEESA is a nationwide expert assisting South African businesses with various needs, from employment contracts and payroll to BEE strategies, POPI compliance, training, and more.

We are a team of highly qualified and experienced professionals who each possess the necessary expertise to assist any size business from any industry.

Our experience has taught us that each business is unique, and our role is to seek to fully understand the needs of our clients, and then to provide the very best solutions.

Our commitment is simple:

SEESA is your partner. We will take care of your Labour Law and Legal Compliance needs, so you can run your business - with peace of mind.

3. Types of Personal Information we Collect:

Personal information includes any information that lets SEESA identify you, such as your name/s and surname combined with your physical address, contact details and/or passport/identity number.

In terms of South African legislation, personal information also refers to the personal information that identifies legal entities, such as the trading name of a company combined with the company registration number.

Special personal information refers to Information regarding race or ethnic origin, religious and philosophical beliefs, political persuasion, trade union membership, health or sex life, biometric information or any criminal behavior which relates to alleged criminal offences or proceedings.

SEESA collects personal information about its clients and their employees. What information is collected depends on how you elect to interact with us, and the services you use. These interactions include but are not limited to filling in contracts, email correspondence, telephone correspondence which are recorded, and making use of one of our various services.

For example:

- **Identity Information:** This includes information that can be used to identify you, such as your name, employee ID, job title, department, and contact information (email address, phone number).
- **Work-Related Information:** This includes information related to your employment, such as your work history, performance reviews, salary information, leave requests, attendance records, contract details, misconduct records, assigned tasks, and training records.
- **Other Information:** We may collect other information relevant to the services you are using, like BEE compliance or claiming your Skills Development Levy.

4. Where and When do we collect Personal Information:

We collect personal information through the following channels:

1. Through contracts between us and our clients;
2. From them directly where they partner with us;
3. From our online platforms where prospective clients may engage with us;
4. From our clients, where they provide us with personal information to allow us to provide our services to them. In some cases we will act as an Operator, but our agreement with our clients make provision for this.

5. When will we process your Personal Information:

We process your personal information only for contractual and lawful purposes related to our business and on behalf of our clients, such as:

Labour Law:

- **Employee Data for Compliance Audits:** Processing employee records (names, contact details, salaries, employment history, performance reviews, disciplinary records, leave records, etc.) to ensure compliance with labour laws (e.g., Basic Conditions of Employment Act, Labour Relations Act). This could include audits of payroll, leave management, and disciplinary procedures.
- **Case Management for Labour Disputes:** Processing personal information of employees and employers involved in disputes (e.g., grievances, CCMA cases) to provide legal advice and representation. This might include sensitive personal information related to the dispute.
- **Drafting Employment Contracts and Policies:** Processing personal information of prospective and current employees to draft compliant employment contracts, policies, and procedures.

BEE Compliance:

- **Verification of Ownership and Management:** Processing personal information of individuals involved in ownership structures, management, and skills development initiatives to assess and verify BEE compliance. This might include ID numbers, race, gender, qualifications, and shareholding information.
- **Supplier Verification:** Processing personal information of suppliers to verify their BEE status.

- Reporting to Authorities: Processing personal information to prepare and submit BEE compliance reports to relevant authorities.

UIF & COID (Unemployment Insurance Fund):

- UIF Registrations and Claims: Processing employee information (ID numbers, employment history, salary details) to register employees with UIF and assist with UIF claims.
- Compliance Audits: Processing employee data to ensure compliance with UIF regulations.

Occupational Health and Safety:

- Incident Reporting: Processing personal information of employees involved in workplace accidents or incidents to comply with health and safety reporting requirements. This could include medical information.
- Risk Assessments: Processing employee information to conduct risk assessments and identify potential hazards.
- Medical Surveillance: Processing employee health information (with consent) for medical surveillance programs required by specific regulations.
- Training Records: Processing personal information of employees who have undergone health and safety training.

Consumer Protection and POPIA:

- Consumer complaints
- Data Privacy Audits: This will involve reviewing how the client collects, uses, stores, and processes personal information.
- Drafting Privacy Policies and Procedures: Processing personal information of client's staff, where needed, to develop compliant privacy policies and procedures.
- Data Breach Management: Processing personal information to assist clients when they investigate and manage data breaches.

Training and Skills Development:

- Processing personal information about attendees (names, job titles, contact details) for training
- Submission of employment equity plans.

Paytime

- Managing employee scheduling and shifts from anywhere, anytime, with our cloud-based solution.
- Payroll processing and associated processing, of which a more comprehensive description can be found on our website.

Compliance and Transparency (CAT)

- This involves assisting with general compliance related to SEESA's services.
- We also process personal information needed to determine your company's beneficial ownership structure and the structure of your Social and Ethics Committee.

SEESA Business Network

- We collect your personal information (name, contact details, company information) to manage your membership, facilitate business networking, and provide our services.
- We share your information with other members to enable networking and referrals. We may also share it with service providers who help us operate our business.

Other information we collect:

Cookies, Web Beacons and Other Similar Technologies:

We collect data through cookies and similar technologies when you visit our website. We use cookies and similar technologies to recognise you and / or your device(s) on, off and across different services and devices. You can control cookies through your browser settings and other tools. You can also opt-out from our use of cookies and similar technologies that track your behaviour on the sites of others for third party advertising.

Cookies are small files that are saved onto your computer which track, save and store information about how you use our website and services. In some instances, these cookies are needed for the website to function – you can disable them in your browser, but this may interfere with the proper functioning of our website. We use the following cookies:

- **Session / Period cookies:** They allow website owners to collect analytics data, remember language settings, and perform other useful functions that help provide a good user experience. These cookies expire when the browser is closed.
- **Permanent / Persistent cookies:** Same as above, however, these remain in operation, even when you have closed the browser. They remember your login details and password, so you don't have to type them in every time you use the site. These cookies have a pre-determined expiry date and will appear until the expiry date is reached.
- **Third-party cookies:** are created by domains other than the one you are visiting directly, hence the name third-party. These are installed by third parties with the aim of collecting certain information to carry out various research into behaviour, demographics etc, such as advertisers.
- **Google analytics:** This is tracking software from Google which we use to monitor how users interact with the website in order for us to improve its functionality and content.
- **Web-server software:** Web-Server software delivers webpages to your browser. The web-server software will automatically collect your IP address whenever you connect to the website.

Your device and location:

We receive data from your devices and networks, including location data. When you visit or leave our services (including our plugins or cookies or similar technology on the sites of others), we receive the URL of both the site you came from and the one you go to next. We also get information about your IP address, proxy server, operating system, web browser and add-ons, device identifier and features, and / or ISP or your mobile carrier. If you use our services from a

mobile device, that device will send us data about your location based on your phone settings. We will ask you to opt-in before we use GPS or other tools to identify your precise location.

If you have any questions about how else we may process your personal information, please contact us on the details below.

6. When will we process your special personal information:

Special personal information includes information about a person's race, ethnicity, religion, sexual orientation, health, or biometric information. We will only process your special personal information in the following circumstances:

1. You have explicitly consented to the processing of your special personal information;
2. It is necessary for us to comply with a legal obligation.

7. How We Use Your Information:

We use your personal information to provide services to you, our clients. We also require your information to comply with the law. We will not share your personal information, with any third party without your consent, except as required by law, or as described in this privacy notice or in the agreement entered into with you.

8. Sharing Your Information:

1. We may share your personal information with third-party service providers who help us to provide our services to you. These service providers are contractually obligated to keep your personal information confidential.
2. We may also share your personal information with law enforcement agencies or other government agencies if we are required to do so by law.
3. We may also share your personal information if it is necessary to protect our legitimate interests.
4. Being part of the SEESA group of companies, your information may need to be shared within the group in order to facilitate our business operations and provide you with the best possible service.
5. We may also share your personal information with co-responsible parties, for example Eye Brain Gym and Momentum, with whom we have a partnership. This will be communicated with you when you make use of these services, to create a profile for you on their portal. You can refer to their website for more information on how they process your personal information.

9. Your Rights and Obligations:

You have rights in connection with your personal information. You have many choices about how your information is collected, used and shared.

In certain circumstances, by law, you have the right to:

- **Request access to your information:** You will be able to ask us what information we have about you as well as ask for a copy of this information. This should be done on request to privacy@seesa.co.za. There are some exemptions, which means you may not always receive all the information we process. When we can give you a copy it might be done at a certain fee, which will also be communicated to you at the time of your query.
- **Change or correct information:** You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- **Delete information:** You can ask us to delete or remove personal information under certain circumstance.
- **Object to processing:** You can do this where we are relying on your legitimate interest, public interest or our legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal data for direct marketing purposes or where you have given your consent for the specific processing, and you want to retract your consent. Retracting your consent does not invalidate your information we lawfully processed while we had your consent to do so.
- **Request the restriction of processing:** You can ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.

Where you want to review, verify or correct your personal information, you can do so by logging into the online system or by completing the attached Form 2 and sending it to us. If you want to object to the processing of your personal information or retract your consent, please send an email, with the completed Form 1 annexed hereto, to privacy@seesa.co.za.

10. Policy Changes:

We may amend or supplement this privacy notice from time to time. We will notify you of any changes by posting the new privacy notice on our website.

11. Other Important Information:

We take steps to protect your personal information from unauthorized access, disclosure, alteration, or destruction. We also limit access to your personal information on a need-to-know basis, subject to a duty of confidentiality.

We do not share your personal information across the borders of South Africa. If the transaction however requires transborder processing, we will only do so in terms of the parameters of POPIA.

You are not required to provide any personal information that we request, but if you do not provide certain information, we may not be able to provide you with financial assistance and/or investment opportunities.

12. Contact Information:

Should you have a query please send an email to: privacy@seesa.co.za.

Our Information Officer:

Roelof WR. Le Roux

Email: privacy@seesa.co.za

The SA Information Regulator:

You have the right to lodge a query and/or complaint with the South African Information Regulator:
See their contact details below:

| | |
|--------------------------|---|
| Physical Address: | Woodmead North Office Park, Maxwell Dr, Woodmead, Johannesburg, 2191 |
| Postal Address: | P.O Box 31533, Braamfontein, Johannesburg, 2017 |
| Website: | https://inforegulator.org.za/ |
| POPIA Complaints email: | POPIAComplaints@inforegulator.org.za |
| PAIA Complaints email: | PAIAcomplaints@inforegulator.org.za |
| General enquiries email: | enquiries@inforegulator.org.za |

Annexures:

FORM 2:

REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION OR DESTROYING OR DELETION OF RECORD OF PERSONAL INFORMATION IN TERMS OF SECTION 24(1) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013) REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018 [Regulation 3]

FORM 1:

OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION IN TERMS OF SECTION 11(3) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013) REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018 [Regulation 2]

FORM 2

REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION OR DESTROYING OR DELETION OF RECORD OF PERSONAL INFORMATION IN TERMS OF SECTION 24(1) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013)

REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018 [Regulation 3]

Note:

- Affidavits or other documentary evidence as applicable in support of the request may be attached.*
- If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.*
- Complete as is applicable.*

Mark the appropriate box with an "x".

Request for:

☐

Correction or deletion of the personal information about the data subject which is in possession or under the control of the responsible party.

☐

Destroying or deletion of a record of personal information about the data subject which is in possession or under the control of the responsible party and who is no longer authorised to retain the record of information.

| A | DETAILS OF THE DATA SUBJECT |
|--|-------------------------------------|
| Name(s) and surname / registered name of data subject: | |
| Unique identifier / Identity Number: | |
| Residential, postal or business address: | |
| | |
| | |
| | Code () |
| Contact number(s): | |
| Fax number/E-mail address: | |
| B | DETAILS OF RESPONSIBLE PARTY |

| | |
|--|--|
| Name(s) and surname/ registered name of responsible party: | |
| Residential, postal or business address: | |
| | |
| | |
| | Code () |
| Contact number(s): | |
| Fax number/ E-mail address: | |
| C | INFORMATION TO BE CORRECTED/DELETED/ DESTRUCTED/ DESTROYED |
| | |
| | |
| | |
| | |
| | |
| | |
| D | REASONS FOR *CORRECTION OR DELETION OF THE PERSONAL INFORMATION ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24(1)(a) WHICH IS IN POSSESSION OR UNDER THE CONTROL OF THE RESPONSIBLE PARTY ; and or REASONS FOR *DESTRUCTION OR DELETION OF A RECORD OF PERSONAL INFORMATION ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24(1)(b) WHICH THE RESPONSIBLE PARTY IS NO LONGER AUTHORISED TO RETAIN. (Please provide detailed reasons for the request) |
| | |
| | |
| | |
| | |
| | |
| | |

Signed at this day of20.....

.....
Signature of data subject/ designated person

FORM 1
OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION IN TERMS OF SECTION 11(3) OF
THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO.
4 OF 2013)

REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018
[Regulation 2]

Note:

1. *Affidavits or other documentary evidence as applicable in support of the objection may be attached.*
2. *If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.*
3. *Complete as is applicable.*

| A | DETAILS OF DATA SUBJECT |
|--|--|
| Name(s) and surname/ registered name of data subject: | |
| Unique Identifier/ Identity Number | |
| Residential, postal or business address: | |
| | |
| | Code () |
| Contact number(s): | |
| Fax number/ E-mail address: | |
| B | DETAILS OF RESPONSIBLE PARTY |
| Name(s) and surname/ Registered name of responsible party: | |
| Residential, postal or business address: | |
| | |
| | |
| | Code () |
| Contact number(s): | |
| Fax number/ E-mail address: | |
| C | REASONS FOR OBJECTION IN TERMS OF SECTION 11(1)(d) to (f) <i>(Please provide detailed reasons for the objection)</i> |
| | |
| | |
| | |
| | |
| | |
| | |
| | |
| | |

Signed at this day of20.....

.....
Signature of data subject/designated person