

TABLE OF CONTENTS	1
1. INTRODUCTION	2
2. PURPOSE	2
3. CHANGES TO PRIVACY POLICY	2
4. NEXIO'S PRIVACY PRINCIPLES.....	3
5. SCOPE	4
6. PERSONAL INFORMATION	4
7. LAWFUL PROCESSING OF PERSONAL INFORMATION IN TERMS OF POPIA.....	4
8. ACCEPTANCE AND CHANGES	5
9. COLLECTION	5
10. CONSEQUENCES OF VIOLATING THIS POLICY	6
11. USE.....	6
12. DISCLOSURE.....	7
13. STORAGE	8
14. EXERCISING YOUR RIGHTS.....	9
15. UNAUTHORISED ACCESS	11
16. CO-OPERATION WITH THE INFORMATION REGULATOR	11
17. RETENTION PERIOD FOR PERSONAL INFORMATION COLLECTED.....	12
18. GENERAL	13
19. COMPLAINTS	13
20. APPROVAL.....	13

1. INTRODUCTION

Storage Technology Services (Proprietary) Limited, trading as Nexio ("Nexio"), with its principal place of business at Techno Park Building, Midridge Park, Midrand, 1685, respects your privacy and is sensitive to the private nature of the personal information you provide to us. Accordingly, we undertake to implement reasonable measures to prevent unauthorised or unlawful access to, interception of, or interference with any such information. The following is our policy and procedure for protecting your personal information ("Privacy Policy"), and it describes how we collect, use, disclose, share, process and store your personal information. By requesting any of our services or accessing our website being, Nexio.co.za, you are deemed to have accepted and agreed to the information collection, use, disclosure, sharing, processing and storage practices described in this Privacy Policy.

2. PURPOSE

The purpose of this Privacy Policy is to demonstrate our commitment to safeguarding the personal information of all persons, including juristic persons (hereafter, the "data subjects"), with whom we interact and to ensure that we comply with the requirements imposed by any applicable legislation, including the Protection of Personal Information Act 4 of 2013 ("POPI") and compliance with the ISO 27001:2013 Standard – Information Technology Security Management System.

3. CHANGES TO PRIVACY POLICY

We are well aware of the dynamic nature of the Data Protection and Privacy environment. As such, the Nexio Legal and Compliance Team is dedicated to achieving full compliance in observing all applicable laws and regulations related to data protection and the privacy or personal information disclosed. To achieve this, the Nexio Legal and Compliance Team frequently conducts internal audits and risk assessments related to Nexio's Privacy Regulatory Control Matrix to identify any possible risks in our control environment and work towards eradicating them.

We are continually improving our communication methods and adding new functionalities and features to the website and to our existing service offerings. As a result of these ongoing changes, such as changes in the law and the ever-changing nature of technology, our data protection practices will change from time to time with the mandated updates.

POLICY: PRIVACY NOTICE



If and when our data protection practices change, we will update this privacy statement to describe our new practices. We encourage you to check this page on our website regularly.

4. NEXIO'S PRIVACY PRINCIPLES

4.1 We have adopted a principled approach to protecting the personal information of all data subjects that engage with the Nexio Website or enter into an agreement with us; our approach is based on the following principles:

4.1.1 **Accountability:** To ensure that we are accountable to all data subjects we engage with or process personal information on behalf of, we have implemented various accountable privacy compliance measures that are monitored and enforced by both the Nexio internal Team and the Vodacom Group.

4.1.2 **Fairness and Lawfulness:** Nexio's Legal and Compliance Team regularly reviews the Nexio Universe of Laws to ensure that Nexio has adhered to all relevant privacy laws with the utmost integrity. The Nexio Legal and Compliance Team regularly engages with communiques from governments, regulators, policymakers and legal opinions to ensure fair and meaningful privacy laws and standards are implemented.

4.1.3 **Openness and Honesty:** We communicate clearly about any actions that may impact the data subjects' privacy, further reflecting on our communications and actions. We encourage all data subjects to provide feedback on our actions in this regard.

4.1.4 **Choice and Access:** We give all data subjects the ability to make simple and meaningful choices about their privacy and allow everyone, where appropriate, to access, update, or delete their personal information.

4.2 We are committed to continuously improving our internal standards and practices to ensure the utmost caution is utilised in processing and/or accessing your personal information. As such, we provide ongoing training to all employees to ensure that the principles mentioned earlier are observed throughout the various business engagements.

5. SCOPE

5.1 This Privacy Policy applies when you:

- 5.1.1 enter into an agreement with us;
- 5.1.2 visit the Nexio website;
- 5.1.3 fill out the "Contact Us" form on the website;
- 5.1.4 attend an event hosted by us and provide your contact details;
- 5.1.5 request our services as a potential customer (i.e. when we run a campaign for you);
- 5.1.6 apply for vacancies; and
- 5.1.7 Subscribe to newsletters, alerts, or other services from us with your permission "or consent and/or as permitted by law. We may also collect information about you from other organisations or third parties if this is appropriate and allowed by law. These include fraud-prevention agencies, business directories, and credit reference agencies.

6. PERSONAL INFORMATION

6.1 **Scope.** Your personal information includes the information that we collect automatically when you visit the website, put through a request for our services, or provide us with the information voluntarily, but excludes anonymous, de-identified, statistical, and public information.

6.2 **Your obligations.** You may only send us your personal information or someone else's personal information if you have their permission/consent to do so.

7. LAWFUL PROCESSING OF PERSONAL INFORMATION IN TERMS OF POPIA

7.1 We undertake to comply with the conditions for the lawful processing of personal information, particularly section 4 of POPI. We will ensure that any processing of your personal data is undertaken in accordance with the values of (i) accountability, honesty, integrity and consistency; (ii) limitation; (iii) purpose qualification; (iv) processing limitation; (v) quality; (vi) openness; (vii) security; and (viii) your participation.

8. ACCEPTANCE AND CHANGES

- 8.1 **Acceptance.** By requesting any of our services or accessing the website, you are deemed to have accepted this Privacy Policy and any amendments that may be made to it. Furthermore, you are deemed to have read, understood, accepted, and agreed to be bound by all of its terms.
- 8.2 **Changes.** We may, in our absolute and sole discretion, change, amend or vary this Privacy Policy at any time and will notify you of the changes by placing a notice on this website or our social media channels. The amended Privacy Policy is deemed to apply to you if you continue using this website or our services following the notification.

9. COLLECTION

- 9.1 **Information collected.** When you use the website or services, you will provide us with personally identifiable information or identifiable information of the legal entity you represent. Such information ranges from but is not limited to, limited personal data, such as name, identity number, telephone number, company, job title, address, and e-mail address, to facts about your business, profession, and product preferences, including billing information.
- 9.2 **Consent to collection.** By accessing this website, you consent to the collection and processing of your personal information by us in accordance with any applicable laws. Such consent may be withdrawn at any time by giving us written notice.
- 9.3 **Methods of collection.** We collect personal information directly from you except as is otherwise provided for below.
- 9.4 **Automatic collection.** When you visit this website, we automatically collect your internet usage information, including your IP address, browser details, and usage information, which we may use to display the website correctly, track your activities on it, or for other necessary purposes.
- 9.5 **Collection on submission.** When you submit information through our 'Contact Us' form on the website, we ask you to provide us with certain identifying information related to our services.

POLICY: PRIVACY NOTICE



9.6 **Collection through a request.** We ask you to provide us with certain information when you request our services.

9.7 **Voluntary collection.** We may ask you to provide us with certain optional information voluntarily.

10. CONSEQUENCES OF VIOLATING THIS POLICY

10.1 Non-compliance with this Policy constitutes misconduct and could, in the case of Nexio employees, result in disciplinary action in terms of Nexio's disciplinary procedures, which could lead to dismissal and further legal action against the responsible Nexio employee(s).

11. USE

11.1 **Processing.** We may process personal information lawfully and reasonably without infringing upon the privacy of your disclosures. Furthermore, we may process your personal information to fulfil our obligations to you. Processing includes gathering your personal information, disclosing it, and/or combining it with other personal information.

11.2 **Minimality.** We undertake to collect personal information in a manner that does not infringe on your rights. We process only information that is necessary for the specific purpose for which it is collected.

11.3 **Specific purpose.** We collect personal information for a specific, explicitly defined, and lawful purpose related to a function or activity. We take steps to ensure that you are aware of the purpose of the collection.

11.4 **Cookies.** Like most websites, this website automatically collects information and data through the use of cookies. A cookie is a small text file placed on your device when you visit the website. It allows us to provide you with a personalised experience by associating your personal information with your device. Cookies let us remember your preferences, allow third parties to provide services to you, and otherwise serve useful purposes for you. Your internet browser generally accepts them automatically, but you can often modify this setting or delete them manually. Suppose you modify your browser preferences and choose to reject cookies. In that case, you will be unable to use those pages on the website that require registration or customisation to participate. You may still view the website in a non-personalised manner without cookies, but some areas of the website may

POLICY: PRIVACY NOTICE



not be accessible or function properly if you choose to reject all cookies. If you choose to accept the cookies, you hereby consent to us setting cookies on your device.

Cookies cannot be used to determine your identity and do not damage your computer. You can set your browser to notify you when you receive a cookie, enabling you to decide whether to accept it or not. If you choose not to accept cookies from our website, this may limit its functionalities or performance.

11.5 Messages. Subject to any applicable laws, we may use your identifying information to send you administrative and update messages about the website. We may also sometimes send you promotional messages, but you may opt out of them.

11.6 Links to other websites. If you use the external links on our website, which are provided for your convenience, you should be aware that those websites are not subject to this Privacy Policy. These hyperlinks are provided for your reference and convenience only and do not imply any endorsement of the activities of these third-party websites or any association with their operators. We do not control these websites and are not responsible for their data or privacy practices.

We recommend that you review the privacy policy at each such website to determine how that website protects your privacy.

11.7 Targeted content. We may use your personal information to provide you with targeted content on our website in a completely automated process.

11.8 Further processing. Further processing of personal information is done in accordance with the purpose for which it was collected initially.

12. DISCLOSURE

- 12.1 Sharing.** We may share your personal information with third parties to fulfil our obligations to you, including the following:
- 12.1.1 other companies or divisions within our group;
 - 12.1.2 our contractors who help provide part of our goods or services;

- 12.1.3 Original Equipment Manufacturers and Software Companies;
 - 12.1.4 partners who assist us in the verification of your payments to us for the purchase and use of our goods and services;
 - 12.1.5 debt collection agencies or other debt recovery organisations;
 - 12.1.6 if in the instance that we are re-organised or sold to another organisation, your personal information shall be provided to that organisation and/or
 - 12.1.7 third parties as required by applicable law, which can include responding to authorities' lawful demands, credit references, fraud prevention, or business scoring agencies.
- 12.2 **Compliance with this Privacy Policy.** We will require anyone with whom we share your personal information to comply with this Privacy Policy whenever possible in terms of applicable law.
- 12.3 **Mandatory disclosure.** We may disclose personal information to third parties if required to fulfil our legal obligations, such as to regulators as required by law or governmental audit, law enforcement as required by a subpoena or court order, or third parties as required by applicable law.
- 12.4 **Marketing Purposes.** We may disclose aggregate statistical information derived from your and other people's personal information to our advertisers or business partners.
- 12.5 **Personnel.** We may need to disclose personal information to our personnel but will not do so unnecessarily.
- 12.6 **Change of ownership.** If our ownership changes for any reason, we may assign our rights to the personal information processed to our new owners.

13.STORAGE

- 13.1 **Accuracy.** We will use commercially reasonable efforts to keep your personal information collected accurate, complete, and up to date.

- 13.2 **Participation.** We may ask you to update your personal information from time to time or give you a way to review it, but we will take steps to verify your identity to prevent unauthorised access when doing so.
- 13.3 **Retention.** We will only keep your personal information for as long as it is necessary to fulfil our obligations to you unless you have permitted us to keep it for a longer period or if we are otherwise legally permitted/required to do so.
- 13.4 **Transfer.** Subject to our compliance with any applicable legislation, particularly POPI, you consent to Nexio processing your personal information in a foreign country. This will happen in instances where our servers, suppliers, service providers or services are based and/or hosted outside of South Africa. It must be noted that countries in the European Economic Area are considered to have adequate data protection laws; however, in other countries, agreements shall be entered into to ensure our compliance with and the protection of your personal information.

14. EXERCISING YOUR RIGHTS

- 14.1 We provide you with a platform to exercise your right as recognised under Sections 23 and 24 of the Protection of Personal Information Act No. 4 of 2013 and the GDPR Business Requirement Specification Sections on Subject Rights (the "Governing Laws"). During the course and scope of pursuing business engagements with us, you may be required to submit various pieces of personal information for processing.
- 14.2 As the Responsible Party, we are required to ensure that at all times, it affords data subjects adequate mechanisms to exercise the following rights:
 - 14.2.1 the right of access to their Personal Information;
 - 14.2.2 the right to object to Processing;
 - 14.2.3 the right to object to direct marketing;

POLICY: PRIVACY NOTICE



- 14.2.4 the right to request an amendment or deletion of Personal Information;
 - 14.2.5 the right to be informed of the purpose of the Processing;
 - 14.2.6 the right to be aware of the information being collected;
 - 14.2.7 the right to know the name and address of the Responsible Party;
 - 14.2.8 the right to request information about third parties;
 - 14.2.9 the right to lodge a complaint to us of any suspected violation or ethical misconduct that contravenes this policy; and
 - 14.2.10 the right to know about information regarding the recipient or categories of recipients.
- 14.3 To exercise the rights noted in clause 13.1 above, data subjects are required to complete the Data Subject Request Form, accessible from Annexure A below, the Nexio Data Privacy SharePoint, and the Nexio website (<https://www.nexio.co.za/>).
- 14.4 Customers, Nexio employees, and independent contractors are required to submit the completed forms to the Legal Team (legal@nexio.co.za) for assistance in completing the actions requested on the form.
- 14.5 The Legal Team is required to manage all requests and respond accordingly within 30 (calendar) consecutive calendar days of receipt of the completed Data Subject Request Form. However, matters with a greater degree of complexity in executing shall require a 2 (two) month timescale to resolve, so long as we communicate the need for an extension within the initial one-month timescale.

POLICY: PRIVACY NOTICE



15. UNAUTHORISED ACCESS

15.1 Despite the security measures we have in place to protect your personal information (firewalls, password access and encryption methods), you acknowledge that it may be accessed by an unauthorised third party, e.g. as a result of an illegal activity.

16. CO-OPERATION WITH THE INFORMATION REGULATOR

16.1 Section 5 (2) of the Protection of Personal Information Act requires all responsible parties that access or process any form of personal information to appoint an Information Officer at an executive level within the organisation to ensure that the responsible parties are held accountable to the Information Regulator. Our duly certified Information

POLICY: PRIVACY NOTICE



Officer is registered with the Information Regulator in terms of the following details:

Name	Designation	Contact
Ed Gassner	Information Officer	Email: egassner@nexio.co.za and/or legal@nexio.co.za Phone: 011 808 6000
Fhatuwani Rasivhaga	Data Privacy Officer	Email: frasivhaga@nexio.co.za and/or legal@nexio.co.za Phone: 011 808 6000
Jasmine Sikhosana	Data Privacy Champion	Email: jsikhosana@nexio.co.za and/or legal@nexio.co.za Phone: 011 808 6000

17. RETENTION PERIOD FOR PERSONAL INFORMATION COLLECTED

- 17.1 We will retain personal information collected for as long as required by law and for as long as the information is relevant to certain business engagements or for as long as we engage the data subject.
- 17.2 Once the engagement with us has terminated, we will retain the personal information for as long as is necessary to fulfil any legal or regulatory requirements (typically, for 5 (five) years upon termination of the contract) and the purposes for which it was collected as prescribed by the law.
- 17.3 We will utilise Personal Data Processing Registers and tools to accurately measure the retention period for personal information and monitor the data mapping for the transfer and use of this personal information within the organisation.

18. GENERAL

18.1 **Limitation.** We are not responsible for, nor do we give any warranties or make any representations regarding, anyone else's privacy policies or practices.

18.2 **Security.** The personally identifiable information we collect about you is stored on limited-access servers. We maintain reasonable safeguards to protect the security, integrity, and privacy of these servers and your personally identifiable information. Notwithstanding this, we cannot guarantee that data transmission over the Internet is 100% secure and, therefore, cannot warrant the security of any personally identifiable information transmitted by you.

18.3 **Enquiries.** Updating, or Removing. If you have any questions, comments, or concerns about this Privacy Policy or the use of your personal information, or if you would like to update or remove your personal information, please contact us at legal@nexio.co.za.

19. COMPLAINTS

19.1 If you believe that we have used your personal information contrary to applicable law, you undertake to first attempt to resolve any concerns with us directly, in accordance with clause 13 above. If you are not satisfied with this process, you have the right to lodge a complaint with the Information Regulator.

20. APPROVAL

	Signatory	
Document Owner	Name: Fhatuwani Rasivhaga Acting EHOD: Legal	Signed by:Fhatuwani Rasivhaga Signed at:2024-08-19 15:31:53 +02:00 Reason:Witnessing Fhatuwani Rasivhaga <i>Fhatuwani Rasivhaga</i>
Document Reviewer	Name: Amanda Hlela Governance and Compliance Specialist	Signed by:Amanda Hlela Signed at:2024-08-19 15:33:11 +02:00 Reason:Witnessing Amanda Hlela <i>Amanda Hlela</i>

POLICY: PRIVACY NOTICE



Executive	Name: Ed Gassner Chief Executive Officer	Signed by:Ed Gassner Signed at:2024-08-19 15:35:34 +02:00 Reason:Witnessing Ed Gassner <i>Ed Gassner</i>
-----------	---	---