

SECURITY PROCESSING NOTICE

1. PURPOSE OF THIS NOTICE AND TERMS USED

- 1.1 **Libstar Holdings Limited** (Registration number: 2014/032444/06) including all divisions, subsidiaries and affiliated companies as well as its trading partners (hereinafter referred to as “we”, “us”, “Company” or “the company”) in our capacity as a Responsible Party, will have to process Personal Information, and in doing so, have to comply with the Protection of Personal Information Act, 4 of 2013 (hereinafter referred to as “POPIA”), which regulates and controls the processing of a legal entity’s and/or an individual’s Personal Information in South Africa, (hereinafter referred to as a “Data Subject”).
- 1.2 In order to comply with POPIA, a Responsible Party processing a Data Subject’s Personal Information must:
- 1.2.1 process Personal Information in a lawful, legitimate and responsible manner that is in accordance with the provisions, principles and conditions set out under the Act;
- 1.2.2 provide the Data Subject with details pertaining to the processing of the Data Subject’s Personal Information, before such information is processed; and
- 1.2.3 get permission or consent, explicitly or implied, from the Data Subject, to process his / her / its Personal Information, unless such processing:
- is necessary to carry out actions for the **conclusion or performance of a contract** to which the Data Subject of the Personal Information is a party;
 - is required in order to comply with an **obligation imposed by law**; or
 - is for a **legitimate purpose or is necessary to protect the legitimate interest (s) and/or for pursuing the legitimate interests** of i) the Data Subject; ii) the Responsible Party; or iii) that of a third-party to whom the Personal Information is supplied; or
 - is necessary for the proper performance of a **public law duty**.
- 1.3 In accordance with the requirements of POPIA, and because your privacy and trust are important to us, we set out how and why Libstar collects, uses, processes and shares your Personal Information.

2. APPLICATION

This Processing Notice applies to you and all persons who come onto our premises and sites, including reception and waiting rooms, offices, operational areas and facilities, manufacturing areas and parking areas (Company premises).

3. INFORMATION REQUIRED

3.1 In in order to gain access to the premises, the Company has to process the following Personal Information, which pertains to you:

- **Your or your employer or organisation's contact information**, such as name, alias, address, identity number, passport number, security number, phone number, cell phone number, vehicle make and registration number, social media user ID, email address, and similar contact data, serial numbers of equipment, details regards the possession of dangerous weapons, your status with an organisation, your images and certain biometrics such as finger prints and similar data, which are required for various legitimate interests, and/or lawful reasons.
- **Specific identifiers**, which are required in order to protect legitimate interests, comply with legal obligations or public legal duties, or in order to accommodate you in our workplaces, such as any disabilities, certain biometric information which may be required for access control such as fingerprints and personal details which we may record in relation to alcohol or drug testing, and health records or related details.
- **Children's Information**, all Personal Information collected and processed from any person under the age of eighteen (18) for the purposes of accessing the Company premises will only be processed with the prior permission of the child's parent or legal guardian, who will be required at all times to accompany such child around the Company premises which he or she is given access to.

4. PURPOSE FOR PROCESSING YOUR PERSONAL INFORMATION

4.1 Your personal information will be processed by us for the following purposes:

- to facilitate access into and out of the Company premises;
- to ascertain who is entering and leaving the company premises;
- to monitor movements on or in the Company premises;
- to ensure a safe working and operating environment;
- to comply with legislation, including Security, Health and Safety related laws and legal obligations;
- to manage security services;
- for the purposes of registering all persons who enter and leave the Company premises;
- for the purposes of managing and investigating security incidents; including accidents within the Company premises or emergency evacuations; and
- other security measures in general and as required.

5. SHARING AND RETAINING YOUR PERSONAL INFORMATION

- 5.1 Your Personal Information may under certain circumstances have to be shared with internal parties and/or third parties for the purposes detailed above.
- 5.2 Your Personal Information will be disposed of within 12 (twelve) months of you leaving our premises, save where it may be required for a longer period. In this regard we retain personal information in accordance with our Company records retention schedule, which varies depending on the type of processing, the purpose for such processing, the business function, record classes, and record types. We determine retention periods based upon the need to (a) fulfil the purposes described in this Processing Notice, (b) meet the timelines determined or recommended by regulators, professional bodies, or associations, (c) comply with applicable laws, legal holds, and other legal obligations (including contractual obligations), (d) comply with your requests and (e) meet the Company's operational requirements.

6. SECURITY OF INFORMATION

- 6.1 The security of your Personal Information is important to us. Considering the nature, scope, context, and purposes of processing Personal Information, as well as the risks to individuals of varying likelihood and severity, we have implemented technical and organisational measures designed to protect the security of Personal Information. In this regard we will conduct regular compliance checks regarding the safety and the security of your Personal Information.
- 6.2 Your Personal Information will be stored electronically and in hard copy form. This information will be accessible to and or provided to persons employed or contracted by us on a need-to-know basis.
- 6.3 Once your Personal Information is no longer required, due to the fact that the purpose for which the Personal Information was held has come to an end, such Personal Information will be retained in accordance with the Company records retention schedule. Retention periods are based upon the need to: (a) fulfil the purposes described in this Processing Notice, (b) meet the timelines determined or recommended by regulators, professional bodies, or associations, (c) comply with applicable laws, legal holds, and other legal obligations (including contractual obligations), (d) comply with your requests and (e) meet the Company's operational requirements.
- 6.4 Notwithstanding the contents housed under clauses 7 and 8, please note that no method of transmission over the Internet or method of electronic storage is 100% secure. Therefore, while we strive to use commercially acceptable measures designed to protect Personal Information, we cannot guarantee its absolute security.

7. ACCESS BY OTHERS AND CROSS BORDER TRANSFER

7.1 The Company may from time to time have to disclose your Personal Information to other parties, including the Company's divisions, subsidiaries, trading partners, agents, auditors, organs of state, regulatory bodies and/or national governmental, provincial, or local government municipal officials, or overseas trading parties or agents, but such disclosure will always be subject to an agreement which will be concluded as between ourselves and the party to whom we are disclosing your Personal Information to, which contractually obliges the recipient of your Personal Information to comply with strict confidentiality and data security conditions.

7.2 Where Personal Information and related data is transferred to a country that is situated outside South Africa, your Personal Information will only be transferred to those countries which have similar data privacy laws in place or where the recipient of the Personal Information concludes an agreement which contractually obliges the recipient to comply with strict confidentiality and data security conditions and which in particular will be to a no lesser set of standards than those imposed by POPIA.

8. YOUR RIGHTS

8.1 You as a Data Subject have certain rights, which are detailed below:

- **The right of access** - You may ask the Company (free of charge) to confirm that we hold your Personal Information, or ask us to provide you with details, (at a fee) on how we have processed your Personal Information, which request must be done by following the process set out under the Company PAIA Manual.
- **The right to rectification** - You have the right to ask us to update or rectify any inaccurate Personal Information which we hold of yours, which can be done by accessing the update / rectification request.
- **The right to object to and restrict further processing** - Where we do not need your consent to process your Personal Information, but you are not in agreement with such processing, you may lodge an objection to such processing by accessing the objection request.
- **The right to withdraw consent** - Where you have provided us with consent to process your Personal Information, you have the right to subsequently withdraw your consent, which can be done by accessing the withdrawal of consent request.

8.2 These rights may be exercised by using the relevant forms housed on the Company website at: <https://www.libstar.co.za/legal/>

9. CHANGES TO THIS PROCESSING NOTICE

- 9.1 As the Company's Operational Requirements change, this Processing Notice is expected to be updated.
- 9.2 The Company reserves the right to amend the Processing Notice at any time, for any reason, and without notice to you other than the posting of the updated Processing Notice on the Company Website.
- 9.3 We therefore request that you to visit our website frequently in order to keep abreast with any changes.

10. PROCESSING OTHER PERSONS PERSONAL INFORMATION

- 10.1 If you process Personal Information on the Company's behalf, or which we provide to you to perform your contractual or legal obligations or to protect any legitimate interest, you will:
- if you are processing such Personal Information as our Operator as defined under POPIA, process all and any such Personal Information in compliance with the obligations set out under our standard "Operator Agreement" housed on our website; or
 - where not acting as an Operator, nonetheless, keep such information confidential and secure as per POPIA and you will not, unless authorized to do so, process, publish, make accessible, or use in any other way such Personal Information unless in the course and scope of your duties, and only for the purpose for which the information has been received and granted to you, and related to the duties assigned to you.

11. COMPLAINTS OR QUERIES - CONTACT US

- 11.1 Any comments, questions or complaints about this Processing Notice or our handling of your Personal Information should be emailed to our Information or Deputy Information officers at their details housed on our website.
- 11.2 Comments, questions or complaints may be communicated directly to a Deputy Information Officer or Information Officer at a division or Libstar as deemed appropriate.
- 11.3 All queries and complaints will be treated in a confidential manner.
- 11.4 Should you feel unsatisfied with our handling of your Personal Information, or about any complaint that you have made to us, you are entitled to escalate your complaint to the South African, Information Regulator who can be contacted at <<https://www.justice.gov.za/infoereg/>>.

12. ACCEPTANCE

12.1 By providing us with the Personal Information that we require from you as listed under this Processing Notice:

- You acknowledge that you understand why your Personal Information needs to be processed;
- You accept the terms which will apply to such processing, including the terms applicable to the transfer of such Personal Information cross border;
- Where consent is required for any processing as reflected in this Processing Notice, you agree that we may process this particular Personal Information.

12.2 Furthermore you confirm that where you provide us with another person's Personal Information for processing that you have obtained the required permission from such person(s) to provide us with their Personal Information for processing.