



The Protection of Personal Information Act No 4 of 2013 ("POPIA") has come into effect and requires that your personal information be protected and dealt with in terms of the POPIA. Mlima Group, together with its subsidiaries and all associated companies, collectively referred to as "MLIMA", are committed to protecting your privacy, complying with the POPIA and ensuring that your personal information is protected.

## This Privacy Policy Explains

Privacy Principles to which MLIMA subscribes.  
What information MLIMA collects and why we collect it.  
How MLIMA uses, discloses, retains, and protects personal information.

## Privacy Principles

1. **Fairness** – We collect and process personal information fairly and in accordance with applicable law.
2. **Legitimacy** – We only use personal information for specified and legitimate purposes as allowed by applicable law.
3. **Relevance** – We collect only the minimum amount of personal information required to fulfil a legitimate purpose and will not collect irrelevant or excessive information.
4. **Accuracy** – We take reasonable steps to ensure that personal information is accurate.
5. **Retention** – We comply with applicable laws regarding how long personal information should be retained and do not retain it longer than is required.
6. **Individual's Rights** – We comply with applicable laws regarding a data subject's rights, such as the right to access and correct the data subject's personal information under our control.
7. **Protection** – We comply with applicable laws regarding data security standards to ensure personal data is adequately protected.
8. **Cross-border transfers** – We only transfer personal data across national borders in compliance with applicable laws.

## What Information Does This Policy Apply To?

This policy applies to personal information collected by MLIMA in connection with the services that we offer and in the course of our business dealings with you.

MLIMA collects, stores and processes personal information (including special personal information) about you: that may be used in connection with the management of your account with us for purposes described in this policy or for purposes that you have consented to.

## What is personal information?

Personal information refers to any information that identifies you or specifically relates to you, or your employees. Personal information includes, but is not limited to, the following information about you and / or your employees:

- Full names and initials
- Marital status
- National origin
- Age
- Language
- Birthplace
- Education

- Relevant financial history
- Identifying number (like an employee number, identity number or passport number)
- E-mail address; physical address (like residential address, work address or your physical location); telephone number
- Biometric information (like fingerprints, signature or voice)
- Race; gender; sex; pregnancy status; ethnic origin; social origin; colour; sexual orientation
- Physical health; mental health; well-being; disability; religion; belief; conscience; culture
- Medical history; criminal history; employment history
- Personal views, preferences, and opinions
- Another's views or opinions about you

### **When will we process your personal information?**

MLIMA may use your Personal Information to the extent permitted in law in the following circumstances:

- For the purposes herein
- If you have consented thereto
- If a person legally authorised by you, the law or a court, has consented thereto
- If it is necessary to conclude or perform under a contract we have with you
- If the law requires or permits it
- If it is required to protect or pursue your, our or a third party's legitimate interest
- We may share your information with our trusted affiliates, in which case we will require those affiliates to honor this privacy policy notice. Affiliates include our parent company and subsidiaries, partners, or other companies that we control or that are under common control with us.

### **Reasons for the collection of Personal Information**

MLIMA may collect, process and use your personal information for various purposes related to our business interaction with you, including but not limited to:

- Carrying out and managing its business operations;
- Servicing your account and/or managing our relationship with you;
- Providing benefits and services to customers and vendors;
- Confirming and verifying identity for security purposes;
- For website log on and account access purposes;
- Making payments and confirming that payments are made to the correct beneficiaries;
- Assessing and processing instructions, queries and requests received;
- Identifying and confirming authorised third parties;
- Updating records with the correct and current information in order to keep in contact;
- Auditing, reporting and record-keeping purposes;
- Archiving emails for disaster recovery purposes;
- Legal reporting obligations and debt collection;
- To register sales with vendors;
- To keep records;
- To undertake credit checks;
- To communicate with you on orders, product information and account matters;
- To fulfil orders placed on MLIMA;
- To conclude and meet contractual obligations to you;
- To provide details of sales to vendors where required;
- For analysis and research purposes;
- In respect of the delivery of services or goods;
- Any related purpose/s to the foregoing or for other legitimate business interests;
- To enable us to identify products or services offered by MLIMA that may be of interest to you and to provide marketing information to you.

## **THIS, AND ANY CONSENT HEREIN MAY BE WITHDRAWN AT ANY TIME BY CONTACTING US ON**

[info@mlimagroup.co.za](mailto:info@mlimagroup.co.za)

By placing orders on us and undertaking business with us, you consent to the processing of personal information for such purposes and in terms of this policy in addition to in terms of any specific consent given to us. You may withdraw this consent at any time.

### **What is special personal information?**

Special personal information is personal information about the following:

- Race (like where a company submits reports to the Department of Labour where the statistical information must be recorded)
- Ethnic origin
- Trade union membership
- Health (like where you apply for an insurance policy)
- Biometric information (like to verify your identity); and / or your criminal behaviour and alleged commission of an offense
- We do not collect special personal information in the ordinary course and will obtain specific consent if we need to.

### **When will we process your special personal information?**

We may process your special personal information in the following circumstances:

- In the circumstances described in this policy
- If you have consented to the processing
- If the information is being used for any Human Resource or payroll related requirement
- If the processing is needed to create, use or protect a right or obligation in law
- If the processing is for statistical or research purposes and all legal conditions are met
- If the special personal information was made public by you
- If the processing is required by law

### **Information collected**

The personal information that will be collected and processed about you from time to time may include but is not limited to the following:

- Name and surname;
- Identity number;
- Company details and registration / VAT number;
- Contact Information;
- Banking details;
- Transaction and purchasing histories and patterns;
- Information required to process or register or render services related to orders placed on MLIMA.

### **Please note:**

- In some instances, MLIMA may send your personal information to an authorised third party to verify your information, for example checking your credit limit with a credit bureau.
- MLIMA will endeavour to only supply your information to third parties who will exercise the necessary protections over your information.
- We may share your personal information across our Group companies as necessary.

- Your personal information may be stored for as long as is necessary for the purposes for which it is collected or such longer periods as may be required from time to time.
- Your personal information may be transferred to locations outside of South Africa and may reside outside of South Africa from time to time. In this instance we will ensure that the destination country has suitable data protection laws or that suitable contractual protections are in place.
- MLIMA will share personal information with companies, organisations, or individuals outside of MLIMA if we have reason to believe that access, use, preservation, or disclosure of the information is reasonably necessary to:
  1. meet any applicable law, regulation, legal process, or enforceable government request;
  2. detect, prevent, or otherwise address fraud or security issues;
  3. protect against harm to the rights, property or safety of MLIMA, our clients or the public as required or permitted by law.
- MLIMA will take reasonable safety measures to protect your personal information.
- Access to your personal information is restricted. Access to your personal information is only permitted to MLIMA employees in order to carry out their duties or to authorised third parties who are subject to the laws that require them to protect your personal information.

### **When will we process your personal information?**

We will only process this personal information for lawful purposes relating to our business if the following applies:

- For the purposes herein
- If you have consented thereto
- If a person legally authorised by you, the law or a court, has consented thereto
- If it is necessary to conclude or perform under a contract, we have with you
- If the law requires or permits it
- If it is required to protect or pursue your, our or a third party's legitimate interest

Please let MLIMA know if you:

- Have any questions or comments or concerns regarding the contents of this policy;
- would like us to correct, update, or if appropriate delete your personal information in records;
- would like a copy of the personal information that we hold about you; or
- wish to report any misuse of your personal information to:

Email: [info@mlimagroup.co.za](mailto:info@mlimagroup.co.za)

### **Changes to this Privacy Policy**

This Privacy policy may be changed from time to time. The latest version and date implemented will be noted at the end of the policy for ease of reference. We will place a notice on our website drawing the attention of our customers to any material updates if and when they are made. We advise customers to familiarise themselves with the latest version of this policy on a regular basis.

**Version Date: November 2023**