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Edge Growth Internal Privacy

POPI Policy / June 2021



EDGE GROWTH BUSINESS DEVELOPMENT PROPRIETARY LIMITED
(registration number 2007/034836/07)

EDGE GROWTH VENTURES PROPRIETARY LIMITED
(registration number 2017/148177/07)

EDGE GROWTH ACCELERATE PROPRIETARY LIMITED
(registration number 2017/124541/07)

EDGE GROWTH ACCESS PROPRIETARY LIMITED
(registration number 2017/124543/07)

EDGE GROWTH BLUE SKIES PROPRIETARY LIMITED
(registration number 2021/516484/07)

EDGE GROWTH TECHNOLOGY SERVICES PROPRIETARY LIMITED
(registration number 2018/315303/07)

Each entity listed above is referred to herein as "Edge Growth Entity", "we", "our" or "us".



This privacy policy describes how we collect and use personal information about you during and after your working relationship with us, in accordance with the applicable data protection laws in the country of your residence.

This policy applies to current and former employees, workers and contractors of an Edge Growth Entity ("**Edge Growth Personnel**"). This policy does not form part of any contract of employment or other contract to provide services. We may update this policy at any time but if we do so, we will provide you with an updated copy of this policy as soon as reasonably practical.

It is important that you read and retain this policy, together with any other privacy policy we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information and what your rights are under the data protection legislation.

a. THE KIND OF INFORMATION WE HOLD ABOUT YOU

Personal information is any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We will collect, store, and use the following categories of personal information about you:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
- Date of birth.
- Gender.
- Marital status and dependants.
- Next of kin and emergency contact information.
- Financial (payslip, Annual income, bank statements).
- Nationality and visa information.
- PAYE number or other applicable tax number.
- Bank account details, payroll records and tax status information.
- Salary, annual leave and benefits information.
- Start date and, if different, the date of your continuous employment.
- Leaving date and your reason for leaving (exit interviews).
- Location of employment or workplace.
- Medical, death and disability insurance and retirement annuity information.
- Copy of driving licence, identification documents, passport.
- Recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process).
- Performance information.
- Disciplinary and grievance information.
- Information about your use of our information and communications systems; and
- Photographs.



We may also collect, store and use the following type of special personal information personal information:

- Information about your race or ethnicity.
- Biometric data.
- Information about your health, including any medical condition, health and sickness records; and
- Information about criminal behaviour to the extent that the criminal behaviour related to an alleged offence or proceedings regarding an alleged offence.

HOW IS YOUR PERSONAL INFORMATION COLLECTED?

We collect personal information about Edge Growth Personnel through the application and recruitment process, either directly from candidates or sometimes from an employment agency or background check provider. We may sometimes collect additional information from third parties including former employers, credit reference agencies or other background check agencies.

We will collect additional personal information during job-related activities throughout the period of you working for us.

HOW WILL WE USE INFORMATION ABOUT YOU?

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- Where we need to perform the contract, we have entered with you.
- Where we need to comply with a legal obligation, to comply with applicable laws, regulations and court orders including administrative laws, broad based black economic empowerment laws, business laws, company laws, communication laws, environmental laws, financial and tax laws, health and safety laws and labour laws as well as checking an employee's right to work at the Edge Growth Entity.
- Where it is necessary to protect your legitimate interests; and/or
- Where it is necessary for legitimate interests pursued by us or a third party and your interests and fundamental rights do not override those interests.

Situations in which we will use your personal information

The situations in which we will process your personal information are listed below.

- Deciding about your recruitment or appointment.
- Determining the terms on which you work for us.
- Checking you are legally entitled to work in the country in which you have applied.
- Paying you and, if you are an employee or deemed employee, for tax purposes and deducting applicable tax contributions.
- Providing benefits such as death and disability insurance cover.
- Administering the contract, we have entered with you.
- Business management and planning, including accounting and auditing.
- Conducting performance reviews, managing performance and determining performance requirements.
- Making decisions about salary reviews and compensation.



- Assessing qualifications for a particular job or task, including decisions about promotions.
- Gathering evidence for possible grievance or disciplinary hearings.
- Making decisions about your continued employment or engagement.
- Making arrangements for the termination of our working relationship.
- Education, training and development requirements.
- Dealing with legal disputes involving you, or other Edge Growth Personnel, including accidents at work.
- Ascertaining your fitness to work.
- Managing sickness absence.
- To prevent fraud.
- To monitor your use of our information and communication systems to ensure compliance with our IT policies.
- To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution; and
- Equal opportunities monitoring.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

If you fail to provide personal information

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered with you (such as paying you or providing a benefit), or we may be prevented from complying with our legal obligations.

How we use special personal information

We may process special categories of personal information in the following circumstances:

- In limited circumstances, with your explicit written consent.
- Where we need to carry out our legal obligations or exercise rights in connection with employment; and
- Where it is needed for equal opportunities monitoring.

OUR OBLIGATIONS AS AN EMPLOYER

We will use your special personal information in the following ways:

- We will use information relating to leaves of absence, which may include sickness absence or family related leaves, to comply with employment and other laws.
- We will use information about your physical or mental health, or disability status, to ensure your health and safety in the workplace and to assess your fitness to work, to provide appropriate workplace adjustments, to monitor and manage sickness absence and to administer benefits including any applicable statutory maternity pay, statutory sick pay and medical aid (to the extent applicable).
- We will use information about your race or national or ethnic origin to ensure meaningful equal opportunity monitoring and reporting where required by law; and



- We will use your biometric information for the purposes of securing our building and systems and this will be done in accordance with labour laws.

AUTOMATED DECISION MAKING

You will not be subject to decisions that will have a significant impact on you based solely on automated decision making unless we have a lawful basis for doing so and we have notified you.

We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

DATA SHARING

We may have to share your data with third parties, including third party service providers and other Edge Growth Entities.

We require third parties to respect the security of your data and to treat it in accordance with the law.

We may transfer your personal information outside the country in which you are resident. If we do, you can expect a similar degree of protection in respect of your personal information.

Why will we share personal information with third parties?

We will share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

Which third party service providers will process your personal information?

" **Third parties**" include third party service providers (including contractors and designated agents) and other Edge Growth Entities. The following activities are carried out by third party service providers: payroll, benefits provision and administration, insurance, professional advisers such as tax advisers and legal advisers and IT services.

How secure is your information with third party service providers and other Edge Growth Entities?

All our third-party service providers and other Edge Growth Entities are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal information for their own purposes. We only permit them to process your personal information for specified purposes and in accordance with our instructions.

When will we share your personal information with other Edge Growth Entities?

We will share your personal information with other Edge Growth Entities as part of our regular reporting activities on performance, when necessary for provision of the services required by you and for system maintenance support and hosting of data.



What about other third parties?

We may need to share your personal information with a regulator or to otherwise comply with the law. This may include making returns to your local tax authorities and disclosures to trustees for reporting requirements.

DATA SECURITY

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. These measures include, but are not limited to, policies and procedures to protect your information and IT security.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

DATA RETENTION

How long will you use my information for?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer an employee, worker or contractor of the Edge Growth Entity we will retain and securely destroy your personal information in accordance with our Document Retention & Destruction policy or applicable laws and regulations.

RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION

Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.



Your rights in connection with personal information

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

- Request access to your personal information (commonly known as a “**data subject access request**”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- Object to processing of your personal information where we are relying on a 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 information for direct marketing purposes.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

If you want to review, verify, correct or request erasure of your personal information or object to the processing of your personal information, please contact the Information Officer in writing.

RIGHT TO WITHDRAW CONSENT

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the Information Officer. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

CHANGES TO THIS PRIVACY NOTICE

We reserve the right to update this privacy policy at any time, and we will provide you with a new privacy policy when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.



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WHO CAN YOU CONTACT REGARDING YOUR PERSONAL INFORMATION AND THIS NOTICE?

Should you have any queries regarding this privacy policy or would like to enforce any rights you may have under applicable data protection laws, please contact us at:

Information Officer: Mr. Daniel Hatfield
010 001 3715
DHatfield@edgegrowth.com

Deputy Information Officer: Matthew Sidebottom
010 001 3715
MSidebottom@edgegrowth.com

If you wish to lay a complaint against us regarding the way we have processed your personal information you can do so at the Information Regulator

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