



# PRIVACY NOTICE

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# PRIVACY NOTICE

## 1. INTRODUCTION

Raubex Group (“We”) recognise the importance of protecting your personal information and as such subscribe to the principles of the Protection of Personal Information (“POPIA”) Act. We respect your privacy and your personal information and are committed to protecting your privacy and to ensure that your personal information is collected and used appropriately, lawfully and transparently. The purpose of our privacy notice, together with Promotion of Access to Information Act (“PAIA”) and POPIA manual, is to inform you about our policy and our use of the data and/or personal information we collect and your rights as a data subject.

This Privacy Notice outlines:

- How we collect personal information;
- What types of personal information we collect and hold;
- The purposes for which we use such personal information;
- Who we share your personal information with, when required; and
- Your rights with respect to the personal information held by us.

## 2. ABOUT THE COMPANY

Raubex Group Limited is an infrastructure development and construction materials supply group.

Our address and contact details are:

Email address                      informationofficer@raubex.com

Physical address                      Building 1  
Highgrove Office Park  
50 Tegel Avenue  
Centurion, 0169

Postal address                      PO Box 66192  
Highveld, 0169

Telephone Number                      +27 (0)12 648 9400

Website                                      www.raubex.com

Registration number                      2006/023666/06

## 3. WHAT IS PERSONAL INFORMATION

According to the POPI Act “personal information” means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person. Please refer to POPIA for a detailed definition and various types or categories of personal information.

Personal information includes:

- Certain information that we collect automatically when you visit our website;
- Certain information collected on registration;
- Certain information collected in the carrying on of business activities; and
- Optional information that you provide to us voluntarily.

but excludes:

- Information that has been made anonymous so that it does not identify a specific person (juristic or natural);
- Permanently de-identified information that does not relate or cannot be traced back to you specifically; and
- Non-personal statistical information collected and compiled by us.

## 4. WHO ARE OUR DATA SUBJECTS?

We process the personal information of the following categories of data subjects:

- Customers or clients;
- Jobs candidates or employees;
- Recruiters and medical practitioners providing services related to employees and contractors;
- Contractors, vendors or suppliers;
- Debtors and creditors;
- Community or other stakeholders;
- Directors and shareholders; and
- Competitors.

## 5. HOW DO WE COLLECT PERSONAL INFORMATION?

We collect information about you directly from you, including additional information on a voluntary basis (optional information), as well as from third parties as allowed and consented to, and publicly accessible sources, including:

### 5.1. From our website

Raubex uses traffic log cookies to create sessions per user, which identifies pages visited and session duration. This helps us to analyse data about web page traffic and improve the website in order to tailor it to customer needs. We only use this information for statistical analysis purposes, and in no way track any personal information of any users connected to the site without consent.

We also collect information directly from you when you submit a contact form on our website, which enables us to engage with you regarding your enquiry, including your name, email address and other personal information contained in the documents that you upload on our website and provide voluntarily.

### 5.2. From job candidates and employees

We collect data from you when you provide us with your personal information, during the carrying on of the employer and employee relationship, and from our business partners and the persons employed by us to provide services for us, which may include background verification and authentication services, security services, debt collection services, communications services and data hosting, processing and management services.

### 5.3. From suppliers and service providers

We collect and process information about you or your employees which you provide directly to us to register as a supplier with us or that are collected or arise in the course of the delivery of services, including names, contact details, billing information, account details, identity numbers and places of business and residence; and from our business partners and the persons employed by us to provide services for us, which may include background verification and authentication services.

### 5.4. Other third parties

We may collect and process information from public registers, credit bureaus, money laundering, fraud prevention and law enforcement agencies, in order to protect both us and our data subjects, including:

- From such persons or entities which may be legally entitled to provide us with information about you.
- From persons or entities which you may consent to providing us with information about you.

### 5.5. During stakeholder engagements

We are committed to serving the communities in the areas that we operate in, and we are required to collect certain information about our stakeholders, such as from attendance registers to events and/or stakeholder engagement programs, including competitor engagements, such as company information, meeting agendas and minutes, and completion certificates of initiatives.

### 5.6. Recording Calls

We do not record telephone calls but you may optionally leave your personal information and contact details when you leave a voice mail message.

### 5.7. Recording Meetings

We may be required to record meetings for record and minuting purposes. Recording of meetings, if necessary, will be announced prior to the recording.

## 6. PURPOSE FOR PROCESSING

We may use or process any personal information, or optional information that you provide to us for the purposes indicated when you agreed to provide it to us. Processing includes gathering your personal information, disclosing it, and combining it with other personal information.

We generally collect and process your personal information for various purposes, including:

- General correspondence and enquiries;
- Recruiting, employee, contractor and general staff administration;
- Administration of contracts and agreements;
- Keeping of accounts, registers and records;
- Sourcing, making use of and paying for goods and service providers;
- Providing products and services to customers;
- Due to health and safety obligations, including, but not limited to: control of access to premises, consultation processes, health monitoring, security and safety monitoring, incident investigation and resolution processes, and legal appointments; and
- To comply with our environmental obligations like environmental impact assessments and handling of environmental concerns.

We may also use information we hold about you for purposes required by or as permitted under applicable law, such as:

- To prevent, investigate and prosecute fraud, money laundering, terrorism, abuse of our services and other unlawful activities;
- To comply with legal and regulatory requirements, for audit purposes and legal proceedings, including client, service provider, supplier, etc. identification and verification as part of our due diligence checks; or
- For such other purposes as you may consent to or as may otherwise be lawfully permitted, including for the purposes of protecting our and/or your legitimate interests and/or that of our suppliers and customers.

## 7. CONSENT TO COLLECTION

You may only send us your own personal information or the information of another data subject where you have their permission to do so.

Where it is applicable and necessary, we will obtain your consent to collect personal information:

- In accordance with applicable law; and
- When you provide us with any registration information or optional information.

## 8. SHARING OF PERSONAL INFORMATION

Keeping your personal information secure is one of our most important responsibilities. We cannot disclose your personal information unless legally permitted thereto. Save as set out below, we will not transfer your personal information to a third party without your consent unless we are legally obliged to.

In particular, we do not sell lists or databases with any of our data subject's personal information and will not provide any of your personal information to entities outside our group so as to permit them to market their products or services to you.

We may share your personal information with third parties, such as:

- To all persons in our employment or in the employment of our affiliated companies who require your information in order to perform their duties, including to our directors, employees, contractors, agents, auditors, legal and other professional advisors and of our affiliated companies (in which case we will seek to require the affiliates to honour this Privacy Notice);
- To governmental, judicial, regulatory and law enforcement bodies and agencies, including the South African Revenue Services;
- To persons or organisations engaged by us and fraud prevention agencies to help detect and prevent potentially illegal acts and violations of our policies;
- To our goods or services providers under contract who help provide certain goods or services or help with parts of our business operations, including client and account verification, electronic or cash payment services, income collection, marketing, technology services (our contracts dictate that these goods or services providers only use your information in connection with the goods or services they supply or services they perform for us and not for their own benefit);
- To any person to whom we subcontract, cede, delegate, transfer or assign any of our rights or obligations pertaining to the services provided to you, or contracts concluded with you;
- To any person that acts as your legal guardian, executor of your estate, curator or in a similar capacity; and
- To such other persons as may be permitted by applicable law or that you may consent to.

# PRIVACY NOTICE continued

## 9. REGULATORY OR LEGAL DISCLOSURE

We may disclose your personal information as required by law or governmental audit. We may also disclose personal information if required:

- By a subpoena or court order;
- To comply with any law;
- To protect the safety of any individual or the general public; and
- To prevent violation of our contractual terms.

## 10. INFORMATION SECURITY

We are legally obliged to provide adequate protection for the personal information we hold and to stop unauthorized access and use of personal information. We will, on an on-going basis, continue to review our security controls and related processes to ensure that your personal information remains secure.

Our security policies and procedures cover physical security, computer and network security, access to personal information, secure communications, retention and disposal of information, acceptable usage of personal information, governance and regulatory issues, monitoring access and usage of private information, investigating and reacting to security incidents.

When we contract with third parties, we impose appropriate security, privacy and confidentiality obligations on them to ensure that personal information that we remain responsible for, is kept secure.

We will ensure that anyone to whom we pass your personal information to agrees to treat your information with the same level of protection as we are obliged to.

## 11. TRANSFER ACROSS BORDERS

We may send personal information outside of South Africa to various countries but we will only transfer data to other countries who have similar privacy laws to South Africa's that provide an adequate level of protection, or to recipients who can guarantee the protection of personal information to the same standard we must protect it.

## 12. ACCURATE AND CURRENT

We will try to keep the personal information we collect as accurate, current, complete, confidential and reliable for the purposes defined in this statement. From time to time we may request you to update your personal information and if any of your personal information changes, we request that you contact us in order to correct the information that we hold about you.

## 13. PERSONAL INFORMATION RETENTION

We may retain your personal information in physical or electronic records at our discretion but we will only retain your personal information for as long as it is necessary to fulfil the purposes explicitly set out in this statement, unless the retention of the record is required or authorised by law, or you have consented to the retention of the record.

We will maintain a Record Retention and Disposal Schedule to ensure that records are only retained as long as necessary and destroyed as soon as practical after the retention period has expired.

During the period of retention, we will continue to abide by our non-disclosure obligations and will not share or sell your personal information.

## 14. YOUR RIGHTS AND OUR OBLIGATIONS TO YOU

If we require your consent to obtain and use the data. You may withdraw your consent at any time by notifying us in writing. We will maintain your data on our records for as long as we have your consent to do so.

For lawful basis other than consent, you have the right to object to processing at any time by following the instructions as contained in our PAIA and POPIA manual.

You have a right to also request us to update, correct or delete your information or to request a copy of the personal information we hold about you at any time by following the instructions as contained in our PAIA and POPIA manual.

Please note that any such access request may be subject to a payment of a legally allowable fee. Refer to our PAIA and POPIA manual for more details.

## PRIVACY NOTICE continued

### 15. CONTACT US

Please notify us via email at [informationofficer@raubex.com](mailto:informationofficer@raubex.com) if you have any concerns about the processing of your personal information or wish to exercise any other rights inferred to you under clause 13 of this document.

We will notify you of the steps taken as a result of your request. We will not be obliged to provide you with information or agree to your request to the extent that we are prohibited thereto by applicable law, if compliance would unreasonably prejudice our legitimate interests or that of a third party, or if we have a legal basis upon which to deny your request. Please note that we may require a reasonable period to comply with your request.

### 16. COMPLAINT

You have a right to complain about our processing of your information by contacting us at [informationofficer@raubex.com](mailto:informationofficer@raubex.com). If we do not respond to your full satisfaction, the complaint can be directed to the Regulator's Office at the details contained in our PAIA and POPIA manual.



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