

Emergence Growth South Africa Data Protection Policy

This policy refers to all parties (employees, job candidates, customers, suppliers etc.) who provide any amount of information/personally identifiable data to Emergence Growth South Africa.

Who is covered under the Data Protection Policy?

Employees of Emergence Growth South Africa must follow this policy. Contractors, consultants, partners and any other external entity are also covered. Generally, this policy refers to anyone Emergence Growth South Africa collaborate with or acts on our behalf and may need occasional access to data.

Policy elements

As part of our operations, we need to obtain and process information that may include sensitive information related to the employees or data regarding business operations. This information includes any offline or online data that makes a person identifiable such as names, addresses, usernames and passwords, digital footprints, photographs, identification and/or passport numbers, financial data etc.

Our company collects this information in a transparent way and only with the full cooperation and knowledge of interested parties. Once this information is available to us, the following rules apply.

Data will be:

- ▶ Accurate and kept up to date.
- ▶ Collected fairly and for lawful purposes only.
- ▶ Processed by the company within its legal and moral boundaries.
- ▶ Reasonably protected against any unauthorized or illegal access by internal or external parties

Data will not be:

- ▶ Communicated informally
- ▶ Stored for more than the required amount of time
- ▶ Transferred to organisation's or countries that do not have adequate data protection policies
- ▶ Distributed to any party other than the ones agreed upon by the data's owner (exempting legitimate requests from law enforcement authorities)

In addition to ways of handling received data the company has direct obligations towards people to whom the data belongs. Specifically Emergence Growth South Africa will provide to organisations the following information, on request:

- ▶ Which data is collected, and for what purpose
- ▶ How data is processed
- ▶ Who has access to their information
- ▶ The provisions made in case of lost, corrupted or compromised data

In addition, the organisation sharing data with us has the right to request that we modify, erase, reduce or correct data contained in our databases.

Actions

To exercise data protection we're committed to:

- ▶ Restrict and monitor access to sensitive data
- ▶ Develop transparent data collection procedures
- ▶ Train employees in online privacy and security measures
- ▶ Build secure networks to protect online data from cyberattacks
- ▶ Establish clear procedures for reporting privacy breaches or data misuse
- ▶ Include contract clauses or communicate statements on how we handle data
- ▶ Establish data protection practices (document shredding, secure locks, data encryption, frequent backups, access authorisation etc.)

Disciplinary Consequences

All principles described in this policy are strictly adhered to. A breach of data protection guidelines will invoke disciplinary and possibly legal action.

Information Regulator

Emergence Growth South Africa is registered with the Information Regulator.

Registration Number: 17072/2021-2022/IRRTT. Kirsten Smythe has been registered with the Information Regulator by Emergence Growth South Africa as the Information Officer in terms of section 55(2) of the Protection of Personal Information Act 4 of 2013 with effect from 01 June 2021.