
SLR SOUTH AFRICAN OPERATIONS PRIVACY NOTICE

The Protection of Personal Information Act 2013 (“POPIA”)

June 2021

Introduction

At SLR, we are committed to protecting your privacy and ensuring that your personal information is collected and used properly, lawfully, and transparently.

This Notice explains how we obtain, use, and disclose your personal information, as is required by the Protection of Personal Information Act, 2013 (“POPIA”).

POPIA gives effect to everyone’s Constitutional right to privacy and is to become law 1 July 2021. POPIA promotes the protection of personal information processed by public and private bodies in South Africa, and establishes minimum requirements for the processing of personal information.

This Privacy Notice is governed by the laws of South Africa. Any disputes which may arise out of this Notice are subject to the jurisdiction of the South African courts.

Information about us

In this Notice, “SLR Consulting Africa”, “SLR”, “SLR South African Operations” or “we” refers to one or more of the companies in the SLR Group of companies, namely the SLR companies that are registered and operate in South Africa. The SLR Group is made up of different legal entities, details of which can be found here: www.slrconsulting.com

SLR Global Limited is the ultimate parent company of the SLR Group of companies, which has its headquarters in the UK. The SLR Group has operations in UK, Africa, Asia-Pacific, Canada, Europe, and the United State of America. This Privacy notice also deals with some aspects relating to the Website (www.slrconsulting.com), which is controlled by SLR Global Ltd in terms of applicable UK Laws. (Disclaimer: The website www.slrconsulting.com may include links to third-party websites, plug-ins, and applications. Clicking on those links or enabling those connections may allow third parties to

collect or share personal data about you. We, and the SLR Group, do not have any control whatsoever over those third-party websites and are not responsible for their privacy statements or practices. When you leave the slrconsulting.com website, we encourage you to read the privacy statement of every website you visit.)

SLR South African Operations and Group Commitment

SLR is committed to maintaining the privacy of Personal Information of all individuals and entities (where applicable) (i.e., 'data subjects') with whom we interact and to complying with the Protection of Personal Information Act, 2013 ("POPIA"). Further, as a member of the global SLR Group, SLR is committed to comply with the provisions of the Data Protection Act 2018 (UK), "UK GDPR", the EU GDPR (where applicable) in respect of the Personal Data of UK and EU individuals that we may process.

This privacy notice applies directly to SLR companies that

operate in South Africa but may also be applicable to other SLR Group Companies outside of South Africa whom we may transfer or collect personal information of protected data subjects.

Why do we collect personal data/information?

POPIA provides that personal information may only be processed lawfully and in a reasonable manner that does not infringe your (the data subject's) privacy.

We collect and process your personal information mainly to provide you with access to our services and products, to help us improve our offerings to you and for certain other purposes explained below. The type of information we collect will depend on the purpose for which it is collected and used.

We will only collect information that we need for that purpose, and will only use it for the purposes for which it was collected or agreed with you, for example:

To provide our products or services to you, to carry out the transaction you requested and to maintain our relationship; For contractual purposes; To assess and process orders; To conduct credit reference searches or verification; To confirm and verify your identity or to verify that you are an authorised user for security purposes; For operational purposes, and where applicable, credit scoring and assessment and credit management; For the detection and prevention of fraud, crime, money laundering or other malpractice; For debt tracing or debt recovery; To conduct market or customer satisfaction research or for statistical analysis; For audit and record keeping purposes; In connection with legal proceedings.

If you fail to provide personal data - Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to contact you when it may be necessary for lawful purposes, including for example, for concluding or performing the contract we have or are potentially concluding with you (for example, to provide you with our services).

How do we collect this information?

We collect information directly from you where you provide us with your personal details, for example when you communicate, correspond or contract with SLR to purchase a product or services from us, or when you submit enquiries to us or contact us. Where possible, we will inform you what information you are required to provide to us and what information is optional. Sometimes, these activities are carried out by third party service providers, and/or other members of the SLR Group.

With your consent, we may also supplement the information that you provide to us with information we receive from other companies in the SLR Group to offer you the best possible experience in your interactions with SLR.

We do not capture or store any personally-identifying information (such as your e-mail address, name, title, or postal address) without your knowledge when you visit our website. (See section on Cookies below for further details). You are always able to choose whether or not to provide such information to us.

How we might use your information

General Use

We may use your information in a variety of different ways dependent on why it has been provided. For example:

- To enable us to communicate with you in connection with the activities for which you have provided us data
- To store data related to any contract we have entered in to or are considering entering in to
- To keep you up to date with our service offerings
- To store data relating to your employment with SLR

Any data you do provide, via our enquiry form or as part of our working relationship with you, will be treated in the strictest confidence and held securely. We will only use your data for the activities that it has been provided for or you have consented to.

From our Website

Website Visitor Tracking

To maintain and improve site quality and integrity, website usage is tracked by Google Analytics. We use Google Analytics Demographics and Interest Reporting tools to provide a better understanding of who is visiting the website. All data that is tracked is anonymous.

Other sites to which we provide links may be governed by different policies. We do not assume responsibility for the content or information practices of these other websites, and we strongly encourage you to review the privacy statements and policies of all externally-linked websites.

COOKIES - Website (www.slrconsulting.com) usage information is collected using “cookies” which allows us to collect standard Internet visitor usage information. Before cookies are placed on your device you will see a banner at the left of your screen requesting your consent to set those cookies. By giving your consent, you are enabling us to provide the best possible experience and service to you. You may, if you wish, deny consent for any cookies other than for SLR Consulting Limited slrconsulting.com, those which are strictly necessary. You will be given the opportunity to allow or deny different categories of cookie that we use. You can return to your cookie preferences to review this at any time. For more information about how to do this, and about cookies in general, you can visit www.allaboutcookies.org. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies.

If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

E-newsletters

In regions where we deliver our regular e-newsletters, we use a third-party provider, MailChimp or Vision6, to deliver these. We gather statistics around email opening and clicks to help us monitor and improve our e-newsletters. We do not assume responsibility for the content or information practices

of these other websites, and we strongly encourage you to review the privacy statements and policies of all externally-linked websites

Marketing

We want to give you control over our use of your data for direct marketing purposes. This means you can opt-out of receiving emails from us at any time by unsubscribing using the link provided in our emails.

Links to other websites

This privacy notice does not cover the links within the company website linking to other websites. We encourage you to read the privacy statements on the other websites you visit.

What is the legal basis for our collection of this information?

We will use your personal information to comply with legal and regulatory requirements or industry codes to which we subscribe, or which apply to us, or when it is otherwise allowed by law (for example to protect SLR's legitimate interests).

Who can we share your information with?

We may disclose your personal information to our service providers and associates who are involved in the delivery of products or services to you. We endeavour to enter into written agreements to ensure that other parties comply with our confidentiality and privacy requirements.

We may share your personal information with, and obtain information about you, from Third parties for the purposes listed above, for example credit reference and fraud prevention agencies, law enforcement agencies; Other companies in the SLR Group when we believe it will enhance the services and products we can offer to you, but only where you have not objected to such sharing; Other third parties from whom you have chosen to receive marketing information.

We may also disclose your information to comply with legal and regulatory requirements or industry codes to which we subscribe, or which apply to us, or when it is otherwise allowed by law (for example to protect SLR's interests).

Data Security

SLR employs appropriate, reasonable, technical and organisational measures to prevent loss of, damage to or unauthorised destruction of personal information and unlawful access to or processing of personal information. These measures include Firewalls; Virus protection software and update protocols; Logical and physical access control; Secure setup of hardware and software making up our information technology infrastructure; and Outsourced service providers who are contracted to implement security controls.

Our security policies and procedures cover Physical security; Computer and network security; Access to personal information; Secure communications; Security in contracting out activities or functions; 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.

We endeavour to enter into written agreements to ensure that other parties comply with our confidentiality and privacy requirements. 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, on an on-going basis, continue to review our security controls and related processes to ensure that your personal information is secure.

Information retention

We will keep your information for as long as you have a relationship with us. After it ends we will keep it where we can access it for our legitimate purposes – for example to comply with legal and regulatory requirements or industry codes to which we subscribe or which apply to us, or when it is otherwise allowed by law, to help us respond to queries or complaints, or for other reasons (such as internal project experience and/or, reference projects if you have agreed to allow us to share the project details with other potential clients) and responding to requests from regulators.

Please contact us at the numbers/addresses provided, if you want to know more about how long we are keeping your personal details. Personal data collected from the website (www.slrconsulting.com) may be retained in an active processing environment for marketing purposes for a period permitted by law, unless you request that it be deleted in the format required by POPIA, and you opt-out from

further marketing communications as set out in this privacy notice. Please be aware that we may not be able to delete or destroy your personal information, as we may need to retain updated and accurate information to comply with legal and regulatory requirements or industry codes to which we subscribe or which apply to us, or when it is otherwise allowed by law.

Transferring your information across borders (out of South Africa)

We may disclose personal information to other countries, including to our shareholders, our parent company and subsidiaries, associate entities or third-party service providers, with whom we engage in business or whose services or products we elect to use, including cloud services hosted in international jurisdictions.

We endeavour to enter into written agreements to ensure that other parties comply with our confidentiality and privacy requirements. 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.

Your rights

You have a number of rights relating to your Personal Data as listed below.

ACCESS TO INFORMATION REQUESTS - How you can request your personal information under POPIA:

POPIA provides that a data subject may, upon proof of identity, request SLR to confirm all the information it holds about the data subject and may request access to such information, including information about the identity of third parties who have or have had access to such information.

Requests for personal information under POPIA must be made in accordance with the provisions of the Promotion of Access to Information Act (PAIA).

RIGHT TO UPDATE, CORRECT OR DELETE YOUR PERSONAL INFORMATION

You, as a data subject may also request to correct or delete personal information about the data subject in its possession or under its control that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, or obtained unlawfully; or destroy or delete a record of personal information

about you **IF** SLR is no longer authorised to retain records in terms of POPIA's retention and restriction of records provisions.

To access our PAIA manual please go to our website (www.slrconsulting.com), alternately please contact the team responsible for data information management at dataprotectionafr@slrconsulting.com requesting the required form: *FORM 2: Request for correction or deletion of personal information or destroying or deletion of record of personal information in terms of section 24(1) of POPIA's Regulations relating to the protection of personal information, 2018 [Regulation 3]*

Please be aware that we may not be able to delete or destroy your personal information, as we may need to retain updated and accurate information to comply with legal and regulatory requirements or industry codes to which we subscribe or which apply to us, or when it is otherwise allowed by law.

RIGHT TO OBJECT TO THE PROCESSING OF YOUR PERSONAL INFORMATION

POPIA provides that you, as a data subject, may object, at any time, to the processing of your personal information, on reasonable grounds relating to your particular situation, unless legislation provides for such processing. To access our PAIA manual please go to our website (www.slrconsulting.com), alternately please contact the team responsible for data information management at dataprotectionafr@slrconsulting.com to request the required form: *FORM 1 - Objection to the processing of personal information*. Please be aware that you may not be permitted to object to SLR processing your personal information, as we may need to retain updated and accurate information to comply with legal and regulatory requirements or industry codes to which we subscribe or which apply to us, or when it is otherwise allowed by law. In that event, we will be entitled to request you to ensure that your information is updated and accurate.

PROOF OF IDENTITY

Proof of identity is required to authenticate your identity and the request. You will, in addition to this prescribed form, be required to submit acceptable proof of identity such as a certified copy of your identity document or other legal forms of identity.

We will take all reasonable steps to confirm your identity before processing your requests, giving you details of, or making changes to, personal information we may hold about you.

To access our PAIA manual please go to our website (www.slrconsulting.com), alternately please contact the team responsible for data information management to request access to information we may hold about you at dataprotectionafr@slrconsulting.com who you should also contact if you have any further queries or need additional information.

You can read more about these rights on the POPI Act website:

- [Information Regulator \(SA\) – https://www.justice.gov.za/inforeg/](https://www.justice.gov.za/inforeg/)

Queries or complaints

SLR takes the security of personal data very seriously. Please let us know if you feel the collection or use of personal information is in any way unfair, misleading or inappropriate.

If you have any queries on the processes we use to collect or store data or have any suggestions on how we could improve our processes please do get in touch with our the Information Officer on dataprotectionafr@slrconsulting.com

Similarly, if you want to make a complaint about the way we have processed your personal information, we first ask that you contact us directly to discuss this and allow us to remedy the situation on dataprotectionafr@slrconsulting.com.

You are entitled to complain directly to the Information Regulator at:

The Information Regulator (South Africa)

JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

P.O Box 31533, Braamfontein, Johannesburg, 2017

Complaints email: complaints.IR@justice.gov.za

General enquiries email: inforeg@justice.gov.za.

Changes to this privacy notice

This Privacy Notice was last updated in June 2021. Please note that we may amend this Notice from time to time. Please check the website (www.slrconsulting.com) periodically to inform yourself of any changes.

How to contact us

If you have any questions or concerns regarding this privacy policy, please direct them to dataprotectionafr@slrconsulting.com

SLR South Africa Operations and SLR Group

The SLR companies included in this Privacy Notice is:

SLR Consulting Ltd, registration number 3880506 (acts on behalf of all SLR Group Companies not registered in Europe for the purposes of compliance with GDPR and the Data Protection Act).

SLR African Holdings Proprietary Limited

SLR Consulting (Africa) Proprietary Limited

SLR Consulting (South Africa) Proprietary Limited

Synergistics Environmental Services Proprietary Limited

CCA Environmental Proprietary Limited