

RaTT-Pac Computer Systems PTY LTD:

Protection of Personal Information (POPI) Privacy Policy

Information Officer: Sarah McCarthy

RaTT-Pac* respects your privacy and is committed to protecting your personal data if you are utilising our software systems and services. This Privacy Policy will inform you as to how we look after and process your personal data when you provide it to us or when it is collected from you, (for example by virtue of you providing us with your log-in details in order to access our software).

Our Contact Details

- Full name of legal entity: RaTT-Pac Computer Systems PTY LTD
- Name or title of Data Protection Officer: Sarah McCarthy
- Email address: info@risk101.com
- Postal address: P.O. Box 51202, V&A, Cape Town 8002
- Physical address: 5th Floor, 186 Loop St, Cape Town 8001
- Telephone number: +27 (0) 21 813 9101/0843300101

You have the right to make a complaint at any time to the Information Regulator of South Africa (www.justice.gov.za/inforeg/). We would, however, appreciate the chance to deal with your concerns before you approach any such regulator, so please contact us in the first instance.

Changes to the Privacy Policy and your Duty to Inform us of Changes

This Privacy Policy was last updated in July 2022. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-Party Links

Our Websites 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 data about you. We do not control these third-party websites and are not responsible for their privacy statements or terms. When you leave our Websites or engage with such third-parties, we encourage you to read the distinct privacy policy of every third-party you engage with.

The Data we collect about you

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

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data). We may collect, use, store and transfer different kinds of personal data about you which may include:

- i. Identity Data including first name, maiden name, last name, Company, country or state of your location, username or similar identifier,
- ii. Contact Data includes billing address, delivery address, email addresses, website address, and telephone numbers;
- iii. Transaction Data includes details about payments to and from you and other details of products and services you have obtained from us.
- iv. Technical Data including internet protocol address/es, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access the Websites;
- v. Profile Data including your username and password, any feedback and survey responses;
- vi. Usage Data including information about how you use our services;
- vii. Application Data and Intellectual Property including project concepts and information, digital project models, physical project models, messages sent using our Websites; and

We may also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users logging on at a particular time. However, we do not combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you.

We do not collect any Special Categories of Personal Data (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, or information about your genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

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 perform the contract we have or are trying to enter into with you (for example, to provide you with services or access to event ticketing). In this case, we may have to cancel Website-access or service you have with us but we will notify you if this is the case at the time.

HOW IS YOUR PERSONAL DATA COLLECTED?

When and from where we obtain personal information about you may include:

- I. When you subscribe to our services and sign contracts with us
- II. Information required to create user logins
- III. How and when you contact us for software support
- IV. From the payroll or HR departments of our clients when they capture financial and non-financial information
- V. We collect information about you based on your use of our products, services or service channels (like our Platform, Applications, Employee Self Service, and Websites)

HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to and for legitimate reasons, which you hereby expressly understand and consent to. Most commonly, we will use your personal data where we need to perform on the contract we are about to enter into or have entered into with you; or where we need to comply with a legal or regulatory obligation

International transfers

We may share your personal data within the RaTT-Pac/Risk101 group of companies. This will involve transferring your data outside of the Republic of South Africa and the European Economic Area, and specifically, to the Republic of South Africa, the European Union, and AsiaPac. This is done for reasons of support only, and your data remains within the umbrella of our personnel and follows our internal security protocols.

DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

Our security methods include:

- I. All laptops and servers are strong-password protected
- II. We run security updates on all devices
- III. We run antivirus and firewall control
- IV. All websites are secured and datasets are password-protected and SHA256 compliant

DATA RETENTION

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of software support and satisfying any legal, accounting, or reporting requirements.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please contact us to find out more about, or manifest, these rights:

- i. Request access to your personal data;
- ii. Request correction of your personal data;
- iii. Request erasure of your personal data;
- iv. Object to processing of your personal data;

- v. Request restriction of processing your personal data;
- vi. Right to withdraw consent.

Time limit to respond

- i. We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.