

COMPASS MEDICAL WASTE SERVICES (PTY) LTD

1. PROTECTION OF PERSONAL INFORMATION ACT PRIVACY NOTICE

- 1.1 COMPASS MEDICAL WASTE SERVICES (PTY) LTD (COMPASS) is required, in certain instances, to process personal information. Accordingly, COMPASS is required to protect personal information as set out in the Protection of Personal Information Act 4 of 2013, including its Regulations (POPI Act).
- 1.2 Section 18 of the POPI Act requires that data subjects must be notified when collecting personal information. In compliance therewith, this policy, as well as other notices given to individual data subjects, constitutes our notice in terms of the abovementioned Section.
- 1.3 The word “process” refers to how personal information is collected, used, stored, made available, destroyed, updated, disclosed, or otherwise dealt with. This policy describes the personal information we process.

2. WHAT PERSONAL INFORMATION IS COLLECTED AND WHAT THE PROCESS IS

2.1 DATA COLLECTED DURING THE COURSE AND SCOPE OF OUR BUSINESS

2.1.1 Personal information is processed in the course and scope of providing our health risk waste management services. Personal information includes, but is not limited to, the following:

- Marital status
- Children
- National origin
- Age
- Language
- Birthplace
- Education
- Relevant financial history
- Identifying number (such as employee number, identity number or passport number)
- E-mail address
- physical address (like residential address, work address or your physical location)
- telephone number
- Biometric information (like fingerprints, signature, or voice)
- Race; gender
- Sex
- pregnancy status
- ethnic origin
- social origin
- colour
- sexual orientation
- Physical health
- mental health
- well-being; disability
- religion
- belief

- conscience
- culture
- Medical history
- criminal history
- employment history
- Personal views
- Preferences and opinions
- Another's views or opinions about you
- Full names and initials

2.1.2 The primary sources of data collected during the course and scope of our business are from our customers, their employees, or representatives. Third parties may provide us with personal information on our customer's instructions, such as auditors. We may also obtain personal information from licensed databases, public records and information that is deliberately made public.

2.1.3 Information collected during the course and scope of our business is processed to be used for payment instruments, ensuring the security of our business systems including our website, complying with the law, charging VAT and keeping records of our dealings with our customers, including backups of our databases, communicating and managing our contract and relationships with our customers and securely and properly administering our business and marketing our services.

2.1.4 We will only collect and process your personal information where:

2.1.4.1 You have provided us with your consent;

2.1.4.2 To perform in terms of a contract with you;

2.1.4.3 To ensure compliance with the law;

2.1.4.4 To protect our legitimate interests in properly and securely administering our business and marketing our services.

2.2 **PERSONAL INFORMATION COMMUNICATED VIA OUR WEBSITE AND SOCIAL MEDIA PLATFORMS**

2.2.1 Other than providing personal information via our website and through social media platforms, you may also provide personal information by:

2.2.1.1 Sending electronic communications, including enquiries, to Compass.

2.2.1.2 Technical information, for instance, through Cookies, such as activity data, such as when the data subject completes a form on the Compass website, subscribes to a newsletter, alerts or other services from Compass

2.2.1.3 Responses to a vacancy advertisement

2.2.1.4 Personal information retrieved from our website and social media accounts, are sourced from you, with your consent and it shall specifically be utilised for the purposes that you provided it.

2.2.2 Enquiries via email are held on our email server, by the recipient and by persons in our business to whom the recipient refers your email for a response. Subscriptions and registrations are held by our marketing employees. Job applications are held by our human

resources employees and anyone to whom our human resources employees refer your application for consideration.

- 2.2.3 Compass uses the personal information that you provide to us through our website or when communicating with us using our social media platforms:
 - 2.2.3.1 to interact with the data subject;
 - 2.2.3.2 to improve design and content on our website;
 - 2.2.3.3 to improve day to day operations ;
 - 2.2.3.4 for the purpose for which the data subject had provided it.
- 2.2.4 Compass may share the personal information of the data subject with agents and suppliers, including those that supply it with technical services such as data analytics, hosting and technical support.
- 2.2.5 Personal information is also collected through the use of Cookies, which are small pieces of data stored on your device when you use the website for browsing sessions only or permanently, which allows the website to recognise you and track your preferences.
- 2.2.6 Our website service providers (including Google Analytics, Google Maps and YouTube), may also use Cookies (Third Party Cookies) to track your activity when you use our website. Third Party Cookies belong to and are managed by our website service providers. We do not control these service providers. These website service providers have their privacy policies which you can find on their websites.
- 2.2.7 If you choose to provide personal information on any of the social media Platforms (such as Facebook, LinkedIn YouTube and Twitter) when communicating with us, we may store it to adequately respond to you. We do so as it is in our legitimate interest in marketing our business and responding to enquiries. When you communicate with us, using our social media accounts, kindly remember that each social media platform may collect your personal information for its purpose. They would have their privacy policies, which you can find on their websites.
- 2.2.8 The transmission to Compass of information via the internet or a mobile phone network connection may not be completely secure and any transmission is at the Data subject's risk. From time to time, Compass may provide links to websites or mobile applications that it does not own or control. This Notice does not apply to those websites. If a Data subject chooses to use those websites, he/she must check the legal and privacy policies or statements posted on each website or mobile application he/she accesses to understand their privacy practices.
- 2.2.9 From time to time, Compass may provide links to websites or mobile applications that it does not own or control. This Notice does not apply to those websites. If a data subject chooses to use those websites, he/she does so at his/her own risk and he/she must check the legal and privacy policies or statements posted on each website or mobile application he/she accesses to understand their privacy practices.
- 2.2.10 Published information, such as posts on any of our social media accounts may be processed by us to administer our website and market our services. The legal basis on which we process published information is your consent and legitimate interests in properly administering our

business including our website and marketing our services or entering or performing a contract with you.

2.3 INFORMATION ABOUT OUR STAFF, THEIR FAMILY MEMBERS AND BENEFICIARIES

2.3.1 All employees as well as their family members and beneficiaries must adhere to this policy. Personal information detailed in 2.1.1 also applies to the above-mentioned persons. Personal information processed in terms of this clause shall be called employee information.

2.3.2 Employee information is obtained mainly through our employees, but also from recruitment agents, websites, references, public records and licensed databases.

2.3.3 Employee Information is processed to effectively render our services, marketing communications, tender invitation responses, responding to requests from data subjects, to conclude and manage contracts with our employees, in relation to benefits such as medical schemes, retirement funds and/or group life insurance membership, to comply with applicable laws including employment, tax, laws relating to COVID-19, determining our employment equity compliance in respect of diversity categories including age, gender, ethnicity, nationality, disability and marital or family status, in our legitimate business interests in determining our broad-based black economic empowerment contribution level, so we know who to contact in an emergency involving a partner or employee, in implementing, monitoring and applying access and security controls for our offices and databases, in dealing with disputes and claims by, and against us, involving any of our employees, including legal proceedings in any forum.

2.3.4 We will only collect and process Employee Information where:

2.3.4.1 Consent has been provided;

2.3.4.2 To ensure compliance with the law;

2.3.4.3 We are concluding and performing a contract with our Directors or employees;

2.3.4.4 We have legitimate interests in providing our services, marketing our services, administering our business, securing our offices and databases, ensuring a proper standard of service to our customers and communicating with and managing our partners and employees.

2.4 INFORMATION RELATING TO JOB APPLICATIONS

2.4.1 Job applicants fall within the employment context and we process the personal information relating to job applicants including names, contact details (including phone numbers, email and other addresses), education and employment history, race, gender and any other personal information included in the job application (Applicant Information).

2.4.2 We source most of the Applicant Information from the job applicant directly, by email or, where applicable, through our website. We may also source Applicant Information from recruitment agents and websites such as LinkedIn, from references, public records and licensed databases.

2.4.3 We process Applicant Information to consider and deal with the job applications and so that we can contact applicants about possible job opportunities.

2.4.4 We will only collect and process Applicant information where:

2.4.4.1 Consent has been provided; and

2.4.4.2 We have legitimate interests in recruiting employees for our business.

2.5 **SUPPLIER INFORMATION**

2.5.1 We process personal information relating to potential and actual suppliers of goods and services including names, identity, passport or registration numbers, contact information (including phone numbers, email and other addresses), VAT numbers, bank account details (Supplier Information).

2.5.2 We usually source the Supplier Information directly from our potential or actual suppliers but we may source it from quotations, adverts, references or other suppliers.

2.5.3 We process Supplier Information concerning the quotations we obtain and supply contracts we conclude, concerning our business and in providing our services to our customers. The legal basis on which we process Supplier Information include consent or concluding and performing contracts with suppliers or our legitimate interests in managing relationships and communicating with our suppliers, receiving, processing and paying supplier invoices, complying with applicable laws including tax laws, dealing with disputes and claims by and against us relating to any of our suppliers, including legal proceedings in any forum.

2.6 **OTHER TYPES OF INFORMATION**

2.6.1 We also share personal information as necessary to open accounts and receive and process payments through banks (Bank Information). We share Bank Information with banks where necessary to receive and make payments, pay refunds and communicate with you and the bank concerning such payments or refunds. The source of the Bank Information is usually the account holder but sometimes we source Bank Information from the banks themselves and from people (not the account holder) for whom, to whom or from whom the payment is made or received. The legal basis on which we process Bank Information is consent or compliance with the law or performance of a contract such as paying an employee or supplier or our customer or the legitimate interest of our customer where we pay on its instructions or our legitimate interest in paying our employees or suppliers for services or goods purchased concerning our business. Every bank has a privacy policy which you can find on its website.

2.6.2 If you enquire about our services, we may process your personal information (Enquiry Information). We process Enquiry Information about our services to respond to your inquiry and market our services to you and to do conflict checks. Consent, as well as compliance with statute, regulation and policies, are the legal basis on which we process your Enquiry Information.

2.6.3 If you subscribe to our newsletters and email marketing communications, we process your personal information (Marketing Information). We source Marketing Information from you. We process Marketing Information for legitimate purposes of marketing our services including sending you invitations to events, updates, newsletters and other communications about our business and services. The legal basis on which we process Marketing Information is your consent.

2.6.4 We process information when you communicate with us (Communication Information). The Communication Information may include your name and contact details, the content of your communication and if you use our website or social media accounts for your communication, related metadata. We process Communication Information to communicate with you and

keep records. The legal basis on which we process Communication Information is our legitimate interest in properly administering our business and website, marketing our services to customers and responding to enquiries.

- 2.6.5 We process any of the personal information identified in this policy to investigate, assess, establish, exercise or defend legal claims by or against us in any forum (Claims Information). The legal basis on which we process Claims Information is our legitimate interest in protecting and enforcing our rights or the rights of others and the proper administration and protection of our business.
- 2.6.6 We process any of the personal information identified in this policy when necessary for audits, to obtain expert advice, identify, mitigate and manage risks and obtain and maintain and claim under insurance cover (Risk Information). The legal basis on which we process Risk Information is our legitimate interest in identifying, managing and protecting our business against risk and dealing with any related disputes or claims by or against or involving us, including legal proceedings in any forum.
- 2.6.7 We process any of the personal information described in this policy and your health information when necessary to comply with the law (e.g. COVID 19 laws) and when necessary to co-operate with any investigation by any regulatory authority or law enforcement agency.
- 2.6.8 We process any of the personal information described in this policy when necessary to protect your life or other vital interests or those of any other person.

2.7 CHILDREN

Our website and Compass' services are not targeted at people under the age of 18. We will not knowingly collect Personal Information in respect of persons in this age group without express permission to do so unless permitted by law.

3. SHARING YOUR INFORMATION

- 3.1 Your privacy is important to us. We will therefore not sell, rent or provide your personal information to unauthorised entities or other third parties, for their independent use, without your consent.
- 3.2 We may disclose your personal information to the following third parties:
 - 3.2.1 Selected third parties who provide us with services, including companies that provide us with technical support and assistance in respect of the Website, companies that provide back-office services, companies that provide hosting services or, that track the Website's activities and analytics, and companies engaged to market and distribute Compass products and/or services and conduct research on our behalf.
 - 3.2.2 Professional advisers, judicial, regulatory and law enforcement bodies; and
 - 3.2.3 A third party that acquires all or part of our assets or shares, or that succeeds us in carrying on all or a part of our business, whether by merger, acquisition, re-organisation or otherwise.
- 3.3 For us to ensure that we meet your needs, we may collect and analyse your personal information and combine all the information that we have about you to compile a profile of you, for us to personalise and tailor our services to meet your specific needs.

3.4 Once we have collected and analysed your personal information, we may send you promotional material or details which we think may be of interest to you. If any of this promotional information relates to products, promotions, news or services of an affiliate party, and if you indicate that you would like more details, we may inform the affiliate party to contact you directly. We will, however, only inform an affiliate party to contact you directly if you have indicated that this is agreeable to you.

3.5 If at any stage, after you have given us your consent, you no longer wish us to use or share your personal information with an affiliate party; you may at any stage withdraw your consent. By choosing to withdraw your consent with affiliated third parties there may be an impact on our offering to you, and it will be explained to you on your request to withdraw your consent.

4. CROSSBORDER SHARING

4.1 We will only transfer your personal information to third parties in another country in any one or more of the following circumstances:

4.1.1 Where your personal information will be adequately protected under the other country's laws or an agreement with the third-party recipient

4.1.2 Where the transfer is necessary to enter into or perform under a contract with you, or a contract with a third party that is in your interest.

4.1.3 Where you have consented to the transfer; and / or

4.1.4 Where it is not reasonably practical to obtain your consent, the transfer is in your interest.

4.2 This transfer will happen within the requirements and safeguards of the law. Where possible, the party processing your personal information in the other country will agree to apply the same level of protection as available by law in your country or if the other country's laws provide better protection the other country's laws would be agreed to and applied.

4.3 If a Microsoft Teams meeting with us is recorded, that recording may be stored on Microsoft OneDrive which is backed up in the European Union. The European Union has data protection laws that provide an adequate level of protection that upholds principles for reasonable processing of personal information substantially similar to the conditions for lawful processing applied by POPIA.

5. DISCLOSURE

5.1 We will only process personal information for lawful purposes relating to our business if the following applies:

5.1.1 If the law requires or permits it. Our services cannot be provided to you without that information.

5.1.2 Our customers are free to volunteer personal information to us. If we request personal information from a customer and if he/she does not provide the same to us, it may restrict or prevent us from providing our services to that customer.

6. PROTECTING THE DATA SUBJECT'S PERSONAL INFORMATION

- 6.1 Compass uses a variety of security measures and technologies to help protect the personal information of the data subject from unauthorised access, use, disclosure, alteration or destruction in line with the applicable personal information and privacy laws.
- 6.2 Despite the security measures that Compass has in place to protect the personal information of a data subject (firewalls, password access, and encryption methods), the data subject acknowledges that it may be accessed by an unauthorised third party, e.g. as a result of illegal activity.

7. DATA SUBJECT'S RIGHTS REGARDING HIS/HER PERSONAL INFORMATION

- 7.1 The data subject is entitled to:
- 7.1.1 make a request to Compass via email to the Information Officer for access to personal information Compass holds about him/her;
 - 7.1.2 request the correction and/or deletion of his/her personal information;
 - 7.1.3 request the restriction of the processing of his/her personal information, or object to that processing;
 - 7.1.4 withdraw his/her consent to the processing of his/her personal information (where Compass is processing his/her personal information based on his/her consent);
 - 7.1.5 withdraw his/her consent to receive marketing messages;
 - 7.1.6 request for the receipt or the transfer to another organisation, in a machine-readable form, of the personal information that he/she has provided to Compass; and
 - 7.1.7 complain to his/her local data protection authority if his/her privacy rights are violated, or if he/she has suffered as a result of unlawful processing of his/her personal information. All grievances regarding the processing of personal information must be sent to:

The Information Regulator at:

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

P.O Box 31533, Braamfontein, Johannesburg, 2017; or

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

8. AMENDING THIS POLICY

- 8.1 Policy changes may be made:
- 8.1.1 Via email to advise data subjects of important changes;
 - 8.1.2 By publishing an updated version on our website
 - 8.1.3 Current versions may be obtained from our Information Officer. All requests for current versions may be directed to the Information Officer.

9. OUR ADDRESS AND OUR INFORMATION OFFICER'S DETAILS

- 9.1 South Africa. Compass Medical Waste Services' head office is at 8 Langford Road, Westville , Durban, 3629,
- 9.2 Our Information Officer can be contacted at informationofficer@compass.za.net or telephone 031 267 9700.