



PRIVACY POLICY

PRIVACY POLICY BY RT PREPARED IN ACCORDANCE WITH THE PROTECTION OF PERSONAL INFORMATION ACT NO. 4 OF 2013 (AS AMENDED)

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1. DEFINITIONS

RT	RTEOR (Pty) Ltd, 2007/012982/07 and RTEOR Turnaround (Pty) Ltd, 2017/357878/07, private companies registered in terms of the Companies Act No. 61 of 2008 (as amended)
Personal Information	Information relating to an identifiable, living, natural persona or information relating to an identifiable, existing juristic person
Policy	This document together with all its annexures (if any), as amended from time to time
POPIA	Protection of Personal Information Act No. 4 of 2013 (as amended) and the Regulations relating to the Protection of Personal Information, 2017
Process, Processing or Processed	Any activity, whether or not by automated means, concerning Personal Information such as collection, receipt, recording, organization, structuring, storage, updating or modification, retrieval, consultation, use, dissemination by means of transmission, distribution or making available in any other form, merging, restriction, degradation, erasure or destruction of information or Special Personal Information
Republic	Republic of South Africa
Special Personal Information	Refers to details about your religious or philosophical beliefs, race, or ethnic origin, trade union membership, political persuasion, health or sex life, biometric information or information about your criminal offences or convictions
You / Your	The person to whom Personal Information relates

2. PURPOSE AND SCOPE OF THE POLICY

POPIA aims to give effect to the constitutional right to privacy in relation to both natural and juristic persons, whilst balancing this against competing rights and interests, particularly the right of access to information.

RT is committed to protecting your privacy and to ensure that your Personal Information is collected and used properly, lawfully and transparently.

This Policy explains how RT obtains, uses and discloses your Personal Information, in accordance with the requirements of POPIA.

By providing RT with your Personal Information, you agree to this Policy and authorise RT to process such information as set out herein and further authorise RT, its service

providers and other third parties to process your Personal Information for the purposes stated in this Policy.

RT may, where permitted or required to do so by applicable law, process your Personal Information without your knowledge or permission, if sufficient grounds for justification are present.

This Policy applies to all external parties with whom RT interacts, including but not limited to clients (natural or juristic persons), representatives of client organizations, service providers.

3. COLLECTION OF PERSONAL INFORMATION

RT may collect or obtain your Personal Information:

- 3.1 through direct interactions / communication with you;
- 3.2 in the course of its relationship with you;
- 3.3 in the course of providing its services to you or your organisation; and
- 3.4 if you make your Personal Information public.

RT may also receive Personal Information about you from third parties (eg, law enforcement authorities).

RT may create Personal Information about you such as records of your communications, including but not limited to, your attendance at meetings, or at job interviews.

4. CATEGORIES OF INFORMATION RT MAY PROCESS

4.1 Personal Information

RT may process the following categories of Personal Information about you:

Personal Details	Name, registered name, photograph
Identifier Information	Which includes identity / passport number, registration number, utility provider details, bank statements, lease agreements
Demographic Information	Which includes gender, date of birth, nationality, title, language preference
Contact Information	Which includes correspondence address, telephone / cell number, email address
Employer Information	Where you interact with RT as an employee or contractor of an organization - which includes name, telephone number and email address of your employer (to the extent relevant)

Payment Information	Which includes billing address, payment method, bank account number or credit card number, invoice records, payment records, SWIFT details, payment amount, payment date, and records of cheques
Financial Information	Which includes financial records, financial statements, tax clearance certificates, income tax numbers, Value Added Tax numbers
Attendance Records	Which includes meetings organized by RT that you have attended, attendance records of employees of RT
Technical Information	Which includes your IP address, your login data

4.2 Special Personal Information

RT will generally not process particularly Special Personal Information about you unless it is necessary for establishing, exercising or defending a right or obligation in law, or where RT has obtained your consent to do so. The situations in which RT may process your Special Personal Information include the following:

- 4.2.1 Racial and ethnic information - as part of BBBEE employment and compliance requirements;
- 4.2.2 Criminal behaviour - as part of the recruitment and hiring process;
- 4.2.3 Political persuasion and Key Influential Persons - as part of the know your client (KYC) processes and customer due diligence (CDD) checks;
- 4.2.4 Health - as part of screening processes when accessing premises (in relation to Covid-19 regulations and protocols).

RT will restrict its collection and processing of Personal Information to data which is sufficient for the fulfilment of its primary business purpose and applicable legitimate purpose for which it is collected.

5. PURPOSE OF PROCESSING AND LEGAL BASES FOR PROCESSING

RT provides a comprehensive selection of specialized restructuring and turnaround services across the complete spectrum of underperforming and distressed business by implementing successful business solutions for all such situations.

RT, based in Cape Town, is part of RT Group which currently has a presence in Europe, (GDPR compliant) and Sub-Saharan Africa.

RT will process your Personal Information in the ordinary course of conducting its business and will primarily use your Personal Information only for the purpose for which it was originally or primarily collected.

RT will use your Personal Information for a secondary purpose only if such purpose constitutes a legitimate interest and is closely related to the original or primary purpose for which the Personal Information was collected.

RT may subject your Personal Information to Processing during the course of various activities, including, without limitation, the following:

- 5.1 operating its business;
- 5.2 analysis, evaluation, review and collation of information in order to prepare and provide services requested;
- 5.3 managing the commercial relationship with clients;
- 5.4 complying with statutory obligations;
- 5.5 regulatory reporting obligations;
- 5.6 creating and managing supplier relationships;
- 5.7 human resources and finance functions including those obligations imposed by legislation;
- 5.8 managing security risks;
- 5.9 recruitment;
- 5.10 procurement processes.

RT may process your Personal Information for internal management and management reporting purposes, including but not limited to conducting internal audits, implementing internal business controls, providing central processing facilities, for management reporting analysis.

6. DISCLOSURE OF PERSONAL INFORMATION TO THIRD PARTIES

RT may disclose your Personal Information to its service providers, for legitimate business purposes, in accordance with applicable law and subject to applicable professional and regulatory requirements regarding confidentiality. In addition, RT may disclose your Personal Information -

- 6.1 if required by law;
- 6.2 legal and regulatory authorities, upon request, or for the purposes of reporting any actual or suspected breach of applicable law or regulation;
- 6.3 third party operators (including, but not limited to, data processors such as providers of data hosting services and document review technology and services), located anywhere in the world;

- 6.4 where it is necessary for the purposes of, or in connection with, actual or threatened legal proceedings or establishment, exercise or defence of legal rights;
- 6.5 to any relevant party for the purposes of prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties, including, but not limited to, safeguarding against, and the prevention of threats to, public security;
- 6.6 to any relevant third-party acquirer(s), in the event RT sell or transfer all or any portion of its business or assets.

If RT engages a third-party operator to Process any of your Personal Information, it recognises that any operator who is in a foreign country must be subject to a law, binding corporate rules or binding agreements which provide an adequate level of protection similar to POPIA. RT reviews its relationships with operators it engages and, to the extent required by any applicable law in force, RT will require such operators to be bound by contractual obligations to:

- 6.7 only Process such Personal Information in accordance with RT's prior written instructions; and
- 6.8 use appropriate measures to protect the confidentiality and security of such Personal Information.

7. INTERNATIONAL TRANSFER OF PERSONAL INFORMATION

RT may transfer your Personal Information to recipients outside of the Republic provided that the country to which the data is transferred has adopted a law that provides for an adequate level of protection substantially similar to POPIA, the operator/third party undertakes to protect the Personal Information in line with applicable legislation and the transfer is necessary in order to provide the relevant services that are required by RT's clients.

8. DATA:

8.1 Security

RT takes reasonable technical and organisational measures and to protect your Personal Information against accidental or unlawful destruction, loss, alteration, unauthorised disclosure and unauthorised access, in accordance with applicable law.

If there are reasonable grounds to believe that your Personal Information in our possession has been accessed or acquired by any unauthorised person, RT will notify the relevant regulator and you, unless a public body responsible for detection,

prevention or investigation of offences or the relevant regulator informs RT that notifying you will impede a criminal investigation.

Although RT will implement all reasonable measures to protect your Personal Information that is in its possession, RT cannot guarantee the security of any information transmitted using the internet and cannot be held liable for any loss of privacy occurring during such transmission.

8.2 Accuracy

RT will take all reasonable steps to obtain accurate, complete and up to date Personal Information. However, the onus is on you to notify RT of the correction and/or update of your Personal Information held by it.

8.3 Retention

RT shall retain and store Personal Information for the period for which the data is required to serve its primary purpose or a legitimate interest or for the period required to comply with an applicable legal requirement, whichever is the longer.

9. YOUR LEGAL RIGHTS

South African data protection legislation may confer certain rights on you in respect of your Personal Information, namely, to request access to your Personal Information, to ask RT to rectify, erase and restrict use of your Personal Information. You may also have rights to object to your Personal Information being used and to withdraw consent to the use of your Personal Information.

10. KEY CONTACT DETAILS AT RT

INFORMATION OFFICER

Name	Michael Dorn
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GENERAL CONTACT

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HEAD OFFICE

Physical Address and Postal Address	Units 6, 7 & 8, 1 st Floor, Amdec House, Silverwood Close, Steenberg Office Park, Tokai, Cape Town, 7945
Website	www.rteor.com

Mr Dorn has been duly appointed as the Information Officer of RT and is the person to whom any queries may be raised in relation to this Policy.

11. UPDATING OF POLICY

This Policy will be reviewed and updated, if necessary, on a periodic basis.