

Privacy Policy of Metal Concentrators SA (Pty) Limited

1. Objective of the Policy

MetCon is committed to complying with the Protection of Personal Information Act, No 4 of 2013 ("the POPI Act"). This Privacy Policy sets out the principles and procedures that the Company has adopted to protect the privacy of its employees, visitors, customers and suppliers whilst ensuring that the business strategy and objectives of the Company are satisfied.

2. Principles

2.1 Why does MetCon process Personal Information?

As a general rule, MetCon will process Personal Information if it is required to do so in order to deliver or offer or receive products or services or to fulfil its HR obligations to its employees such as salary payments.

MetCon will process Personal Information for the following main reasons:

- for security, identity verification and to check the accuracy of the Personal Information;
- to enable the provision of products and/or services;
- to enable the receipt of raw materials and/or services;
- to comply with legislative and/or regulatory requirements;
- for the detection and prevention of fraud, crime, money laundering or other malpractice; to enable the payment of and deductions from employees' salaries; and
- for legitimate research purposes.

2.2 From whom does MetCon collect Personal Information?

MetCon typically collects Personal Information directly from the individual or company concerned.

2.3 When and from where does MetCon obtain Personal Information?

MetCon will process Personal Information if it is necessary to do so in terms of a contract (written or implicit) and/or if the law requires or permits it and/or for legitimate purposes relating to our business.

MetCon processes Personal Information that is collected upon the provision of, inter alia:

- KYC documentation;
- quotations, delivery slips, invoices, order forms, receipts and other transaction related documentation;
- site access forms for visitors and/or suppliers; and
- employee recruitment and compliance documentation.

2.4 How MetCon uses Personal Information for marketing purposes

MetCon may use Personal Information to market our products and services to you electronically via email. You can request us to stop sending marketing communications to you by email at any time using the Opt Out option.

2.5 When, how, and with whom MetCon shares Personal Information

MetCon may disclose Personal Information if there is a right or duty to do so. This would typically involve the following parties:

- law enforcement, fraud prevention agencies, courts of law and other persons tasked with the prevention and prosecution of crime; and
- regulatory authorities, industry ombudsmen, governmental departments, local and international tax authorities.

MetCon may also disclose Personal Information to service providers who are involved in the delivery of the Company's products or services such as:

- our agents and sub-contractors like couriers;
- payment processing services providers and banks; and
- attorneys, tracing agents and debt collectors.

It should be noted that, subject to the access control limitations set out below, certain employees have access to Personal Information in order to fulfil their employment duties.

2.6 How MetCon secures Personal Information

MetCon takes appropriate and reasonable technical and organisational steps to protect Personal Information. Our security measures (including physical, technological and procedural safeguards) are appropriate and reasonable. These include the following:

- keeping our computer and network systems secure (by monitoring access and usage);
- storing our physical and electronic records securely;
- controlling the access to our buildings, systems and/or records;
- safely destroying or deleting records;
- investigating and reacting to security incidents; and

2.7 How long does MetCon keep Personal Information?

MetCon will keep Personal Information for as long as:

- the law requires;
- a contract (written or implicit) requires MetCon to do so;
- it is required for statistical or research purposes; or
- it is required for our lawful business purposes.

Note: We may retain Personal Information even if there is no longer a relationship with MetCon for any historical data that may be required.

2.8 The MetCon website and social media pages

Using the MetCon website and/or its social media pages signifies acceptance of this Privacy Policy. If you do not agree to this Policy, please do not make use of our site and/or our social media pages. Please note that Personal Information gathered in online forms and subscription requests on the website and any Personal Information which is placed on our social media pages is used to personally identify users that make use of these services. This Personal Information will not be used for anything other than that which is stated in any terms and conditions of use for these services. None of the Personal Information will be sold or made available to anyone outside of MetCon.

MetCon website usage information may be collected using "cookies" which allows MetCon to collect standard internet visitor usage information.

2.9 Updating of and agreeing to this Privacy Policy

The Company may change this Privacy Policy from time to time if the law or our business practices require such change. If you do not agree with our Privacy Policy, please do not

provide us with Personal Information and please refrain from continuing to use our products or services.

2.10 Your rights with respect to your PI

Should you require further details relating to the processing of your or your company's Personal Information and/or should you wish to access, amend, request the deletion of, object to or complain about the processing of such Personal Information, please complete this form.