

tdglobal Group Data Protection Compliance Statement

Version 2 (20 July 2021)

Our Commitment

tdglobal ('we' or 'us' or 'our') are committed to ensuring the security and protection of the personal information that we process, and to provide a compliant and consistent approach to data protection.

tdglobal operates in several different geographies which have their own laws and regulations which relate to data protection. **tdglobal** complies with all local laws and regulations in the geographical areas in which it operates. **tdglobal's** international data protection approach is to abide by industry standard data protection regulations and to conform to the provisions and directives set out in the **EU General Data Protection Regulation (GDPR)** and the **Protection of Personal Information Act, Act 4 of 2013 (South Africa) (POPIA)** (together, the 'Data Protection Laws').

tdglobal is dedicated to safeguarding the personal information under our remit and in developing a data protection regime that is effective, fit for purpose and demonstrates an understanding of, and appreciation for Data Protection Laws. Our preparation and objectives for Data Protection Laws compliance have been summarised in this statement and include the development and implementation of data protection roles, policies, procedures, controls and measures to ensure maximum and ongoing compliance.

GDPR Compliance

tdglobal has a consistent level of data protection and security across our organization and demonstrates compliance with the Data Protection Laws by virtue of the following compliance principles:

1. **Information Audit** – we consistently carry out company-wide information audits to identify and assess what personal information we hold, where it comes from, how and why it is processed and if and to whom it is disclosed.
2. **Policies & Procedures** – we have implemented and consistently revise our internal data protection policies and procedures to meet the requirements and standards of the Data Protection Laws and any other relevant data protection laws, including:
 - 2.1. **Data Protection** – our main policy and procedure document for data protection has been meets the standards and requirements of the Data Protection Laws. Accountability and governance measures are in place to ensure that we understand and adequately disseminate and evidence our obligations and responsibilities; with a dedicated focus on privacy by design and the rights of individuals.
 - 2.2. **Data Retention** – our retention policy ensures that we meet the 'data minimisation' and 'storage limitation' principles and that personal information is stored, archived and destroyed compliantly and ethically. We have erasure procedures in place to meet the 'Right to Erasure' obligation and are aware of when this and other data subject's rights apply; along with any exemptions, response timeframes and notification responsibilities.
 - 2.3. **Data Breaches** – our data breach procedures ensure that we have safeguards and measures in place to identify, assess, investigate and report any personal data breach at the earliest possible time. Our procedures are robust and have been disseminated to all employees, making them aware of the reporting lines and steps to follow.
 - 2.4. **International Data Transfers & Third-Party Disclosures** – where **tdglobal** stores or transfers personal information outside the EU, we have robust procedures and safeguarding measures in place to secure, encrypt and maintain the integrity of the data. Our procedures include a continual review of the recipient countries, data protection policies and binding corporate rules. We carry out strict due diligence checks with all recipients of personal data to assess and verify that they have appropriate safeguards in place to protect the information, ensure enforceable data subject rights and have effective legal remedies for data subjects (where applicable).
 - 2.5. **Subject Access Request (SAR)** – our SAR procedures accommodate the 30-day timeframe for providing the requested personal information, which service is offered by **tdglobal** free of charge. Our SAR

procedures detail how to verify a data subject, what steps to take for processing an access request, what exemptions apply and a suite of response templates to ensure that communications with data subjects are compliant, consistent and adequate.

3. **Legal Basis for Processing** - we have reviewed all processing activities to identify the legal basis for processing and have ensured that each basis is appropriate for the activity it relates to. Where applicable, we also maintain records of our processing activities, ensuring that our obligations under Article 30 of the GDPR and Schedule 1 of the Data Protection Bill are met.
4. **Privacy Notice** – our Privacy Notice(s) comply with the Data Protection Laws, ensuring that all individuals whose personal information we process have been informed of why we need it, how it is used, what their rights are, who the information is disclosed to and what safeguarding measures are in place to protect their information.
5. **Obtaining Consent** - our consent mechanisms for obtaining personal data ensure that individuals understand what they are providing, why and how we use it and providing clear, defined ways to consent to us processing their information. We have developed stringent processes for recording consent, making sure that we can evidence an affirmative opt-in, along with time and date records; and an easy to see and access way to withdraw consent at any time.
6. **Direct Marketing** – we ensure that any direct marketing undertaken by **tdglobal** is in line with the Data Protection Laws and in particular that the wording of any direct marketing includes clear opt-in mechanisms for marketing subscriptions; a clear notice and method for opting out and providing unsubscribe features on all subsequent marketing materials.
7. **Data Protection Impact Assessments (DPIA)** – in the event that it appears likely we will process personal information that is considered high risk, involves large scale processing or includes special category/criminal conviction data; we will implement procedures and assessment templates for carrying out impact assessments that comply fully with the Data Protection Laws requirements. We will establish and implement documentation processes that record each assessment, allow us to rate the risk posed by the processing activity and implement mitigating measures to reduce the risk posed to the data subject(s).
8. **Processor Agreements** – in the event that we use any third-party to process personal information on our behalf (i.e. Payroll, Recruitment, Hosting etc), we will draft and execute compliant Processor Agreements and due diligence procedures for ensuring that they (as well as we), meet and understand their/our Data Protection Laws obligations. These measures will include initial and ongoing reviews of the services provided, the necessity of the processing activity, the technical and organisational measures in place and compliance with the Data Protection Laws.
9. **Special Categories Data** – in the event that we obtain and process any special category information, we will do so in complete compliance with the Article 9 requirements and will have high-level encryptions and protections on all such data. Special category data will only be processed where necessary and is only processed where we have first identified the appropriate Article 9(2) basis or the Data Protection Bill Schedule 1 condition. Where we rely on consent for processing, this is explicit and is verified by a signature, with the right to modify or remove consent being clearly signposted.

Data Subject Rights

In addition to the policies and procedures mentioned above that ensure individuals can enforce their data protection rights, we provide contact details on our website to ensure easy to access information relating to an individual's right to access any personal information that **tdglobal** processes about them and to request information about:

- What personal data we hold about them
- The purposes of the processing
- The categories of personal data concerned
- The recipients to whom the personal data has/will be disclosed
- How long we intend to store the personal data for
- If we did not collect the data directly from them, information about the source of the data

- The right to have incomplete or inaccurate data about them corrected or completed and the process for requesting this
- The right to request the deletion of personal data (where applicable) or to restrict processing in accordance with data protection laws, as well as to object to any direct marketing from us and to be informed about any automated decision-making that we use
- The right to lodge a complaint or seek judicial remedy and who to contact in such instances

Information Security & Technical and Organisational Measures

tdglobal takes the privacy and security of individuals and their personal information very seriously and takes every reasonable measure and precaution to protect and secure the personal data that we process. We have robust information security policies and procedures in place to protect personal information from unauthorised access, alteration, disclosure or destruction and have several layers of security measures.

Roles and Employees

tdglobal have designated:

- (i) **Juul van den Esker** as our Appointed Person for the purposes of GDPR; and
- (ii) **Wayne Borchers** as our Information Officer for the purposes of POPIA;

and have appointed a data privacy team. The team is responsible for promoting awareness of the Data Protection Laws across the organisation, assessing our compliance, identifying any gap areas and implementing the new policies, procedures and measures.

tdglobal understands that continuous employee awareness and understanding is vital to the continued compliance with the Data Protection Laws and have involved our employees in our ongoing compliance measures.

If you have any questions about our compliance with the Data Protection Laws, please contact the appropriate person mentioned above.