

## PRIVACY POLICY

### 1. Policy objective

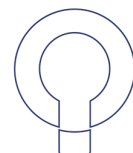
- 1.1 The purpose of the policy is to ensure legislative compliance with The Protection of Personal Information Act, 4 of 2013. The Protection of Personal Information Act (POPIA) gives effect to the constitutional right to data privacy in terms of Section 14 of the Bill of Rights of the Constitution.
- 1.2 This Policy sets out the responsibilities and obligations of all persons who make use of, access or receive Rocket Science's information and communications through all its communication facilities and resources. This Policy further sets out how users are to ensure that information is processed lawfully and in accordance with POPIA.
- 1.3 The aim of the policy is to inform Data Subjects about how Rocket Science processes their Personal Information.

### 2. The Protection of Personal Information Act

- 2.1 The Protection of Personal Information Act sets out the conditions for the lawful processing of personal data of individuals and juristic persons, and grants rights to individuals in respect of their information.
- 2.2 POPIA applies to data processors or responsible parties who are either domiciled in the Republic of South Africa or who are domiciled elsewhere but makes use of automated or non-automated means in South Africa.

### 3. Collection of Personal Information

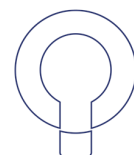
- 3.1 Rocket Science collects and processes various information pertaining to its employees, clients and suppliers. The information collected is based on a specific purpose and it will be processed for that purpose only, unless an exception is applicable (such as, for example, where the Data Subject has made the Personal Information public or the Personal Information is contained in or derived from a public record).



- 3.2. For the purposes of this Policy, employees include potential, past and existing employees of Rocket Science. Independent contractors are treated on the same basis where the collection of information is concerned.
- 3.3. Rocket Science uses Personal Information in accordance with the Rocket Science Terms and Conditions that we have entered into with the Data Subject for the access to and use of our Services. Where possible, the Data Subject will be informed regarding what information is mandatory and what information is optional. The Data Subject will be informed of the consequence/s of failing to provide such Personal Information and any prejudice which may be incurred due to non-disclosure. Rocket Science may collect or obtain Personal Information:
  - 3.3.1. Directly from the Data Subject;
  - 3.3.2. In the course of relationship with the Data Subject;
  - 3.3.3. In the course of providing services to the Data Subject; or
  - 3.3.4. From Third Parties.
- 3.4. Rocket Science will collect Personal Information in a fair, lawful and reasonable manner to ensure that it protects the Data Subject's privacy and will process the Personal Information based on legitimate grounds in a manner that does not adversely affect the Data Subject in question.

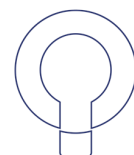
#### **4. Lawful processing of Personal Information**

- 4.1 Where Rocket Science is the Responsible Party, it will only process a Data Subject's Personal Information (other than for Special Personal Information) where:
  - 4.1.1. Where consent is required of the Data Subject, such consent will be obtained;
  - 4.1.2. Processing is necessary to carry out the actions for conclusion of performance or a contract to which a Data Subject is party;
  - 4.1.3. Processing complies with an obligation imposed by law on Rocket Science;
  - 4.1.4. Processing protects a legitimate interest of the Data Subject; or
  - 4.1.5. It is necessary, for pursuing the legitimate interests of the company or of an authorised Third Party to whom the information is supplied.
- 4.2 Rocket Science shall not process special Personal Information without complying with the specific provisions of POPIA.
- 4.3 Where Rocket Science is relying on a Data Subject's consent as the legal basis for processing Personal Information, the Data Subject may withdraw their consent or may object to Rocket Science's processing of their Personal Information at any time. However, this will not affect the lawfulness of any processing carried out prior to the withdrawal of consent or any processing justified by any other legal ground provided under POPIA.
- 4.4 If the consent is withdrawn or if there is otherwise a justified objection against the use or the processing of such Personal Information, Rocket Science will ensure that the Personal Information is no longer processed.



## 5. Purpose for processing Personal Information

- 5.1 Rocket Science understands its obligation to make Data Subjects aware of the fact that it is processing their Personal Information and inform them of the purpose for which it processes such Personal Information.
- 5.2 Rocket Science will only process a Data Subject's Personal Information for a specific, lawful and clear purpose (or for specific, lawful and clear purposes) and will ensure that it makes the Data Subject aware of such purpose(s) as far as possible.
- 5.3 It will ensure that there is a legal basis for the processing of any Personal Information. Further, Rocket Science will ensure that processing will relate only to the purpose for and of which the Data Subject has been made aware (and where relevant, consented to) and will not process any Personal Information for any other purpose(s).
- 5.4 Rocket Science will generally use Personal Information for purposes required to operate and manage its normal operations and these purposes include one or more of the following non-exhaustive purposes:
  - 5.4.1. For the purposes of providing its services to clients;
  - 5.4.2. Generally for procurement and supply purposes;
  - 5.4.3. For purposes of monitoring the use of Rocket Science's electronic systems and online platforms by Data Subjects;
  - 5.4.4. For purposes of preventing, discovering and investigating violations of this Policy, the applicable law and other Rocket Science policies;
  - 5.4.5. In connection with the execution of payment processing functions, including payment of Rocket Science's suppliers'/service providers' invoices;
  - 5.4.6. For employment-related purposes such as recruiting staff, administering payroll, background checks, etc.;
  - 5.4.7. In connection with internal audit purposes (i.e. ensuring that the appropriate internal controls are in place in order to mitigate the relevant risks, as well as to carry out any investigations where this is required);
  - 5.4.8. In connection with external audit purposes. For this purpose, Rocket Science engages external service providers and, in so doing, shares Personal Information of the Data Subjects with Third Parties;
  - 5.4.9. For company secretarial related purposes;
  - 5.4.10. For such other purposes to which the Data Subject may consent from time to time;
  - 5.4.11. For such other purposes as authorised in terms of applicable law; and
  - 5.4.12. To comply with any applicable law or any query from Government authorities, including any regulatory authority that has authority over Rocket Science.



## **6. Personal Information accuracy**

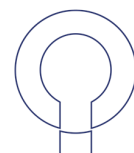
Rocket Science will take reasonable steps to ensure that all Personal Information is kept as accurate, complete and up to date as reasonably possible depending on the purpose for which Personal Information is collected or further processed. The Personal Information provided to Rocket Science should be accurate, complete and up-to-date. Should Personal Information change, the onus is on the Data Subject to notify Rocket Science of the change and provide Rocket Science with the accurate data.

## **7. Data storage and Third Party service providers**

- 7.1 Rocket Science may store a Data Subject's Personal Information in hardcopy format and/or in electronic format using Rocket Science's own secure servers or other internally hosted technology. A Data Subject's Personal Information may also be stored by Third Parties, via cloud services or other technology, with whom Rocket Science has contracted with, to support Rocket Science's operations.
- 7.2 Rocket Science's Third Party service providers, including data storage and processing providers, may from time to time also have access to a Data Subject's Personal Information in connection with purposes for which the Personal Information was initially collected to be processed.
- 7.3 Rocket Science will ensure that such Third Party service providers will process the Personal Information in accordance with the provisions of this Policy, all other relevant internal policies and procedures and POPIA.
- 7.4 These Third Parties do not use or have access to the Data Subject's Personal Information other than for purposes specified by Rocket Science, and Rocket Science requires such parties to employ at least the same level of security that Rocket Science uses to protect the Data Subject's personal data.
- 7.5 A Data Subject's Personal Information may be processed in South Africa or another country where Rocket Science, its affiliates and their Third Party service providers maintain servers and facilities and Rocket Science will take steps, including by way of contracts, to ensure that it continues to be protected, regardless of its location, in a manner consistent with the standards of protection required under applicable law, including POPIA.

## **8. Provision of Personal Information to Third Party service providers**

- 8.1 Rocket Science may disclose Personal Information to Third Parties and will enter into written agreements with such Third Parties to ensure that they process any Personal Information in accordance with the provisions of this Policy, and POPIA.
- 8.2 Rocket Science notes that such Third Parties may assist Rocket Science with the purposes listed in paragraph 5.3 above – for example, service providers may be used, inter alia:
  - 8.2.1. For data storage;
  - 8.2.2. To assist Rocket Science with auditing processes (external auditors);



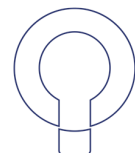
- 8.2.3. For providing outsourced services to Rocket Science, including in respect of its:
  - (i) Legal;
  - (ii) Data storage requirements and
  - (iii) Upskilling of its Employees; and/or
- 8.2.4. To notify the Data Subjects of any pertinent information concerning Rocket Science.
- 8.3 Rocket Science will disclose Personal Information with the consent of the Data Subject or if Rocket Science is permitted to do so without such consent in accordance with applicable laws.
- 8.4 Further, Rocket Science may also send Personal Information to a foreign jurisdiction outside of the Republic of South Africa, including for processing and storage by Third Parties.
- 8.5 When Personal Information is transferred to a jurisdiction outside of the Republic of South Africa including to any cloud, data centre or server located outside of the South Africa, Rocket Science will obtain the necessary consent to transfer the Personal Information to such foreign jurisdiction or may transfer the Personal Information where Rocket Science is permitted to do so in accordance with the provisions applicable to cross-border flows of Personal Information under POPIA.
- 8.6 The Data Subject should also take note that the processing of Personal Information in a foreign jurisdiction, if and to the extent such processing does occur, may be subject to the laws of the country in which the Personal Information is held, and may be subject to disclosure to the governments, courts of law, enforcement or regulatory agencies of such other country, pursuant to the laws of such country.

## **9. Direct marketing**

- 9.1 Rocket Science may process a Data Subject's Personal Information for the purposes of providing them with information regarding services that may be of interest to them.
- 9.2 Rocket Science will not use a Data Subject's Personal Information to send them marketing materials if they have requested not to receive them. If they request that we stop processing their Personal Information for marketing purposes, Rocket Science shall do so.
- 9.3 Requests to opt out of receiving marketing information from Rocket Science should be directed to [admin@rocketscience.co.za](mailto:admin@rocketscience.co.za)

## **10. Data Retention**

- 10.1 Rocket Science may keep records of the Personal Information, correspondence, or comments it has collected in an electronic or hardcopy file format.
- 10.2 In terms of POPIA, Rocket Science may not retain Personal Information for a period longer than is necessary to achieve the purpose for which it was collected or processed and is required to delete, destroy (in such a way that it cannot be reconstructed) or de-identify the information as soon as is



reasonably practicable once the purpose has been achieved. This prohibition will not apply in the following circumstances:

- 10.2.1. Where the retention of the record is required or authorised by law or by any Government authority;
  - 10.2.2. Rocket Science requires the record to fulfil its lawful functions or activities;
  - 10.2.3. Retention of the record is required by a contract between the parties thereto;
  - 10.2.4. The Data Subject has consented to such longer retention; or
  - 10.2.5. The record is retained for historical, research, archival or statistical purposes. Rocket Science will, subject to the exceptions noted in this Policy, retain Personal Information for as long as necessary to fulfil the purposes for which that Personal Information was collected and/or as permitted or required by applicable law.
- 10.3 Where Rocket Science retains Personal Information for longer periods for statistical, historical, archival or research purposes, Rocket Science will ensure that appropriate safeguards have been put in place to ensure that all recorded Personal Information will continue to be processed in accordance with this Policy and applicable laws.

## **11. Data minimisation**

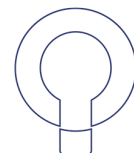
Rocket Science will restrict its processing of Personal Information to data which is sufficient for the fulfilment of the primary purpose and applicable legitimate purpose for which it was collected.

## **12. Failure to provide Personal Information**

Should Rocket Science need to collect Personal Information by law or under its obligations as an employer or service provider and a Data Subject fails to provide the Personal Information when requested, failure by the Data Subject to provide such Personal Information may have negative consequences, including that Rocket Science may not be able to effectively perform its obligations as an employer or service provider. Rocket Science may have to decline to receive the relevant services from a supplier, and the supplier will be notified where this is the case.

## **13. Security and breaches of Personal Information**

- 13.1 Rocket Science will ensure the security and integrity of Personal Information in its possession or under its control with appropriate, reasonable technical and organisational measures to prevent loss, unlawful access and unauthorised destruction of Personal Information. Rocket Science shall preserve the security of Personal Information and, in particular, prevent its alteration, loss and damage, or access by non-authorized Third Parties.
- 13.2 Should Rocket Science detect a security breach on any of its systems that contain personal information, it shall take the required steps to assess the



nature and extent of the breach in order to ascertain if any information has been compromised. Rocket Science will address any Data Breach in accordance with the terms of POPIA.

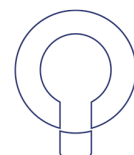
- 13.3 Rocket Science will as soon as reasonably possible after it has become aware of any data breach in respect of such Data Subject's Personal Information, notify the Regulator and the affected Data Subject (unless the applicable law or a Government authority requires that we delay notification to the Data Subject) in writing in the event of a Data Breach (or a reasonable belief of a Data Breach) in respect of that Data Subject's Personal Information. Such notification shall only be made where the organisation can identify the Data Subject to which the information relates. Where it is not possible it may be necessary to consider website publication and whatever else the Information Regulator prescribes.
- 13.4 Where Rocket Science acts as an 'Operator' for purposes of POPIA and should any Data Breach affect the data of Data Subjects whose information Rocket Science processes as an Operator, Rocket Science shall (in terms of POPIA) notify the relevant Responsible Party immediately where there are reasonable grounds to believe that the Personal Information of relevant Data Subjects has been accessed or acquired by any unauthorised person.

#### **14. Cookies and similar technologies**

- 14.1 Rocket Science may process a Data Subject's Personal Information by our use of cookies and similar technologies. Website usage information may be collected using cookies which allows us to collect standard internet visitor usage information and also track and report website traffic.
- 14.2 A Data Subject may refuse to accept cookies by activating the setting on their browser which allows them to refuse the setting of cookies. If they accept a cookie or fail to deny the use of cookies, they agree that we may use their personal information collected using cookies (subject to the provisions of this Policy).

#### **15. Access and correction of Personal Information**

- 15.1 A Data Subject may have rights under the South African and other laws to have access to their Personal Information and to ask us to rectify, erase and restrict use of their Personal Information. A Data Subject may also have rights to object to their Personal Information being used, to ask for the transfer of Personal Information that was made available to us by the Data Subject, and to withdraw consent to the use of their Personal Information.
- 15.2 Data Subjects have the right to request access to any personal information that Rocket Science holds about them.
- 15.3 Data Subjects have the right to request Rocket Science to update, correct or delete their personal information on reasonable grounds. Such requests must be made to the Information Officer (see details below).
- 15.4 A Data Subject that has previously consented to the processing of their Personal Information has the right to withdraw such consent and may do so by providing notice to Rocket Science's Information Officer. Further, a Data



Subject may object, on reasonable grounds, to the processing of Personal Information relating to them.

- 15.5 Accordingly, Rocket Science may request the Data Subject to provide sufficient identification to permit access to, or provide information regarding the existence, use or disclosure of the Data Subject's Personal Information. Any such identifying information shall only be used for the purpose of facilitating access to or information regarding the Personal Information.
- 15.6 Data Subjects can request in writing to review any Personal Information about them that Rocket Science holds including Personal Information that Rocket Science has collected, utilised or disclosed.
- 15.7 Rocket Science will respond to each written request of a Data Subject within 14 (fourteen) working days after receipt of such request.
- 15.8 The prescribed fees to be paid for copies of the Data Subject's Personal Information are listed the Promotion of Access to Information Act, No. 2 of 2000 (PAIA) Manual.

## **16. Changes to this Policy**

Rocket Science reserves the right to make amendments to this Policy from time to time and will use reasonable efforts to notify Data Subjects of such amendments. The current version of this Policy will govern the respective rights and obligations between the Data Subject and Rocket Science.

## **17. Contact Details**

All comments, questions, concerns or complaints regarding Personal Information or this Policy, should be forwarded to us as follows:

Information Officer - Storm Ward  
Telephone Number - 010 300 0807  
Email – [admin@rocketscience.co.za](mailto:admin@rocketscience.co.za)

