



RBM MINERAL RESOURCES CC

A MEMBER OF THE RBM GROUP · SOUTH AFRICA | UAE

DATA PROTECTION

Privacy Policy

Processing of personal information under the Protection of Personal Information Act

Issued in accordance with the *Protection of Personal Information Act 4 of 2013*. To be read with the Company's PAIA Manual.

Issuing entity	RBM Mineral Resources CC · Registration 2008/036156/23
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1. Purpose and scope

This Policy explains how RBM Mineral Resources CC, a member of the RBM Group (the "**Company**"), collects, uses, shares, stores and protects personal information, and the rights available to the people whose information it holds. It is issued in accordance with the Protection of Personal Information Act 4 of 2013 ("**POPIA**").

It applies to personal information about clients and counterparties and their representatives, suppliers and their personnel, employees and job applicants, community members and beneficiaries of the Company's corporate social responsibility programme, and visitors to rbmgroup.co.za. It applies to processing in South Africa and to any processing carried out on the Company's behalf elsewhere, including in the United Arab Emirates.

2. Information Officer

The Company's Information Officer is responsible for compliance with POPIA and the Promotion of Access to Information Act 2 of 2000, for dealing with requests made to the Company, and for working with the Information Regulator. The Information Officer is registered with the Information Regulator and may be contacted at compliance@rbmgroup.co.za.

3. Conditions for lawful processing

The Company gives effect to the eight conditions for lawful processing set out in POPIA:

Condition	How the Company applies it
Accountability	The Information Officer is accountable for compliance. Processing activities are recorded and reviewed annually.
Processing limitation	Information is processed lawfully, in a reasonable manner that does not infringe privacy, and only to the extent adequate, relevant and not excessive. It is collected directly from the data subject unless an exception applies.
Purpose specification	Information is collected for the specific, explicitly defined and lawful purposes set out in Section 4, and the data subject is made aware of the purpose at the point of collection.
Further processing limitation	Information is not used for a purpose incompatible with that for which it was collected, unless the data subject consents or the law permits it.
Information quality	Reasonable steps are taken to ensure information is complete, accurate, not misleading and updated where necessary.
Openness	This Policy and the Company's PAIA Manual are published on rbmgroup.co.za . Data subjects are notified of collection as required.
Security safeguards	Appropriate technical and organisational measures protect information against loss, damage, unlawful access and unauthorised processing, as set out in Section 8.
Data subject participation	Data subjects may request access to, correction of, or deletion of their information as set out in Section 9.

4. What the Company collects, and why

Who	Information collected	Purpose and lawful basis
Website enquiries	Name, company, email address, telephone number, nature of enquiry and message content	To respond to the enquiry. Consent, given by ticking the consent box on the form.
Job applicants	Name, contact details, curriculum vitae, employment and education history, right to work, and information in supporting documents	To assess the application and, if successful, to conclude employment. Consent and steps preceding a contract.
CSR beneficiary applicants	Name, contact details, organisation, and the information supplied in support of the application	To assess and administer the application. Consent.
Clients and counterparties	Identity, contact and address details, identity documents, beneficial ownership, sanctions and prominent-person screening results, transaction records	To perform the contract and to comply with obligations imposed by the Financial Intelligence Centre Act and mineral-sector legislation. Legal obligation and legitimate interest.
Suppliers	Contact and banking details of representatives, due diligence and origin documentation	To perform the contract and to conduct supply chain due diligence. Contract and legal obligation.
Employees	Recruitment, employment, payroll, tax, banking, health and safety, and disciplinary records	To administer employment and to comply with labour, tax and mine health and safety obligations. Contract and legal obligation.

The Company does not sell personal information, and does not use it for automated decision-making that produces legal consequences for a data subject.

5. Special personal information and children

The Company processes special personal information — for example health and safety records, and biometric information where used for site access control — only where POPIA permits, and applies restricted access to it. The Company does not knowingly collect the personal information of children through its website. Where processing relating to a child is necessary, the Company obtains the consent of a competent person.

6. Sharing personal information

The Company shares personal information only where necessary, and only with:

- operators who process on the Company's written instruction — including its website host, email provider and payroll administrator — each bound by a written agreement requiring confidentiality and appropriate security;
- professional advisers, auditors and insurers, under a duty of confidence;
- banks and financial institutions, to the extent required to settle transactions;

- regulators and law enforcement, including the Financial Intelligence Centre, the South African Diamond and Precious Metals Regulator, the South African Revenue Service and the Information Regulator, where the Company is obliged or entitled to disclose; and
- a purchaser or prospective purchaser in connection with a corporate transaction, subject to confidentiality undertakings.

7. Cross-border transfers

The Company operates in South Africa and the United Arab Emirates and uses service providers that may store information outside South Africa. The Company transfers personal information across borders only where the recipient is subject to a law, binding corporate rules or a binding agreement providing an adequate level of protection substantially similar to POPIA, or where the data subject consents, or where the transfer is necessary to perform a contract with or for the benefit of the data subject.

8. Security safeguards

The Company applies technical and organisational measures proportionate to the sensitivity of the information, including access control on a need-to-know basis, encryption of data in transit to and from its website, secure storage of physical records, confidentiality undertakings from employees and operators, and periodic review of access rights.

Where the Company or an operator has reasonable grounds to believe that personal information has been accessed or acquired by an unauthorised person, it will notify the Information Regulator and the affected data subjects as soon as reasonably possible after discovering the compromise, unless a public body responsible for detection or prevention of crime directs otherwise. Operators are contractually required to notify the Company without delay.

9. Retention and deletion

The Company keeps personal information only for as long as it is needed for the purpose for which it was collected, or for as long as the law requires it to be kept – including the five-year retention period imposed by the Financial Intelligence Centre Act, and the retention periods imposed by tax, labour and mine health and safety legislation. Where information is no longer required, it is deleted or de-identified.

Unsuccessful job applications are retained for twelve months and then deleted, unless the applicant asks the Company to keep them on file for future opportunities.

10. Rights of data subjects

A data subject has the right to:

- be notified that personal information about them is being collected, and that it has been compromised;
- request confirmation, free of charge, of whether the Company holds personal information about them, and to request the record or a description of it;

- request correction or deletion of personal information that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully;
- object, on reasonable grounds, to the processing of their personal information;
- withdraw consent at any time, where processing is based on consent, without affecting the lawfulness of processing before withdrawal;
- not be subject to a decision based solely on automated processing that has legal consequences for them; and
- complain to the Information Regulator, and to institute civil proceedings.

Requests are made in writing to the Information Officer at **compliance@rbmgroupp.co.za**, using the process set out in the Company's PAIA Manual. The Company responds within the period prescribed by PAIA. Where the Company refuses a request, it gives reasons.

11. Complaints to the Information Regulator

A data subject who is dissatisfied may complain to the Information Regulator of South Africa. The Regulator's contact details are published at info regulator.org.za. The Company asks, but does not require, that a complaint be raised with it first so that it has an opportunity to resolve the matter.

12. Website, cookies and analytics

The Company's website uses cookies and similar technologies that are necessary for the site to function, and may use analytics that record aggregated usage information. The website is served over an encrypted connection. Personal information is submitted only through the enquiry, careers and CSR forms, each of which carries a consent statement.

13. Training

Employees who handle personal information receive training on this Policy at induction and at least annually thereafter, covering lawful collection, minimality, security, and the procedure for handling a data subject request or a suspected compromise.

14. Review

This Policy is reviewed by the Information Officer at least annually, and additionally whenever there is a material change to the Company's processing activities or to the applicable law. Material amendments require the approval of the Managing Member.

Approval

Approved by the Managing Member of RBM Mineral Resources CC on 19 August 2026, with effect from that date.

Signature	Date
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 R H Rayman — Managing Member for and on behalf of RBM Mineral Resources CC	19 August 2026 Effective from
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