

Associate Privacy Policy

It's our promise to associates that we respect the trust you place in us and the privacy of the information you share. We will always let you know in a clear, prominent, and easily accessible way how we collect, use, share, and above all protect your personal information. In this policy, Massmart, "we", "us" or "the Company" refers to Massmart Holdings Limited and any other company that forms part of the Massmart corporate family of companies. We will only collect personal information that is necessary for the purposes described in this policy and will only process personal information in compliance with applicable laws, including the protection of Personal Information Act (POPIA) and in ways that are for, or compatible with, the business purposes for which the personal information was collected or that are subsequently authorised by you.

This Policy outlines:

- How and why we collect your personal information;
- How your personal information is used and protected;
- When and with whom we share your personal information; and
- What choices you can make about how we collect, use, and share your personal information.

Massmart takes steps to ensure that we manage your personal information properly to maintain your trust. We may collect the following categories of personal information. Not all categories may be collected about every individual and this will depend on the purpose for which we need the personal information:

- Personal identifiers, such as name and address
- Device and online identifiers and related information, such as telephone number and email address
- Internet, application, and network activity, such as cookie IDs and browser visits
- Government identifiers, such as CIPC registration numbers, national identification numbers and driver's license numbers
- Demographic information, such as age and date of birth
- Financial information, such as annual financial statements, bank statements, credit and debit card numbers and claims information
- Purchase history information, such as products you have bought, rented, and returned
- Biometric information, such as imagery of the iris, retina, and fingerprints
- Location information, such as geo-location information
- Audio, visual, and other sensory information, such as audio and video recordings
- Employment information, such as occupation, title, licenses and professional memberships
- Background and criminal information, such as background checks and criminal convictions
- Education information, such as degree and schooling information
- Individual preferences and characteristics, such as inferences related to shopping patterns and behaviors

Collection of Personal Information

We collect information from you in a variety of ways. It may be:

- Provided directly by you or a member of your household or employer;
- Collected from a device associated with you;
- Collected through in-store technology;
- Collected from another company within our family of companies; or
- Collected from an external third-party source.

Information Provided Directly by You or a Member of Your Household or Employer

Massmart collects personal information directly from you as part of your employment. For example, information that you give us when you fill out an employment application or enroll in benefits programs, or it can be information that you give us when you interact with services such as Talent Print or fill out your profile at myselfservice.massmart.co.za. We may also collect photographs or audio/visual recordings on Massmart property, or during events and activities relating to your employment with Massmart.

Information Collected From a Device Associated With You

We collect information from you automatically when you use certain websites Massmart operates for our associates. This information may not identify you directly. For example, we may collect IP address, browser or operating system information, and referring website. Our websites may use cookies, which are small text files stored on your computer that help us to maintain your session or provide other interactive features. You can turn off cookies through your browser. However, turning off cookies may limit some functionality of the site, such as changing the layout of your personalized content. The site may also use web beacons, which allow us to know if you visited a certain page.

Information We Collect Through In-Store Technology

We may collect your personal information from technology we use in our stores, such as our facility cameras. We operate cameras in stores and corporate facilities for security and operational purposes, for example, to help us improve the design of our stores to better serve our customers and associates.

Information We Collect From Another Company Within Our Family of Companies

We may collect your personal information from another organization within our corporate family of companies.

Information Collected From External Third-Party Sources

We receive information about you from third party sources to assist us with employment-related activities, and other legal matters. For example, we may collect information from employment background agencies for the purpose of conducting a background check. Examples of the types of information contained in a background check may include your criminal, employment, and educational history, as well as information about your character, general reputation, personal characteristics, mode of living, credit standing, and more. Before requesting a background check, Massmart will obtain your informed and specific consent by asking you to sign a Disclosure Form. All personal information that is supplied to the Company must be accurate, up-to-date, not misleading and complete in all respects. You undertake to immediately advise the Company of any changes to your personal information should any of these details change.

Our goal is to limit the information we collect to the information needed to support our business.

Purpose for Collection of Personal Information

We will collect personal information about you or your dependents relating to your working relationship with Massmart. We will use the information for employment purposes and in the context of our employment relationship with you, such as recruiting and hiring, enrolling you in benefits and administering payroll, and for evaluation and training purposes.

Recruiting and Hiring – We use your personal information to consider your skills, qualifications and interests in connection with our employment opportunities; to communicate with you and inform you of career opportunities; to conduct background checks if you are offered a job; and to improve our recruiting and hiring process.

Benefits – We will use your information to enroll you, deliver, and communicate with you about the various benefit plans we offer. Massmart offers associates many different benefits and uses associate information in different ways depending on the type of benefit program. For example:

- Associate Discount Cards – you are automatically enrolled to receive an Associate Discount Card once you have met the eligibility requirements. Massmart may monitor or review your use of the associate discount card as a part of an investigation of potential misuse or abuse of the benefit.
- Health Benefits – Associate information such as date of hire, job classification, medical information about you and your dependents, and more, can be used to determine your eligibility for health benefits as well as to help you select and enroll in the benefits programs that are right for you and your family. If you choose to enroll in a healthcare plan offered by Massmart, it is important to note that your plan does not share associate information collected in the course of your medical care with Massmart unless it is required or permitted by law.

Payroll – We will use information you have provided, such as direct deposit or banking information, to administer payroll services.

Job Performance and Career Management – We will use your information for the purposes of evaluating performance, managing job related training, building career-path development insights and tools, and optimizing job roles.

Legal Purposes – We may use your information to prepare any legal claim or defense necessary to protect the interests of Massmart, our associates, and our customers.

Investigative Purposes – We may use your information to conduct investigations related to company policies. All Personal Information which you provide to the Company will be used and/or retained only for the purposes for which it is collected, whereafter it will be permanently destroyed. We will only retain personal information for longer than the purpose for which it was collected if it is required by law or where you have given consent for us to retain such information for an extended period.

Closed Circuit Television and Cameras

To ensure the safety and security of our visitors, customers, associates and assets, closed circuit television and cameras are used throughout Massmart facilities. These cameras are used for purposes such as safety and security, asset protection, operations improvement, and deterrence and investigation of misconduct. Cameras will only be used in areas where an individual has an expectation that the individual could be recorded.

Equipment and Systems

We have a reasonable interest in ensuring that company equipment and systems, as well as data, are protected and used properly. Accordingly, to the extent allowed by applicable law, we monitor or record any and all use of company equipment and systems, including use for personal purposes.

Sharing and Joint Use of Associate Information

All of the categories of personal information that we collect may be shared with other companies, including those within our corporate family, for a business purpose. We may share your personal information in limited circumstances, such as:

- To conduct our business;
- To maintain an employment relationship;
- When legally required to do so; or
- With service providers or third parties that help with our business activities.

Sharing with the Massmart Business

Associate information may be shared with our business teams or within our corporate family of companies, as permitted by law, when it is determined that there is a benefit for you or our business. Associate information must be managed and protected in accordance with Massmart policies. In addition, Massmart takes appropriate technical, organizational, and legal steps to protect your information. For example, access to information is granted on a need to know basis and is given only to persons who need relevant information to accomplish their properly assigned job responsibilities.

Sharing with third parties.

From time to time, we may utilize service providers to administer certain programs, benefits, or administrative functions on behalf of Massmart. We require our service providers to keep your personal information confidential. In addition, your information may be shared in the course of business transfers. Where all or a part of our business is merged, sold or reorganized personal information about you could be shared with the successor business. We will use reasonable measures to help ensure that any successor treats your information in accordance with this Policy.

Sharing for Legal Requirements and Protection of Massmart and Others

We may share your personal information in other special circumstances, which include situations when sharing is required by law, or we believe sharing will help to protect the safety, property, or rights of Massmart, our customers, our associates, or other persons. Examples include:

- Protecting the health or safety of associates or customers;
- Addressing crimes committed on Massmart property;
- Identifying and addressing fraud or financial risk;

- Providing personal information to law enforcement at their written request; or
- Responding to a search warrant or other valid legal inquiry

Where we need to transfer your personal information outside the borders of South Africa, we will ensure that we only transfer the personal information to countries that have similar privacy laws to those applicable in South Africa or to a party who is contractually bound to comply with data protection obligations which impose no lesser legal requirements than those imposed by POPIA.

Before transferring personal information to a third-party, such as an authorised service provider, the Company will obtain assurances from the third party that it will process personal information in a manner consistent with this policy. Where we learn that a third party contractor is using or disclosing personal information in a manner contrary to this policy, we will take reasonable steps to prevent such use or disclosure.

Websites and Mobile Applications

By using our websites, mobile applications, Wi-Fi and/ or by providing your information to us at any of our home offices, you expressly consent to our collection and use of the information you disclose to us in accordance with this policy, including but not limited to your consent for us to share your information as set out in this privacy policy. If you disclose any personal information relating to other people to us, you warrant that you have the authority to do so and to permit us to use the information in accordance with this policy.

By using our websites, mobile applications, Wi-Fi and/ or by providing your information to us, you agree to the practices described in this policy and you agree to Massmart, its directors, officers, employees, servants, agents and/or contractors and/or other third parties to process (which will include collecting, using and disclosing) your personal information for the purposes stated in this policy.

If you do not agree to this policy, please do not use our websites, mobile applications, Wi-Fi and/ or provide your information to us. Any use by you of our websites, mobile applications, Wi-Fi and/ or any provision by you of your information will be deemed to constitute your acceptance of the terms in this policy.

Security

The security and confidentiality of your personal information is important to us. We have implemented technical, administrative, and physical security measures to protect your personal information from unauthorised access or disclosure and improper use.

Access to your personal information is restricted to only to those employees who need the personal information to perform a specific job / task. All employees with access to Personal Information are kept up-to-date on our security and privacy practices. After a new policy is added, these employees are notified and/or reminded about the importance we place on privacy, and what they can do to enhance protection for our associates personal information.

We are committed to ensuring that our security measures which protect your personal information are continuously reviewed and updated where necessary.

It is important for you to protect yourself against unauthorised access to your account password. Be sure to log out of your account or to close your browser after you have completed your visit to the website or mobile application.

Whilst we will do all things reasonably necessary to protect your personal information, we cannot guarantee nor do we accept any liability of whatsoever nature for any unauthorised or unlawful disclosure and/or use of your personal information, either by employees and/or made by any third parties (including third party service providers) who are not subject to our control, unless such disclosure and/or use is as a result of our gross negligence.

Your rights

Upon reasonable request and in accordance with POPIA, we will grant associates reasonable access to their personal information and will permit them to correct, amend or delete personal information that is incomplete or inaccurate. Should you so request, we will provide you with the record or a description of the personal information which we have about you, including information about the identity of all third parties who have, or have had, access to the personal information: (i) within a reasonable time; (ii) at a prescribed fee, if any; (iii) in a reasonable manner and format; and (iv) in a form that is generally understandable.

Should you wish to make a request please click on the following link <https://www.massmart.co.za/privacy-centre>.

We will take reasonable steps to ensure that all personal information is kept as accurate, complete and up-to-date as reasonably possible but may not always expressly request you to verify and update your personal information, unless this process is specifically necessary. We expect that you will notify us from time to time in writing of any updates required in respect of your personal information.

In addition, you may cancel or modify the email communications you have chosen to receive from us by following the instructions contained on our website. If you have any questions concerning your personal information or how to exercise these rights, please Contact Us at info.officer@Massmart.co.za

You also have the right to lodge a complaint with the Information Regulator. You can email the Information Regulator with your complaint/query at <mailto:inforeg@justice.gov.za> or call them on [012 406 4818](tel:0124064818). Visit their website for more details: <https://www.justice.gov.za/inforeg/contact.html>.

The Company reserves the right to amend this policy at any time. All amendments to this policy will be posted on the website.