

POPIA Privacy Policy

Company Name: Total Reward Knowledge Hub NPC

Registration Number: 2025 / 634253 / 08

Effective Date: 1 January 2026

Version: 1

1. Introduction

The Total Reward Knowledge Hub NPC ("TRKH", "the Company", "the Hub", "we", "us", or "our") is committed to protecting the privacy and personal information of data subjects in accordance with the Protection of Personal Information Act 4 of 2013 ("POPIA"). This Privacy Policy explains how we lawfully collect, use, store, share, and protect personal information.

This policy applies to all personal information processed by the Company, whether collected electronically, in paper form, or through any other means.

2. Definitions

- **"Personal Information"** has the meaning ascribed to it in POPIA and includes information relating to an identifiable, living natural person or juristic person.
 - **"Data Subject"** means the person or entity to whom personal information relates.
 - **"Processing"** means any operation concerning personal information, including collection, storage, use, dissemination, or destruction.
 - **"Responsible Party"** refers to the Company as defined in POPIA.
 - **"Operator"** means a person who processes personal information on behalf of the Company.
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3. Purpose of Processing Personal Information

The Company processes personal information for legitimate business purposes, including but not limited to:

- Providing products and/or services.
 - Managing client and supplier relationships.
 - Employment and human resources administration.
 - Compliance with legal and regulatory obligations.
 - Marketing and communication (where consent is required).
 - Improving products, services, and customer experience.
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4. Categories of Personal Information

The Company may process the following categories of personal information:

- Identification information (e.g. name, ID number, passport number).
 - Contact information (e.g. address, email address, telephone number).
 - Financial information (e.g. banking details, payment records).
 - Employment-related information.
 - Correspondence and communication records.
 - Technical information (e.g. IP address, website usage data).
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5. Lawful Basis for Processing

Personal information is processed in accordance with POPIA and only where:

- The data subject has given consent;
 - Processing is necessary to carry out or conclude a contract;
 - Processing complies with a legal obligation;
 - Processing protects a legitimate interest of the data subject; or
 - Processing is necessary for pursuing the Company's legitimate interests.
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6. Information Sharing and Disclosure

The Company may share personal information with:

- Employees and authorised representatives.
- Third-party service providers and operators under written agreements.
- Regulatory or governmental authorities where required by law.

All third parties are required to implement appropriate security safeguards in line with POPIA.

7. Security Safeguards

The Company implements appropriate technical and organisational measures to protect personal information against:

- Loss or damage.
- Unauthorised access or disclosure.
- Unlawful processing.

Measures include access controls, secure storage, encryption where appropriate, and staff training.

8. Data Subject Rights

Data subjects have the right to:

- Access their personal information.
- Request correction or deletion of personal information.
- Object to processing of personal information.
- Withdraw consent at any time.
- Lodge a complaint with the Information Regulator.

Requests may be submitted in writing to the Information Officer.

9. Retention of Personal Information

Personal information is retained only for as long as necessary to fulfil the purpose for which it was collected, or as required by law. Once no longer required, information is securely destroyed or anonymised.

10. Cross-Border Transfers

Personal information may be transferred outside South Africa only where adequate data protection safeguards exist, or where the data subject has consented to such transfer, in accordance with POPIA.

11. Cookies and Website Usage (If Applicable)

The Company may use cookies and similar technologies to improve website functionality and user experience. Users may manage cookie preferences through their browser settings.

12. Information Officer

The Company has appointed an Information Officer as required under POPIA.

Information Officer: Allen Lombard

Email: A.Lombard@TRKH.co.za

13. Complaints

Data subjects may lodge complaints with the Information Regulator of South Africa:

Information Regulator (South Africa)

JD House, 27 Stiemens Street, Braamfontein, Johannesburg

Tel: +27 (0)10 023 5200

Email: complaints.IR@justice.gov.za

14. Policy Updates

This Privacy Policy may be updated from time to time. The latest version will be made available on request or on the Company's website.

Approved by: Peet Kruger: CEO

Date: 1 January 2026