

Privacy and Cookies Policy

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1. PURPOSE

Practara is committed to protecting the privacy, confidentiality, integrity, and lawful processing of personal information obtained through its advisory, consulting, technical, ESG, digital, and on-site activities within the mining, metals, infrastructure, and energy sectors.

Practara recognises that responsible information management forms part of good corporate governance, stakeholder trust, ethical business conduct, and legal compliance. Personal information is therefore managed using risk-based controls and appropriate technical and organisational safeguards aligned to applicable legislation, client requirements, and industry good practice.

This Privacy and Cookies Policy explain how Practara collects, processes, stores, protects, uses, transfers, retains, and disposes of personal information.

2. POLICY COMMITMENT

Practara is committed to:

- Applying sound information governance and data-protection practices across offices, remote work environments, operational sites, digital platforms, and community engagement activities.
- Processing personal information lawfully, transparently, and only for legitimate business, contractual, regulatory, operational, recruitment, ESG, project-delivery, and stakeholder-engagement purposes.
- Complying with the Protection of Personal Information Act, 2013 ("POPIA"), applicable South African legislation, and applicable host-country privacy and data-protection laws where operating cross-border, applying the stricter requirement where reasonably practicable.
- Limiting the collection and processing of personal information to information that is relevant, necessary, and proportionate for the intended purpose.
- Implementing appropriate administrative, technical, physical, and cybersecurity controls to protect personal information against loss, misuse, unauthorised access, disclosure, alteration, destruction, or cyber-related threats.
- Ensuring that employees, contractors, consultants, subcontractors, and third-party service providers handling personal information understand and comply with applicable confidentiality, privacy, and information-security obligations.
- Managing cross-border information transfers responsibly and only where appropriate safeguards, contractual protections, or lawful transfer mechanisms are in place.

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- Maintaining appropriate procedures for data retention, secure destruction, incident reporting, breach management, and continuous improvement of information-management practices.
- Respecting the rights of data subjects, including rights relating to access, correction, objection, withdrawal of consent, and lawful complaints.
- Using cookies and website analytics responsibly to improve website functionality, user experience, cybersecurity, and service performance while respecting user privacy preferences.
- Continually improving privacy, cybersecurity, and information-management performance through monitoring, lessons learned, training, periodic reviews, and updates to this Policy.

Compliance with this Policy is mandatory for all employees, directors, contractors, consultants, subcontractors, and third parties acting on behalf of Practara.

3. SCOPE

This Policy applies to:

- Practara employees, directors, consultants, contractors, subcontractors, and temporary personnel.
- Clients, suppliers, business partners, and stakeholders engaging with Practara.
- All personal information processed by Practara through:
 - websites,
 - emails,
 - cloud systems,
 - digital platforms,
 - project activities,
 - recruitment activities,
 - stakeholder engagement processes,
 - operational site activities, and
 - business administration systems.

This Policy applies irrespective of jurisdiction where Practara undertakes work or processes information.

4. APPLICABLE LEGISLATION AND STANDARDS

Practara processes personal information in accordance with applicable legal and regulatory requirements, including but not limited to:

- Protection of Personal Information Act, 2013 ("POPIA"),
- Promotion of Access to Information Act, 2000 ("PAIA"),

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- Contractual confidentiality obligations, and
- Client information-management requirements

5. WHAT IS PERSONAL INFORMATION?

Personal information means information relating to an identifiable natural or juristic person and may include:

- Name and surname
- Identity or passport numbers
- Contact details
- Residential or business addresses
- Employment and professional information
- Educational qualifications
- Financial or banking information
- Technical site access information
- Electronic communications
- GPS or location information where operationally required
- Recruitment information
- Health and safety information required for operational site access
- CCTV, biometric, or access-control information where applicable
- Opinions, correspondence, or records associated with a person or organisation
- Special personal information which may include information relating to health, biometrics, criminal background verification, ethnicity, trade union membership, or other legally protected information categories where lawfully required.

6. HOW WE COLLECT PERSONAL INFORMATION

Practara may collect personal information directly or indirectly through:

- Website contact forms,
- Client onboarding processes,
- Contractual engagements,
- Email correspondence,
- Recruitment submissions and CVs,
- Project execution activities,
- Site access and induction processes,
- Stakeholder engagement activities,
- Third-party service providers,
- Publicly available sources,
- Client systems and platforms where authorised, and

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- Cookies and website analytics tools.

Where required by law, consent will be obtained prior to collecting or processing personal information.

7. PURPOSES FOR PROCESSING PERSONAL INFORMATION

Practara may process personal information for purposes including:

- Providing advisory, technical, engineering, permitting, and project-support services across the mining, metals, infrastructure, and energy sectors,
- Providing ESG, environmental, social, sustainability, compliance, stakeholder engagement, due diligence, and governance-related advisory services,
- Providing mining governance, MRM, technical assurance, operational risk management, audit support, and site-based or cross-border consulting services
- Managing contractual relationships,
- Conducting recruitment and employment activities,
- Managing health, safety, security, and operational site access requirements,
- Responding to enquiries or requests,
- Delivering reports, proposals, presentations, and project outputs,
- Managing invoicing and financial administration,
- Maintaining operational security and cybersecurity,
- Complying with legal, regulatory, contractual, and client obligations,
- Managing internal governance, quality assurance, and risk management systems,
- Conducting statistical analysis, research, and service improvement activities, and
- Maintaining business continuity and operational resilience.

Practara will only process personal information where a lawful basis exists.

8. SHARING OF PERSONAL INFORMATION

Practara may share personal information with:

- Clients and authorised client representatives,
- Regulatory authorities where legally required,
- Professional advisors and auditors,
- Approved contractors and subcontractors,
- Cloud hosting and IT service providers,
- Recruitment and background screening providers,
- Health and safety service providers,

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- Legal representatives, and
- Government authorities where legally required.

Practara will take reasonable steps to ensure third parties implement appropriate confidentiality and information-security controls.

Practara does not sell personal information.

9. CROSS-BORDER TRANSFERS

Where Practara undertakes international projects or utilises international service providers, personal information may be transferred across borders.

Such transfers will only occur where:

- Adequate safeguards exist;
- Contractual protections are implemented;
- The transfer is legally permitted;
- Consent has been obtained where required; or
- The transfer is necessary for contractual or operational performance.

Practara will take reasonable steps to ensure transferred information receives an appropriate level of protection.

10. INFORMATION SECURITY

Practara implements reasonable technical and organisational measures to protect personal information, including:

- Access controls,
- Secure cloud and digital platforms,
- Password management controls,
- Device and endpoint security,
- Cybersecurity monitoring,
- Controlled document access,
- Confidentiality agreements,
- Secure storage and destruction procedures,
- Incident reporting and response procedures, and
- Employee awareness and training.

While Practara takes reasonable precautions, no electronic transmission or storage system can guarantee absolute security.

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11. DATA RETENTION

Practara retains personal information only for as long as reasonably necessary to:

- Comply with legal or regulatory obligations;
- Fulfil contractual requirements;
- Support legitimate business purposes;
- Maintain project or technical records;
- Manage disputes or claims;
- Support historical, research, or audit requirements.

Information no longer required will be securely deleted, destroyed, anonymised, or archived in accordance with applicable requirements.

12. DATA SUBJECT RIGHTS

Subject to applicable legislation, individuals may request:

- Access to personal information,
- Correction or updating of information,
- Deletion of information where legally permissible,
- Objection to processing,
- Restriction of processing,
- Withdrawal of consent, and
- Information relating to third-party disclosures.

Requests may require proof of identity and must be submitted in writing.

13. COOKIES POLICY

Practara websites may utilise cookies, analytics tools, and similar technologies to:

- Improve website functionality and user experience,
- Analyse website traffic and usage trends,
- Support cybersecurity and fraud prevention,
- Remember user preferences,
- Improve website performance and content.

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Cookies may collect technical information such as browser type, device information, IP address, pages visited, and session activity.

Users may disable cookies through browser settings; however, certain website functionality may be affected.

By using Practara websites, users consent to the use of cookies in accordance with this Policy.

14. BREACHES AND INCIDENT MANAGEMENT

Any actual or suspected personal information breach, unauthorised disclosure, cybersecurity incident, or privacy-related concern must be reported immediately through appropriate management channels.

Practara will investigate incidents and take reasonable corrective and mitigation measures in accordance with applicable legal obligations.

15. POLICY REVIEW AND UPDATES

Practara reserves the right to amend this Policy from time to time to reflect:

- Legislative changes;
- Operational changes;
- Technological developments;
- Client requirements;
- Cybersecurity risks; or
- Business improvement initiatives.

The latest approved version published by Practara will apply.

16. CONTACT DETAILS

For privacy-related requests, complaints, or enquiries, contact:

Practara (Pty) Ltd

Building 12 Thornhill Office Park, 84 Bekker Road, Vorna Valley, Midrand, South Africa

Email: info@practara.co.za

Website: <https://www.practara.co.za>

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RUAN DAFFUE
MANAGING DIRECTOR

Date: 26/05/2026

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