

# HomeChoice International PLC Privacy Policy

## Introduction

HIL is committed to business practices in compliance with all applicable privacy legislation. HIL operates in different jurisdictions and the "applicable legislation" to which we refer in this policy includes the South African Protection of Personal Information Act 4 of 2013 ("POPI") and the Mauritian Data Protection Act 20 of 2017 ("MU DPA"). "Personal information" (or referred to simply as "information") includes any personal information as specified in the applicable legislation.

In this policy "HIL" refers to HomeChoice International PLC, a public liability company incorporated in the Republic of Mauritius. This policy applies whenever we process personal information of a person who is a shareholder of HIL, a party that is interested in HIL and provides its personal information to HIL, visits or makes use of our websites, or communicates with us through any channel ("you" or "stakeholder"). It also applies if you are a third-party and we process your information as a result of your relationship with our stakeholder (for example if you are a representative / proxy / agent of a shareholder).

We may amend this policy from time to time, in line with changes required by legislation or our business. You must therefore review the policy whenever you visit any of our channels for any such changes. The amended version shall supersede and replace all previous versions. If you have any questions about it or do not agree with it, please contact us directly at [governance@homechoiceinternational.com](mailto:governance@homechoiceinternational.com). By engaging with us as a stakeholder or on behalf of a stakeholder you agree to the terms of this policy.

Different privacy policies may apply to employee and supplier information.

## Securing Personal Information

HIL intends to protect your personal information and shall take reasonable internal technical and organisational security measures to prevent loss of or damage to personal information, unauthorised access, disclosure, modification, or unauthorised destruction of the data. However, information transmitted to us online (via the internet) is done so at your own risk. When entering your personal information via the internet, it is your responsibility to ensure that you use a secure computer or other electronic device. The internet is an open and often vulnerable system and the transfer of information via the internet is not completely secure, and it is your responsibility to ensure that you always use a secure and trusted internet connection. Once we have received your personal information, we will store all information in secured environments, for example on secured servers in a protected data centre.

We also have physical and electronic access controls to our buildings.

We only authorise access to information to those employees who require it to fulfil their designated responsibilities.

## Links on our channels or platforms

The HIL channels, platforms and our correspondence with you may include links to other apps or third-party websites which do not fall under our supervision. We cannot accept any responsibility for your privacy or the content of these third-party sites, but we display these links in order to make it easier for you to find information about specific subjects, products or services. **Your use of and reliance on these links is at your own risk.**

## Your legal rights

You have certain rights in relation to your personal information. As available and except as limited by POPI or the MU DPA, you have the following rights in respect of your personal information:

- right of access: the right to be informed of and request access to the personal information that we process about you;
- right to rectification: you may request that your personal information be amended or updated where it is inaccurate or incomplete;

- right to erasure: the right to request that we delete your personal information, subject to applicable limitations and exceptions;
- right to restrict processing: you may request that we temporarily or permanently stop processing your personal information;
- right to object: you may object to us processing your personal information, including to object to your personal information being processed for direct marketing purposes or in terms of;
- right not to be subject to automated decision-making: where a decision that has a legal or other significant effect is based solely on automated decision making, including profiling, you may, subject to certain exceptions, or request that your personal information not be processed in that manner.

Where you have previously provided consent for us to process your personal information, you may also withdraw your consent. However, we may continue to process or store your personal information if another legal justification exists for the processing or storage.

### **Quality and access to your information**

Quality: we want to ensure that your personal information is accurate and up to date. You may ask us to correct or remove any personal information that you think is inaccurate by sending us an email to [governance@homechoiceinternational.com](mailto:governance@homechoiceinternational.com). Please also inform us promptly of any updates to your personal information.

Access: you have the right to request that we provide you with personal information that we hold about you. You must contact us directly to do so and send an email to [governance@homechoiceinternational.com](mailto:governance@homechoiceinternational.com). This request may be subject to an access to information request in terms of applicable laws and may require you to verify your identity, identify the rights you are wishing to exercise and pay a fee.

The right to access your personal information may further be limited in terms of applicable law.

### **Categories of information collected and processed**

- general personal information and contact details like name, ID numbers, address, contact numbers, email address, employment etc;
- demographic and similar information related to stakeholders;
- cookies and device information like browser settings, IP address, time of logging on etc;
- your views, opinions preferences; and
- consent records.

### **Collecting your information**

We collect information about you as follows:

- directly if you provide it to us through any communication with us or our agents and service providers;
- third party sources with whom we have contractual relationships to regulate the use of the information. These include the business affiliates and other companies within the HIL group;
- public sources, including social media; and
- through cookies and similar technologies.

### **How we use your personal information**

We typically use your information for the following purposes:

- perform in terms of any agreement with you;
- linking all information about you available within the HIL group of companies to use it for legitimate business purposes, including but not limited to updating records, and contacting you about stakeholder relations;
- carry out, monitor and analyse our business operations;
- contact you as allowed for in law by email, SMS, letter, telephone or in any other way for marketing purposes, unless you tell us that you do not want to receive these marketing communications;
- audits and to identify or prevent fraud and money laundering;
- market research, data science, modelling, statistical and analytical purposes,
- perform other administrative and operational processes including the testing of systems;
- trace you;
- comply with our regulatory or other legal obligations;
- share information as set out in this policy, including with other companies within the HIL group;

- carry out any other reasonable business operation considering our legitimate business interests and our relationship with you; and
- your information may also be used for other purposes for which you give your permission or where the law allows us to use it.

We aim to only process personal information in a manner that is adequate, relevant and not excessive, considering our purposes of use.

### **Direct Marketing**

If you qualify as our stakeholder or we obtained your details from you opting-in to our mailing list, we will market to you unless you opt out.

### **Personal information about children and special/sensitive personal information**

We will only process information about children with the consent of a competent person (someone like the parent or guardian) or if the applicable laws otherwise allow it.

We do not intend to use any 'special/sensitive personal information' as defined in the applicable legislation, and will only do so with your consent or as allowed in terms of applicable legislation.

### **Cookies**

We make use of cookies on our website. When you use our website, we automatically receive and record information on our server logs from your browser. This information may include, amongst others, your location, IP address, cookie permissions and Google Analytics information. This is statistical data about browsing actions and patterns. We may also obtain information about your general internet usage through a cookie file which is stored on the hard drive of your computer. Cookies enable us to improve our website and services, estimate our audience size and usage patterns, store information about your preferences and recognise when you return to the website.

You can set your web browser to refuse cookies, but if you do this you may not be able to enjoy the full use of the website.

Please note that third parties may also use cookies, but we do not have access to, or control over them, and therefore cannot take responsibility for them.

### **Information we share**

We will keep your personal information confidential and only share it for purposes set out in this policy or if you have consented thereto, or if we otherwise have a legal right or obligation to share it.

We have trusted relationships with various third-parties who provide services to us or on our behalf and who may process your personal information on our behalf. We will share information with them on a need-to-know basis and subject to a contract to maintain the security of your personal information and to use it for our specified purposes only. We may also share personal information with the companies within our group of companies and for regulatory and reporting purposes, as required by law or where we sell or transfer a portion of our business.

### **Breach**

We will report any security breach to both the applicable regulatory bodies and the individuals or companies involved. If you want to report any concerns about our privacy practices or if you suspect any breach regarding your personal information, kindly notify us by sending an email to [governance@homechoiceinternational.com](mailto:governance@homechoiceinternational.com).

### **Right to object**

You may, on reasonable grounds, object to us using your Information. If you object, we will stop using your information, except if the law allows its continued use or retention.

### **Lodging a complaint**

If you believe we are using your information unlawfully, you may lodge a complaint directly to us at [governance@homechoiceinternational.com](mailto:governance@homechoiceinternational.com).

Alternatively, you may lodge a complaint to the appropriate Information Regulator with the following contact details:

**South Africa: The Information Regulator**

Website: <http://www.justice.gov.za/infoereg/index.html>

Address: JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001, South Africa

General queries email: [infoereg@justice.gov.za](mailto:infoereg@justice.gov.za)

Complaints email: [complaints.IR@justice.gov.za](mailto:complaints.IR@justice.gov.za)

**Mauritius: Data Protection Office**

Website: <https://dataprotection.govmu.org/SitePages/Index.aspx>

Address: Level 5, SICOM Tower, Wall Street, Ebene Cyber City, Ebene, Mauritius

Contact number: +230 460 0251

Fax number: +230 489 7341

Email address: [dpo@govmu.org](mailto:dpo@govmu.org)

**Retention of Information**

We retain personal information in accordance with the required retention periods in law or for legitimate business purposes. We will only retain your personal information for the purposes explicitly set out in this policy. We may keep personal information indefinitely in a de-identified format for statistical purposes.

**Trans-border flow of Information**

We may transfer your personal information to foreign countries mainly for the business purposes of the companies within the HIL group, for retention or if our service providers are cross border or make use of cross border systems. As a stakeholder, you expressly agree that we may transfer the personal information cross border for these purposes. We will only share information cross border to recipients who have laws similar to the applicable laws, or who have entered into an agreement with us to include the relevant principles prescribed by the applicable legislation.