



FFS REFINERS - PRIVACY POLICY

INTRODUCTION

FFS Refiners (Pty) Ltd is committed to protecting the privacy and security of Personal Information in compliance with applicable data protection legislation. As a South African company, FFS Refiners primarily complies with the Protection of Personal Information Act 4 of 2013.

FFS Refiners understands the importance of ensuring that we collect, use, store, share and dispose of information about you in a fair, ethical, transparent, secure and lawful way.

1. DEFINITIONS

- 1.1. "Affiliate/s" means any entity which is associated with FFS Refiners through common ownership;
- 1.2. "Applicable Law/s" means any laws applicable to the protection and Processing of Personal Information, with particular emphasis on POPIA a;
- 1.3. "Child" means a natural person under the age of 18 (eighteen) (including the plural "Children");
- 1.4. "Consent" means any voluntary, specific and informed expression of will, in terms of which permission is given for the Processing of Personal Information as contemplated in Applicable Laws;
- 1.5. "Cookies" are a small amount of Data generated by a website and saved by your web browser. Its purpose is to remember information about you. If Data Subjects elect not to receive Cookies, they may be able to view some, but not all, of the content on our Platforms;
- 1.6. "Data" means Personal Information, Usage Data, Cookies and/or Location Data;
- 1.7. "Data Subject" means our customer(s), user(s) or any natural person in respect of whom we Process Personal Information (also referred to as "you" or "your");
- 1.8. "FFS" means FFS Refiners Proprietary Limited and any of its subsidiaries, as incorporated from time to time, (also referred to as "we", "us" or "our"). For purposes of this Policy, we are the responsible party as defined in Section 1 of POPIA;
- 1.9. "PAIA" means the Promotion of Access to Information Act 2 of 2000;
- 1.10. "Personal Information" means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to: information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person; information relating to the education or the medical, financial, criminal or employment history of the person; any identifying number, symbol, e-mail address, physical address, telephone number, Location Data, online identifier or other particular assignment to the person; the Biometric information of the person; the personal opinions, views or preferences of the person; correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence; the views or

opinions of another individual about the person; and the name of the person if it appears with other Personal Information relating to the person or if the disclosure of the name itself would reveal information about the person.

- 1.11. "POPIA" means the Protection of Personal Information Act. No. 4 of 2013 and the regulations thereto, as amended from time to time;
- 1.12. "Pseudonymisation" means the Processing of Personal Information in such a manner that the Personal Information can no longer be attributed to a specific person without the use of additional information.
- 1.13. "Responsible Party" means a public or private body or any other person which alone or in conjunction with others, determines the purpose of and means for processing personal information. For purposes of this Policy, we are the responsible party as defined in Section 1 of POPIA;
- 1.14. "Usage Data" User data refers to the information collected about individuals who interact with digital platforms, encompassing personal identifiers, behavioral patterns, preferences, and interactions.
- 1.15. "Website/s" means our main website at www.ffsrefiners.com and any of our Subsidiary and/or Affiliate company websites.

2. SCOPE

This policy applies to all FFS employees, contractors, suppliers, service providers and third parties that process Personal Information on behalf of FFS. It also applies to the processing of Personal Information in jurisdictions where international data protection laws may be applicable.

3. COLLECTION OF PERSONAL INFORMATION

- 3.1. FFS may collect Personal Information directly from the Data Subjects or indirectly from third parties or publicly available sources for purposes including, but not limited to;
 - 3.1.1. Contract administration and business operations;
 - 3.1.2. Compliance with legal and regulatory obligations;
 - 3.1.3. Customer and Supplier relationship management;
 - 3.1.4. Recruitment, employment and human resources management;
 - 3.1.5. Safety, security and environmental compliance.

4. CROSS-BORDER PROCESSING

- 4.1. Where FFS transfers Personal Information outside of South Africa, such transfer will occur;
- 4.2. In compliance with POPIA requirements;
- 4.3. Where the recipient country has laws that provide adequate protection of Personal Information, or where contractual safeguards are in place;
- 4.4. In line with applicable international data protection laws.

5. USE AND PROCESSING OF PERSONAL INFORMATION

- 5.1. Personal Information will only be processed:
- 5.2. For lawful and legitimate purposes;
- 5.3. With the knowledge or consent of the Data Subject, unless otherwise legally permissible;
- 5.4. In a manner that is relevant, adequate and not excessive,
- 5.5. With appropriate safeguards to maintain confidentiality and integrity.

6. DISCLOSURE OF PERSONAL INFORMATION

- 6.1. FFS may share Personal Information with;
- 6.2. Service providers and other operators under contractual obligations;
- 6.3. Regulatory bodies or government authorities where required by law;
- 6.4. Business partners or stakeholders where necessary for operational purposes.

7. SECURITY SAFEGUARDS

- 7.1. FFS implements appropriate, reasonable technical and organisational measures to secure Personal Information against;
- 7.2. Loss, damage or unauthorised destruction;
- 7.3. Unlawful access, alteration or disclosure.

8. RETENTION OF INFORMATION

- 8.1. Personal Information will not be retained longer than is necessary for achieving the purpose for which it was collected, unless required by law or for legitimate business purposes.
- 8.2. It is specifically recorded that you could have the right to object to the processing of your Personal Information at any time during the Processing. However, we would be required to retain and store your Personal Information for the purposes of swiftly dealing with such an objection or enquiry.
- 8.3. FFS will use Pseudonymisation to retain your Usage Data for internal analysis purposes. We generally retain your Usage Data for a shorter period, except when it is used to strengthen the security or to improve the functionality of our Offerings, or we are legally obligated to retain it for longer time periods

9. RIGHTS OF DATA SUBJECTS

- 9.1. Data Subjects have the right to;
 - 9.1.1. Request access to their Personal Information
 - 9.1.2. Request correction or deletion of inaccurate, irrelevant or excessive Personal Information
 - 9.1.3. Object to the processing of their Personal Information
 - 9.1.4. Exercise rights under applicable international data protection laws;
 - 9.1.5. Lodge complaints with the Information Regulator or other relevant authority in their jurisdiction.

10. COOKIES AND SIMILAR TECHNOLOGIES

- 10.1. When you access our Sites, we and our service providers use cookies and similar technologies including scripts, embedded web links, web beacons, Local Shared Objects (flash cookies) and Local Storage. We and our service providers use cookies to assist us with activities such as:
 - 10.1.1. Enabling users to sign-in to our Sites;
 - 10.1.2. Authentication;
 - 10.1.3. Keeping track of information you have provided to us;
 - 10.1.4. Improve users browsing experience;
 - 10.1.5. Customising our interactions with users;
 - 10.1.6. Storing and managing your preferences and settings;
 - 10.1.7. Compiling statistical data;
 - 10.1.8. Analysing the performance and usability of our Sites;
 - 10.1.9. Measuring traffic patterns for our Sites; and
 - 10.1.10. Determining which areas of our Sites have been visited

- 10.2. These technologies collect information that your browser sends to our Sites including using data, such as your browser type, information about your IP address (a unique identifier assigned to your computer or device which allows your PC or device to communicate over the Internet), together with the date, time and duration of your visit, the pages you view and the links you click.
- 10.3. Our Sites may also contain web beacons or similar technologies from analytics providers, through which they collect information about your activities across our Sites to help us compile aggregated statistics.

For more information on how we use cookies please see our Cookies Statement.

11. CHILDREN'S PRIVACY

We encourage parents and guardians to take an active role in their children's online activities. We do not aim our Sites at children. If you believe that we may have collected Personal Information about someone who is under the applicable age of consent in your country without proper consent of the child's parent or guardian, please contact us

12. CONTACT US

Name of Body	FFS Refiners (Pty) Ltd
Information Officer	Andrew Canning
Email Address	ffs@ffs.co.za
Postal Address	P O BOX 25102, Sea View, KwaZulu Natal, 4062
Street Address	104 Umhlatuzana Road, Sea View, 4094, South Africa
Contact Number	+27 31 459 5300

If you are not satisfied with the outcome of the above process, you have the right to lodge a complaint with the relevant Data Protection Authority, using the contact details listed below:

Name of Body	Information Regulator South Africa
Phone Number	010 023 5200
Website	eServices: Information Regulator
General Enquiries	enquiries@infoeregulator.org.za
POPIA Complaints	POPIAComplaints@infoeregulator.org.za

13. POLICY REVIEW AND UPDATES

This policy will be reviewed periodically and updated to reflect legal, regulatory, or operational changes.

Reviewer	Revision Date	Comments	Status
Corporate Affairs Officer	04 September 2025	None	Reviewed