

Vedanta Zinc International Website Privacy Policy

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Content Owner(s)

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❖ Change History

Modified Date	Version	Modified by	Description of change
2021/06/01	1.0	Hermien Uys	Sent for approval
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❖ Definitions and Abbreviations

Word / Phrase / Abbreviation	Definition
Applicable Privacy Laws	Means the Protection of Personal Information Act, 2013 (POPIA).

1. Information We Collect and Receive

We collect and receive information about you in the following ways:

1.1. Information you give us:

This includes any information that you provide to us directly:

- 1.1.1. when you sign-up to deliver services or products to us, or buy our products;
- 1.1.2. by filling in forms on our websites, or those provided to you;
- 1.1.3. when you enter a competition, promotion or complete a survey;
- 1.1.4. by posting comments or content on our social media pages; or
- 1.1.5. When you contact us, or we contact you and you provide information directly to us.

1.2. What personal information we collect

When you register to provide services or products to us, or to buy our products, you will be required to provide us with the following information, your –

- 1.2.1. name and surname;
- 1.2.2. contact number and email address;
- 1.2.3. physical address;
- 1.2.4. identity or passport number; and
- 1.2.5. Date of birth.

1.3. Information we collect or receive when you use our website or social media platforms.

We collect information when you use websites or social media platforms by using cookies, web beacons and other technologies. Depending on how you access and use websites, we may receive:

- 1.3.1. Log information.
- 1.3.2. Information we infer about you based on your interaction with products and services.

1.3.3. Device information (for example the type of device you are using, how you access platforms, your browser or operating system and your Internet Protocol ("IP") address).

1.3.4. Location information.

1.4. Information from third-party sources

We may receive additional information about you that is publicly or commercially available and combine that with the information we have collected or received about you in other ways.

2. How We Use the Information We Collect and Receive

We use the information we collect and receive for the following general purposes:

- 2.1.1.** to provide you with information, products, or services you request from us;
- 2.1.2.** to assess your application to provide products or services to us;
- 2.1.3.** in order to refer you to an appropriate third-party service provider;
- 2.1.4.** to communicate with you;
- 2.1.5.** to provide you with support; and
- 2.1.6.** to report to various regulatory institutions in South Africa.

3. How We Use the Information We Collect and Receive

- 3.1.** We do not sell your personal information to third parties for their marketing purposes.
- 3.2.** We may share information as follows:
 - 3.2.1.** We may disclose your personal information to a limited number of our employees and third-party service providers (other than those who we refer you to), who we assist you to interact with;
 - 3.2.2.** Our business partners. We may share non-personally identifiable information with select business partners;
 - 3.2.3.** other parties in response to legal processes or when necessary to conduct or protect our legal rights;
 - 3.2.4.** Companies that provide services to us. Companies that provide services to us or act on our behalf may have access to information about you. These companies are limited in their ability to use information they receive while providing services to us or you; and
 - 3.2.5.** Third parties where you provide consent. We may share information with third parties where you provide consent in the form of an explicit opt-in. Before we ask you to opt-in, we will endeavour to provide you with a clear description of what personal information would be shared with the third-party. Remember that once you have opted in to allow us to send your information to the third-party, we cannot control what they do with your personal information; therefore, be sure to investigate their privacy policies before providing permission for us to share your information.

4. Your Rights

- 4.1. You have the right to ask us not to contact you for marketing purposes. You can exercise this right at any time by using any of the various "opt-out" options that we will always provide to you when we communicate with you. We will not send you marketing messages if you tell us not to, but we will still need to send you service-related messages.
- 4.2. Our websites use cookies. If you wish to reject our cookies, you can configure your browser to do so.
- 4.3. We want to make sure that any personal information we hold about you is up to date. So, if you think your personal information is inaccurate, you can ask us to correct or remove it.

5. Retention of Personal Information

We will retain your personal information only for as long as is necessary for the purposes set out in this privacy policy or to comply with our legal obligations, resolve disputes, and enforce our legal agreements and policies.

6. Our Commitment to Security

The security of your personal information is important to us. While we strive to use commercially acceptable means to protect your personal information, we cannot guarantee its absolute security. However, we do employ several safeguards intended to mitigate the risk of unauthorized access or disclosure of your information. We will do our best to protect your personal information and we will use up to date technology that will help us to do this. We will always comply with our obligation under applicable law.

7. Transfer of Personal Information

- 7.1.** We are based in and operate from South Africa. Your information, including personal information, may be transferred to, and maintained on servers located outside of your country of residence, where the data privacy laws, regulations and standards, may not be equivalent to the laws in your country of residence.
- 7.2.** We might transfer your personal information to places outside of South Africa and store it there, where our suppliers might process it. If that happens, your personal information will only be transferred to and stored in country that has equivalent, or better, data protection legislation than South Africa or with a service provider which is subject to an agreement requiring it to comply with data protection requirements equivalent or better than those applicable in South Africa.
- 7.3.** Your use of our website, followed by your submission of information to us, represents your consent to such transfer.
- 7.4.** We will take all steps reasonably necessary to ensure that your personal information is treated securely and in accordance with this privacy policy.

8. Links to Other Websites

Our website or social media platforms may contain links to and from websites, mobile applications, or services of third parties, advertisers, or affiliates. Please note that we are not responsible for the privacy practices of such other parties and advise you to read the privacy statements of each website you visit which collects personal information.

9. Changes to This Privacy Policy

We may update this privacy policy from time to time. Any changes that we may make to our privacy policy will be posted on our website and will be effective from the date of posting.

10. Access to Your Personal Information

10.1. You may at any time request:

10.1.1. Confirmation that we hold your personal information;

10.1.2. Access to your personal information;

10.1.3. The identities or categories of third parties to whom we have disclosed your personal information; or

10.1.4. That we correct or delete any personal information that is incomplete, misleading, inaccurate, excessive or out of date.

10.2. Please refer to our Promotion of Access to Information Act (PAIA) Manual on how to make your requests in writing, which is available at the following link:

https://www.vedanta-zincinternational.com/images/PAIA/BMM_PAIA_Manual.pdf

11. Validity and Document Management

11.1. Document Validity

This Policy is effective from 2023/03/30 and was last reviewed on 17-05-2023.
This Policy will be reviewed every 1 Year.

11.2. Document Management

11.2.1. This Policy replaces any other policy issued earlier by VZI to the extent specifically covered here. This Policy should be followed in letter and spirit.

11.2.2. VZI is committed to continuously reviewing and updating policies and procedures, based on the Entity's risk assessment and shall incorporate for any regulatory requirement which is required to do so.

11.2.3. Any amendment to this Policy or issue of any guidance or circular etc. under this procedure must be approved in writing by the approving authority as listed in this document.

11.2.4. VZI reserves the right to withdraw, modify or revise the Policy as a whole / partial without providing any justification for the same. On revision, it should be duly communicated to the personnel involved.

11.2.5. If compliance with this Policy ever conflicts with the applicable law, regulation, directives issued by statutory and or regulatory authority then compliance must be ensured with the law.

11.2.6. In order to ensure compliance or to address any known conflicts with the law or to address any specific local requirements, VZI may adopt local sub-procedures which shall be by way of addendum to this Policy and which shall be approved by the approver of this Policy. Proposing of such addendum shall be the responsibility of the respective Entity's competent authority who is at an equivalent level with the Policy owner as set out in this document.

11.3. Violation of Policy

11.3.1. VZI follows a “Zero Tolerance Policy” with respect to non-compliance with this Policy and/or any other Policy / guidance issued by VZI.

11.3.2. Violation of this Policy is subject to appropriate disciplinary actions which may include but not limited to termination of employment. This determination will be based upon the facts and circumstances of each situation. Any accused of violation of this Policy will be given an opportunity to present their case prior to any determination of appropriate disciplinary actions. Violation of this Policy may also be subject to substantial civil damages, criminal fines and prison terms.

11.3.3. Each employee is responsible for ensuring that their conduct and the conduct of anyone reporting to them shall fully comply with this Policy. Compliances, both personal and by subordinates, will be a factor in periodic performance appraisals.

11.4. Disclaimer

11.4.1. This Policy issued by VZI is for internal compliance and does not create, nor shall it be construed to create, directly or implicitly, any rights, duties or obligations of VZI to any person, body or legal Entity.

11.4.2. This document and its contents are the copyright property of VZI. The release of this document to any third party outside VZI is strictly prohibited without prior consent.

12. Review and Approval

Content Owner(s)

Loganathan Govender (Company Secretary & Compliance Officer | VZI) TimeStamp: 2023/03/31 11:40:54 AM

Content Reviewer(s)

[txtRew2]

Content Approver(s)

Hermien Uys (Head: Legal | VZI) TimeStamp: 2023/03/31 12:04:05 PM || Pushpender Singla (Executive Director and Chief Financial Officer | VZI) TimeStamp: 2023/05/17 02:14:18 PM

This document was approved (in sequence) by the individuals above using electronic approval in our Document Control System.

Final approval status: [Approved](#)

Approvals were done electronically.

❖ **Annexures / Appendix**