



SOUTH AFRICAN WOMEN IN MINING INVESTMENT HOLDINGS (PTY) LTD

WEBSITE AND GENERAL PRIVACY POLICY

Effective Date: 18 August 2026

Issued in accordance with the Protection of Personal Information Act 4 of 2013 ("POPIA")

1. INTRODUCTION

South African Women in Mining Investment Holdings (Pty) Ltd ("SAWIMIH", "we", "us" or "our") respects and is committed to protecting the privacy of individuals whose personal information we process.

This Privacy Policy explains how SAWIMIH collects, uses, stores, shares, protects and otherwise processes personal information when you visit or use our website, communicate with us, participate in our activities, apply for, hold or deal with shares in SAWIMIH, or otherwise provide personal information to us.

This Privacy Policy is issued in accordance with the Protection of Personal Information Act 4 of 2013 ("POPIA") and applies to all personal information processed by SAWIMIH, whether collected through our website, in writing, electronically, telephonically or in person.

This Privacy Policy should be read together with any other notices, terms or consent forms that may apply to particular services, transactions or activities involving SAWIMIH.

2. DEFINITIONS

For ease of reference, the key terms used in this Privacy Policy have the meanings given to them in POPIA, summarised below:

- **"Consent"** means any voluntary, specific and informed expression of will in terms of which permission is given for the processing of personal information.
- **"Data subject"** means the person to whom personal information relates — in most cases, you.
- **"Direct marketing"** means approaching a data subject, in person or by electronic or other means, to promote or offer goods or services, or to request donations.
- **"Operator"** means a person who processes personal information on behalf of SAWIMIH, as responsible party, in terms of a written contract, without coming under SAWIMIH's direct authority.
- **"Personal information"** means information relating to an identifiable, living natural person and, where applicable, an identifiable existing juristic person (see Section 4 below).
- **"Processing"** means any operation performed on personal information, including collecting, receiving, recording, organising, storing, updating, retrieving, using, disseminating, merging, restricting or erasing it.
- **"Responsible party"** means the person who determines the purpose of, and means for, processing personal information — in relation to this Privacy Policy, SAWIMIH.

- **“Special personal information”** means personal information concerning a data subject's religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life, biometric information, or criminal behaviour.
- **“PAIA”** means the Promotion of Access to Information Act 2 of 2000.
- **“POPIA”** means the Protection of Personal Information Act 4 of 2013.

3. WHO WE ARE

South African Women in Mining Investment Holdings (Pty) Ltd is a private company incorporated in South Africa, focused on creating equity investment and economic-participation opportunities for women, youth and persons with disabilities in the mining and natural resources sector.

For the purposes of POPIA, SAWIMIH is the “responsible party” in relation to the personal information it collects and for which it determines the purpose and means of processing, as described in this Privacy Policy.

Company: South African Women in Mining Investment Holdings (Pty) Ltd

Registration Number: 2003/025168/07

Website: www.sawimih.co.za

Registered/Business Address: 96 Rivonia Road, Sandton, 2194

Telephone: 010 746 0146

Privacy/POPIA Email: siphiwe@sawimih.co.za

Information Officer: Siphiwe Jiyane

Information Officer Email: siphiwe@sawimih.co.za

As required by section 55 of POPIA, SAWIMIH has designated the Information Officer named above, who is responsible for encouraging compliance with POPIA within SAWIMIH, dealing with requests made to SAWIMIH in terms of POPIA and PAIA, working with the Information Regulator, and otherwise ensuring compliance with the conditions for lawful processing.

4. WHAT PERSONAL INFORMATION WE PROCESS

“Personal information” means information relating to an identifiable, living natural person and, where applicable, an identifiable existing juristic person, as defined in POPIA.

Depending on your relationship with SAWIMIH, the personal information we process may include:

- Name and surname;
- Contact details, including telephone numbers and email addresses;
- Residential, postal or business addresses;
- Identification or passport information where required;
- Gender, disability status and other demographic information relevant to eligibility for shareholding or participation in SAWIMIH's programmes (see Section 8 below);
- Shareholder or investment-related information;
- Shareholding records and transaction information;
- Banking details where required for legitimate business purposes, including dividend payments;
- Information contained in correspondence and enquiries submitted to us;
- Information supplied in connection with shareholder verification or administration;
- Information relating to deceased estates where relevant to the administration of a shareholder's interests;
- Information provided when applying for, purchasing, transferring or otherwise dealing with shares or investments;
- Website usage and technical information; and
- Any other information that you voluntarily provide to us or that we are legally entitled or required to collect.

We will only collect personal information that is adequate, relevant and limited to what is reasonably necessary for a specific, explicitly defined and legitimate purpose, in accordance with the processing limitation and purpose specification conditions in POPIA.

5. HOW WE COLLECT PERSONAL INFORMATION

Wherever reasonably possible, SAWIMIH collects personal information directly from the data subject. We may also collect personal information:

- When you contact us by email, telephone, post or through our website;
- When you complete a website form or submit an enquiry;
- When you subscribe to communications from us;
- When you become or are recorded as a shareholder;
- In connection with the administration of your shareholding;
- From authorised representatives acting on your behalf;
- From service providers or professional advisers where lawfully permitted;
- From publicly available sources where permitted by law; and
- Automatically when you use our website, including through cookies and similar technologies.

Where personal information is collected from a source other than the data subject, SAWIMIH will only do so where permitted by POPIA — for example, where the information is contained in or derived from a public record, you have consented, collection would not prejudice your legitimate interests, or collecting it directly from you is not reasonably practicable.

Where required by POPIA, we will take reasonable steps to ensure that you are aware of the collection of your personal information, the purpose of collection, and the other matters listed in section 18 of POPIA, including whether supplying the information is voluntary or mandatory, the consequences of not providing it, and your right to object.

6. WHY WE PROCESS PERSONAL INFORMATION

SAWIMIH may process personal information for the purposes set out below.

6.1 Shareholder and investment administration

We may process personal information to:

- Maintain and administer shareholder records;
- Verify shareholder identities, eligibility and information;
- Process and administer share transactions;
- Communicate with shareholders;
- Process dividend payments and related banking information;
- Respond to shareholder enquiries;
- Manage changes to shareholder information;
- Administer matters relating to deceased shareholders and estates;
- Maintain records required by law; and
- Fulfil our obligations to shareholders and other stakeholders.

6.2 Business and corporate purposes

We may process personal information to:

- Conduct our business and manage our operations;
- Communicate with clients, shareholders, investors, suppliers, advisers and other stakeholders;
- Manage contracts and business relationships;
- Obtain professional, legal, accounting, auditing or other business services;
- Protect our rights, property and interests; and
- Comply with applicable laws and regulatory requirements.

6.3 Website purposes

We may process information relating to your use of our website to:

- Operate and maintain the website;
- Improve website functionality and user experience;
- Understand how visitors use our website;
- Monitor website performance and security;
- Detect and prevent fraudulent, malicious or unauthorised activity; and
- Respond to enquiries submitted through the website.

7. LAWFUL BASIS FOR PROCESSING

SAWIMIH will only process personal information where a lawful basis exists under section 11 of POPIA. Depending on the circumstances, this may be because:

- You have given your consent to the processing;
- Processing is necessary to conclude or perform a contract to which you are a party;
- Processing is necessary to comply with an obligation imposed on SAWIMIH by law;
- Processing is necessary to protect a legitimate interest;
- Processing is necessary for the proper performance of a public law duty by a public body (where applicable); or
- Processing is necessary for pursuing the legitimate interests of SAWIMIH or of a third party to whom the information is supplied.

SAWIMIH does not rely on consent as the sole basis for every form of processing — for example, shareholder and corporate administrative information is generally processed on the basis of a legal or contractual obligation, rather than consent alone.

Where processing is based on consent, you may withdraw that consent at any time. Withdrawal does not affect the lawfulness of processing carried out before withdrawal, and may be subject to legal or contractual consequences — for example, where consent was required to conclude an agreement with you.

8. SPECIAL PERSONAL INFORMATION

Because part of SAWIMIH's mandate involves promoting the economic participation of women, youth and persons with disabilities in the mining and natural resources sector, SAWIMIH may, in limited circumstances, process special personal information as defined in section 26 of POPIA — for example, information about a data subject's gender, disability status, or race or ethnic origin — to verify eligibility for shareholding, membership or participation in SAWIMIH's programmes, or to comply with applicable broad-based black economic empowerment or employment equity legislation.

SAWIMIH will only process special personal information where permitted by section 27 of POPIA, including where:

- You have consented to the processing;
- Processing is necessary to establish, exercise or defend a right or obligation in law;
- Processing is necessary to comply with an obligation of international public law;
- Processing is for historical, statistical or research purposes, subject to appropriate safeguards; or
- Processing is otherwise authorised or required by law, including legislation relating to broad-based black economic empowerment, employment equity or the promotion of equality.

Where SAWIMIH processes special personal information, it will apply safeguards appropriate to the sensitivity of that information and limit access to it to those who require it for the relevant purpose.

9. SHAREHOLDER INFORMATION

Because SAWIMIH administers and maintains information relating to shareholders and investments, certain personal information may be required for shareholder administration and regulatory purposes. This may include information relating to:

- Identity verification;
- Share ownership;
- Share purchases or transfers;
- Dividend payments;
- Banking details;
- Contact details;
- Correspondence concerning shareholding;
- Legal representatives or authorised representatives;
- Deceased estates; and
- Other information required to comply with applicable legal and regulatory obligations.

Where necessary, SAWIMIH may share relevant information with authorised professional advisers, service providers, financial institutions, registrars, auditors, legal advisers, regulators or other parties, where permitted or required by law.

10. DIRECT MARKETING

SAWIMIH may send communications relating to its business, activities, shareholder communications, events, initiatives or other information that may be relevant to you.

Where POPIA requires consent for direct marketing by means of unsolicited electronic communications (such as email, SMS or automated calls), SAWIMIH will send such communications for your consent.

Where SAWIMIH has obtained your details in the context of a sale of a product or service, POPIA permits SAWIMIH to market its own similar products or services to you without separate prior consent, provided you were given a reasonable opportunity to object, free of charge, to such use of your details at the time of collection and on each subsequent communication.

You may object to receiving direct marketing communications, or request that SAWIMIH stop sending them, at any time and free of charge. Where a communication contains an unsubscribe or opt-out mechanism, you may use that mechanism, or contact our Information Officer directly.

Nothing in this section limits SAWIMIH's ability to send communications that are necessary for the administration of your shareholding, a contractual relationship, compliance with a legal obligation, or other legitimate business purposes that do not constitute direct marketing.

11. DISCLOSURE OF PERSONAL INFORMATION

SAWIMIH will not sell your personal information.

We may disclose or provide access to personal information where reasonably necessary and lawful, including to:

- Employees and authorised representatives who require the information to perform their duties;
- Share registrars or other parties responsible for shareholder administration;
- Banks and payment service providers;
- Auditors and accountants;
- Legal and professional advisers;
- Information technology, hosting and other service providers;
- Government departments and regulatory authorities;
- Law enforcement agencies where legally required;

- Courts or other dispute-resolution bodies; and
- Other third parties where you have consented or where disclosure is otherwise permitted or required by law.

Where third parties process personal information on our behalf, SAWIMIH will take reasonable steps to ensure that appropriate confidentiality and security obligations apply (see Section 12 below).

12. OPERATORS AND SERVICE PROVIDERS

SAWIMIH may appoint third-party service providers to process personal information on its behalf as “operators” under POPIA. Such parties may include technology providers, hosting providers, communication platforms, professional advisers, payment providers and other service providers.

In accordance with section 21 of POPIA, SAWIMIH will only appoint an operator under a written contract that requires the operator to:

- process personal information only with SAWIMIH's knowledge or authorisation, and in accordance with SAWIMIH's instructions;
- treat personal information as confidential; and
- implement and maintain appropriate security safeguards to protect the integrity and confidentiality of the personal information it processes.

13. CROSS-BORDER TRANSFERS

Certain service providers or technology platforms used by SAWIMIH may process or store personal information outside South Africa.

In accordance with section 72 of POPIA, SAWIMIH will only transfer personal information to a third party in a foreign country where:

- the third party is subject to a law, binding corporate rules or binding agreement that provides an adequate level of protection substantially similar to POPIA, including provisions similar to POPIA's conditions for lawful processing and further transfer;
- you have consented to the transfer;
- the transfer is necessary for the performance of a contract between you and SAWIMIH, or to implement pre-contractual measures taken in response to your request;
- the transfer is necessary for the conclusion or performance of a contract concluded in your interest between SAWIMIH and a third party; or
- the transfer otherwise benefits you, it is not reasonably practicable to obtain your consent, and you would likely have given consent if asked.

14. SECURITY MEASURES

SAWIMIH takes reasonable technical and organisational measures to protect personal information against:

- Loss;
- Damage;
- Unauthorised destruction;
- Unlawful access;
- Unauthorised processing;
- Accidental disclosure; and
- Other reasonably foreseeable security risks.

These measures may include appropriate access controls, confidentiality requirements, secure storage, system protections and other safeguards appropriate to the nature of the information and the risks involved.

SAWIMIH regularly reviews its security practices and will take reasonable steps to address identified risks and improve its safeguards, in accordance with section 19 of POPIA, which requires responsible parties to implement reasonable technical and organisational measures to protect the integrity and confidentiality of personal information and to identify and manage foreseeable risks.

15. SECURITY COMPROMISES

If SAWIMIH has reasonable grounds to believe that personal information has been accessed or acquired by an unauthorised person, SAWIMIH will take reasonable steps to investigate and respond to the incident.

Where required by section 22 of POPIA, SAWIMIH will notify the Information Regulator — using the Regulator's mandatory online security-compromise reporting facility on its eServices portal — and affected data subjects, as soon as reasonably possible after becoming aware of the compromise.

Notification to data subjects will, where reasonably possible, include sufficient information to allow you to take protective measures, and will be provided in at least one of the ways prescribed by POPIA — for example, in person, by mail, by email, or by a notice placed in a prominent position on SAWIMIH's website.

16. RETENTION OF PERSONAL INFORMATION

SAWIMIH will not retain personal information for longer than is necessary for the purpose for which it was collected or subsequently processed, unless:

- Retention is required or authorised by law;
- Retention is required for contractual or legitimate business purposes;
- Retention is necessary for legal proceedings;
- You have consented to continued retention; or
- Another lawful basis for retention exists.

Certain records — including SAWIMIH's Securities Register, records of Directors, and annual financial statements — must be retained for the periods prescribed by the Companies Act 71 of 2008 and SAWIMIH's Memorandum of Incorporation (generally seven years), and will be retained accordingly.

When personal information is no longer required, SAWIMIH will take reasonable steps to securely delete, destroy or anonymise it, where appropriate.

17. ACCURACY OF PERSONAL INFORMATION

SAWIMIH will take reasonable steps to ensure that personal information in its possession is accurate, complete, not misleading and updated where necessary.

You are encouraged to notify us if your personal information changes, or if you become aware that information we hold about you is incorrect.

18. YOUR RIGHTS AS A DATA SUBJECT

Subject to applicable law, you have the right to:

- Ask whether SAWIMIH holds personal information about you;
- Request access to personal information held about you;
- Request correction or updating of inaccurate personal information;
- Request deletion of personal information where legally permissible;
- Object to certain processing of your personal information;
- Object to the processing of your personal information for direct marketing purposes;
- Withdraw consent where processing is based on consent; and

- Lodge a complaint concerning the processing of your personal information (see Section 25 below).

Requests to access personal information held by SAWIMIH are dealt with under sections 23 to 25 of POPIA, read together with the Promotion of Access to Information Act 2 of 2000 (“PAIA”), and the prescribed fees may be payable.

The Information Regulator has published prescribed forms for certain rights — including objections to processing and requests for correction or deletion of personal information — available on the Information Regulator's website.

To exercise any of these rights, please contact our Information Officer using the details in Section 3 above.

19. AUTOMATED DECISION-MAKING

SAWIMIH does not currently make decisions about data subjects based solely on automated processing (including profiling) that would result in legal or similarly significant effects for you.

If this changes, SAWIMIH will update this Privacy Policy and, in accordance with section 71 of POPIA, provide for your right to request that any such decision be taken again, with reasonable opportunity to make representations and with a human being involved in the decision.

20. COOKIES

Our website may use cookies and similar technologies. Cookies are small data files that may be placed on your device when you visit a website. We may use:

Essential cookies

These cookies may be necessary for the website to operate properly.

Analytics cookies

Where used, these cookies may help us understand how visitors interact with our website and improve its functionality.

Functionality cookies

These may remember preferences or settings to improve your experience.

Third-party cookies

Certain third-party services integrated into our website may place their own cookies or similar technologies.

Where applicable, you may be able to manage cookies through your browser settings or other controls provided on the website.

SAWIMIH will update this section where necessary to accurately reflect the cookies and tracking technologies actually used on the website.

21. WEBSITE LOGS AND TECHNICAL INFORMATION

When you visit our website, certain technical information may automatically be collected, including, where applicable:

- IP address;
- Browser type;
- Operating system;
- Device information;
- Pages visited;
- Date and time of visits;
- Referring website; and
- Other technical information necessary for website operation, security and analytics.

Where such information can reasonably be linked to an identifiable individual, SAWIMI will treat it as personal information in accordance with POPIA.

22. THIRD-PARTY WEBSITES

Our website may contain links to third-party websites, social media platforms or other online services.

These third-party websites operate independently from SAWIMI and may have their own privacy policies and terms. SAWIMI is not responsible for the privacy practices of third-party websites that it does not control.

You should review the privacy policy of any third-party website before providing personal information to it.

23. CHILDREN'S PERSONAL INFORMATION

In accordance with sections 34 and 35 of POPIA, SAWIMI does not knowingly process the personal information of a child, except where and to the extent permitted by POPIA — for example, with the prior consent of a competent person (such as a parent or legal guardian), where necessary to establish, exercise or defend a right in law, or where otherwise authorised by law.

Where SAWIMI becomes aware that it has processed a child's personal information unlawfully, it will take reasonable steps to delete that information and address the situation in accordance with POPIA.

24. CHANGES TO THIS PRIVACY POLICY

SAWIMI may update this Privacy Policy from time to time to reflect:

- Changes in applicable legislation;
- Regulatory developments;
- Changes to our services or business;
- Changes to our website; or
- Changes to how we process personal information.

The updated Privacy Policy will be published on our website and will indicate the date on which it was last updated.

25. COMPLAINTS

If you have a concern about how SAWIMI processes your personal information, we encourage you to contact our Information Officer first (using the details in Section 3 above), so that we can investigate and attempt to resolve your concern.

You also have the right to lodge a complaint with the Information Regulator of South Africa at any time.

Information Regulator of South Africa:

Toll-Free: 0800 017 160

Telephone: 010 023 5200

Email: enquiries@infoeregulator.org.za

Website: <https://infoeregulator.org.za/>

eServices Portal: <https://eservices.infoeregulator.org.za/>

Complaints, security-compromise reports and certain data-subject requests may be submitted to the Information Regulator through its eServices portal.

26. CONTACT US

For questions, requests or concerns relating to this Privacy Policy or SAWIMIH's processing of your personal information, please contact:

Company: South African Women in Mining Investment Holdings (Pty) Ltd

Attention: Information Officer (Siphiwe Jiyane)

Address: 96 Rivonia Road, Sandton, 2194

Telephone: 010 746 0146

Email: siphiwe@sawimih.co.za

27. GOVERNING LAW

This Privacy Policy is governed by the laws of the Republic of South Africa.

Any dispute concerning the processing of personal information will be dealt with in accordance with applicable South African law, including POPIA and any other legislation applicable to the matter.

END OF PRIVACY POLICY