IMINI ENHLE HOLDINGS (PTY) LTD

Environmental, Mining & Engineering Services

PRIVACY POLICY & PAIA MANUAL

Protection of Personal Information Act, 2013 & Promotion of Access to Information Act, 2000

Company	Imini Enhle Holdings (Pty) Ltd
Registration No.	2015/239170/07
Information Officer	Noluthando Fisiwe Mahlangu
Deputy Information Officer	Lunga Dweba
POPIA Reg. No.	2025-004012
Effective Date	1 July 2026
Review Date	12 months from Effective Date

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Document Information

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Information Officer	Noluthando Fisiwe Mahlangu
Deputy Information Officer	Lunga Dweba
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Head Office	2980 Newstands, Ogies, 2233
Telephone	+27 (0) 13 004 0516
Email	info@iminiholdings.co.za
Website	www.iminiholdings.co.za

Purpose of This Document

This combined document serves two functions. First, it constitutes the Privacy Policy of Imini Enhle Holdings (Pty) Ltd, informing Data Subjects of their rights and explaining how their Personal Information is processed in accordance with the Protection of Personal Information Act, 4 of 2013 (POPIA). Second, it constitutes the Company's PAIA Manual in accordance with the Promotion of Access to Information Act, 2 of 2000 (PAIA), as amended, providing information on the records held by the Company and the procedures for requesting access to those records.

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Approval & Adoption

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PART A

Privacy Policy — Our Commitment to You

1. Introduction

Imini Enhle Holdings (Pty) Ltd ("we", "us", "our", or "the Company") provides environmental, mining, and engineering support services for underground, opencast, and surface mining operations. We are committed to protecting the privacy and personal information of all individuals with whom we interact — including clients, employees, subcontractors, suppliers, personnel of client mining operations, and members of the public.

This Privacy Policy describes how we collect, use, store, share, and safeguard Personal Information in compliance with the Protection of Personal Information Act, 4 of 2013 ("POPIA") and all related South African data protection legislation.

2. Definitions

In this document, unless the context requires otherwise:

- **"Company"** means Imini Enhle Holdings (Pty) Ltd (Reg. No. 2015/239170/07).
- **"Data Subject"** means any identifiable natural or juristic person to whom Personal Information relates.
- **"Information Officer"** means Ms Noluthando Fisiwe Mahlangu, designated to ensure POPIA compliance.
- **"Personal Information"** means information relating to an identifiable, living natural person or juristic person, including name, contact details, identity number, employment history, financial information and any other information as defined in POPIA.
- **"Processing"** means any operation performed on Personal Information, including collection, storage, use, transmission, erasure, or destruction.
- **"Responsible Party"** means the Company as the entity that determines the purpose and means of Processing Personal Information.
- **"Special Personal Information"** includes health records, biometric information, criminal history, religious beliefs, race, and political views as defined in Section 26 of POPIA.
- **"Operator"** means a third party who processes Personal Information on behalf of the Company.

3. Our Information Officer

We have designated an Information Officer responsible for overseeing POPIA compliance and handling all data protection matters:

Name	Noluthando Fisiwe Mahlangu
Designation	Director & Information Officer
Deputy Information Officer	Lunga Dweba

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POPIA Reg. No.	2025-004012 (registered 2 May 2025)
Email	business@iminiholdings.co.za
Telephone	+27 (0) 13 004 0516
Address	2980 Newstands, Ogies, 2233

All requests relating to Personal Information — including access, correction, deletion, or objection requests — must be directed to the Information Officer at the contact details above.

4. Personal Information We Collect

4.1 Categories of Information

Category	Examples
Identity Information	Full name, ID number, passport number, date of birth
Contact Details	Physical address, postal address, email, telephone number
Employment Information	Job title, employment history, qualifications, references
Financial Information	Bank account details, tax number, payment history
Health & Safety Information	Medical fitness certificates required for site access, incident and near-miss reports, emergency contacts
Professional Credentials	Trade certificates, mine-specific competency certificates, professional registrations, B-BBEE information

4.2 How We Collect Information

Personal Information is collected through:

- Direct submission by individuals via employment application forms, contracts, quotation forms, and supplier registrations
- Site induction and access registration processes at client mining premises
- Third parties such as professional bodies and government databases
- Correspondence and communications including email, post, and telephone

5. Lawful Basis for Processing

We Process Personal Information only where at least one of the following lawful bases applies:

- The Data Subject has given specific, informed, and voluntary consent
- Processing is necessary to fulfil a contract to which the Data Subject is a party
- Processing is required to comply with a legal obligation
- Processing protects a legitimate interest of the Data Subject
- Processing is necessary for the proper performance of a public law duty

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- Processing is necessary for pursuing the legitimate interests of the Company, provided such interests are not overridden by the rights of the Data Subject

6. Purpose of Processing

The Company collects and Processes Personal Information for the following purposes:

- Recruitment, employment, and human resources management
- Execution of mining support, engineering, and environmental services contracts with client mining operations
- Procurement, tender submission, and supplier relationship management
- Occupational health and safety compliance for personnel deployed to client sites
- Financial administration, payroll, and tax compliance (SARS)
- B-BBEE verification and compliance reporting
- Legal and regulatory compliance
- Marketing and business development communications (with consent only)
- Site access administration at client premises

7. Retention of Personal Information

Personal Information is retained only for as long as is necessary to fulfil the stated purpose or as required by applicable law:

Record Type	Retention Period	Authority
Employment records	3 years after termination or from date of last entry	Basic Conditions of Employment Act, Secs. 29(4) & 31(2)
Financial records	5 years	Tax Administration Act
Health & safety records (general)	3 years minimum	Occupational Health and Safety Act, General Administrative Regulations
Contract and project documents	Duration of project + 5 years	Company policy

Where personnel are deployed to client mine sites, medical surveillance and occupational health records specific to mine health hazards are maintained by the client mine operator under the Mine Health and Safety Act. The Company retains only the general employment, induction, and site-access records set out above.

Upon expiry of the retention period, Personal Information is securely destroyed or de-identified.

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8. Sharing of Personal Information

8.1 Third-Party Disclosure

We may share Personal Information with the following third parties only to the extent necessary and with appropriate safeguards in place:

- Government bodies: SARS, Department of Employment and Labour, Department of Mineral Resources and Energy, Information Regulator
- Professional and industry bodies relevant to registered trades and services
- Client mining operations, for project-specific personnel and compliance records
- Financial institutions and payroll service providers
- Legal and professional advisors bound by confidentiality

8.2 Cross-Border Transfers

Personal Information will not be transferred to foreign countries unless the recipient country has equivalent data protection laws, the Data Subject has consented, or appropriate contractual safeguards are in place as prescribed by POPIA.

9. Security Measures

The Company implements appropriate technical and organisational security measures to protect Personal Information against unauthorised access, loss, misuse, alteration, or destruction. In the event of a security breach likely to result in harm to a Data Subject, we will notify both the Information Regulator and the affected Data Subject(s) as required by Section 22 of POPIA.

10. Rights of Data Subjects

Your Right	What This Means
Right to Access	Request a record of Personal Information we hold about you
Right to Correction	Request correction of inaccurate or incomplete Personal Information
Right to Deletion	Request deletion of Personal Information no longer required for its original purpose
Right to Object	Object to the Processing of your Personal Information in certain circumstances
Right to Complain	Lodge a complaint with the Information Regulator at www.inforegulator.org.za

11. Direct Marketing

The Company will not use Personal Information for direct marketing purposes without prior consent. Where consent has been obtained, individuals may opt out at any time by contacting business@iminiholdings.co.za with the subject line "UNSUBSCRIBE".

12. Updates to This Policy

This document is reviewed annually or following any material change in law or business operations. The current version is published on our website and is available from the Information Officer on request.

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PART B

PAIA Manual — Access to Information

This Part constitutes the Company's PAIA Manual in accordance with the Promotion of Access to Information Act, 2 of 2000 (PAIA), as amended. It describes the records held by the Company and the procedures for requesting access to those records. This Manual is available from the Information Officer upon request.

13. Guide on How to Access Information

The Information Regulator has compiled a guide as contemplated in Section 10 of PAIA to assist persons wishing to exercise their right of access to information held by public and private bodies. This guide is available from:

Information Regulator	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg
Postal Address	P.O. Box 31533, Braamfontein, Johannesburg, 2017
Telephone	+27 (0) 10 023 5200
Email	enquiries@inforegulator.org.za
Website	www.inforegulator.org.za

14. Records Held by the Company

14.1 Human Resources and Employment Records

- Job applications, CVs, and recruitment correspondence
- Employment contracts and amendments
- Employee personal details and identity documentation
- Payroll, tax, and UIF records
- Performance evaluations and disciplinary records
- Leave records and skills development documentation
- Termination and exit documentation

14.2 Health, Safety and Environmental Records

- Site induction and access records for client mine premises
- Medical fitness certificates required for site access
- Site safety files and method statements
- Incident, injury, and near-miss reports
- SHEQ compliance documentation
- PPE issuing records

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14.3 Client and Supplier Records

- Client contracts, scope of work documents, and project correspondence relating to mining support, engineering, and environmental services
- Contact details of client representatives
- Supplier registration forms
- Subcontractor agreements

14.4 Regulatory Compliance Records

- B-BBEE certificate (Level 1)
- Tax clearance and good standing certificates
- POPIA registration certificate (Reg. No. 2025-004012)
- Company policies and procedures
- ISO 9001, 14001 and 45001 certification documentation
- Other industry-specific registrations and certifications as required for specific projects

14.5 Operational and Project Records

- Project plans, drawings, and specifications
- Site diaries, progress reports, and completion certificates
- Plant and equipment registers
- Material delivery notes and quality control records
- Photographic records of project works

14.6 Records Available Without a Formal Request

The following records are publicly available without a formal access request:

- Company profile and service offerings
- Contact details of the Information Officer
- This PRIVACY POLICY & PAIA MANUAL

15. How to Submit an Access Request

15.1 The Request Process

Any person (the "Requester") may request access to a record held by the Company. Requests must be submitted in writing using the prescribed Form C as provided under PAIA, addressed to the Information Officer and submitted by:

- Email: business@iminiholdings.co.za (subject line: PAIA/POPIA ACCESS REQUEST)
- Post: 2980 Newstands, Ogies, 2233
- Hand delivery to the head office: Monday to Friday, 08:00 – 15:00

Access requests are processed at no charge, with the Company reserving the right to recover reasonable reproduction costs.

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15.2 Timeframe and Grounds for Refusal

The Company will respond within 30 days, extendable by a further 30 days in exceptional circumstances. Requests may be refused where disclosure would infringe third-party privacy rights, reveal commercially sensitive information, be protected by legal privilege, or endanger any person. Written reasons will be provided for any refusal together with the Requester's right to appeal.

15.3 Escalation to the Information Regulator

If not satisfied with the Company's response, a Data Subject may escalate to:

Information Regulator	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg
Postal Address	P.O. Box 31533, Braamfontein, Johannesburg, 2017
Telephone	+27 (0) 10 023 5200
Email	enquiries@inforegulator.org.za
Website	www.inforegulator.org.za

Approval & Adoption

This PRIVACY POLICY & PAIA MANUAL was reviewed, adopted, and approved by the Director of Imini Enhle Holdings (Pty) Ltd on 30 June 2026. It will be reviewed annually or upon any material change in law or operations.

Document Version: **1.0**

Effective Date: **1 July 2026**

Next Review Date: **12 months from Effective Date**

Signature: _____ Date: 30 June 2026

Ms Noluthando Fisiwe Mahlangu

Director & Information Officer | Imini Enhle Holdings (Pty) Ltd