



# WEBSITE PRIVACY POLICY

## COMPLIANCE

*DRA Global*

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Revision: 2

**REVISION RECORD**

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## 1 INTRODUCTION

DRA Global Ltd and its subsidiaries, associates and joint ventures (collectively referred to as “**DRA**” or “**we**”) are committed to protecting the privacy and security of personal data that we hold.

This Website Privacy Policy (the “**Policy**”) explains how DRA uses or processes personal data that we collect from external data subjects (“**you**”), as provided to us by individuals, by others, or through the use of any DRA website.

Processing includes any operation or set of operations performed in relation to personal data or sets of personal data, whether by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Processing of personal data shall be in accordance with the relevant data protection laws that apply in the various countries and jurisdictions within which DRA operates.

We may use personal data provided to us for any of the purposes described in this Policy or as otherwise stated at the point of collection.

## 2 WHAT PERSONAL DATA WE COLLECT ABOUT YOU

We collect several different types of information for various purposes to provide and improve our services to you. We only collect and use personal data that is directly related to, or reasonably necessary for, our business functions and activities. If you choose not to provide some of your personal data, this may prevent us from providing our services to you or limit our ability to provide the level of service you would normally expect from us.

We may also collect special categories of personal data (“**Sensitive Personal Data**”) from you. However, we will only collect this type of information if you have provided explicit consent and/or the information is required for us to fulfil our legal obligations (for example, if you apply for a job with us or are a current employee). Examples of Sensitive Personal Data include personal data about children and information about a data subject’s racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health, sex life and sexual orientation, genetic or biometric data (including passport biodata), criminal record and police clearances, financial and credit checks.

We may also collect information about how a DRA website is accessed and used by you. This may include information such as your computer’s internet protocol address, browser type, browser version, the pages of our website that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

DRA will only collect personal data of any child under the age of 18 where consent has been obtained from the parent or guardian of that child or where it is permitted to do so in accordance with applicable law. We do not knowingly collect personal data from any child under the age of 18. If you are a parent or guardian and you are aware that your child has provided us with personal data, please contact us. If we become aware that we have collected personal data from children without verification of parental consent, we will take steps to remove that information from our servers.

## 3 HOW WE COLLECT YOUR PERSONAL DATA

We collect your personal data directly from you, unless it is unreasonable or impracticable to do so. When collecting personal information from you, we may collect it in various ways, including:

- through your access to and use of our websites or mobile applications;
- when you register to receive any of our publications or newsletters;
- when attending an event organised by us;
- when you or your representatives communicate with us; or
- when you make use of our services.

We may also collect your personal data from third parties or other sources, such as recruitment companies, background screening checks, previous employers, provident, superannuation or retirement fund administrators and health insurance administrators.

#### 4 LAWFUL PROCESSING OF YOUR PERSONAL DATA

DRA will only process your personal data for purposes of legitimate interests and such interests are not overridden by any interests or rights of a data subject, particularly where such personal data relates to a child or where Sensitive Personal Data is processed. Other lawful grounds for processing include where:

- consent of the data subject is obtained;
- processing is necessary for the performance of a contract to which the data subject is a party;
- processing is necessary for compliance with a legal obligation imposed on DRA;
- processing is necessary for the protection of a legitimate interest of a data subject or another natural person;
- processing is necessary for the performance of a task carried out in the public interest.

#### 5 PURPOSE OF USING YOUR PERSONAL DATA

DRA will only collect or use personal data for a specified, explicit and legitimate purpose and will not process the personal data further in a manner that is incompatible with the purpose for which it was originally collected. Personal data collected may not be used for a new, different or incompatible purpose from that disclosed when the personal data was originally collected without first informing the data subject of the changed purpose and, where required, obtaining their consent.

The purpose of collecting and using your personal data is dependent on what your interaction is with DRA. A non-exhaustive list of agreed and restricted purposes for which DRA processes personal data, together with the rationale for processing the personal data in each instance, includes:

- **Website administration** – this includes managing communications; responding to requests for information or enquiries from visitors to our websites; ensuring the content from our website is presented in the most effective manner for you and your device; monitoring the use of our website; detecting, preventing and addressing technical issues; and analytics for business intelligence purposes.
- **Managing our relationship with you** – this includes providing you with information or services, improving our services and communicating with you.
- **Business-related purposes** – this includes negotiating, managing and fulfilling our contracts with clients, suppliers, service providers, employees and other third parties (including e-commerce transactions); managing business relationships; administering real estate leases and licences; conducting clearance procedures; managing accounts and records; supporting corporate social responsibility activities; employment-related resource planning and workforce management; activities and operations; internal investigations; business partner due diligence; and debt administration.
- **Marketing and public relation purposes** – this includes analysing the characteristics of visitors to DRA's website; to prepare analytics and profiling for business intelligence purposes; to personalise website user experience; managing newsletters and communications and, where DRA collects details in the membership database relevant to DRA's websites, for demographic analysis and personalisation of the websites.
- **Recruitment-related purposes** – this includes considering you for career opportunities (including internship positions) with DRA and inviting you to participate in recruitment activities and events.
- **Managing safety and security risks** – this includes managing and monitoring access and use of our premises and sites, safety and security at our sites (including through the use of video surveillance or CCTV) and our IT environment (including monitoring electronic communications); and the health and safety of those on our sites.
- **Managing shareholder relationships** – this includes undertaking share transactions, dividend payments and communication with shareholders.
- **Meeting legal obligations** – this includes meeting obligations imposed under law or contract; responding to lawful requests from governments, public authorities and contractual parties; and responding to potential or actual litigation.

## 6 SHARING YOUR PERSONAL DATA

Personal data held by DRA may be transferred to other DRA entities or business partners of DRA for the purposes for which it was collected, or to such other third parties as may be required by law. We require our business partners to respect the security of your personal data in compliance with applicable data protection laws, have or put into place appropriate technical and operational measures to secure the personal data and enter into appropriate contractual arrangements. Any transfer of your personal data shall not affect any of your rights regarding your personal data, as described in this Policy.

Examples of categories of persons to who DRA may transfer your personal data include:

- **Companies or entities within DRA** – this may include cross-border transfers of personal data, as further dealt with below.
- **Business partners** – this includes business representatives, agents, distributors, clients, joint venture partners, consultants, service providers, suppliers, professional advisors, or other contractors or intermediaries that have a business relationship with a DRA entity. Services providers includes third party technology service providers, for example cloud service providers.
- **Business transfers** – third parties engaged as part of a business transfer, such as a merger, sale of business, sale of assets.
- **Government, regulatory and law enforcement agencies** – this includes transfers in order to comply with a legal obligation; protect and defend the rights or property of DRA; prevent or investigate possible wrongdoing in connection with our services; protect the personal safety of users of our services or the public; and/or protect against legal liability.

DRA maintains an operating model to provide services globally. As a multinational group, the cross-border transfer of personal data is inevitable. Your personal data may be transferred to computers located outside of your state, province or country where the data protection laws may differ from those of your jurisdiction, for the purposes of storage and/or maintenance. Any cross-border transfer of personal data shall be in accordance with applicable data protection laws and subject to appropriate security measures.

We may transfer your personal data to the following overseas recipients:

- financial institutions;
- professional advisers (such as lawyers, accountants or auditors);
- cloud service providers or third parties who store personal data or operate outside your jurisdiction;
- auditors;
- labour brokers;
- government, regulatory and law enforcement agencies;
- payroll administration system providers.

## 7 SECURING YOUR PERSONAL DATA

DRA may store your personal data in hardcopy and/or electronic format using our own secure on-site servers and internally hosted technology or by third parties via cloud services or other technology.

DRA will treat your personal data as confidential and process it in a secure manner, using appropriate technical and organisational measures to protect against unlawful or unauthorised processing and against accidental loss, destruction or damage. The security measures will be appropriate and proportionate to DRA's size, business, available resources, the amount of personal data processed and the level of risk. The technical and organisational measures implemented by DRA include measures in relation to:

- identity and access control mechanisms to permit only authorised access to your personal data;
- the pseudonymisation and encryption of personal data;
- ensuring the ongoing confidentiality, integrity, availability and resilience of processing systems and services;

- restoring the availability and access to personal data in a timely manner in the event of a physical or technical incident;
- regular testing, assessment and evaluation of the effectiveness of the security measures;
- employee training on security, data protection and handling of personal data.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator or relevant third party of a suspected breach where we are legally required to do so.

## 8 RETENTION OF YOUR PERSONAL DATA

DRA will keep and use your personal data as long as necessary for us to comply with our business requirements and legal obligations, resolve disputes and enforce our legal agreements and policies. We will take reasonable steps to securely destroy or de-identify your personal data when we no longer need it for a reason, including for legal or business purposes.

## 9 YOUR RIGHTS IN RELATION TO YOUR PERSONAL DATA

Subject to certain restrictions or exceptions, you have the following rights in relation to your personal data:

- **Right to be informed** – you have the right to know how your personal data will be collected, processed, and stored, and for what purpose.
- **Right to access** – you have the right to access and receive a copy of your personal data.
- **Right of correction** – you have the right to have inaccurate or incomplete personal data corrected.
- **Right to erasure** – you have the right to have your personal data permanently deleted.
- **Right to object** – you have the right to object to the processing of your personal data; to withdraw your consent at any time where DRA relied on your consent to process your personal data; and to submit a complaint and report your concerns in writing either to us, or to the relevant data protection authority. Links to the relevant authority based in your country of residence are provided in section 12.
- **Right to restriction of processing** – you have the right to restrict or limit the processing of your personal data.
- **Right to data portability** – you have the right to move, copy or transfer your personal data from one controller to another, in a safe and secure way and in a commonly used and machine-readable format.
- **Rights related to automated decision-making** – we do not currently undertake automated decision-making, which refers to the process of making decisions by automated means without human involvement which results in legal consequences for a data subject or significantly affects a data subject, and may involve profiling a data subject through analysis of personal aspects. However, should we carry out this type of activity in the future, you have the right to not be subject to automated decisions, unless the decision is necessary for the entry into or performance of a contract with you, authorised by law or based on your consent.

To exercise or enquire about any of your rights in relation to your personal data, please contact us using our contact details included in section 12. Upon receipt of your enquiry, we will email you a form that you must complete and return with proof of identity before we attend to your request.

Once we have received your request, we endeavour to respond within 30 calendar days and may charge you a reasonable fee for providing access to your personal data, but not for making the request itself. Depending on the complexity or number of requests, processing a request may take longer than 30 days, in which event you will be notified.

If we decline a request for access to personal data, we will provide you with written feedback that sets out the reasons for the refusal.

## 10 LINKS TO OTHER SITES

The DRA website may contain links to third-party websites, plug-ins and applications that are not operated by us. We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites or services. If you click a third-party link, you will be directed to that third party's site. We strongly advise you to review the privacy policy of every site you visit.

## 11 USE OF WEBSITE COOKIES

The DRA website, through the use of cookies, collects data about how you interact with our website and mobile applications. Cookies are small text files which are downloaded to your computer or mobile device when you access a website or mobile application.

We use cookies to enhance the online experience of our website users (for example, by remembering your language and/or preferences) and to better understand how our website is used.

Most browsers are initially set to accept cookies. You have the right to choose whether or not to accept cookies. However, please note that if you do not accept our cookies, you may not be able to use the full functionality of our website or mobile applications.

You can find out more information about cookies and how to disable them at [www.allaboutcookies.org](http://www.allaboutcookies.org).

## 12 CONTACT US

If you have any questions about this Policy or how we handle your personal data, please contact us at the details provided below:

Region	Address	Email
DRA Group and APAC	256 Adelaide Terrace, Perth 6000, Western Australia, Australia Tel: +61 8 6163 5900	<a href="mailto:privacy@draglobal.com">privacy@draglobal.com</a>
AMER	20 Queen Street West, 29 <sup>th</sup> Floor, Toronto Ontario, M5C 3R3 Tel: +1 416 800 8797	<a href="mailto:complianceAMER@draglobal.com">complianceAMER@draglobal.com</a>
EMEA (including DRA Water, Nexus and SENET)	Building 33, Woodlands Office Park, Sandton 2080, South Africa +27 11 202 8600	<a href="mailto:informationofficer@draglobal.com">informationofficer@draglobal.com</a>
Minopex	2 <sup>nd</sup> Floor, Building 31, Woodlands Office Park, Sandton 2080, South Africa Tel: +27 11 785 7000	<a href="mailto:informationofficer@minopex.com">informationofficer@minopex.com</a>

You also have the right to make a complaint at any time to the relevant data protection authority if you are unsatisfied with the manner in which DRA has addressed your enquiry or complaint. The contact details of the key data protection authorities relevant to DRA, as at the date of this Policy, can be accessed using the links below.

Country	Data Protection Authority
Australia	Office of the Australian Information Commissioner (OAIC) <a href="https://www.oaic.gov.au/privacy/privacy-complaints">https://www.oaic.gov.au/privacy/privacy-complaints</a>
Canada	Office of the Privacy Commissioner of Canada <a href="https://www.priv.gc.ca/en/report-a-concern/">https://www.priv.gc.ca/en/report-a-concern/</a>
Chile	No national data protection authority
China	Office of the Central Cyberspace Affairs Commission <a href="http://www.cac.gov.cn">www.cac.gov.cn</a>
Ghana	Data Protection Commission <a href="https://www.dataprotection.org.gh/contact">https://www.dataprotection.org.gh/contact</a>
Peru	National Authority for the Protection of Personal Data



Country	Data Protection Authority
	<a href="https://www.gob.pe/institucion/anpd/tema/denuncias-y-sanciones">https://www.gob.pe/institucion/anpd/tema/denuncias-y-sanciones</a>
Saudi Arabia	Saudi Data and Artificial Intelligence Authority <a href="https://sdaia.gov.sa/">https://sdaia.gov.sa/</a>
South Africa	Information Regulator of South Africa <a href="https://info regulator.org.za/complaints/">https://info regulator.org.za/complaints/</a>
United States of America	No national data protection authority
Zimbabwe	Postal and Telecommunications Regulatory Authority of Zimbabwe (POTRAZ) <a href="https://www.potraz.gov.zw">https://www.potraz.gov.zw</a>

### 13 CHANGES TO THIS WEBSITE PRIVACY POLICY

We may update this Policy from time to time and will notify data subjects by posting the updated Policy on DRA's website and use other reasonable efforts to notify data subjects of such amendments. You are advised to review this Policy periodically so that you are updated on any changes. Amendments to this Policy are effective when posted on our website.

This Policy was last updated on 20 March 2023.