



WEBSITE PRIVACY POLICY

CORPORATE GOVERNANCE

DRA Global

DRA-00-CG-POL-010

Revision: 0

APPROVALS

Description	Name	Title	Signature	Date
Author	Leanne Kirsten	Compliance / Privacy / Information Officer		
Approval	Wray Carvelas	Chief Executive Officer		

REVISION RECORD

Revision	Description	Date
A	Draft	29 May 2019
0	Group Legal comments incorporated and issued for Signature	10 June 2019

LEGISLATION AND STANDARDS**Applicable Legislation and Best Practice Standards**

Privacy Act 1988, as amended (Australia)

Protection of Personal Information Act 2013 (POPIA), as amended (South Africa)

Personal Information Protection and Electronic Documents Act (PIPEDA), as amended (Canada)

General Data Protection Regulation 2016/679, as amended (EU)

Promotion of Access to Information Act 2 of 2000 (PAIA), as amended (South Africa)

REPORTING A CONCERN

Country	Document Description
Australia	Office of the Australian Information Commissioner (OAIC) https://www.oaic.gov.au/
South Africa	Information Regulator (South Africa) http://www.justice.gov.za/inforeg/
Canada	Office of the Privacy Commissioner of Canada https://www.priv.gc.ca/en/report-a-concern/
EU Member Countries	EU member Data Protection Authorities (DPO) https://edpb.europa.eu/about-edpb/board/members_en

REFERENCE DOCUMENTS

Document Number	Document Description
-	Code of Conduct
-	Privacy Statement
-	Employee Privacy Policy
-	Whistle-Blowing Policy

DEFINITIONS

Terms	Definition
Service	Service is the https://www.draglobal.com/ website operated by DRA Global Limited
Personal Data	Means any information or opinion about an identified individual or an individual who is reasonably identifiable, whether the information or opinion is true or not, and whether the information or opinion is stored in a material form or not.
Usage Data	Usage Data is data collected automatically either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a website or page visit).
Cookies	Cookies are small files stored on your device (computer or mobile device).
Data Controller	Means the natural or legal person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any Personal Data is, or is to be, processed. For the purposes of this Privacy Policy, we are a Data Controller of your Personal Data.
Data Processors (or Service Providers)	Means any natural or legal person who processes the data on behalf of the Data Controller. We may use the services of various Service Providers in order to process your data more effectively.
Data Subject (or User)	Means any living individual who is using our Service and is the subject of Personal Data.

TABLE OF CONTENTS

1	PRIVACY POLICY	6
2	INFORMATION COLLECTION AND USE	6
2.1	Types of Data Collected	6
2.1.1	Personal Data	6
2.1.2	Usage Data	6
2.1.3	Tracking Cookies Data.....	6
2.2	Use of Data	7
2.3	Legal Basis for Processing Personal Data under Global Privacy Laws	8
2.4	Retention of Data	8
2.5	Transfer and Storage of Data	8
2.6	Disclosure of Data	9
2.6.1	Disclosure for Law Enforcement	9
2.6.2	Disclosure of Personal Data	9
2.6.3	Legal Requirements.....	9
2.7	Direct Marketing	9
2.8	Security of Data	10
3	YOUR DATA PROTECTION RIGHTS UNDER GLOBAL PRIVACY LAWS	10
4	SERVICE PROVIDERS	11
5	LINKS TO OTHER SITES	11
6	CHILDREN'S PRIVACY	11
7	CHANGES TO THIS PRIVACY POLICY	11
8	CONTACT US	11

1 PRIVACY POLICY

DRA Global Limited operates the <https://www.draglobal.com/> website to promote the DRA Global business and its services (hereinafter referred to as the "Service") for the benefit of DRA Global Limited and its [related bodies corporate (as defined in section 50 of the Corporations Act 2001 (Cth))] ("us", "we", or "our").

We recognise the importance of protecting the privacy of Personal Data we collect about you. This page informs you of our policies regarding the collection, use, disclosure, transfer and management of your Personal Data following your use of our Service.

We use your Personal Data to provide and improve the Service. By using the Service, you agree to the collection, use, disclosure, transfer and management of information in accordance with this policy.

You should review this Privacy Policy periodically so that you are updated on any changes.

2 INFORMATION COLLECTION AND USE

We collect several different types of information for various purposes to provide and improve our Service to you. We only collect Personal Data that is directly related to, or reasonably necessary for, our functions and activities.

If you choose not to provide some of your Personal Data, this may prevent us from providing our Service to you or limit our ability to provide the level of service you would normally expect from us.

We may collect Personal Data from our business or related entities and affiliates which collected your information in a different country (e.g. Canada, South Africa, United States of America, China, United Kingdom etc.)

2.1 Types of Data Collected

2.1.1 Personal Data

While using our Service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you. Personal Data may include, but is not limited to:

- Email address
- First name and last name
- Phone number
- Address, state, province, zip/postal code, city
- Identifier (such as an identification number)
- location data
- an Internet Protocol (IP) address
- a cookie ID
- the advertising identifier of your phone

2.1.2 Usage Data

We may also collect information on how the Service is accessed and used by you ("Usage Data"). This Usage Data may include information such as your computer's internet protocol address (e.g. IP address), browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

2.1.3 Tracking Cookies Data

We use cookies and similar tracking technologies to track the activity on our Service and we hold certain information.

Cookies are files with a small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. We also use other tracking technologies such as beacons, tags and scripts to collect and track information and to improve and analyse our Service.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service.

Examples of Cookies we use:

- **Session Cookies.** We use Session Cookies to operate our Service.
- **Preference Cookies.** We use Preference Cookies to remember your preferences and various settings.
- **Security Cookies.** We use Security Cookies for security purposes.

2.2 Use of Data

The purposes for which we collect your Personal Data depend on your interaction with us, but generally, DRA Global Limited uses the collected Personal Data for the following (including but not limited to) purposes:

- To provide and maintain our Service
- To notify you about changes to our Service
- To provide business services
- To allow you to participate in interactive features of our Service when you choose to do so
- To provide customer support
- To provide support to our investors
- To provide support to persons and entities interested in purchasing or investing in us, or purchasing any of our assets of business
- To provide support to our employees and contractors
- To provide support to local, state and Federal government departments, union officials, and interested members of the community
- To gather analysis or valuable information so that we can improve our Service
- To monitor the usage of our Service
- To detect, prevent and address technical issues

We may sometimes use the Personal Data we collect for one or more secondary purposes, that is, for use in a way different from the original reasons for collection set out above. We will only do this in one of the following circumstances:

- Where you have consented
- Where the secondary purpose is directly related to the primary purpose, and you would reasonably expect us to use or disclose the information in such a way
- You would reasonably expect, or have been told (for example, by means of this Privacy Policy), that your information will be passed on to those individuals, entities or agencies
- Where we are permitted or required to do so by law
- It is in the interests of public safety to do so

2.3 Legal Basis for Processing Personal Data under Global Privacy Laws

DRA Global Limited's legal basis for collecting and using the Personal Data described in this Privacy Policy depends on the Personal Data we collect and the specific context in which we collect it.

DRA Global Limited may process your Personal Data because:

- We need to perform a contract with you
- You have given us permission to do so
- The processing is in our legitimate interests and it is not overridden by your rights
- To comply with the law

2.4 Retention of Data

DRA Global Limited will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes and enforce our legal agreements and policies. If we no longer require your Personal Data for any purpose, including legal purposes, we will take reasonable steps to securely destroy or de-identify your Personal Data.

DRA Global Limited will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Service, or we are legally obligated to retain this data for longer periods.

2.5 Transfer and Storage of Data

Your information, including Personal Data, may be transferred to, and maintained on, computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ from those of your jurisdiction.

If you are located outside Australia and choose to provide information to us, please note that we transfer the information, including Personal Data, to Australia and process it there.

The Personal Data that we collect from you may be transferred to, and stored at, a destination outside Australia. Such destination countries may have different levels of privacy protection than in your country of residence.

If we collect your Personal Data, you are taken to consent to the disclosure, transfer, storing or processing of your Personal Data outside of your country of residence. You acknowledge and agree that by providing your consent:

- We will not be required to take steps as are reasonable in the circumstances to ensure that such third parties comply with the relevant data protection laws in your country of residence
- If the overseas recipient handles your Personal Data in breach of the data protection laws applicable in your country of residence:
 - we will not be liable under the data protection laws applicable in your country of residence; and
 - you will not be able to seek redress under the data protection laws applicable in your country of residence
- the overseas recipient may not be subject to any privacy law or principles similar to the data protection laws applicable in your country of residence;
- you may be unable to seek redress overseas; and
- the overseas recipient is subject to a foreign law that could compel the disclosure of Personal Data to a third party, such as an overseas authority.

2.6 Disclosure of Data

2.6.1 Disclosure for Law Enforcement

Under certain circumstances, DRA Global Limited may be required to disclose your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

2.6.2 Disclosure of Personal Data

DRA Global Limited may disclose your Personal Data to (including but not limited to):

- Any member of our corporate group, which means related entities that form part of our corporate group (including overseas entities) as well as licensees or agents of our corporate group
- Our business partners (including our joint venture partners and Service Providers)
- Third party service providers that provide us with communication (e-mail) or data storage services
- Technology services including application, development and technical support, processing, storing, hosting and data analysis
- Professional advisers (such as lawyers, accountants or auditors) to the extent that is reasonably required
- Administrative services, including mailing services, printing, archival and contract management services
- Third party agents or contractors with whom we contract in the ordinary course of business
- One or more third parties in the event that we go through a business transition, such as a merger, being acquired by another company, or selling all or part of our business or assets

We oblige the above persons and entities to whom we may disclose your Personal Data to assume and apply the same rights and obligations regarding your Personal Data as described in this Privacy Policy.

2.6.3 Legal Requirements

DRA Global Limited may disclose your Personal Data to third parties (including but not limited to government, regulatory and law enforcement agencies) in the good faith belief that such action is necessary to:

- Comply with a legal obligation
- Protect and defend the rights or property of DRA Global Limited
- Prevent or investigate possible wrongdoing in connection with the Service
- Protect the personal safety of users of the Service or the public
- Protect against legal liability

2.7 Direct Marketing

You consent to DRA Global using and/or disclosing any Personal Data collected from you for direct marketing purposes, whether collected via telephone, the Service, or otherwise, but subject to the terms of this Privacy Policy. DRA Global does not sell or rent individuals' Personal Data to other companies for marketing purposes.

Unless otherwise provided in this Privacy Policy and in accordance with global privacy legislation, DRA Global retains the right to use and disclose your Personal Data for direct marketing purposes:

- That has been collected from you in circumstances where:
 - you have provided consent to do so, or
 - it is within reasonable expectations, or

- where it is impracticable to obtain your consent
- That has been collected from any third party in circumstances where you have provided consent to do so.

In each direct marketing communication, we will include a statement notifying you of your right to “Opt-Out” from further direct marketing communications and provide a simple means for you to opt-out of receiving further communications of that kind.

Should you choose to opt-out we will stop using your Personal Data for direct marketing purposes. DRA Global will not use sensitive information for direct marketing purposes.

2.8 Security of Data

We store your Personal Data in different ways, both at our own premises and with the assistance of our Service Providers. These ways may include:

- physical (paper) form;
- storage through an electronic records system; and
- data management software or systems in accordance with our usual business practices.

The security of your Personal Data is important to us. We take all reasonable measures to ensure that your Personal Data is stored safely to protect it from misuse, loss, interference, unauthorised access, modification or disclosure, including electronic and physical security measures.

We also have policies in place for data retention across all key areas. We keep your Personal Data for as long as it is required for the purposes for which it is collected and to comply with legal requirements. If we no longer require your Personal Data for any purpose, including legal purposes, we will take reasonable steps to securely destroy or de-identify your Personal Data.

Our Service is professionally hosted and operated in a secure environment. While we strive to ensure the security, integrity and privacy of Personal Data submitted to our Service, unfortunately, no data transmission over the Internet can be guaranteed to be totally secure and we take no responsibility for the security of data transmissions to and from our Service or other information technology systems.

3 YOUR DATA PROTECTION RIGHTS UNDER GLOBAL PRIVACY LAWS

DRA Global Limited aims to take reasonable steps to allow you to correct, amend, delete or limit the use of your Personal Data.

If you wish to be informed about what Personal Data we hold about you and if you want it to be removed from our systems, please contact us.

You may access the Personal Data we hold about you by making a written request. We will respond to your request within a reasonable period. We may charge you a reasonable fee for providing access to your Personal Data (but not for making a request for access).

In certain circumstances, you have the following data protection rights:

- **The right to access, update or delete the information we have on you.** Whenever made possible, you can access, update or request deletion of your Personal Data directly within your account settings section. If you are unable to perform these actions yourself, please contact us to assist you.
- **The right of rectification.** You have the right to have your information rectified if that information is inaccurate or incomplete.
- **The right to object.** You have the right to object to our processing of your Personal Data.
- **The right of restriction.** You have the right to request that we restrict the processing of your Personal Data.
- **The right to data portability.** You have the right to be provided with a copy of the information we have on you in a structured, machine-readable and commonly used format.

- **The right to withdraw consent.** You also have the right to withdraw your consent at any time where DRA Global Limited relied on your consent to process your Personal Data.

To make one of the above requests, please contact our Privacy/Information Officer/us at:

- **Street address:** DRA Minerals Park, 3 Inyanga Close, Sunninghill, 2157
- **Email address:** leanne.kirsten@draglobal.com / christo.visser@draglobal.com
- **Telephone:** +27 11 202 8600

Please note that we may ask you to verify your identity before responding to such requests.

We may decline a request for access to Personal Data in circumstances prescribed by the relevant data protection laws and if we do, we will provide you with a written notice that sets out the reasons for the refusal (unless it would be unreasonable to provide those reasons).

You also have the right to complain to a Data Protection Authority about our collection and use of your Personal Data. For more information, please contact your local Data Protection Authority in your country of residence.

4 SERVICE PROVIDERS

We may employ third party companies and individuals to facilitate our Service ("Service Providers"), provide the Service on our behalf, perform Service-related services or assist us in analysing how our Service is used.

These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

5 LINKS TO OTHER SITES

Our Service may contain links to other sites that are not operated by us. 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.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

6 CHILDREN'S PRIVACY

Our Service does not address anyone under the age of 18 ("Children").

We do not knowingly collect personally identifiable information from anyone 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 take steps to remove that information from our servers.

7 CHANGES TO THIS PRIVACY POLICY

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

We will let you know via email and/or a prominent notice on our Service, prior to the change becoming effective and update the "effective date" at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

8 CONTACT US

If you have any questions about this Privacy Policy, please contact us:

- By email: leanne.kirsten@draglobal.com / christo.visser@draglobal.com