

Accenture (South Africa) Education Trust ("the Trust")

The Trust registered in accordance with the laws of South Africa with master's reference number IT1556/01 and with address Building Number 3 Waterfall Corporate Campus, 74 Waterfall Drive, Waterfall City, Johannesburg, 1685

Policy on Privacy of Personal Information ("this Policy")

Adopted by the Board of Trustees December 2021

1 INTRODUCTION

South African data privacy laws, including the Protection of Personal Information Act No. 4 of 2013 ("**POPIA**"), govern how the Trust handles Personal Information. Personal Information means information relating to an identifiable, living, natural person or juristic person ("Data Subject") and is more fully described as a definition in POPIA.

2 POLICY

The Trust is committed to protect Personal Information as required by law and has adopted this policy to manage such commitment.

3 DEFINITIONS

- 3.1 "**Child**" means any natural person under the age of 18 (eighteen) years;
- 3.2 "**Information Officer**" has the meaning ascribed thereto in POPIA and, for purposes of this Manual, means the Trust's Information Officer as recorded under section 10 hereto.
- 3.3 "**Information Regulator**" means the Information Regulator established in terms of POPIA.
- 3.4 "**Operator**" means a person or entity who Processes Personal Information for a Responsible Party in terms of a contract or mandate, without coming under the direct authority of that Responsible Party.
- 3.5 "**Responsible Party**" means a public or private body or any other person which alone or in conjunction with others, determines the purpose of and means for Processing Personal Information.
- 3.6 "**Special Personal Information**" means Personal Information concerning a Data Subject's religious or philosophical beliefs, race or ethnic origin, trade union membership, political opinions, health, sexual life, biometric information or criminal behaviour.
- 3.7 "**Third Party**" means any independent contractor, agent, consultant, sub-contractor or other representative of the Trust.

4 APPLICABILITY AND SCOPE

This policy applies to all Personal Information processed by the Trust as a Responsible Party for its own purposes in terms of POPIA. It includes Personal Information about Data Subjects who include Trust beneficiaries and family members, who may include children and young people, and Trustees, and Personal Information held by the Trust about any other person.

This policy does not apply to the information practices of third party companies who we may engage with in relation to our business operations (including, without limitation, their websites,

platforms and/or applications) which we do not own or control; or individuals that the Trust does not manage or employ.

5 PURPOSES FOR PROCESSING PERSONAL INFORMATION

The purpose of this policy is to inform Data Subjects about how the Trust processes their Personal Information.

The Trust will process Personal Information for the purposes of managing the Trust and complying with its obligations in terms of applicable laws and its trust deed ("Trust Deed") including to / for:

- 5.1 Process applications to become beneficiaries of the Trust
- 5.2 Accept and onboard beneficiaries to the Trust
- 5.3 Accept and invest donations to the Trust and issue appropriate receipts and certificates to donors
- 5.4 Process account statements and provide benefits to beneficiaries, including direct payment of amounts due by beneficiaries to approved educational and other suppliers
- 5.5 Provide communication, mentoring and similar assistance to beneficiaries associated with the objectives of the Trust
- 5.6 Provide status reports on beneficiaries to Trustees and donors
- 5.7 Carry out all related administrative tasks required under the laws that apply to the Trust and its Trust Deed Record and keep track of the Trust products
- 5.8 Prevent fraud and other prohibited or illegal activities
- 5.9 Prevent, discover and investigate violations of this policy, the applicable law and other policies of the Trust
- 5.10 Conclude or perform in terms of a contract
- 5.11 Employment-related purposes such as recruiting staff, administering payroll, background checks, etc.
- 5.12 Audit purposes
- 5.13 Such other purposes to which the Data Subject may consent from time to time
- 5.14 Such other purposes as authorised in terms of applicable law
- 5.15 Comply with any applicable law generally
- 5.16 Enable the services of administrators to assist the Trust to fulfil its obligations and carry out its statutorily prescribed tasks and these defined processes.

6 THE TRUST'S PRIVACY COMMITMENTS

Set out below are the Trust's data privacy commitments.

- 6.1 Be lawful:

- 6.1.1 The Trust will only Process a Data Subject's Personal Information (other than for Special Personal Information) where one of the following legal bases is present: (i) consent of the Data Subject (or a competent person, where the Data Subject is a Child) is obtained; (ii) Processing is necessary to carry out the actions for conclusion of a contract to which a Data Subject is party; (iii) Processing complies with an obligation imposed by law on the Trust; (iv) Processing protects a legitimate interest of the Data Subject; and/or (v) Processing is necessary for pursuing the legitimate interests of the Trust or of a third party to whom the information is supplied.
- 6.1.2 Where the Trust is relying on a Data Subject's consent as the legal basis for Processing Personal Information, the Data Subject may withdraw his/her/its consent or may object to Trust's Processing of the Personal Information at any time. However, this will not affect the lawfulness of any Processing carried out prior to the withdrawal of consent or any Processing justified by any other legal ground provided under POPIA.
- 6.1.3 the Trust's defined purposes will comply with POPIA, and other appropriate laws and the Trust will limit use of Personal Information to those purposes.
- 6.2 In addition, be ethical: the Trust will only process Personal Information ethically, including in a manner consistent with the Trust Deed, and with all aspects of Accenture's Code of Business Ethics that are not in conflict with the Trust Deed.
- 6.3 In addition, be transparent: the Trust will provide appropriate notice, and, where necessary, consent and choice in relation to the Personal Information processed by the Trust and will advise Data Subjects where the provision of Personal Information is voluntary or mandatory (including where this may be required under applicable laws)
- 6.4 The Trust will respect Data Subjects' rights in relation to their Personal Information such as a right to request access to a copy of their Personal Information, have their Personal Information corrected or deleted, and object to certain processing of their data (for example, using their data for marketing or profiling purposes). On request, the Trust will provide Data Subjects with a copy of their Personal Information to the extent required by law and the Trusts' policies and procedures which apply in terms of the Promotion of Access to Information Act No. 2 of 2000 ("PAIA"). [See our PAIA manual for more information]
- 6.5 The Trust will minimize data collection to what is reasonably required to achieve the intended purpose, keep data accurate, up to date and follow retention schedules as required for the records of the Trust.
- 6.6 The Trust will build privacy into the processes, application forms and documentation of the Trust.
- 6.6.1 The Trust will follow the applicable laws and regulations for processing Special Personal Information. More specifically, the Trust will not Process Special Personal Information unless: (i) Processing is carried out in accordance with the Data Subject's consent; (ii) Processing is necessary for the establishment, exercise or defence of a right or obligation in law; (iii) Processing is for historical, statistical or research purposes, subject to stipulated safeguards; (iv) information has deliberately been made public by the Data Subject; (v) specific authorisation applies in terms of POPIA.
- 6.6.2 Further, the Trust will not Process any Personal Information concerning a Child unless it has obtained the consent of the parent or guardian of that Child or where it is permitted to do so in accordance with applicable laws.
- 6.7 The Trust will document evidence of the Trust's data privacy compliance.

- 6.8 The Trust will implement measures to control access and protect Personal Information.
- 6.9 The Trust will follow the applicable laws and regulations for any suspected or actual data security breach.
- 6.10 The Trust will monitor the activities of any operator acting on behalf of the Trust, such as companies in the Accenture Group and other service providers.
- 6.11 The Trust will only transfer any Personal Information outside of the borders of South Africa where it is permitted to do so in accordance with the provisions applicable to cross-border flows of Personal Information under POPIA.

7 PROCESSING OF PERSONAL INFORMATION BY THIRD PARTIES

- 7.1 The Trust may disclose Personal Information to Third Parties and will enter into written agreements with such Third Parties to ensure that they Process any Personal Information in accordance with the provisions of this policy and POPIA.
- 7.2 The Trust specifically requires such Third Parties to:
 - 7.2.1 Abide by the confidentiality principles and the principles contained in POPIA, in particular but not limited to those principles relating to accountability, limitations on Processing of information and purpose specification and other applicable laws governing the Processing of Personal Information, in order to ensure that all Personal Information provided to it by the Trust is kept secure and confidential.
 - 7.2.2 Take reasonable steps to ensure (i) that only authorised personnel of the Third Parties have access to the Trust and Data Subject Personal Information; (ii) that the Third Parties' personnel are aware of the Third Parties' obligations under the agreement with the Trust and (iii) the reliability, integrity and trustworthiness of all of the Third Parties' personnel with access to the Trust and Data Subject Personal Information.
 - 7.2.3 Notify the Trust upon becoming aware of any breaches of the Personal Information immediately.
 - 7.2.4 The Trust will only disclose Personal Information with the consent of the Data Subject or if the Trust is permitted to do so without such consent in accordance with applicable laws.

8 RIGHTS OF A DATA SUBJECT

- 8.1 POPIA read with the relevant provisions of PAIA confers certain access rights on Data Subjects. The Trust's PAIA Manual can be found at www.accenture.co.za ("**PAIA Manual**").
- 8.2 The Data Subject has the following rights in relation to the Personal Information held by the Trust:
 - 8.2.1 a Data Subject having provided adequate proof of identity has the right to: (i) request a Responsible Party to confirm whether any Personal Information is held about the Data Subject; and/or (ii) request from a Responsible Party a description of the Personal Information held by the Responsible Party including information about Third Parties who have or have had access to the Personal Information. A Data Subject may request: (i) to confirm, free of charge, whether it holds any Personal Information about him/her/it; (ii) to obtain from the Trust the record or description of Personal Information concerning him/her/it and any information regarding the recipients or categories of recipients who have or had access to the Personal Information. Such record or description is to be provided:

(a) within a reasonable time; and (b) in a reasonable manner and format and in a form that is generally understandable;

- 8.2.2 a Data Subject may also request the Trust to: (i) correct or delete Personal Information about the Data Subject in its possession or under its control that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully; (ii) destroy or delete a record of Personal Information about the Data Subject that the Trust is no longer authorised to retain records in terms of POPIA's retention and restriction of records provisions;
- 8.2.3 a Data Subject that has previously consented to the Processing of his/her/its Personal Information has the right to withdraw such consent and may do so by providing the Trust with notice to such effect at the address set out in paragraph 10 hereto. Further, a Data Subject may object, on reasonable grounds, to the Processing of Personal Information relating to him/her/it;
- 8.2.4 a Data Subject has the right to erase any Personal Information held by the Trust; provided that in terms of Section 11 (b) of POPIA, the right of the Data Subject to request deletion of his Personal Information does not apply where the processing of the Data Subject's information is necessary in order to fulfil a contract to which the Data Subject is party, for example a contract between the Trust, the Data Subject and another person in relation to a housing loan provided to the Data Subject with the Trust acting as guarantor;
- 8.2.5 a Data Subject has the right to restrict further processing of Personal Information for any purposes other than those set out in paragraph 5 of this document;

9 CHANGES TO THIS POLICY

The Trust reserves the right to make amendments to this policy from time to time and will use reasonable efforts to notify Data Subjects of such amendments.

10 CONTACTING US

- 10.1 All comments, questions, concerns or complaints regarding your Personal Information or this policy, should be forwarded to us as follows —

Tel: **+27 11 208 3104 / +27 83 265 2975**

Address: **Building Number 3 Waterfall Corporate Campus, 74 Waterfall Drive, Waterfall City, Johannesburg, 1685**

Postal: **P.O Box 1587, Kelvin, 2054**

Information Officer: **Kenneth Brian Robinson**

E-mail: DataPrivacyOfficer@accenture.com

11 VIOLATIONS OF THIS POLICY AND RAISING CONCERNS

- 11.1 Any action or inaction by the Trust or issue involving the Trust ("Concern") which any person believes or suspects may be in violation of this policy may be raised with the Chairman of the Trust, or any appropriate process within Accenture, or may follow any process supported by POPIA or any other applicable law.
- 11.2 The Board of Trustees of the Trust will appropriately consider any such Concern and appropriately assist in any regulatory or legal process as required by regulation or law.

11.3 Any person, being dissatisfied with the manner in which the Trust addresses any complaint with regard to the Trust's processing of Personal Information, may contact the office of the Information Regulator at–

Website: <http://justice.gov.za/infoereg/>

Tel: 012 406 4818

Fax: 086 500 3351

Email: enquiries@infoeregulator.org.za

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