

PROTECTION OF PERSONAL INFORMATION ACT POLICY

1 PURPOSE

The purpose of this Protection of Personal Information Act Policy is to describe how HEALTHY LIVING CONSULTING (PTY) LTD (HLC) and any subsidiary to HEALTHY LIVING CONSULTING (PTY) LTD collects, uses and shares Personal Information about its employee's ,clients, contractors or business network partners including but not limited to suppliers and/or stakeholders of HEALTHY LIVING CONSULTING (PTY) LTD as well as users of HEALTHY LIVING CONSULTING (PTY) LTD online interfaces (e.g., websites and/or mobile applications) owned and controlled by HEALTHY LIVING CONSULTING (PTY) LTD. This policy also applies to the Wellbeing Engagement Platform / Progressive Web Application provided by Healthy Living Consulting (PTY) LTD to corporate clients, branded in their own identity. The platform gathers survey information, and such data collection is subject to the same protections and user rights as outlined in this policy

HEALTHY LIVING CONSULTING (PTY) LTD Protection of Personal Information Act Policy explains:

- What is Personal Information?
- What processing activities does this policy apply to?
- Personal Information that HEALTHY LIVING CONSULTING (PTY) LTD collect
- How HEALTHY LIVING CONSULTING (PTY) LTD use and share Personal Information
- Security of Personal Information
- Data integrity and retention
- Access to Personal Information and choices
- Individual rights in relation to Personal Information
- Changes to HEALTHY LIVING CONSULTING (PTY) LTD Privacy Policy

2 SCOPE

This Protection of Personal Information Act Policy applies only to Personal Information (including Special Personal Information) collected during HEALTHY LIVING CONSULTING (PTY) LTD day to day business activities including any electronic interfaces (e.g., websites and/or mobile applications) owned and controlled by HEALTHY LIVING CONSULTING (PTY) LTD. HEALTHY LIVING CONSULTING (PTY) LTD cannot be held responsible for the privacy practices of third-party participants linked to HEALTHY LIVING CONSULTING (PTY) LTD be it sub-contractors to any suppliers to HEALTHY LIVING CONSULTING (PTY) LTD or affiliates to public access online sites (such as Facebook or the like).

3 WHAT IS PERSONAL INFORMATION?

For the purpose of this Policy, "**Personal Information**" means information relating to an identifiable, living, natural person and, where applicable, an identifiable existing juristic person, including but not limited to –

3.1 Information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;

3.2 Information relating to the education or the medical, financial, criminal or employment history of the person.

3.3 Any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier, or other particular assignment to the person.

3.4 The personal opinions, views, or preferences of the person.

3.5 Correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence.

3.6 The views or opinions of another individual about the person; and

3.7 The name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person.

3.8 For the purpose of this policy, reference to Personal Information throughout this policy includes Special Personal Information. "**Special Personal Information**" means:

- religious or philosophical beliefs.
- race or ethnic origin.
- trade union membership.
- political persuasion.
- health or any related medical information.

3.9 Criminal behaviour to the extent that such information relates to the alleged commission by a data subject of an offence or any proceedings in respect of any offence allegedly committed by a data subject or the disposal of such proceedings.

4. WHAT PROCESSING ACTIVITIES DOES THIS POLICY APPLY TO?

4.1 For the purpose of this policy, "*Processing*" means any operation or activity or set of operations concerning Personal Information, including but not limited to, the collection, receipt, recording, organisation, collation, storage, updating, modification, retrieval, retention, alteration, use, disclosure, access, transfer, distribution, linking, merging, degradation, erasure or destruction.

4.2 This policy will only apply to the processing of Personal Information entered in a record by or for any entity in HEALTHY LIVING CONSULTING (PTY) LTD by making use of automated or non-automated means. Personal Information processed by non-automated means will form part of this policy if the records so created form part of a filing system or are intended to form part thereof.

4.3 For the purpose of this policy, a "*record*" means any writing on any material. It also includes information produced, recorded or stored by means of a tape-recorder, computer equipment or other device, as well as any label, marking, map, book, plan, graph, drawing, or photograph, film, negative, tape or other device in which one or more visual images are embodied.

4.4 For the purpose of this policy, "*automated means*" means any equipment capable of operating automatically in response to instructions given for the purpose of processing information.

4.5 For the purpose of this policy, a "*data subject*" means the person to whom Personal Information relates.

5. PERSONAL INFORMATION COLLECTED BY HEALTHY LIVING CONSULTING (PTY) LTD

5.1 Personal Information provided to HEALTHY LIVING CONSULTING (PTY) LTD, would include all relevant information supplied by its employee's ,clients, contractors or business network partners including but not limited to suppliers and/or stakeholders of HEALTHY LIVING CONSULTING (PTY) LTD during HEALTHY LIVING CONSULTING (PTY) LTD day to day business activities as well as through the online interfaces (e.g., websites and/or mobile applications) owned and controlled by HEALTHY LIVING CONSULTING (PTY) LTD. All documentation relating to public requests for information, contact customer support, or other communications with HEALTHY LIVING CONSULTING (PTY) LTD This information may include:

- Name
- Address
- Billing address
- Email address
- Telephone number
- Date of birth

5.2 All employee records (including but not limited to employment contracts, leave applications, disciplinary records, remuneration and medical information) collected or shared with the employee during the duration of said employee's employment at HEALTHY LIVING CONSULTING (PTY) LTD

5.3 Any and all information, such as pricing, products, contact and contract details , gathered by current, past, and future suppliers to HEALTHY LIVING CONSULTING (PTY) LTD will be kept by HEALTHY LIVING CONSULTING (PTY) LTD

5.4 A record of any contact or correspondence by way of verbal, hand written or electronic (such as email, messaging, SMS as well as social apps like Twitter and/or Instagram including Facebook posts and YouTube uploads)from members of the public or any person associated with HEALTHY LIVING CONSULTING (PTY) LTD, be it internal such as employees or external such as suppliers , may be kept.

5.5 Information that HEALTHY LIVING CONSULTING (PTY) LTD may ask for if entering any competition or promotion featured by HEALTHY LIVING CONSULTING (PTY) LTD be it online, by SMS, messaging, email and/or by direct contact, may be kept by HEALTHY LIVING CONSULTING (PTY) LTD

5.6 Photos, files, videos, chat messages and other communications from or between HEALTHY LIVING CONSULTING (PTY) LTD and outside parties

5.7 HEALTHY LIVING CONSULTING (PTY) LTD may conduct surveys with members of the public, by means of face to face interaction or via electronic means, for research purposes where contact details might be requested.

5.8 HEALTHY LIVING CONSULTING (PTY) LTD may retain details of transactions carried out through their day to day operation of their business or through their online interface.

5.9 Where applicable, HEALTHY LIVING CONSULTING (PTY) LTD may retain details that users provide, such as new or deleted postings, new or deleted comments, keyword searches, and scam reports as well as, but not limited to, traffic data, location data, weblogs , other communication data and the resources that were accessed.

5.10 The supply of Personal Information is voluntary, however HEALTHY LIVING CONSULTING (PTY) LTD might withhold certain services if Personal Information is not supplied.

5.11 Where applicable HEALTHY LIVING CONSULTING (PTY) LTD might collect Personal Information on their online interface by way of tracking technology to gain information about the user. Tracking might be done by HEALTHY LIVING CONSULTING (PTY) LTD or sites linked to HEALTHY LIVING CONSULTING (PTY) LTD site. Examples of tracking is below:

- **Google Analytics**
HEALTHY LIVING CONSULTING (PTY) LTD may use Google Analytics, a web analytics service provided by Google, Inc. ("**Google**") to collect certain information relating to online use of HEALTHY LIVING CONSULTING (PTY) LTD site. Google Analytics uses "cookies", which are text files placed on users' electronic devices, to help analyse how users use the site.
- **Information Collected Through Cookies and Similar Technologies**
HEALTHY LIVING CONSULTING (PTY) LTD may use cookies, web beacons, and other technologies to receive and store certain types of information whenever users interact with their site through a computer or mobile device. When a user visits the site again, the cookie allows the site to recognize the user's browser. Cookies may store unique identifiers, user preferences and other information. Users may refuse all cookies or to indicate when a cookie is being sent. However, some site features or services may not function properly without cookies.

5.12 HEALTHY LIVING CONSULTING (PTY) LTD will not collect personal information from anyone under the age of 13

6. HOW HEALTHY LIVING CONSULTING (PTY) LTD USE AND SHARE PERSONAL INFORMATION

HEALTHY LIVING CONSULTING (PTY) LTD collect Personal Information in order to:

6.1 Provide products and services through their day to day operation as well as through their online interface.

6.2 To abide by all legal requirements prescribed by law, including Government, pertaining but not limited to, employment, financial management, ethical processes, and business best practise.

6.3 In aggregate form, for internal business purposes such as generating statistics and developing strategic and marketing plans.

6.4 To ensure that the business as a whole is presented in the most effective manner for their clients.

6.5 Provide information requested from HEALTHY LIVING CONSULTING (PTY) LTD to contact any third party.

6.6 To allow participation and interactivity of HEALTHY LIVING CONSULTING (PTY) LTD services, when asked to do so.

6.7 To carry out any contracts between HEALTHY LIVING CONSULTING (PTY) LTD and any third party.

6.8 To keep logs of video calls, voice calls and text messages for audit purposes (but the content of such messages may be encrypted and not accessible by HEALTHY LIVING CONSULTING (PTY) LTD)

6.9 To respond to any queries made by any third party

6.10 To notify public, selected clients, contractors and/or employees about changes to HEALTHY LIVING CONSULTING (PTY) LTD services or relevant information pertaining to the company.

6.11 To notify selected third parties of amounts payable for purchases, security, administrative or legal purposes,

6.12 To send promotional materials or advertisements about HEALTHY LIVING CONSULTING (PTY) LTD products and/or services, as well as new features and offerings; administer surveys and provide interest-based targeted advertising to selected third parties where they have consented to be contacted for such purposes.

7 SHARING WITH THIRD PARTIES.

7.1 HEALTHY LIVING CONSULTING (PTY) LTD may provide information, as defined in Section 5 above, to third party service providers that assist HEALTHY LIVING CONSULTING (PTY) LTD operate and manage its day to day operation including processing of orders, as well as deliver products and services to their clientele either in person, via a third party supplier or through their onsite business.. These service providers will have access to selected Personal Information in order to provide these said services, but when this occurs HEALTHY LIVING CONSULTING (PTY) LTD will ensure that there are written contracts in place with these services providers in terms of which they undertake to implement appropriate and reasonable administrative, technical and physical security measures to protect the confidentiality and security of the Personal Information. Added to this, all service providers must declare that they have read and understood the Protection of Personal Information Policy of HEALTHY LIVING CONSULTING (PTY) LTD.

7.2 HEALTHY LIVING CONSULTING (PTY) LTD reserves the right to terminate access of third party for any reason in its sole discretion where HEALTHY LIVING CONSULTING (PTY) LTD reasonably considers that such access should be denied

7.3 Where applicable, HEALTHY LIVING CONSULTING (PTY) LTD may belong to ad networks that may use third party browsing history across participating websites to show interest-based advertisements on those websites. HEALTHY LIVING CONSULTING (PTY) LTD cannot be held liable if their site does not recognize if third party browser sends a "do not track" signal or similar mechanism to indicate that the user does not wish to be tracked or receive interest-based ads.

7.4 HEALTHY LIVING CONSULTING (PTY) LTD will provide an opt out mechanism for any mobile app or sms function including email communication, where applicable, that is used to provide company related information such as, but not limited to, promotions, trading times and/or research surveys.

8 LEGAL PROCEEDINGS.

HEALTHY LIVING CONSULTING (PTY) LTD may share personal information with third party companies, organizations, or individuals outside of HEALTHY LIVING CONSULTING (PTY) LTD if there is a good-faith belief that access, use, preservation or disclosure of the information is reasonably necessary to:

8.1 Meet any applicable law, regulation, subpoena, legal process, or enforceable governmental request.

8.2 Enforce applicable Terms of Use, including investigation of potential violations.

8.3 Detect, prevent, or otherwise address fraud, security, or technical issues.

8.4 Protect against harm to the rights, property, or safety of HEALTHY LIVING CONSULTING (PTY) LTD, their users, customers or the public as required or permitted by law including responding to claims that any content violates the rights of third parties.

9 TRANSFER IN THE EVENT OF SALE OR CHANGE OF CONTROL.

If the ownership of all or substantially all of HEALTHY LIVING CONSULTING (PTY) LTD business changes or HEALTHY LIVING CONSULTING (PTY) LTD otherwise transfer assets relating to their business or their online interface to a third party, such as by merger, acquisition, bankruptcy proceeding or otherwise, HEALTHY LIVING CONSULTING (PTY) LTD may transfer or sell Personal Information to the new owner. In such a case, subject to the applicable laws, Personal information would remain subject to the promises made in the applicable privacy policy unless otherwise agree upon.

10 SECURITY OF PERSONAL INFORMATION

10.1 HEALTHY LIVING CONSULTING (PTY) LTD uses industry standard physical, technical, and administrative security measures and safeguards to protect the confidentiality and security of Personal Information. HEALTHY LIVING CONSULTING (PTY) LTD shall endeavour to ensure the security and confidentiality of Personal Information as far as reasonably possible against anticipated threats or hazards to the security or integrity of the Personal Information and protect as far as reasonably possible against unauthorised access to or use of such Personal Information that could result in substantial harm. Regarding HEALTHY LIVING CONSULTING (PTY) LTD online interface, HEALTHY LIVING CONSULTING (PTY) LTD cannot guarantee, ensure, or warrant the security of any information that is transmitted to HEALTHY LIVING CONSULTING (PTY) LTD. There is no guarantee that information may not be accessed, disclosed, altered, or destroyed by breach of any of HEALTHY LIVING CONSULTING (PTY) LTD physical, technical, or managerial safeguards. HEALTHY LIVING CONSULTING (PTY) LTD will not be liable for security breach arising out of sharing of passwords and personal details to a third party not vetted or known to HEALTHY LIVING CONSULTING (PTY) LTD. E-mails and other communications sent to HEALTHY LIVING CONSULTING (PTY) LTD through the "Contact Us" form are not encrypted, and HEALTHY LIVING CONSULTING (PTY) LTD will not be liable for any confidential information sent through these means.

10.2 HEALTHY LIVING CONSULTING (PTY) LTD may, from time to time, transfer, store, or host Personal Information on servers outside of South Africa or in the form of cloud-based storage. HEALTHY LIVING CONSULTING (PTY) LTD will at all times ensure that appropriate security safeguards are in place to secure and protect such personal information held in another country or using cloud based storage, and that the service provider acts at all times in compliance with applicable privacy laws.

Where required under applicable laws HEALTHY LIVING CONSULTING (PTY) LTD will take measures to ensure that Personal Information handled in other countries or on cloud-based storage, will receive at least the same level of protection as it is given in this Privacy Policy.

11 DATA INTEGRITY AND RETENTION

11.1 HEALTHY LIVING CONSULTING (PTY) LTD will take reasonable steps to ensure that the Personal Information processed is reliable for its intended use and is accurate, up to date and complete for carrying out the purpose for which it was collected and is retained by HEALTHY LIVING CONSULTING (PTY) LTD.

11.2 HEALTHY LIVING CONSULTING (PTY) LTD will only retain Personal Information for as long as is reasonably necessary to achieve the purpose for which the Personal Information was initially collected, unless a longer retention period is (i) required or permitted by law or (ii) reasonably required by HEALTHY LIVING CONSULTING (PTY) LTD for lawful purposes related to its functions or activities or (iii) required by a contract between the parties thereto or (iv) the data subject has consented thereto.

11.3 In circumstances where HEALTHY LIVING CONSULTING (PTY) LTD is no longer authorized or permitted to retain the Personal Information, such Personal Information will be destroyed or de-identified in a manner that reasonably prevents misappropriation, reconstruction, or unauthorized use.

11.4 Personal Information provided to HEALTHY LIVING CONSULTING (PTY) LTD, by its employee's, clients, contractors or business network partners including but not limited to suppliers and/or stakeholders of HEALTHY LIVING CONSULTING (PTY) LTD during HEALTHY LIVING CONSULTING (PTY) LTD day to day business activities as well as through the online interfaces (e.g., websites and/or mobile applications) owned and controlled by HEALTHY LIVING CONSULTING (PTY) LTD is protected by HEALTHY LIVING CONSULTING (PTY) LTD as outlined in Section 10.. However, any breach of the information referred to herein, except to the extent any such losses are directly or indirectly attributable to HEALTHY LIVING CONSULTING (PTY) LTD gross negligence or wilful misconduct, or the gross negligence or wilful misconduct of anyone acting for or under HEALTHY LIVING CONSULTING (PTY) LTD control, the above mentioned agree to, at their sole expense, defend, indemnify and hold HEALTHY LIVING CONSULTING (PTY) LTD harmless from any damages, losses, costs, or expenses which HEALTHY LIVING CONSULTING (PTY) LTD may incur as a result of information breach.

12. ACCESS TO PERSONAL INFORMATION AND CHOICES

12.1 Where applicable any party mentioned in section 2 of this policy can access and update certain information that HEALTHY LIVING CONSULTING (PTY) LTD has, relating to Personal Information. If access and/or updates are required, appropriate channels need to be followed to access and edit the information.

12.2 HEALTHY LIVING CONSULTING (PTY) LTD may retain a copy of relevant Personal Information for archival purposes, and to avoid identity theft or fraud subject to the applicable laws regarding retention of Personal Information.

13. INDIVIDUAL RIGHTS IN RELATION TO PERSONAL INFORMATION

Individuals have the following rights in relation to their Personal Information:

13.1 to be notified that Personal Information about them is being collected unless (i) they have consented to non-compliance; (ii) non-compliance would not prejudice their legitimate interests; (iii) compliance would prejudice a lawful purpose of the collection or is not reasonably practicable in the circumstances; or (iv) non-compliance is otherwise permitted in terms of any applicable law;

13.2 to be notified that Personal Information about them has been accessed or acquired by an unauthorised person.

13.3 to establish whether HEALTHY LIVING CONSULTING (PTY) LTD holds Personal Information about them and request access to such information by submitting the prescribed form to HEALTHY LIVING

CONSULTING (PTY) LTD . A request to access Personal Information may be refused on any grounds permissible in law.

13.4 to request the correction, destruction, or deletion of their Personal Information. HEALTHY LIVING CONSULTING (PTY) LTD shall consider the request but is not obliged to comply with such request. In the event that HEALTHY LIVING CONSULTING (PTY) LTD does not comply with the request, and if so requested, HEALTHY LIVING CONSULTING (PTY) LTD will take such steps that are reasonable in the circumstances to attach to the Personal Information an indication that a correction of the information was requested but has not been made;

13.5 subject to any applicable law, to object, on reasonable grounds relating to their particular situation and in the legally prescribed manner, to the processing of their Personal Information.

13.6 to object to HEALTHY LIVING CONSULTING (PTY) LTD processing their Personal Information for the purpose of direct marketing by unsolicited electronic communications.

13.7 not to be subject to a decision based solely on automated processing.

13.8 to submit a complaint to the relevant regulatory body or institute civil proceedings.

14. CHANGES TO HEALTHY LIVING CONSULTING (PTY) LTD PRIVACY POLICY

14.1 HEALTHY LIVING CONSULTING (PTY) LTD Privacy Policy may change from time to time. HEALTHY LIVING CONSULTING (PTY) LTD will not reduce any rights under this Privacy Policy without prior consent in accordance with applicable law. HEALTHY LIVING CONSULTING (PTY) LTD will post any privacy policy changes through its management structure and where applicable onsite and, if the changes are significant, HEALTHY LIVING CONSULTING (PTY) LTD will provide a more prominent notice (including, for certain services, email notification of privacy policy changes). HEALTHY LIVING CONSULTING (PTY) LTD will also keep prior versions of this Privacy Policy in an archive for review.

14.2 If this Privacy Policy or any provision in this Privacy Policy is regulated by or subject to the Protection of Personal Information Act ("POPI") or other data protection legislation it is not intended that any provision of this Privacy Policy contravenes any provision of POPI or other data protection legislation. Therefore, all provisions of this Privacy Policy must be treated as being qualified, to the extent necessary, to ensure that the provisions of POPI or other data protection legislation are complied with.