DRDGOLD Limited

(Registration number 1895/00926/06)

Protection of Personal Information Policy

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Definitions

In this DRDGOLD Policy, the following words and expressions shall have the meaning ascribed thereto below[1]:

Board or DRDGOLD Board	The Board of Directors of the Company. This does not include the Board of a Subsidiary.
Chairman	The individual who is appointed as the chairman of the Board as per the relevant provisions of the Company's Memorandum of Incorporation.
Consent	Any voluntary, specific, and informed expression of will in terms of which permission is given for the processing of personal information.
Companies Act	The Companies Act, No. 71 of 2008, as amended from time to time, read with the Companies Regulations, 2011.
Company or DRDGOLD	Means DRDGOLD Limited with registration number 1895/00926/06.
Data Subject	You or me, being a person to whom personal information relates.
Direct Marketing	Sending a data subject an electronic communication about goods and services that you are promoting or offering to supply in the ordinary course of business or requesting a donation of any kind for any reason.
DRDGOLD Group or Group	The DRDGOLD Group comprises DRDGOLD and its Subsidiaries.
Group Exco	The Group Executive Committee responsible for the leadership, implementation of the strategy, and day-to-day management of the affairs and business of the DRDGOLD Group.
Group CEO or GCEO	The Group Chief Executive Officer of DRDGOLD Limited.
Group CFO or GCFO	The Group Chief Financial Officer of DRDGOLD Limited.
Group COO of GCOO	The Group Chief Operating Officer of DRDGOLD Limited.
Information Regulator	The professional body that is empowered to monitor and enforce compliance by public and private bodies with the provisions of the Act in terms of section 39.
King IV™	The King IV™ Report on Corporate Governance for South Africa 2016.2
Management	All persons who direct, control and exercise authority over or supervise or oversee the business activities of any area, department or function within the DRDGOLD Group.
Operator	A party that processes personal information only with the knowledge and/or authorisation of the responsible party; and treat personal information which comes to your knowledge as

[1] A word or expression defined in the Companies Act and applied in the Policy shall have the meaning as ascribed thereto in the Companies Act if not defined herein.

[2] The King IV Report on Corporate Governance for South Africa 2016, copyright and trademarks are owned by the Institute of Directors in South Africa.

	confidential and must not disclose it.
Person	A natural or juristic person.
Personal Information	Information relating to an identifiable, living, person.
Policy	A course or principle of action adopted or proposed by an organisation or individual.
PoPI	Protection of Personal Information
Procedure	An established or official way of doing something.
Processing	Any activity that involves use of personal information. Includes any operation or activity or set of operations, whether or not by automatic means, concerning personal information, including: • Collection, receipt, recoding, organisation, collation, storage, updating or modification, retrieval, alteration, consultation, or use; and/or • Dissemination by means of transmission, distribution, or making available in any other form; and/or • Merging, linking, as well as restriction, degradation, erasure, or destruction of information.
Record	Any recorded information, regardless of when it came into existence.
Responsible Party	A public or private body or any other person which determines the purpose of and means for processing personal information.
Review	A formal assessment of something with the intention of instituting change if necessary.
Special Personal Information	The religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life or biometric information and criminal record of a data subject.

1. Policy Scope

1.1 Purpose of the Policy

The purpose of this document is to outline the policy ("Policy") on the Protection of Personal Information Act (hereinafter referred to as "PoPIA") for DRDGOLD. DRDGOLD Group is committed to the highest legal, ethical, and moral standards

The Protection of Personal Information Act is South Africa's data protection law enacted in 2013. It will come into effect in its entirety, by presidential proclamation. It regulates how anyone who processes personal information must handle, keep, and secure this personal information. PoPIA makes provision for what is called 'special person information' such as religious beliefs, trade union membership persuasion etc. There is a general prohibition on the processing of special personal information unless explicit prior consent is obtained.

PoPIA impacts on any personal information that is being gathered by companies. It clearly outlines:

- The manner in which information should be stored;
- What care should be taken in dealing with that information;
- When that information has to be purged; and
- Allows for no deviation from these rules.

The purpose of PoPIA is to protect personal information, to strike a balance between the right to privacy and the need for the free flow of, and access to information, and to regulate how personal information is processed.

1.2 Objectives of the Policy

The Policy establishes a general standard on the appropriate protection of personal information within DRDGOLD. It provides the principles regarding the right of individuals to privacy and to reasonable safeguards of their personal information. It gives effect to the right to privacy in terms of the South African common law, section 14 of the Constitution and the purpose and application of the Protection of Personal Information Act, No 4 of 2013. It gives effect to the constitutional right to privacy by safeguarding personal information when processed by a responsible third-party and it regulates the manner in which personal information may be processed, by establishing conditions, in harmony with international standards that prescribe the minimum threshold requirements for the lawful processing of personal information.

The Policy further provides persons with rights, responsibilities, and remedies to protect their personal information from processing that is not in accordance with the Act and communicate DRDGOLD's commitment to data protection.

Furthermore, the Policy ensure that DRDGOLD complies with the law in respect of the data DRDGOLD holds on behalf of clients and employees and protects DRDGOLD from the consequences of a breach of its responsibilities.

1.3 Availability of the Policy

The Policy is available to all Employees and can be accessed on DRDGOLD's intranet. It is the responsibility of each Manager to ensure that the Policy is available to all Employees who report to them.

2. Policy Governance

2.1 Roles and Responsibilities

Board of Directors

The board of directors (the "Board") is ultimately responsible for ensuring that all financial, reputational, and other risks are appropriately managed ("Risk Management") and for ensuring that the requisite systems, practices, and culture are in place for Risk Management. The Board is also ultimately responsible for ensuring that DRDGOLD complies with all applicable laws and regulations ("Compliance"). The Board may delegate Risk Management and Compliance to individuals, committees, consultants, but the ultimate responsibility still vests with the Board.

Information Officer

The Group Company Secretary has been duly appointed as the Information Officer by the Chief Executive Officer, to act as the person to whom requests for access to information must be made in terms of the Act.

Management

Management is responsible for publishing, enforcing, regularly reviewing and, where necessary, updating the Policy.

Employees

Employees are expected to comply with DRDGOLD's obligations under DRDGOLD's protection of information and data security framework (including all internal rules and policies adopted under such framework) as well as with any additional controls, processes and procedures that may be implemented by the Information Officer and management. All employees have a responsibility for the management and lawful processing of personal information.

Internal Audit

Internal Audit will conduct, as a minimum, annual reviews of this Policy and DRDGOLD's Risk Management and Compliance in general and will provide reports to DRDGOLD on the adequacy of the Policy and Risk Management and Compliance.

Internal Audit is responsible for:

(i) assessing DRDGOLD's internal business management and control processes and the extent to which Remedial Action has been implemented; and

(ii) for reporting thereon to the Board.

2.2 Policy Review

The Policy will be reviewed on an annual basis considering any changes in Compliance and the DRDGOLD's operational requirements.

2.3 Ownership of Policy

Ownership of the Policy will be vested in the CEO.

2.4 Approval of Policy

The Policy and any amendments from time to time must be approved by the Audit and Risk Committee for recommendation and approval by the Board.

2.5 Related Group Policies

The policy is supported by the following policies:

- PAIA Manual
- Whistleblowing Policy

3. Policy Statement

DRDGOLD respects and recognises the importance of protecting the privacy and data of its employees, clients, members, and all external clients. The right of privacy is enshrined in the South African Constitution which expressly states that everyone has the right to privacy. The legislation contained in PoPIA is aimed at facilitating the protection of this important right.

DRDGOLD has identified a need to create consistent standards and rules within the workspace. For this reason, DRDGOLD will implement policies addressing the protection of its people's personal information and data.

4. Types of Records

- Attendance and training registers
- Correspondence
- Founding documents
- Licences (categories)
- Minutes of meetings
- Statutory returns

- Conditions of service
- Employment contracts
- Information relating to health and safety regulations
- Pension and provident fund records
- Performance appraisals and remuneration records
- Personnel guidelines, policies, and procedures
- Skills requirements
- Staff recruitment policies
- Training Records
- Marketing and future strategies
- Annual financial statements.

5. Types of Information to be protected

Section 26 of PoPIA creates a special category of personal information called “special personal information”. This relates to religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life or biometric information. Also included in this category is information relating to the alleged commission of any offence or any proceedings in respect of any offence allegedly committed and the outcome of such proceedings.

Failure to obtain consent makes processing this special personal information strictly prohibited, unless,

- it is necessary by law;
- or is done for historical, statistical or research purposes;
- or the information has been deliberately made public by the subject.

Therefore, the following information needs to be strictly protected at all times by DRDGOLD

- Identity and / or passport number
- Date of birth and age
- Phone number(s) and email address(es)
- Physical address
- Gender, race, and ethnic origin
- Marital / relationship status and family relations
- Criminal record
- Private correspondence
- Employment history and financial information
- Biometric information

6. Use of Personal Information

DRDGOLD may use the data subject’s personal information to:

- Respond to queries;
- Verify client identification;
- Render services;
- Payment of accounts.

7. Disclosure of Personal Information

7.1 DRDGOLD is not in the business of selling personal information and therefore we will not disclose any personal information and data to anyone except as provided in this Policy.

7.2 We may for administration purposes disclose or transfer personal information to our clients.

7.3 It may be necessary for us to disclose or transfer personal information to suppliers, affiliates, partners, or agents in order to serve our clients and to provide our members with quality service.

7.4 We will need to disclose personal information to our employees who require it to do their jobs. We make sure they are aware of and take their confidentiality obligations seriously. They are contractually bound to keep all confidential information confidential.

7.5 There may be situations where the law requires us to disclose personal information and data. In all other situations, we will not disclose personal information without notifying the data subject or the relevant parties and enabling owners of the personal information into object and consent.

8. Security of Personal Information

8.1 DRDGOLD undertakes all reasonable and appropriate measures to secure personal information. We encrypt our laptops and our phones. However, it is important to highlight that to ensure absolute security of it we shall back-up all personal information and data on a regular basis.

8.2 We are also legally obliged to provide adequate protection for the Personal Information and to stop unauthorised access and use of personal information.

8.3 Our security policies and procedures cover:

- Physical security
- Access to personal information
- Secure communications
- Monitoring access and usage of personal information
- Computer and network security
- Security in contracting out activities and functions

- Governance and regulatory issues

8.4 When we contract with third parties, we impose appropriate security, privacy, and confidentiality obligations on them to ensure that personal information we remain responsible for is kept secure.

8.5 The discipline of Information Security aims to protect the:

- Confidentiality of information, by ensuring that information is accessible only to those authorised to have access to the information;
- Integrity of information, by safeguarding the accuracy and completeness of information; and
- Availability of information, by ensuring that authorised users have access to information and information systems required to process information, as and when needed.

9. Revision and Review

Date of Revision:	March 2022
Reason for Revision:	New Policy
Review Cycle:	This policy and underlying principles will be reviewed annually by the Board, to ensure its continued application and relevance.

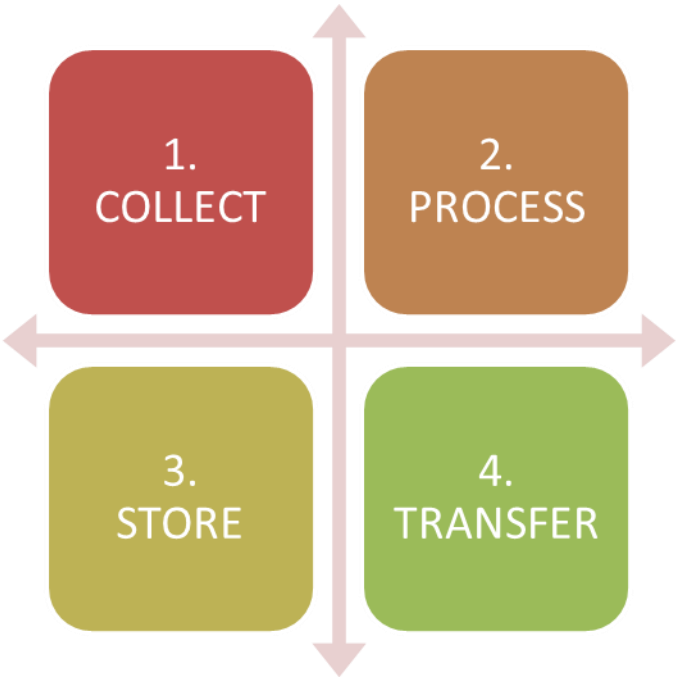
10. Attachments

Appendix A: PoPI Guidelines

“APPENDIX A”
POPI GUIDELINES

1. The PoPI Framework

The protection of personal information framework occurs at both an organisational level (top-down) and business unit level (bottom-up). It comprises the following steps:



STEP 1: COLLECT

- The first relevant area concerns the collection of personal information.
- Data collection is the process of gathering and measuring information.
- Under PoPIA, such information may only be collected for the specific purpose of providing services to a particular subject.
- A specific new obligation created by PoPIA is that once personal information has been collected from another source, DRDGOLD will take reasonable steps to inform the data subject of this, together with the source of the information and the purpose for which it has been collected.
- This processing requires one to answer relevant questions and evaluate outcomes.
- The process of collecting data information includes:
    - Identifying issues and/or opportunities for collecting data;

- Defining the purpose for collection the data; and
- Analysing and interpreting the data.

STEP 2: PROCESS

Personal information can only be processed:

- With the consent of the “data subject”;
- If it is necessary for the conclusion or performance of a contract to which the “data subject” is a party;
- It is required by law;
- It protects a legitimate interest of the “data subject”;
- It is necessary to pursue your legitimate interests or the interest of a third party to whom the information is supplied; and
- Any operation, or activity, or set of operations (whether or not by automatic means).

Processing information includes:

Collection, receipt, recording, organisation, collation, storage, updating, modification, retrieval, alteration, consultation, or use; dissemination by means of transmission, distribution or making available in any other form; or merging, linking, as well as restriction, erasure, or destruction.

STEP 3: STORE

- This element covers the processing and storing of information, the duration of storage, and the need to inform data subjects that their information is being stored.
- Whenever DRDGOLD establishes a business relationship or concludes a transaction with a client, whether the transaction is a single transaction or concluded in the course of a business relationship which DRDGOLD has with the client, DRDGOLD must keep record of this information.
- DRDGOLD must keep records of the business relationship, for at least five years from the date on which the business relationship is terminated.
- When concluding a transaction, records must be kept for at least five years from the date on which that transaction is concluded.

STEP 4: TRANSFER

- PoPIA makes provision for transfers and applies to the distribution of personal information to third parties who process (collect, store, use or destroy) such information on behalf of DRDGOLD.

- Data transfers are a daily business requirement when transferring personal information.

- Such transfers should take place only where absolutely necessary and employing the most secure channel available.

- To support this, all DRDGOLD employees must adhere to the following: -

    - Data transfers should, where possible, only take place via secure on-line channels where the data is encrypted.

    - Strong passwords must be used to protect the data during transfer. Such passwords must not be sent with the data it is intended to protect. Care should be taken to ensure that the password is sent securely to the intended recipient and that it is not disclosed to any other person.

    - Standard email should never be used to transmit any personal data. Where file encryption or the use of a secure email facility which will encrypt the data (including any attachments) is sent, staff must still ensure that the mail is sent only to the intended recipient.

2. RECORDING INFORMATION

Regardless of when the record came into existence.

A “record” means:

- Any recorded information;
- Regardless of form or medium;
- In the possession or under the control of the private body; and
- Whether or not it was created by the private body.

A record in the possession or under the control of an independent contractor engaged by a private body is regarded as being a record of that private body.

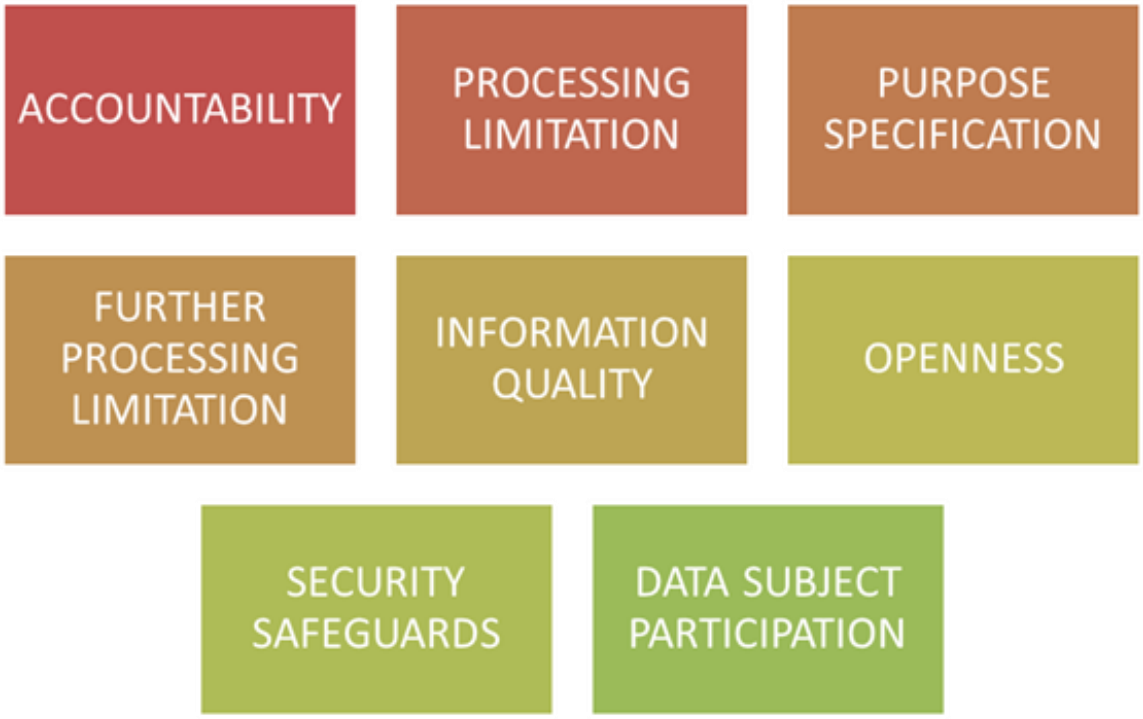
3. TRANS-BORDER FLOWS OF PERSONAL INFORMATION

- PoPIA focusses on the location of processing rather than the location of the data subject.

- Section 72 of PoPIA deals with transfers of personal information outside South Africa or trans-border information flows. A responsible party may not transfer personal information about a data subject to a third party who is in a foreign country unless certain protections are in place. For example, if:

  - the foreign country has a law that provides adequate protection;
  - there are binding corporate rules that provide adequate protection;
  - there is an agreement between the sender and the receiver that provides adequate protection;
  - the data subject consents to their personal information being so transferred; or
  - the transfer is necessary for the responsible party to perform in terms of a contract.
  - In light of the above, DRDGOLD must ensure that one or more of the appropriate aforementioned actions have been taken and the applicable measures have been put in place to ensure compliance with PoPIA in the event that it is required to participate in a cross-border transfer of personal information for a beneficiary.

8 (Eight) Conditions for Lawful Processing of Personal Information



1. ACCOUNTABILITY

1.1 DRDGOLD will ensure that all the principles contained in PoPIA and all the measures that give effect to these principles are complied with when:

- Deciding the purpose of processing personal information;
- Deciding how the processing will be done; and
- While the information is being processed.

1.2 DRDGOLD will appoint personnel and task them with the responsibility of compliance.

1.3 This individual will be held liable for non-compliance in certain situations regarding breaches of personal information of data subjects.

2. PROCESSING LIMITATION

2.1 The processing of information must be lawful and in a reasonable manner that does not infringe the privacy of the data subject.

2.2 Information may only be processed if it is adequate, relevant, and not excessive.

2.3 Must have been consented to and collected directly from the subject (subject to provisions).

2.4 The processing of information must be justified on the basis of one or more of a number of particular reasons, including the fact that the processing:

- Is necessary for performing a contract;
- Complies with a legal obligation;
- Protects a legitimate interest of the data subject;
- Is necessary for the performance of a public law duty of a public body is necessary to pursue the 'legitimate interests' of those to whom the information is supplied; and
- If a data subject has objected to the processing of personal information; DRDGOLD may no longer process the personal information and consent may be withdrawn at any time.

2.5 Personal information must be collected directly from the data subject except in certain circumstances, for instance where the information is already available in a public record or where there is consent to collect the information from another source.

3. PURPOSE SPECIFICATION

3.1 DRDGOLD will take steps to ensure that the data subject knows the purpose for which the data is being collected.

3.2 That the information is collected for a specific and explicitly defined and lawful purpose – related to the activity or function of DRDGOLD.

3.3 Records must not be detained for longer than necessary.

4. FURTHER PROCESSING LIMITATION

4.1 Personal information may not be processed for a secondary purpose unless that processing is compatible with the original purpose.

4.2 DRDGOLD will ensure that secondary processing is aligned with the original intent.

4.3 It will be in accordance with the purpose for which it was collected.

4.4 DRDGOLD will put in place an assessment of further processing.

4.5 DRDGOLD must take account of the relationship between purpose of intended further processing and the initial purpose of collection.

4.6 In the absence of specific consent for further use DRDGOLD will only use the personal information if it is compatible with or in accordance with the purpose for which it was collected.

4.7 Further processing of personal information must be in accordance or compatible with the purpose for which it was collected in the first place.

4.8 DRDGOLD will take account of:

- The relationship between the purpose of the intended further processing and the purpose for which the information has been collected;
- The nature of the information concerned;
- The consequences of the intended further processing for the data subject;
- The manner in which the information has been collected; and
- Any contractual rights and obligations between the parties.

5. INFORMATION QUALITY

5.1 DRDGOLD has the responsibility to take reasonably practicable steps to ensure information is complete, accurate and not misleading.

5.2 It must be updated where necessary and consider the purpose for which collected.

5.3 It will ensure that the information is reliable all the time.

5.4 It will have processes in places to ensure that all clients, data subjects and employees are able to update their personal information.

6. OPENNESS

6.1 There are a number of requirements which DRDGOLD must meet when personal information is collected from a data subject and there are also reasons for non-compliance with this condition.

6.2 This includes that DRDGOLD must take reasonably practicable steps to ensure that the data subject is aware of the fact that the information is being collected and where the information is not collected from the data subject, the source from which it is collected.

6.3 DRDGOLD will maintain the documentation of all processing operations under its responsibility.

6.4 DRDGOLD take reasonably practicable steps to ensure that the data subject is aware of:

- The information being collected or the source from which it is collected;
- The name and address of the responsible party;
- The purpose for which the information is being collected;
- Whether or not the supply of the information is voluntary or mandatory; and
- The consequences of failure to provide the information.

7. SECURITY SAFEGUARDS

7.1 DRDGOLD has a duty to secure the integrity and confidentiality of personal information in its possession or under its control.

7.2 Where there are reasonable grounds to believe personal information has been accessed by an unauthorized person, DRDGOLD will:

- Notify the Regulator;
- Notify the data subject; and
- Take reasonable technical and organisational measures to prevent loss of, damage, unlawful access, or unauthorised destruction.

7.3 This includes risk management and steps to identify threats.

7.4 The regulator and subject must be informed if there has been or a reasonable expectation of a breach of security.

8. DATA SUBJECT PARTICIPATION

8.1 A data subject, with adequate proof of identity has the right to request DRDGOLD to confirm, free of charge, whether they hold personal information of the subject.

8.2 Data subject may request the correction or deletion of personal information that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, or obtained unlawfully.

8.3 Enquire – free of charge - whether their personal information being processed.

8.4 Request description of their personal information.

8.5 Request information on recipients of their personal information.

8.6 Challenge the accuracy of personal information.

8.7 Request correction of information (if inaccurate, irrelevant, excessive, out of date, incomplete, misleading, or obtained unlawfully).