

## RODE PRIVACY POLICY

Date of last review: 1 April 2026

Version 1.00

### IMPORTANT NOTICE

This Privacy Policy forms part of and is incorporated by reference into the terms and conditions of and applicable to:

- the websites, <http://www.rodedia.co.za>, [www.rhode-intel.com](http://www.rhode-intel.com) and/or such other mirrored mobisite or application forming part of or attached to this website (collectively referred to as “**the Rode virtual platforms**”); and
- the Rode Subscription Licence Agreement.

Please read Rode’s virtual platforms terms and conditions and the terms and conditions of this Privacy Policy carefully, as your use of the Rode virtual platforms will signal that you have read and agreed to those and these terms and conditions. If you do not accept either those or these terms and conditions, then you are to immediately cease using the Rode virtual platforms, failing which you will be deemed to have agreed to have accepted those and these terms and conditions.

Please note that Rode cannot, despite its safeguards and security, guarantee the security of any personal information that you disclose on the internet or online. As such, Rode will not be liable for any loss, damages or injury that you may suffer or incur as a result of any unintentional disclosure of your personal information to any unauthorised person or otherwise.

The terms and conditions of this Privacy Policy are subject to the mandatory and unalterable provisions of, amongst others, the CPA, the ECT Act, PoPI, and the Constitution of the Republic of South Africa.

### DEFINITIONS AND INTERPRETATION

Words and/or terms defined in the Rode virtual platforms’ terms and conditions will have the same meanings in this Privacy Policy’s terms and conditions. In addition thereto, references to the word or term:

- “**personal information**” means information relating to an identifiable, living, natural person and where it is applicable, identifiable, existing juristic person, including all information as defined in the South African Protection of Personal Information Act, 2013 (Act No. 4 of 2013), as amended (“**PoPI**”). When referenced to you, it means all information specific to you, that identifies you, provided by you or Rode over the internet.
- “**process**” or “**processing**” or “**processed**” or words of similar nature or meaning, means the creation, generation, communication, storage, and/or destruction of personal information as more fully defined in PoPI.
- “**you**” or the “**user**” means you, the person who uses the Rode virtual platforms, for any purpose.



## STATUS

Rode respects your privacy and will take reasonable measures to protect it, as more fully detailed below.

This Privacy Policy sets out Rode's information gathering and dissemination practices on and in respect of the Rode virtual platforms.

This Privacy Policy governs the processing of personal information provided to Rode through you using of the Rode virtual platforms.

## AMENDMENTS

Rode may amend this Privacy Policy from time to time:

- to comply with changes in the law;
- to correct mistakes;
- to improve the clarity and effectiveness of this Privacy Policy;
- to update the Privacy Policy for new services, products and/or publications;
- to accommodate the introduction of new systems, system upgrades, and changes in methods of operation; and
- for any other purpose Rode, in its sole discretion, may deem necessary.

The latest version of the Privacy Policy's terms and conditions, from time to time, will:

- be effective from the date on which they are posted; and
- apply at the time as and when you use the Rode virtual platforms, as you are hereby deemed to accept such new terms and conditions if you continue to use the Rode virtual platforms.

It is your duty to remain appraised of the prevailing or current version of this Privacy Policy from time to time, as the then prevailing version will apply from time to time.

A certificate signed by the administrator of the Rode virtual platforms is *prima facie* proof (meaning in the absence of proof to the contrary) of the date and content of the latest and any previous versions of these terms and conditions.

## WHY WOULD RODE COLLECT YOUR PERSONAL INFORMATION

Rode will use your personal information only as appropriate in the normal course of business. Your personal information will be collected essentially for the following reasons:

- to identify you;
- for Rode to process your instructions;
- to manage any transaction or contract you may have with Rode;
- to comply with the laws of the Republic of South Africa;
- to detect fraud; and/or
- for direct marketing to you via e-mail, mobile phone or telephone.



Rode does not permit the selling or providing of personal information to third parties for independent use or commercial gain. Rode may share your personal information with its business partners or affiliated companies if that information is required to provide you with the services, products and/or publications requested by you. This includes, but is not limited to information necessary for hosting, billing, support and/or legal compliance.

## REGISTRATION

Should you be required, at any time, to register on the Rode virtual platforms, for a service, product, publication or otherwise, you may be required or obliged to provide Rode with the following personal information:

- first name and surname;
- date of birth or age;
- email address;
- physical address;
- contact telephone or mobile / cellular number; and/or
- username and password.

If you represent a juristic person (being the corporate entity (company or close corporation), association, partnership, trust, organ of state or government department, as the case may be) you will be required to likewise provide information akin to personal information, such as your name, status, reference, registration and/or VAT number, representative, contact and billing details.

In addition to the above, Rode may be required, in the ordinary course of doing business with you or by law, to request or keep the following information:

- bank account details;
- tax information;
- records of correspondence;
- details of transactions or subscriptions; and
- biometric information, such as fingerprints, voiceprints and images or photographs.

Should that information change, you are requested to update such information as soon as reasonably possible to enable Rode to update its records.

You may choose to provide additional personal information to Rode, in which event you agree to provide accurate and current information, and not to impersonate or misrepresent any person or entity or falsely state or otherwise misrepresent your affiliation with anyone or anything.

## PROCESSING OF PERSONAL INFORMATION

### Important:

By providing or submitting your personal information to Rode you acknowledge that it has been collected directly from you and consent to and authorise its processing by Rode.



Please do not provide or submit any personal information to Rode if you do not agree to any of these terms and conditions.

If you do not consent to these terms and conditions or any part thereof, Rode may not be able to provide you with its services, products and/or publications.

Where you submit personal information (such as your name, address, telephone number and email address etc.) via the Rode virtual platforms (e.g. through completing any online form or registration) the following principles will be observed in the processing of that information:

- Rode will only collect personal information for a purpose consistent with the purpose for which it is required, which will be apparent from the context in which it is requested;
- Rode will only process personal information in a manner that is adequate, relevant and not excessive in the context of the purpose for which it is processed;
- personal information will only be processed for a purpose compatible with that for which it was collected, unless you have agreed to an alternative purpose in writing or Rode is permitted or obliged in terms of legislation of general application dealing primarily with the protection of personal information;
- Rode will keep records of all personal information collected and the specific purpose for which it was collected for a period of 12 (twelve) months from the date on which it was last used, save where otherwise required by law;
- Rode will not disclose any of your personal information to any third party without your prior written agreement or Rode is required to do so in law;
- if personal information is released with your consent Rode will retain a record of the information released, the third party to which it was released, the reason for the release and the date of release, for a period of 12 (twelve) months from the date on which it was last used; and/or
- Rode will destroy or delete any personal information that is no longer needed by Rode for the purpose it was initially collected, or subsequently processed.

As permitted by the ECT Act, Rode hereby advises that it may use your personal information, so collected, towards the compiling of profiles for statistical purposes. The information contained in the profiles or statistics will not be able to be linked back to any specific user. In other words, it is deidentified or anonymised data and statistics.

## **ECT ACT**

Rode subscribes to the principles of collecting personal information electronically as provided for in section 51 of the ECT Act.

## **COLLECTION OF ANONYMOUS DATA**

Rode may use standard technology to collect information about the use of the Rode virtual platforms, but which will only be for the collection of statistical data.

Rode may utilise temporary or session cookies to keep track of users' browsing habits. It is important that it be brought to your attention that a "cookie" is a small file that is transferred or downloaded onto the



hard drive of your computer in order to keep a record of your interaction with the Rode virtual platforms and facilitate your convenience. Cookies, by themselves, will not be used to identify a user, but may be used to compile deidentified or anonymised statistics relating to the use of services, products, publications or goods offered by or through Rode or to provide Rode with feedback on the use, efficiency and/or performance of the Rode virtual platforms and its services, products and/or publications.

The following types of information may be collected if you have enabled cookies:

- the browser software used;
- Internet Protocol address;
- the date and time of activities while visiting the Rode virtual platform;
- the URLs or uniform resource locator of internal pages; and/or
- referrers.

It is possible to opt out and/or alter the manner in which your browser handles cookies. Please note that, if this is done, certain services, products, publications or links on the Rode virtual platforms may not be available.

(Please refer Cookie Policy below)

## **SECURITY**

Rode takes reasonable measures to ensure the security and integrity of information submitted to or collected by the Rode virtual platforms, but cannot, under any circumstances, be held liable for any loss or other damage sustained by you as a result of unlawful access to or dissemination of any personal information by a third party.

## **LINKS TO OTHER WEBSITES**

Rode has no control over and accepts no responsibility or liability for the privacy practices of any third party website or mobisite to which hyperlinks may have been provided.

Rode urges you to review the privacy policy of every website or mobisite you visit before using it.

## **CHILDREN'S PRIVACY**

If you are a parent or guardian and you are aware that your child has provided Rode with personal information, please contact Rode. If Rode becomes aware that it may have collected personal information from anyone under the age of 18 (eighteen) without verification of parental consent, Rode will take steps to remove that information from its servers. If Rode needs to rely on consent as a legal basis for processing your information and your country requires consent from a parent, Rode will have the right and may require your parent's consent before it collects and uses that information.

## **COOKIE POLICY**

A cookie is a small piece of data sent from the Rode virtual platform or applications to your computer or device hard drive or Internet browser where it is saved. The cookie contains information to personalise

your experience on a website, mobisite or applications and may improve your experience on the Rode virtual platform or applications. The cookie will also identify your device, whether it be a computer or smart phone.

By using a Rode virtual platform or application you agree that cookies may be forwarded from the relevant Rode virtual platform or application to your computer or device. The cookie will enable Rode to know that you have visited the Rode virtual platform or application before and will identify you. Rode associates, cessionaries, delegates, assigns, affiliates or successors in title and/or appointed third parties (like its authorised agents, partners, contractors and suppliers) may also use a cookie to prevent fraud and for analytics.

## QUERIES AND COMPLAINTS

If you have any queries or complaints about this Privacy Policy and the Cookie Policy, please contact Rode by emailing it on: [info@rodemedia.co.za](mailto:info@rodemedia.co.za).

If you are not satisfied with the outcome of any query or complaint, you have a right to lodge a complaint with the Information Regulator, on the below contact details:

- **POPIA Complaints (Privacy):** [POPIAComplaints@inforegulator.org.za](mailto:POPIAComplaints@inforegulator.org.za)
- **PAIA Complaints (Access to Information):** [PAIAComplaints@inforegulator.org.za](mailto:PAIAComplaints@inforegulator.org.za)
- **General Helpline:** 010 023 5200
- **Toll-Free Number:** 0800 017 160
- **Email for General Enquiries:** [enquiries@inforegulator.org.za](mailto:enquiries@inforegulator.org.za)
- **Physical Address:** Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191
- **eServices/iSupport Portal:** <https://eservices.inforegulator.org.za/Contact.aspx>

## POPI

The following statements are made to comply with PoPI.

### Introduction

In addition to the above, where reference is made to “process”, it means how Rode collects, uses, stores, makes available, destroys, updates, discloses, or otherwise deals with personal information. As a general rule, Rode will only process this personal information if it is required to deliver or offer a service, provide a product, carry out a transaction or obligation in a contract.

Rode may combine this personal information and use the combined personal information for any of the purposes stated above.

If you use Rode’s other services, products and/or publications you agree that Rode may process this personal information.

By using the Rode virtual platforms you provide Rode with consent to process this personal information.

Rode is considered a global organisation operating and trading ostensibly in the Republic of South Africa and, as such, this Privacy Policy will apply to the processing of personal information of any natural person globally.

If Rode processes personal information for another party under a contract or a mandate, the other party's privacy policy will apply to the processing of such information.

This Privacy Policy establishes a general standard for the appropriate protection of personal information within Rode's environment, whilst also acknowledging the rights of individuals to privacy and to reasonable safeguards of their personal information.

## **Scope**

All of Rode's employees, contractors, consultants, temporary and other workers, including all personnel affiliated with third parties should adhere to this Privacy Policy. The Privacy Policy applies to information, assets owned or leased by Rode, or to devices that connect to Rode's network or reside at its offices.

## **Policy Statement**

### ***What is personal information?***

In addition to the abovestated definition, personal information refers to any information that identifies you or specifically relates to you, or Rode's employees, as the case may be, that is processed. Personal information includes, but is not limited to, the following information about you and/or Rode's employees, as the case may be:

- Marital status
- National origin
- Age
- Language
- Birth place
- Education
- Relevant financial history
- Identifying number (like an employee number, identity number or passport number)
- E-mail address
- Physical address (like residential address, work address or your physical location)
- Telephone number
- Biometric information (like fingerprints, signature or voice)
- Race, gender, sex, pregnancy status, ethnic origin, social origin, colour, or sexual orientation
- Physical health, mental health, well-being, disability, religion, beliefs, conscience, or culture
- Medical history, criminal history, or employment history
- Personal views, preferences and opinions

- Another's views or opinions about you
- Full names and initials.

***When will Rode process your personal information?***

Rode will only process personal information for lawful purposes relating to its business if the following applies:

- If you have consented thereto;
- If a person legally authorised by you, the law or a court, has consented thereto;
- If it is necessary to conclude or perform under a contract Rode has with you;
- If the law requires or permits it; and/or
- If it is required to protect or pursue your, Rode's or a third party's legitimate interest.

***What is special personal information?***

Special personal information is personal information about the following:

- Race (where reports to the Department of Labour for statistical information is required);
- Ethnic origin;
- Trade union membership;
- Health (for an insurance policy);
- Biometric information (to verify identity); and/or
- Criminal behaviour and alleged commission of an offense.

***When will Rode process your special personal information?***

Rode may process your special personal information in the following circumstances:

- If you have consented to the processing;
- If the information is being used for any Human Resource or payroll related requirement;
- If the processing is needed to create, use or protect a right or obligation in law;
- If the processing is for statistical or research purposes and all legal conditions are met;
- If the special personal information was made public by you; and
- If the processing is required by law.

***When and from where Rode obtains personal information about you?***

- Rode collects personal information from you directly.
- Rode may collect personal information from a public record or if you have deliberately made the information public.
- Rode may collect personal information from third parties that are directly integrated with the Rode virtual platforms' software.

- Rode may collect information about you based on your use of its services, products and/or publications.
- Rode may collect information about you based on how you engage or interact with Rode, such as via emails, letters, telephone calls and surveys.
- Rode may collect personal information from completed forms, such as contact and billing information - If the law requires Rode to do so, it will ask for your consent before collecting personal information. The third parties from whom Rode may collect your personal information include, but are not limited to, the following:
  - Rode's partners, affiliates and associates, as well as other bureau or channel partners or connected companies, subsidiary companies, cessionaries, delegates, assigns, or successors in title and/or appointed third parties (like its authorised agents, partners, contractors and suppliers) for any of the purposes identified in this Privacy Policy;
  - your employer and fellow employees or you directly;
  - your spouse, dependents, partners, and other similar sources;
  - people you have been authorised to share your personal information, like a person that makes a travel booking on your behalf or a medical practitioner for insurance purposes;
  - attorneys, tracing agents, debt collectors and other persons that assist with the enforcement of agreements;
  - payment processing services providers, merchants, banks and other persons that assist with the processing of your payment instructions, like Electronic Fund Transfer transaction partners;
  - insurers, brokers, other financial institutions or other organisations that assist with insurance and assurance underwriting, the providing of insurance and assurance policies and products, the assessment of insurance and assurance claims and other related purposes;
  - law enforcement and fraud prevention agencies and other persons tasked with the prevention and prosecution of crime;
  - regulatory authorities, industry ombudsman, governmental departments, local and international tax authorities;
  - trustees, executors or curators appointed by a court of law or otherwise in accordance with the law;
  - Rode's service providers, agents and sub-contractors, like internet service providers, the internet, couriers and other persons it uses to offer and provide information, data, services, products and /or publications to you; and/or
  - courts of law or tribunals.

***What are the reasons Rode needs to process your personal information?***

Rode may need to process your personal information for the following reasons:

- to provide you with information, data, services, products, publications and/or goods;
- to market our services, products, publications and goods to you;

- to respond to your enquiries and complaints;
- to comply with legislative, regulatory, risk and compliance requirements (including directives, sanctions and rules), voluntary and involuntary codes of conduct and industry agreements or to fulfil reporting requirements and information requests;
- to conduct market and behavioural research, including scoring and analysis to determine if you qualify for products and services or to determine your credit or insurance risk;
- to develop, test and improve products, services and/or publications for you;
- for historical, statistical and research purposes, like market segmentation;
- to process payment instruments;
- to create, manufacture and print payment advice;
- to enable us to deliver services, products, publications, goods, documents or notices to you;
- for security, identity verification and to check the accuracy of your personal information;
- to communicate with you and carry out your instructions and requests;
- for customer satisfaction surveys and promotional offerings;
- to enable you to take part in and make use of value-added services and products;
- to assess any and all risks; and/or
- for any other related purposes.

***How will Rode use your personal information for marketing purposes?***

Rode may use your personal information to market its services, as well as related services and products.

Rode may also market non-banking or non-financial products, goods or services to you.

Rode will do this in person, by post, telephone, or electronic channels such as SMS, WhatsApp and email.

If you are not a customer or client, or in any other instances where the law requires, Rode will only market to you by electronic communications with your consent.

In all cases, you can request Rode to stop sending marketing communications to you at any time.

***When, how and with whom may Rode share your personal information?***

In general, Rode will only share your personal information if any one or more of the following apply:

- If you have consented to this;
- If it is necessary to conclude or perform under a contract Rode has with you;
- If the law requires it;
- If it's necessary to protect or pursue your, Rode's or a third party's legitimate interest. Where required, each shareholder of Rode may share your personal information with the following persons, who, together with its and their associates, cessionaries, delegates, assigns, affiliates or successors in title and/or appointed third parties (like its authorised agents, partners, contractors and suppliers) have an obligation to keep your personal information secure and confidential –

- Rode's employees, as required by their employment conditions;
- Attorneys, tracing agents, debt collectors and other persons that assist with the enforcement of agreements;
- Payment processing services providers, merchants, banks and other persons that assist with the processing of your payment instructions, like third party Electronic Fund Transfer service providers;
- Law enforcement and fraud prevention agencies and other persons tasked with the prevention and prosecution of crime;
- Regulatory authorities, industry ombudsmen, governmental departments, local and international tax authorities and other persons the law requires us to share your personal information with;
- Service providers, agents and sub-contractors like couriers and other persons Rode uses to offer and provide services, products and goods to you;
- Persons to whom Rode has transferred or ceded its rights or delegated its obligations to under agreements, such as the sale of a business;
- Courts of law or tribunals that require the personal information to adjudicate referrals, arbitrations, actions or applications;
- Trustees, Executors or Curators appointed by a court of law or in accordance with the law;
- Participating partners in customer loyalty reward programmes, where you purchase goods, products and services or spend loyalty rewards; and/or
- Rode's joint venture and other partners with whom it has concluded business agreements, for your benefit.

***Under what circumstances may Rode transfer your personal or other information to other countries?***

Rode will only transfer your Personal Information to third parties in another country in any one or more of the following circumstances:

- Where your personal information will be adequately protected under the other country's laws or an agreement with the third party recipient;
- Where the transfer is necessary to enter into or perform under a contract with you, or a contract with a third party that is in your interest;
- Where you have consented to the transfer; or
- Where it is not reasonably practical to obtain your consent, the transfer is in your interest. This transfer will take place within the requirements and safeguards of the prevailing law. Where possible, the party processing your personal information (in the other country) will agree to apply the same level of protection as available by law in South Africa (if in South Africa) or your country of residence (if outside South Africa) or if the other country's laws provide better protection the other country's laws would be agreed to and applied. An example of transferring your personal information to another country is where foreign payments take place if you purchase goods or services in a foreign country, or request that Rode facilitates payments in those countries.

***What are your duties and rights about the personal information Rode has about you?***

- You must provide proof of identity when enforcing the rights;
- You must inform Rode when your personal information changes. Please refer to the South African Promotion of Access to Information Act, 2000 (Act No. 2 of 2000), as amended and Rode's Manual (PAIA Manual) for further information on how you can give effect to the rights listed below;
- You have the right to request access to the personal information Rode has on you by contacting Rode. This includes requesting:
  - Confirmation that Rode holds your personal information;
  - A copy or description of the record containing your personal information; and
  - The identity or categories of third parties who have had access to your personal information;
- Rode will attend to requests for access to personal information within a reasonable time;
- You may be required to pay a reasonable fee to receive copies or descriptions of records, or information about third parties;
- Rode will inform you of the fee before attending to your request;
- Please note that the law may limit your right to access information;
- You have the right to request Rode to correct or delete the personal information Rode has about you if it is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, obtained unlawfully or Rode is no longer authorised to keep it;
- You must inform Rode of your request in writing. Please refer to Rode's PAIA Manual for further information in this regard, in particular, the process you should follow to give effect to this right;
- It may take up to 15 (fifteen) business days for the change to reflect on the applicable system;
- Rode has the right, but not the obligation, to request documents from you to verify the change in personal information;
- A specific agreement that you have entered into with Rode may determine how you must change your personal information provided at the time when you entered into the specific agreement;
- If the law requires Rode to keep the personal information, it will not be deleted upon your request. The deletion of certain personal information may lead to the termination of your relationship with Rode;
- You may object on reasonable grounds to the processing of your personal information;
- Rode will not be able to give effect to your objection if the processing of your personal information was and is permitted by law; you have provided consent to the processing and the processing was done according to your consent or the processing is necessary to conclude or perform under a contract with you;
- You must inform Rode of any objection in writing. Please refer to Rode's PAIA Manual for further information in this regard, for the process you should follow to give effect to this right;
- Where you have provided your consent for the processing of your personal information, you may withdraw your consent. If you withdraw your consent Rode may explain the consequences to you.

Rode may proceed to process your personal information even if you have withdrawn your consent if the law permits or requires it. It may take up to 15 (fifteen) business days for the change to reflect on the system, during this time Rode may still process your personal information.

- You have a right to file a complaint with Rode or any Regulator with jurisdiction about an alleged contravention of the protection of your personal information. Rode will address your complaint as far as reasonably possible.

#### ***How will Rode secure your personal information?***

Rode will take appropriate and reasonable technical and organisational steps to protect your personal information according to industry best practices. The security measures (including physical, technological and procedural safeguards) will be appropriate and reasonable, and include the following:

- Keeping the system secure (like monitoring access and usage);
- Storing records securely;
- Controlling the access to buildings, systems and/or records;
- Safely destroying or deleting records; and/or
- Ensuring compliance with international security standards.

#### ***How long will Rode keep your personal information?***

Rode will keep your personal information, whichever is the later, for as long as:

- The law requires Rode to keep such information;
- A contract between you and Rode requires it to keep such information;
- You have consented to Rode keeping such information;
- Rode is required to keep such information to achieve the purposes listed in this Privacy Policy;
- Rode requires such information for statistical or research purposes;
- A code of conduct requires Rode to keep such information; and/or
- Rode requires such information for its lawful business purposes.

Note: Rode may keep your personal information even if you no longer have a relationship with it, for the historical data that may be required to be kept.