

MPOWER HOLDINGS (PTY) LTD

Procurement Processing Notice

Effective Date: 7 May 2026

1. Introduction

This Procurement Processing Notice ("Notice") explains how MPOWER HOLDINGS (PTY) LTD (Registration Number 2011/104748/07) ("MPower Holdings", "we", "us", or "our"), in its capacity as a holding company and on behalf of coordinated group procurement activities, collects, uses, and otherwise processes the personal information of suppliers, prospective suppliers, contractors, vendors, service providers, and their representatives (collectively, "Suppliers", "you", or "your").

This Notice is issued in accordance with the Protection of Personal Information Act, 4 of 2013 ("POPIA") and should be read together with our Privacy Policy. This Notice describes our processing in the procurement context. The Privacy Policy applies more broadly to all personal information that we process.

For the purposes of POPIA, MPower Holdings is the Responsible Party in respect of the personal information processed under this Notice. Where personal information is shared with a group company for the purposes of that group company's own procurement activities, the relevant group company will be a separate Responsible Party in respect of its own processing.

2. Personal Information We Collect

In the course of conducting procurement activities, evaluating prospective Suppliers, and managing supplier relationships at a group level, we may collect the following categories of personal information about you or your representatives:

2.1 Identification and Contact Information

- Full names and titles of contact persons, directors, and authorised signatories;
- Identity numbers, passport numbers, or other government-issued identifiers (where required for verification or compliance);
- Postal and physical addresses;
- Email addresses, telephone numbers, and other contact details.

2.2 Business and Corporate Information

- Trading name and registered name of the legal entity;
- Company registration number and registration documents;
- VAT registration number and tax clearance certificates;
- B-BBEE certificates and verification information;
- Information on shareholders, directors, beneficial owners, and key personnel;

- Industry sector, products, and services offered;
- Trade and business references.

2.3 Financial and Banking Information

- Bank account details for the processing of payments;
- Financial statements and creditworthiness information;
- Pricing, quotations, and payment terms;
- Invoice, credit note, and payment records.

2.4 Compliance and Due Diligence Information

- Information necessary to comply with anti-bribery, anti-corruption, sanctions screening, and anti-money laundering laws;
- Information regarding adverse media, criminal records, and litigation history (where lawful and proportionate);
- Health, safety, environmental, and quality certifications and policies;
- Insurance certificates and proof of coverage;
- Licences, permits, and registrations relevant to the supply of goods or services.

2.5 Operational Information

- Records of communications, meetings, and correspondence;
- Performance data, audit findings, and quality records;
- Records of site visits, including access logs and CCTV footage where applicable.

3. Sources of Personal Information

We collect personal information from the following sources:

- Directly from you or your representatives, for example through registration forms, requests for proposals, contracts, and ongoing communications;
- From publicly available sources such as government registries (e.g., the Companies and Intellectual Property Commission), regulator databases, and credible online sources;
- From credit bureaus, fraud prevention agencies, and sanctions-screening service providers;
- From our group companies, subsidiaries, and affiliated entities;
- From third-party references and introducers.

4. Purpose of Processing

We process Suppliers' personal information for the following purposes:

- To assess and onboard prospective Suppliers, including conducting due diligence, vetting, and risk assessments;

- To negotiate, conclude, perform, and manage contracts with Suppliers, whether on behalf of MPower Holdings or a group company;
- To coordinate group procurement, including consolidated purchasing arrangements and shared supplier panels;
- To process orders, deliveries, and payments;
- To manage day-to-day communications and the supplier relationship;
- To monitor, evaluate, and audit Supplier performance, quality, and compliance across the group;
- To comply with our legal, regulatory, contractual, and reporting obligations, including those relating to tax, financial reporting, B-BBEE, occupational health and safety, environmental management, and anti-bribery and anti-corruption;
- To prevent, detect, and investigate fraud, corruption, theft, and other unlawful conduct;
- To protect our rights, property, and the safety of our personnel and visitors;
- To establish, exercise, or defend legal claims;
- To maintain accurate records and for general business administration;
- For any other purpose with your consent or as permitted by law.

5. Lawful Basis for Processing

We process Suppliers' personal information on one or more of the following lawful bases as set out in POPIA:

- The processing is necessary for the conclusion or performance of a contract to which the Supplier (or the entity the Supplier represents) is a party;
- The processing complies with an obligation imposed by law on us;
- The processing protects a legitimate interest of the Data Subject;
- The processing is necessary for pursuing our legitimate interests, including the proper management of our supply chain, group procurement coordination, fraud prevention, and protection of our business; or
- The Data Subject has consented to the processing.

6. Disclosure of Personal Information

We may disclose Suppliers' personal information to the following categories of recipients:

- Members of our group of companies, subsidiaries, and affiliated entities, including for coordinated procurement, shared services, and consolidated supplier onboarding;
- Operators and service providers who process personal information on our behalf, including IT, hosting, accounting, banking, payment processing, logistics, vetting, and audit service providers;
- Professional advisors such as auditors, attorneys, accountants, and consultants;
- Banks and financial institutions for payment processing;

- Credit bureaus, sanctions-screening providers, and fraud prevention agencies;
- Regulatory and government authorities where required by law (including but not limited to the South African Revenue Service, the Department of Agriculture, Land Reform and Rural Development, and the B-BBEE Commission);
- Law enforcement agencies, courts, and tribunals where necessary to comply with legal obligations or to protect our rights;
- Prospective or actual purchasers in the event of a sale, merger, restructuring, or other business transaction.

We require all third parties who process personal information on our behalf to do so in accordance with appropriate written agreements that include obligations of confidentiality and security consistent with POPIA. Personal information shared with group companies is subject to intra-group data-sharing arrangements.

7. Cross-Border Transfers

Although MPower Holdings operates in South Africa, we make use of service providers (including cloud-based hosting, email, analytics, and productivity providers) whose infrastructure may be located outside of South Africa. As a result, your personal information may be transferred to, stored in, or processed in countries outside South Africa.

Such cross-border transfers will only be made where permitted by section 72 of POPIA, including where the recipient is subject to a law, binding corporate rules, or binding agreement that provides an adequate level of protection, or where the transfer is necessary for the performance of a contract or with your consent.

8. Information Security

We take appropriate, reasonable technical and organisational measures to safeguard personal information against loss, damage, unauthorised access, alteration, disclosure, and destruction. Suppliers are required to implement equivalent safeguards in respect of any personal information they receive from us in the course of providing goods or services.

9. Retention

We retain Suppliers' personal information for as long as is necessary to fulfil the purposes for which it was collected, to comply with our legal, regulatory, accounting, and reporting obligations, and to establish, exercise, or defend legal claims.

In general, we retain procurement records for a minimum of five (5) years from the end of the relevant financial year, in accordance with the Companies Act, the Tax Administration Act, and the Value-Added Tax Act. Certain records may be retained for longer periods where required by law or for legitimate business purposes.

10. Your Rights as a Data Subject

Subject to POPIA and other applicable laws, Suppliers and their representatives have the following rights in relation to their personal information:

- The right to be notified about the collection and processing of personal information;
- The right to request access to the personal information we hold;
- The right to request the correction or deletion of inaccurate, irrelevant, excessive, out-of-date, incomplete, misleading, or unlawfully obtained personal information;
- The right to object, on reasonable grounds, to the processing of personal information;
- The right to withdraw consent (where processing is based on consent), without affecting the lawfulness of processing prior to withdrawal;
- The right to lodge a complaint with the Information Regulator.

Please note that the exercise of certain rights may affect our ability to engage with you as a Supplier or to continue an existing supplier relationship, where the personal information is necessary for the purposes set out in this Notice.

11. Suppliers as Independent Responsible Parties

Where a Supplier supplies the personal information of its own employees, contractors, directors, or representatives to MPower Holdings, the Supplier warrants that:

- It has the necessary lawful basis (including, where required, consent) to disclose such personal information to us;
- It has provided the relevant Data Subjects with a privacy notice that contemplates disclosure to and processing by MPower Holdings and, where applicable, our group companies for the purposes set out in this Notice;
- It will, on request, provide proof of compliance with the foregoing.

12. Direct Marketing

We may send you communications relating to procurement opportunities, supplier engagement events, and other matters reasonably connected to our supplier relationship. You may opt out of receiving such communications at any time by contacting our Information Officer using the details below.

13. Changes to this Notice

We may update this Notice from time to time to reflect changes in our procurement practices, legal requirements, or industry standards. Any changes will be posted on our Website with an updated effective date. We encourage Suppliers to review this Notice periodically.

14. Complaints

If you have any concerns or complaints about how we process your personal information, please contact our Information Officer in the first instance. If you are not satisfied with our response, you have the right to lodge a complaint with the Information Regulator at:

Authority	The Information Regulator (South Africa)
Address	JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
Postal	P.O. Box 31533, Braamfontein, Johannesburg, 2017
Complaints Email	POPIAComplaints@info regulator.org.za
Enquiries Email	enquiries@info regulator.org.za
Website	https://info regulator.org.za/

15. Contact Us

For any questions about this Notice or to exercise any of your rights, please contact our Information Officer:

Company	MPOWER HOLDINGS (PTY) LTD
Information Officer	Pieter Espach
Postal Address	1 Amatole Street, N4 Gateway Industrial Park, Willow Park Manor X65, Pretoria 0184, Gauteng, South Africa
Street Address	1 Amatole Street, N4 Gateway Industrial Park, Willow Park Manor X65, Pretoria 0184, Gauteng, South Africa
Telephone	+27 18 632 0050
Email	info@mpowerholdings.co.za
Website	www.mpowerholdings.co.za