

Privacy Policy

1. Introduction:

- 1.1 This privacy policy explains how Greenstone Energy (RF) Ltd ("**Greenstone Energy**") obtains, uses and discloses your personal information, in accordance with the requirements of the Protection of Personal Information Act 4 of 2013, as amended ("**POPIA**").
- 1.2 Greenstone Energy and including this website, www.greenstoneenergy.com are committed to protecting your privacy and to ensuring that your personal information is collected and used properly, lawfully and transparently.

2. Who we are

- 2.1 Greenstone Energy is a modern, independent utility driven by a core team of energy and financial specialists with deep expertise in leading-edge renewable energy technologies and innovative fin-tech solutions.
- 2.2 Greenstone Energy provides clean, affordable and independent power to commercial and industrial sector clients and deploys a scalable digital platform capable of monitoring, controlling and optimising power generation plants even in the most remote locations. Similarly Greenstone Energy uses the same cloud-based platform to provide secure, access controlled real-time billing and financial information to clients, investors and partners. This allows our customers and partners to have greater control and visibility of their energy resources and investments.

3. The type of personal information we collect

- 3.1 We currently collect and process your personal information mainly to contact you for the purposes of understanding your requirements, and delivering services accordingly. For this purpose we will collect contact details including your name and organisation.

- 3.2 We collect information directly from you where you provide us with your personal details. Where possible, we will inform you what information you are required to provide to us and what information is optional.
- 3.3 Website usage information may be collected using "cookies" which allows us to collect standard internet visitor usage information.

4. How we get the personal information and what we use it for

- 4.1 Majority of the personal information we process, is provided to Greenstone Energy directly by you.
- 4.2 Greenstone Energy will use your personal information only for the purposes for which it was collected and agreed with you. In addition, where necessary your information may be retained for legal or user experience optimisation purposes, enabling us to provide you with an enhanced service experience at Greenstone Energy.
- 4.3 In addition to the above, we collect such information in order to (not limited):
 - 4.3.1 gather contact information;
 - 4.3.2 confirm and verify your identity or to verify that you are an authorised user for security purposes;
 - 4.3.3 detect and prevent fraud, crime, money laundering or other malpractice;
 - 4.3.4 conduct market or customer satisfaction research or for statistical analysis;
 - 4.3.5 audit and keep records as required by law;
 - 4.3.6 ensure we are legally compliant.
- 4.4 We may disclose your personal information to our service providers who are involved in the delivery of products or services to you. We have agreements in place to ensure that they comply with the privacy requirements as required by POPIA.
- 4.5 We may also disclose your information where we have a duty or a right to disclose in terms of law or industry codes and/or where we believe it is necessary to protect our rights.

5. Collection of Information by "Cookies"

You are aware that information and data is automatically collected through the standard operation of the internet servers and through the use of "cookies." "Cookies" are

small text files a Website can use to recognise repeat users, facilitate the user's ongoing access to and use of the Website and allow a Website to track usage behaviour and compile aggregate data that will allow content improvements and targeted advertising. Cookies are not programs that come onto your system and damage files. Generally, cookies work by assigning a unique number to you that has no meaning outside the assigning site. If you do not want information collected through the use of cookies, there is a simple procedure in most browsers that allows you to deny or accept the cookie feature, however, you should note that cookies may be necessary to provide you with certain features (e.g., customized delivery of information) available on our Website.

6. When will we process your personal information

In terms of the POPIA, the justification ground which we base our processing on, consist out of the following:

- 6.1 the data subject or a competent person where the data subject is a child **consents** to the processing. Kindly note that you have the right to withdraw your consent;
- 6.2 the processing is **necessary** to carry out actions for the conclusion or performance of a contract to which the data subject is a party;
- 6.3 the processing complies with an **obligation** imposed by law on the business;
- 6.4 the processing protects a **legitimate** interest of the data subject;
- 6.5 the processing is necessary for the proper performance of a **public law** duty by the business; or
- 6.6 the processing is necessary for pursuing the legitimate **interests** of the business or of a third party to whom the information is supplied.

7. How we store your personal information

- 7.1 Your information is securely stored on the one drive cloud server of Greenstone Energy.
- 7.2 Greenstone Energy will keep your information as follows:

Credit Agreements

Nr	Type of document	Minimum Retention Required
1	Enquiries	2 Years
2	Payment profile	5 Years
3	Adverse information	1 Year
4	Civil court judgements	The earlier of 5 years or until the judgement is rescinded by a court or abandoned
5	Administration orders	The earlier of 10 years or until the order is rescinded by a court
6	Sequestrations	The earlier of 10 years or the order is rescinded by a court
7	Liquidations	Unlimited
8	Rehabilitation orders	5 Years

Electronic Communication

Nr	Type of document	Minimum Retention Required
1	Personal information and the purpose for which the data was collected must be kept by the person who electronically requests, collects, collates processes or stores the information.	As long as the information is used and at least 1 year thereafter
2	A record of any third party to whom the information was disclosed.	As long as information is used and at least 1 year thereafter
3	All personal data that has become obsolete.	Destroy

Contracts

Nr	Type of document	Minimum Retention Required
1	Client contracts including inter alia Power Purchase Agreement	5 years after expiration or termination
2	Supplier Agreements	5 years after expiration or termination

3	Subcontracts	5 years after expiration or termination
4	Consultancy Agreements	5 years after expiration or termination

7.3 Greenstone Energy will then dispose your information as follows:

7.3.1 under no circumstances would paper documents or removable media (CD's, DVD's, discs, etc.) containing personal or confidential information be simply binned or deposited in refuse tips;

7.3.2 Greenstone Energy will ensure that all electrical waste, electronic equipment and data on disk drives be physically removed and destructed in such a way that the data will by no means be able to be virtually retrieved; and

7.3.3 Greenstone Energy will ensure that all paper documents that should be disposed of, be shredded locally within the department and then be recycled. Where local shredding is not possible, bulk quantities of restricted paper waste must be held in waste sacks. These will be collected and disposed of by an employee instructed to do so by the Information Officer.

8. Your data protection rights

8.1 You are entitled to access your personal data by sending a written request to aumichand@greenstoneenergy.com. Greenstone Energy may charge you a fee for this service as set out in terms of Condition 8 of POPIA.

8.2 You may also request Greenstone Energy to correct or supplement any of your personal data which Greenstone Energy will undertake as soon as practicable.

8.3 You may request the destruction of your personal data. The Information Officer of the Deputy Information Officer will consider your request in light of any other laws or regulations prohibiting Greenstone Energy from destroying your personal data.

8.4 You are not required to pay any charge for exercising your rights. If you make a request, Greenstone Energy has 1 (one) month to respond to you.

Please contact us at aumichand@greenstoneenergy.com if you wish to make a request.

Contact details

Name: Faheema Rahim
Address: 255 Rivonia Road, Morningside, Sandton, Gauteng
Phone Number: +27 10 824 8002
E-mail: legal@greenstoneenergy.com

How to complain:

If you have any concerns about our use of your personal information, you can make a complaint to us at aumichand@greenstoneenergy.com.

You can also complain to the Information Regulator if you are unhappy with how we have used your Information.

Their contact details are as follows:

The Information Regulator (South Africa)

33 Hoofd Street, Forum III, 3rd Floor Braampark
P.O Box 31533, Braamfontein, Johannesburg, 2017

Complaints email: complaints.IR@justice.gov.za

Signed off and approved by Faheem Patel on 22 September 2022



Signature

THE END