

DEDALUS

INFORMATION NOTICE

CLIENTS AND PROSPECTS IN SOUTH AFRICA (ZA)

The Dedalus Group attaches a great deal of importance to and intends to pay particular attention to protecting your personal data and respecting your privacy.

The aim of this information notice is therefore to inform you of how your personal data is processed when you act on behalf of a client or prospect of the Dedalus Group (e.g., employee, intern, company representative, etc.).

In this respect, please note that the controller of your personal data is the Dedalus Group entity that has among its clients or prospects the entity on behalf of which you are acting (hereinafter referred to as “we”, “our” and “us”). Please refer to the address information of the Dedalus Group entity on our website www.dedalus.com or you can find this information in your contractual documentation. Please refer to Section 7 (“How can you contact us?”) below to access the contact details of the relevant controller.

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WHAT PERSONAL DATA DO WE COLLECT?

We collect the following categories of personal data about you:

- Identification data (e.g., surname, first name, contact details, etc.).
- Professional data (e.g., position held, identity of your employer, etc.).

In most cases, provision of your personal data is mandatory; we will be unable to manage our working relationship with the entity on behalf of which you are acting properly without it. For example, if you refuse to provide us with your contact details so we can send you an agreement to sign, we will be unable to enter into an agreement with the entity on behalf of which you are acting.

In any case, we will inform you when it is mandatory to provide your personal data.

Additionally, in the event that you provide us with personal data belonging to third parties (e.g. if you provide us with the data of a signatory so we can prepare the agreement to be signed), you undertake to ensure that such persons have been duly informed of the processing of their personal data in accordance with this policy and, if required, have consented to the processing of their personal data.

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WHY DO WE USE YOUR PERSONAL DATA?

The table below outlines the purposes that we process your personal data for and, for each purpose, the legal basis for the processing operation in question:

PURPOSES	LEGAL BASIS
<p>Client and prospect relationship management, including, but not limited to:</p> <ul style="list-style-type: none"> (i) preparation and performance of agreements; (ii) order management and follow-up; (iii) invoicing; (iv) accounting of client accounts; (v) management of requests, complaints, and after-sales service; etc. 	<p>The processing is necessary for the performance of a contract or to take steps at your request to enter a contract</p>
<p>Carrying out commercial marketing operations and sending marketing communications</p>	<p>The processing is based on your consent.</p>
<p>Carrying out commercial marketing operations and sending marketing communications to promote products or services offered by the Controller, similar to those ones already purchased by the data subject (<i>soft-spam</i>).</p>	<p>The processing is based on our legitimate interest in developing our client base.</p>
<p>Analysis of data for business intelligence purposes in order to improve our understanding of internal business processes, evaluate the effectiveness and efficiency of our management system and assess initiatives</p>	<p>Our legitimate interest to analyze our organization and improve internal processes</p>
<p>Carrying out satisfaction surveys of commercial statistics with clients / prospects and managing opinions on our products and services</p>	<p>The processing is based on your consent.</p>
<p>Where applicable, studying, organizing, and executing transactions relating to our activities, particularly in the context of mergers and acquisitions, spin-offs, etc.</p>	<p>Our legitimate interest in finding and managing investors / buyers / other stakeholders who may be interested in our business.</p>
<p>Compliance with the applicable legal framework</p>	<p>Need to comply with a legal obligation that we are subject to.</p>
<p>Managing and following up unpaid bills, as well as potential disputes with you or third parties</p>	<p>The processing is necessary to manage the contract and to pursue our legitimate interest to collect the sums due and to defend our interests, including through legal action and, where applicable, if certain categories of data (conviction, offense, security measure) are processed, the need to establish, exercise or defend our legal claims.</p>

In any case, please note that we will not process your personal data for any other purpose that is incompatible with the above-mentioned purposes.

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WHO DO WE SHARE YOUR PERSONAL DATA WITH?

In the context of our processing operations, we may communicate your personal data to the following recipients:

- to our service providers, suppliers, agents, and contractors, to the extent that they assist us in carrying out the purposes set out in this information notice (e.g., we use IT service providers to host your personal data on our behalf; in the case of unpaid invoices, we may use the services of service providers specialized in debt collection; etc.).
- to other entities of the Dedalus Group (e.g., in the context of our accounting / fiscal obligations, we may have to share a certain amount of information, including personal data concerning you, for consolidation purposes at Dedalus Group level).
- where applicable, to investors / buyers and their advisors (e.g., in the context of mergers and acquisitions).
- to competent courts, public authorities, government agencies and law enforcement agencies (including where we are required to comply with legal or regulatory requests).

Regardless of the recipient, we will only disclose your personal data to them on a strictly need-to-know basis and only to the extent required to fulfill the purposes identified in this information notice.

We do not sell your personal data.

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DO WE TRANSFER DATA OUTSIDE SOUTH AFRICA?

In connection with the processing operations described in this policy, we may transfer your personal information outside the South Africa (“**ZA**”), including to countries that are not generally recognized as providing an adequate level of data protection.

In this context, we ensure that the level of protection your personal information is given is not adversely affected by such transfers.

This specifically means that each of the intended transfers is based on one of the following mechanisms at least:

- the provision of an adequate level of protection for the processing of personal information as referred to in section 72 of POPI; or, alternatively;
- the conclusion of binding corporate rules or binding agreements which provide an adequate level of protection that effectively upholds principles for reasonable processing of the information that are substantially similar to the conditions for the lawful processing of personal information in the Republic of South Africa, including the standard contractual clauses reproducing the models adopted by the European Commission; or, alternatively;
- the existence of an exemption related to one of the specific situations exhaustively provided for in Applicable Data Protection Laws (e.g., where you have given your consent to such transfer having been informed of the absence of safeguards, where the transfer is necessary for the performance of a contract concluded between us, where the transfer is necessary for the conclusion or performance of a contract concluded in your interest between us and a

third party, or where the transfer is necessary for the establishment, exercise or defense of our legal claims, where it is not reasonably practicable to obtain your consent and where if it was practical you would be likely to give consent etc.).

You can obtain copies of these documents by emailing our information officer (“IO”), whose contact details are set out in Section 7 (*How can you contact us?*) below.

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HOW LONG DO WE STORE YOUR PERSONAL DATA FOR?

We store your personal data for no longer than is necessary for the purpose of the processing concerned.

In other words, this means that the storage periods we apply vary depending on the purpose for which we process the data in question. The table below therefore indicates, for each purpose, the storage period that will be applied to your personal data:

PURPOSES	STORAGE PERIOD
<p>Client and prospect relationship management, including, but not limited to:</p> <ul style="list-style-type: none"> (i) preparation and performance of agreements; (ii) order management and follow-up; (iii) invoicing; (iv) accounting of client accounts; (v) management of requests, complaints, and after-sales service; etc. 	<p>If you are acting on behalf of one of our clients, we will retain your personal data for up to 7 years after the end of our contractual relationship with the client concerned.</p> <p>If you are acting on behalf of one of our prospects, we will retain your personal data until the withdrawal of the consent.</p>
<p>Carrying out commercial marketing operations</p>	<p>If you are acting on behalf of one of our clients, we will retain your personal data for up to 2 years after the end of our contractual relationship with the client concerned.</p> <p>If you are acting on behalf of one of our prospects, we will retain your personal data until the withdrawal of the consent.</p> <p>However, if you object to our commercial marketing activities, we will immediately delete your personal data for this purpose (except for only the data that is strictly necessary to keep track of your objection and thus not send you any further commercial communication).</p>

PURPOSES	STORAGE PERIOD
Carrying out commercial marketing operations and sending marketing communications to promote products or services offered by the Controller, similar to those ones already purchased by the data subject (<i>soft-spam</i>).	We will retain your personal data for up to 2 years after the purchasing of the similar products or service by the client. However, if you object to our commercial marketing activities, we will immediately delete your personal data for this purpose (except for only the data that is strictly necessary to keep track of your objection and thus not send you any further commercial communication).
Analysis of data for business intelligence purposes in order to improve our understanding of internal business processes, evaluate the effectiveness and efficiency of our management system and assess initiatives	For the duration necessary to carry out the business intelligence analysis
Carrying out satisfaction surveys of commercial statistics with clients / prospects and managing opinions on our products and services	Your data will not be stored for longer than is necessary for completing said surveys and/or until the withdrawal of the consent.
Where applicable, studying, organizing, and executing transactions relating to our activities, particularly in the context of mergers and acquisitions, spin-offs, etc.	Your data will only be stored for as long as is necessary to assess the appropriateness of the proposed transactions and, if necessary, to carry them out.
Compliance with the applicable legal framework	Your data will be stored for the duration of the limitation period of the obligations that we are subject to. Without prejudice to different terms, 7 years – Business and Companies Act
Managing and following up unpaid bills, as well as potential disputes with you or third parties	Your data will be stored for the duration of the recovery / dispute and until all potential remedies have been exhausted.

We have also defined an archiving policy. This ensures that your personal data is not stored in the active database unnecessarily.

In any case, once the applicable storage period has elapsed, we will irrevocably erase or anonymize your personal data so that you can no longer be identified.

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WHAT RIGHTS DO YOU HAVE?

In accordance with the applicable data protection legal framework, particularly POPI and PAIA, you have the following rights as a data subject:

- a) to be notified that personal information about you is being collected as provided for in terms of section 18 POPI; or your personal information has been accessed or acquired by an unauthorised person as provided for in terms of section 22 POPI;

- b) to establish whether a responsible party holds personal information of that data subject and to request access to your personal information as provided for in terms of section 23 POPI;
- c) to request, where necessary, the correction, destruction or deletion of your personal information as provided for in terms of section 24 POPI;
- d) to object, on reasonable grounds relating to your particular situation to the processing of your personal information as provided for in terms of section 11(3)(a) POPI;
- e) to object to the processing of your personal information at any time for purposes of direct marketing in terms of section 11(3)(b) POPI; or in terms of section 69(3)(c) POPI;
- f) not to have your personal information processed for purposes of direct marketing by means of unsolicited electronic communications except as referred to in section 69(1) POPI;
- g) not to be subject, under certain circumstances, to a decision which is based solely on the basis of the automated processing of your personal information intended to provide a profile of such person as provided for in terms of section 71 POPI;
- h) to submit a complaint to the Regulator (<https://www.justice.gov.za/inforeg/index.html>; Email address: inforeg@justice.gov.za) regarding the alleged interference with the protection of the personal information of any data subject or to submit a complaint to the Regulator in respect of a determination of an adjudicator as provided for in terms of section 74 POPI; and
- i) to institute civil proceedings regarding the alleged interference with the protection of his, her or its personal information as provided for in section 99 POPI.

However, please note that some of the above rights are subject to specific conditions dictated by the applicable data protection legal framework. So, in the event that your specific situation does not meet these conditions, we will unfortunately be unable to comply with your request.

Also, as juristic person, we have the right, and the obligation to secure of business and ICT infrastructure. This means that we can monitor communications in the form of speech, data, text, visual images, signals and radio frequency spectrum as provided for in terms of section 6 of Regulation of Interception of Communications and Provision of Communication-related information Act of 2002 (RICA).

Our company also has a right to privacy in the same you do, so the protections afforded to you, apply to us also.

To exercise your rights, please contact our information officer using the contact details provided in Section 7 (*How can you contact us?*). To process your request as efficiently as possible, we may ask you for certain additional information to confirm your identity and/or assist in locating the personal information that forms the subject matter of your request.

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HOW CAN YOU CONTACT US?

Your personal data will be processed by the Dedalus Group Company with which you have entered into the contractual/pre-contractual relationship, which will act as the Data Controller. The Data Controller can be contacted at the address of its registered office, as indicated on the respective website and in the contractual documentation.

We also have appointed an information officer (“**IO**”), which you can contact by e-mail at the following address: dpo.group@dedalus.eu

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