

NASPERS GROUP

Human Resources Data Privacy Implementation Policy

I. INTRODUCTION

Naspers recognises that many countries control the collection and use of personal data relating to employees. As such Naspers must handle its Human Resources data in compliance with its Board-approved *Legal Compliance Policy*. The present Human Resources Data Privacy Implementation Policy describes a baseline set of common principles governing the handling of Human Resources personal data within the Naspers Group worldwide. Where country-specific additions to this Policy are warranted to assure local compliance they will be permitted and should be communicated by the relevant Group company as required by law. This approach ensures that Naspers has implemented the Board-approved *Legal Compliance Policy* in the context of Human Resources personal data protection.

2. WHAT THIS POLICY COVERS

- The present Policy applies to all personal data about employees and applicants for employment ('You') that is collected, maintained or used by directors, officers and employees of any Naspers Group company¹ ('We/Us') as part of an actual or prospective employment relationship.
- Personal data collected, maintained or used outside of the employment relationship, such as personal data arising from your use of our consumer products or platforms, is not covered by this Policy.
- Nothing in this Policy is intended to form a contract of employment or otherwise.
- At our discretion and as necessary, we may amend this Policy from time to time. We will notify you when updates are made.

3. OUR APPROACH

- We value our employees and appreciate the importance of treating personal data as appropriately confidential. In this Policy we outline our global standards for Human Resources personal data-privacy practices so that you have an opportunity to understand and agree to participate fully as an employee with us.
- We require any directors, officers and employees entrusted with your personal data as part of their job responsibility to treat it as confidential and in conformity with this Policy.
- We will also seek to assure that any third-party service providers we use to administer our Human Resources programmes, as described in Section 6 below, are bound to maintain confidentiality when handling your personal data on our behalf, in a manner that is consistent with this Policy.

1. For purposes of this Policy, a 'Naspers Group Company' includes Naspers Limited ('Naspers') and its direct and indirect subsidiaries and controlled affiliates where Naspers owns more than 50 per cent of the voting rights or has the right to control the entity.

4. INFORMATION WE COLLECT

- We generally will collect personal data about you directly from you in the course of your application and employment. We may also use other sources to assist in obtaining relevant personal data about you for example to support recruitment, credit checks, reference and background checks; investigations of possible employee wrongdoing; and to help us locate former employees and beneficiaries for purposes of administering certain benefits plans.
- Our Human Resources programmes require personal data about you to function properly. Among other related information, you may expect us or our approved third-party service providers to process your name, relevant family information, contact and address information, age, sex, and government-issued identification numbers including passport numbers. In limited circumstances some programmes may involve certain sensitive health information (e.g. medical certificates submitted to us or other health-related benefits processes) and financial data (e.g. payroll).
- We will endeavour to collect only the minimum amount of personal data required to administer our programmes and to comply with applicable employment laws. Sensitive personal data will be treated with the utmost care and in accordance with special requirements set out in applicable data protection and other laws.

5. HOW WE USE THIS DATA

- Personal data that we collect about employees is to be used only for employment-related purposes, such as to administer our Human Resources programmes and benefits. Our employment-related programmes span the full employee 'lifecycle,' including recruitment, hiring, internal communications, payments, insurance and medical programmes, relocation, assorted other benefits, termination, retirement or disability, and compliance with all applicable laws, including employment and tax laws.
- Additionally, your personal data may be used when we assert, execute or defend a legal claim, or carry out a company evaluation.

6. INFORMATION SHARING & TRANSFER

- Your personal data will be shared within our Group for the purposes described in Section 5 above to the extent we deem necessary to carry out these purposes, and as permitted by law.
- We are a global Group with a global footprint. Note that your personal data may be processed either locally in the

jurisdiction where you work or reside, or in any other jurisdiction where we or our approved third-party service providers operate, worldwide, depending on the needs of the business over the course of your tenure with us, to the extent we deem necessary and as permitted by law.

- Your personal data will only be shared outside our Group with third parties under the following circumstances: (1) Where a third-party service provider retained by us is under contract to assist in administering aspects of our Human Resources programmes, subject to non-disclosure obligations compatible with this Policy; (2) in the event that the company, business or division in which you are employed is being considered for outsourcing or sale, and then only subject to contractual requirements to preserve confidentiality; (3) with private or government authorities only when we have determined that we are required to do so under applicable laws, to investigate suspected fraud or illegality, or to anticipate or defend legal claims; or (4) you have given us your prior permission to do so.

7. ACCESS, CORRECTION & RETENTION

- We have an interest in keeping your personal data accurate and up to date. You may request reasonable access and a chance to correct personal data about you that we hold by contacting your Human Resources representative. Your ability to access or correct information may be limited in certain circumstances. When this is the case we will work with you to ensure you understand why.
- Your personal data will only be retained by us for so long as necessary to fully implement our employment-related programmes, including benefits, or as required by applicable law.

8. DATA SECURITY

- Maintaining the security and integrity of our applicants' and employees' personal data is a high priority and we endeavour to maintain appropriate administrative, technical, personnel and physical measures to safeguard personal data against loss, theft, and unauthorised uses or modifications. Inside the Group, our *IT Governance Charter* assigns responsibility for the oversight of our security practices.



CONTACTS

Questions about this Policy will be administered through the Human Resources department, which you may contact by email: hrprivacy@naspers.com