RUMIKA GROUP

PRIVACY POLICY

Rumika (Pty) Ltd | Rumika Consulting and Rumika Industry

Version	1.0
Effective date	06th November 2026
Policy owner	Information Officer, Rumika (Pty) Ltd
Next review	Annually, or sooner if the law or our operations change

1. WHO WE ARE

Rumika Group is the trading identity of Rumika (Pty) Ltd, a private company registered in the Republic of South Africa. Rumika Consulting and Rumika Industry operate as business divisions or trading activities of Rumika (Pty) Ltd and do not constitute separate legal entities.

For the purposes of the Protection of Personal Information Act 4 of 2013 (POPIA), Rumika (Pty) Ltd is the responsible party for all personal information processed through this website and through both of its divisions. In this policy, “Rumika”, “we”, “us” and “our” mean Rumika (Pty) Ltd. Any reference to Rumika Group, Rumika Consulting or Rumika Industry is a reference to Rumika (Pty) Ltd acting under that trading name.

Registered name	Rumika (Pty) Ltd
Trading identity	Rumika Group
Business divisions	Rumika Consulting; Rumika Industry
Physical address	24 Brittany,18 Kent Road, Dunkeld West, Johannesburg, South Africa, 2196
Telephone	+27-(0)-82-305-2380
Email	info@rumika.co.za

Website	www.rumika.co.za
Information Officer	Rudesh Balvantrai Patel, Chief Executive Officer
Privacy contact	info@rumika.co.za

2. WHAT THIS POLICY COVERS

We take privacy seriously because much of our work involves confidential commercial information, cross-border counterparties and, at times, sensitive transaction documents. This policy explains what personal information we collect, why we collect it, who we share it with and what your rights are.

It applies when you:

- visit or browse our website;
- send us an enquiry through a website form, email, telephone, WhatsApp or social media;
- request a proposal, quotation or pro-forma invoice for consulting services or industrial equipment;
- engage with us as a client, prospective client, supplier, manufacturer, logistics provider, investor, funder, referral partner or other commercial counterparty, or as a representative of one; or
- send us your CV or apply to work with us.

Under POPIA, personal information includes information about identifiable natural persons and, where applicable, existing juristic persons such as companies and trusts. We apply the same care to both.

Where we sign an engagement letter, non-disclosure agreement, quotation or other contract with you that contains its own privacy or confidentiality terms, those terms apply together with this policy. If there is a conflict, the signed contract will prevail for that engagement.

3. PERSONAL INFORMATION WE COLLECT

We only collect what we reasonably need for the purpose at hand. What we collect depends on how you deal with us:

Category	Examples
Identity and contact	Name, title, job title, organisation, email address, telephone number, country and city.
Enquiry and project information	Nature of your enquiry; project scope; equipment requirements (for example roll-forming profile, material gauge, coil width, output speed, power supply); funding or investment requirements; commodity type, grade, volume and delivery port; budgets and timelines.
Verification and due diligence	Only once a transaction or engagement progresses: company registration documents, details of directors, shareholders and beneficial owners, identity or passport copies of authorised signatories, proof of address, tax and VAT numbers, bank confirmation letters, letters of authority, and results of sanctions, watch-list and adverse media screening.
Contractual and financial	Proposals, quotations, contracts, purchase orders, invoices, payment records and banking details needed to pay or be paid.
Recruitment	CVs, qualifications, employment history and references that you choose to send us.
Technical and website usage	IP address, device and browser type, pages visited, referring website, date and time of access, and your cookie preferences.
Communication preferences	Whether you have agreed to receive updates or marketing from us, and any opt-out requests.

Special personal information and children

We do not ask for special personal information (such as religious or philosophical beliefs, race or ethnic origin, health, biometric information or trade union membership) through this website. Please do not send it to us. If a due diligence check on a counterparty reveals information about alleged criminal behaviour or similar matters, we will only process it where POPIA or another law allows us to.

Our website and services are aimed at businesses and adults. We do not knowingly collect personal information about children (persons under 18). If you believe a child has sent us personal information, please contact us and we will delete it.

4. HOW WE COLLECT IT

- **Directly from you**, when you complete a form, email or call us, meet with us or sign a document.
- **From your organisation**, when a colleague gives us your details as a contact person or authorised signatory.
- **From third parties**, such as public registers (for example the CIPC), screening and due diligence service providers, referral partners, professional advisers, manufacturers and logistics providers involved in a transaction.
- **Automatically**, through server logs, cookies and similar technologies when you use our website (see section 10).

Where we collect information about you from someone else, we will let you know where POPIA requires us to, unless an exemption applies.

5. WHY WE USE YOUR INFORMATION

POPIA requires us to have a lawful reason for each use of personal information. The table below sets out our main purposes and the grounds we rely on.

Purpose	Lawful ground under section 11 of POPIA
Responding to enquiries and preparing proposals, quotations or pro-forma invoices	Steps you have asked us to take before concluding a contract; our legitimate interest in responding to business enquiries
Concluding and carrying out consulting engagements, equipment supply agreements and sourcing or trade facilitation mandates	Performance of a contract

Purpose	Lawful ground under section 11 of POPIA
Know-your-customer checks, beneficial ownership verification, sanctions and adverse media screening, anti-fraud and anti-corruption checks on clients, suppliers and counterparties	Legitimate interest in protecting Rumika and its clients; compliance with legal obligations where they apply
Arranging shipping, freight, customs clearance, inspection, installation and commissioning	Performance of a contract
Invoicing, accounting, tax and statutory record-keeping	Compliance with legal obligations (including the Companies Act and tax legislation)
Considering job applications	Steps before concluding a contract; legitimate interest
Running, securing and improving our website	Legitimate interest; consent for non-essential cookies
Sending updates, insights and marketing	Consent, or our existing client relationship, as set out in section 7
Establishing, exercising or defending legal claims and responding to lawful requests from regulators, courts and law enforcement	Compliance with legal obligations; legitimate interest

We will not use your information for a purpose that is incompatible with the reason we collected it, unless the law allows it or you agree.

6. DO YOU HAVE TO GIVE US YOUR INFORMATION?

Sending us an enquiry is voluntary. However, if you do not give us enough information we may not be able to respond properly, prepare an accurate quotation or take an engagement forward. Certain information becomes mandatory once we contract, for example details we need to issue a valid tax invoice, or verification documents we need before we introduce counterparties

or move a transaction forward. We will tell you when information is required and why.

7. DIRECT MARKETING

We will only send you electronic marketing (by email, SMS, WhatsApp, automated or telephone call) if you have given your consent, or if you are an existing client and the marketing relates to similar services or products we offer. We do not buy contact lists.

Every marketing message will give you a simple way to opt out, free of charge. You can also opt out at any time by emailing info@rumika.co.za. We follow section 69 of POPIA and the Information Regulator's Guidance Note on Direct Marketing.

Operational messages about an enquiry or engagement you have with us, such as quotation follow-ups or delivery updates, are not marketing.

8. WHO WE SHARE YOUR INFORMATION WITH

We share personal information only on a need-to-know basis and only to the extent required for the purpose concerned. Recipients may include:

- our directors, employees and contracted associates, all of whom are bound by confidentiality;
- service providers who process information on our behalf ("operators"), such as website hosting, email, cloud storage, IT support, accounting and document management providers;
- professional advisers, including attorneys, auditors, tax practitioners and insurers;
- manufacturers, suppliers and engineering partners, in South Africa or abroad, who need project or equipment specifications to prepare quotations or deliver equipment;
- freight forwarders, clearing agents, shipping lines, inspection agencies and insurers involved in moving goods or commodities;
- banks and payment service providers;
- prospective commercial counterparties, funders, investors or consortium partners in a specific transaction, but only with your knowledge and, where appropriate, under a confidentiality agreement;

- regulators, the South African Revenue Service, courts and law enforcement agencies where the law requires it; and
- a purchaser or successor if all or part of our business is sold or restructured, subject to equivalent protections.

We do not sell, rent or trade personal information. Operators acting for us must agree in writing to keep your information confidential and secure, as required by sections 20 and 21 of POPIA.

9. TRANSFERS OUTSIDE SOUTH AFRICA

Our work is international. We source industrial equipment from overseas manufacturers, facilitate trade with foreign buyers and work with offshore investors and partners. Some of our technology providers may also store data on servers outside South Africa. As a result, your personal information may be transferred to other countries, including China, India, the United Arab Emirates, the United Kingdom, the European Union and the United States.

We will only transfer personal information across borders where section 72 of POPIA allows it, for example where the recipient is bound by laws, binding corporate rules or a written agreement that provide an adequate level of protection, where the transfer is necessary to perform a contract with you or in your interest, or where you have consented.

Our website, email and document storage are provided by trusted third-party service providers who are bound by appropriate confidentiality and data-protection obligations.

10. COOKIES AND SIMILAR TECHNOLOGIES

Cookies are small text files placed on your device when you visit a website. We use them as follows:

Type	What it does	Your choice
Strictly necessary	Makes the website work, keeps it secure and remembers your cookie choices.	Always on
Analytics	Helps us understand how visitors use the site so we can improve it.	Only with your consent

Type	What it does	Your choice
Embedded content	Third-party content such as maps or videos may set their own cookies.	Only with your consent

You can accept or reject non-essential cookies through the cookie banner, change your choice at any time through the cookie settings link at the bottom of each page, and manage or delete cookies through your browser settings. Blocking essential cookies may affect how the website works.

11. HOW WE KEEP YOUR INFORMATION SECURE

As required by section 19 of POPIA, we take appropriate and reasonable technical and organisational measures to protect personal information against loss, damage, unauthorised access and unlawful processing. These include:

- encrypted connections (HTTPS/TLS) for this website;
- role-based access controls and multi-factor authentication on our email and cloud systems;
- restricted sharing of transaction documents, using access-controlled folders or data rooms where appropriate;
- confidentiality obligations for staff, associates and service providers;
- regular backups, software updates and anti-malware protection; and
- checking the security standards of operators before we appoint them.

No transmission over the internet is completely secure. Please do not send identity documents, bank statements or other sensitive documents through the general website contact form. If we need such documents, we will arrange a suitable secure channel.

If we have reasonable grounds to believe that your personal information has been accessed or acquired by an unauthorised person, we will notify the Information Regulator and you as soon as reasonably possible, as required by section 22 of POPIA.

> **Protect yourself from fraud.** Rumika will only correspond from email addresses ending in @rumika.co.za. We will never change our banking details by email alone. Before making any payment to Rumika, confirm our banking details by telephone on a number you have verified independently. Report any suspicious communication to info@rumika.co.za.

12. HOW LONG WE KEEP YOUR INFORMATION

We keep personal information only for as long as we need it for the purpose for which it was collected, unless the law requires or allows us to keep it longer (section 14 of POPIA). As a guide:

Type of record	Typical period	Reason
Enquiries that do not lead to an engagement	24 months after last contact	Follow-up and record of dealings
Client, supplier and counterparty contracts and engagement files	7 years after the relationship ends	Companies Act, tax legislation, prescription periods for claims
Accounting and tax records	At least 5 to 7 years	Tax Administration Act and Companies Act
Verification and due diligence records	5 years after the relationship ends	Risk management and legal compliance
Unsuccessful job applications	12 months, unless you agree to longer	Future vacancies
Website server logs	12 months	Security and troubleshooting
Marketing preferences	Until you opt out; opt-outs are kept on a suppression list	To respect your choice

When the retention period ends, we securely delete or destroy the information, or de-identify it so that it can no longer be linked to you.

13. YOUR RIGHTS

Subject to POPIA and the Promotion of Access to Information Act 2 of 2000 (PAIA), you have the right to:

- ask whether we hold personal information about you, free of charge;
- request access to that information (a prescribed fee may apply for copies, as set out in our PAIA Manual);
- ask us to correct, update, destroy or delete information that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or unlawfully obtained;
- object to the processing of your information on reasonable grounds, including processing based on our legitimate interests, and to object at any time to direct marketing;
- withdraw your consent where we rely on consent, without affecting processing that took place before the withdrawal;
- not be subject to a decision based solely on automated processing that has legal or similarly significant effects for you (we do not make such decisions); and
- lodge a complaint with the Information Regulator.

To exercise any of these rights, email our Information Officer at info@rumika.co.za . You may use Form 1 (objection) or Form 2 (correction or deletion) prescribed under the POPIA Regulations, 2018, but a clear written request is also acceptable. We will need to verify your identity before acting on a request, and we aim to respond within 30 days.

14. COMPLAINTS

If you have a concern, please contact us first so that we can try to resolve it. If you are not satisfied, you may complain to the Information Regulator:

Physical address	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191
Telephone	010 023 5200 (toll-free 0800 017 160)
General enquiries	enquiries@inforegulator.org.za
Complaints	Through the Regulator's eServices portal, as explained at https://inforegulator.org.za/complaints/
Website	https://inforegulator.org.za

15. LINKS TO OTHER WEBSITES

Our website may contain links to third-party websites. We are not responsible for their content or privacy practices, and we encourage you to read their privacy policies.

16. CHANGES TO THIS POLICY

We may update this policy from time to time to reflect changes in the law, our services or our technology. The current version, with its effective date, will always be available on our website. Where a change materially affects how we use your information, we will take reasonable steps to bring it to your attention.

17. CONTACT US

For any question about this policy or how we handle your personal information, please contact the Information Officer, Rumika (Pty) Ltd, at info@rumika.co.za or +27-(0)-82-305-2380, or write to us at 18 Kent Road, Dunkeld West, Johannesburg, South Africa, 2196.

Our PAIA Manual, which explains how to request access to records held by Rumika, is available on our website.