



PRIVACY

Privacy Notice (POPIA)

How SiteActive collects, uses and protects personal information.

Version 1.1 — Effective 22 June 2026

Protection of Personal Information Act 4 of 2013 | SiteActive (Pty) Ltd This Privacy Notice explains how SiteActive (Pty) Ltd (registration number 2026/298206/07) ("SiteActive", "we", "us", "our") collects, uses, shares and protects personal information in accordance with the Protection of Personal Information Act 4 of 2013 ("POPIA"). It applies to the SiteActive website, the SiteActive SHERQ Compliance Operating System (the "Platform") at app.siteactive.co.za, and the SiteActive Pilot Programme.

1. WHO WE ARE AND HOW TO CONTACT US

Responsible Party SiteActive (Pty) Ltd Registration number 2026/298206/07 Information Officer Caleb Kilion Reddy — registered with the Information Regulator (registration number 2026-024071), appointed 11 April 2026 Email info@siteactive.co.za Registered address 131 707 Road, Montford, Durban, 4092

2. DEFINITIONS

2.1 Terms used in this Notice have the meanings given to them in POPIA. "Personal Information" means information relating to an identifiable, living natural person and, where applicable, an identifiable existing juristic person. "Special Personal Information" includes information concerning a person's health, biometrics and the other categories listed in section 26 of POPIA. "Processing" means any operation concerning Personal Information, including collection, storage, use, dissemination and deletion. A "Responsible Party" determines the purpose of and means for Processing; an "Operator" Processes Personal Information on behalf of a Responsible Party.

3. OUR TWO ROLES: RESPONSIBLE PARTY AND OPERATOR

SiteActive operates a two-sided platform and acts in two distinct capacities. Which capacity applies determines who is accountable for the relevant Personal Information.

3.1 As Responsible Party. When you register for and administer an account, and in respect of the Personal Information of your account administrators and users, SiteActive determines the purpose and means of Processing and is the Responsible Party. This Notice governs that Processing.

3.2 As Operator. When a customer organisation uploads Personal Information about its own workers, contractors or personnel (for example, within a SHE File), SiteActive Processes that information as an Operator, only on the documented instruction of that customer and for the purpose of providing the Platform. In that case the customer is the Responsible Party and is responsible for the lawful basis of Processing, for notifying its own data subjects, and for responding to their requests.

4. PERSONAL INFORMATION WE COLLECT

4.1 Identity and contact: name, job title, work email, telephone number, organisation.

4.2 Account and authentication: username, hashed credentials, one-time verification codes, role and permissions.

4.3 Organisation data: company registration details, compliance configuration, site and project structure.

4.4 Compliance and SHE File content: compliance documents and certificates uploaded by or about users, which may include identity numbers and, in some cases, special personal information such as medical certificates of fitness.

4.5 Billing data: billing contact, transaction references and payment status. Payment-card data is handled by our payment processor and is not stored by us.

4.6 Usage and technical data: log data, device and browser information, IP address, essential cookies and similar technologies on the website, and audit-trail records of actions on the Platform.

5. HOW WE COLLECT PERSONAL INFORMATION

We collect Personal Information directly from you when you register, configure and use the Platform; from your organisation or its authorised users; automatically through your use of the website and Platform; and, where lawful, from third parties such as your corporate clients or contractors within the Platform ecosystem.

6. PURPOSES AND LAWFUL BASIS FOR PROCESSING

We Process Personal Information for the following purposes, relying on one or more of the lawful bases indicated:

- 6.1 Providing, operating and supporting the Platform — performance of a contract; legitimate interests.
- 6.2 Account creation, authentication and security — performance of a contract; legitimate interests.
- 6.3 Compliance management and reporting for customers — performance of a contract; compliance with a legal obligation of the customer.
- 6.4 Billing and payment — performance of a contract; legal obligation.
- 6.5 Service communications and support — performance of a contract; legitimate interests.
- 6.6 Improving and securing the Platform, including de-identified analytics — legitimate interests.
- 6.7 Marketing communications, where applicable — consent; legitimate interests, subject to opt-out.
- 6.8 Meeting our own legal and regulatory obligations — compliance with a legal obligation.

7. SPECIAL PERSONAL INFORMATION AND CHILDREN

7.1 Compliance records uploaded to the Platform may contain special personal information, such as health-related information in medical certificates of fitness. Where SiteActive acts as Operator, the customer who uploads such information is responsible for ensuring that an authorisation under sections 26 and 27 of POPIA applies. Where SiteActive acts as Responsible Party, we Process special personal information only where an authorisation under POPIA applies.

7.2 The Platform is intended for business use and is not directed at children. We do not knowingly Process the Personal Information of children except where lawfully permitted and necessary.

8. HOW WE SHARE PERSONAL INFORMATION

We share Personal Information only as necessary and subject to appropriate safeguards, with the following categories of recipients:

- 8.1 Hosting, database and infrastructure provider — secure hosting, database and storage for the Platform (European Union).

8.2 Transactional email provider — sending account, verification and service emails (European Union).

8.3 Payment processor — processing subscription and pilot payments (South Africa).

8.4 AI document-validation provider — automated assistance in validating uploaded compliance documents (outside South Africa).

8.5 Frontend hosting and content-delivery provider — serving the web application (outside South Africa).

8.6 Customer organisations — disclosure of relevant compliance records within the two-sided ecosystem (as applicable).

8.7 Professional advisers or authorities — where required by law or to protect our rights (as applicable). Each operator that Processes Personal Information on our behalf is bound by a written agreement requiring it to Process the information only for the agreed purposes and to maintain appropriate security safeguards, in accordance with section 21 of

9. CROSS-BORDER TRANSFERS

9.1 Some of the operators we use Process Personal Information on infrastructure located outside South Africa, principally in the European Union. Our primary hosting and database infrastructure is located in the European Union (Ireland).

9.2 Where Personal Information is transferred outside South Africa, we do so in accordance with section 72 of POPIA, relying on one or more of the following: (a) the recipient is subject to a law or binding agreement that provides an adequate level of protection substantially similar to POPIA — recipients in the European Union are subject to the General Data Protection Regulation; (b) the transfer is necessary for the performance of a contract; or (c) the data subject has consented.

9.3 POPIA does not require Personal Information to be stored within South Africa. Where the conditions in clause 9.2 are met, Processing in the European Union is lawful under section 72. This cross-border Processing is governed by a written data-processing agreement with the relevant operator and is disclosed in this Notice.

10. AUTOMATED PROCESSING AND AI

The Platform uses automated tools, including an AI document-validation service, to assist in reviewing and classifying uploaded compliance documents. These tools support, and do not replace, human decision-making: outputs are advisory, are subject to confidence thresholds and human oversight, and are not used to make a decision that has legal or similarly significant effects on a person based solely on automated Processing within the meaning of section 71 of POPIA.

11. SECURITY SAFEGUARDS

We maintain appropriate, reasonable technical and organisational measures to protect Personal Information against loss, unauthorised access and unlawful Processing, in accordance with section 19 of POPIA. These include encryption in transit, access controls and role-based permissions, row-level security in our database, audit logging, and tamper-evident, independently verifiable records of key compliance events through our Chain Anchor capability. No method of transmission or storage is completely secure, and we cannot guarantee absolute security.

12. RETENTION

We retain Personal Information only for as long as necessary to fulfil the purposes for which it was collected, to provide the Platform, and to comply with legal, accounting and regulatory obligations. Where SiteActive acts as Operator, retention is determined by the relevant customer's instructions. When Personal Information is no longer required, it is deleted or de-identified.

13. YOUR RIGHTS

Subject to POPIA, you have the right to: be notified that your Personal Information is being collected or has been accessed without authorisation; request access to the Personal Information we hold about you; request correction, deletion or destruction of Personal Information that is inaccurate, irrelevant, excessive, out of date or unlawfully obtained; object, on reasonable grounds, to the Processing of your Personal Information; withdraw consent where Processing is based on consent; and lodge a complaint with the Information Regulator. To exercise these rights, contact our Information Officer at info@siteactive.co.za. Where SiteActive acts as Operator, we will refer your request to the relevant customer as Responsible Party. Requests may be subject to the procedures and forms under the Promotion of Access to Information Act 2 of 2000, POPIA and our PAIA Manual.

14. DATA BREACH NOTIFICATION

Where there are reasonable grounds to believe that Personal Information has been accessed or acquired by an unauthorised person, we will notify the Information Regulator and the affected data subjects as soon as reasonably possible, in accordance with section 22 of POPIA. Where SiteActive acts as Operator, we will notify the relevant customer without undue delay.

15. COMPLAINTS TO THE INFORMATION REGULATOR

Name The Information Regulator (South Africa) Physical address JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001 POPIA complaints POPIAComplaints@inforegulator.org.za General enquiries enquiries@inforegulator.org.za Telephone +27 (0)10 023 5200 Website inforegulator.org.za

16. CHANGES TO THIS NOTICE

We may update this Notice from time to time. The current version is published on the SiteActive website, and material changes will be communicated by appropriate means. Your continued use of the Platform after an update constitutes acknowledgement of the updated Notice.

Acknowledgement (paper option)

Your acceptance is recorded digitally on your status page. This copy is provided only if you additionally require a signed paper record.

Name: _____ Designation: _____

Signature: _____ Date: _____