PRIVACY POLICY

This Privacy Policy sets out the data processing practices carried out through the use of the Internet and the World Wide Web by or on behalf of Lewis Group Ltd and its affiliates or subsidiaries ("LEWIS" or "us" or "we").

If you have any requests or comments concerning your personal information or any queries with regard to these practices, please contact the **Deputy Information Officer on stakeholders@lewisgroup.co.za**.

THIS PRIVACY POLICY FORMS PART OF LEWIS' WEBISITES TERMS OF USE. IF YOU DO NOT AGREE WITH ANY TERM OF THIS PRIVACY POLICY, YOU MUST CEASE YOUR ACCESS OF THIS WEBSITE IMMEDIATELY.

1 DEFINITIONS AND INTERPRETATION

- 1.1 "Lewis" means Lewis Group Limited and its subsidiaries which fall under Lewis Stores (Pty) Ltd as well as its affiliates.
- 1.2 "Personal Information" means information relating to an identifiable, living, natural person and where it is applicable, identifiable, existing juristic person, including all information as defined in the Protection of Personal Information Act 4 of 2013.
- 1.3 "Processing" means the creation, generation, communication, storage, destruction of personal information as more fully defined in the <u>Protection of Personal Information Act</u> 4 of 2013.
- 1.4 "You" or the "user" means any person who accesses and browses this website for any purpose.
- 1.5 "Website" means the website of LEWIS at URL <u>www.lewisgroup.co.za</u> as well as Lewis Stores, Beares, Best Home & Electric and UFO brand websites, URL's or such other URL's as LEWIS may choose from time to time.

2 STATUS AND AMENDMENTS

- 2.1 LEWIS respects your privacy. This privacy policy statement sets out LEWIS' information gathering and dissemination practices in respect of the Website.
- 2.2 This Privacy Policy governs the processing of personal information provided to LEWIS through your use of the Website.
- 2.3 Please note that, due to legal and other developments, LEWIS may amend these terms and conditions from time to time. The version of the terms and conditions effective for this Privacy Policy are indicated by the effective date incorporated in the title of this Privacy Policy. It is your duty to remain appraised of the current version of this Privacy Policy. The date indicated in the heading of this Privacy Policy is the effective date that governs the browsing and use of this Privacy Policy from that date

until the next revision of this Privacy Policy becomes effective.

2.4 Continuing to browse or use this Privacy Statement after a revised Privacy Policy becomes effective constitutes your agreement to observe this Privacy Policy as may be revised.

3 PROCESSING OF PERSONAL INFORMATION

- 3.1 By providing your personal information to LEWIS you acknowledge that it has been collected directly from you and that you consent to its processing by LEWIS.
- 3.2 Where you submit Personal Information (such as your name, address, telephone number and email address) via the website (e.g. through completing any online form) the following principles are observed in the processing of that information:
- 3.2.1 LEWIS will only collect personal information for a purpose consistent with the purpose for which it is required. The specific purpose for which information is collected will be apparent from the context in which it is requested.
- 3.2.2 LEWIS will only process personal information in a manner that is adequate, relevant and not excessive in the context of the purpose for which it is processed.
- 3.2.3 Personal information will only be processed for a purpose compatible with that for which it was collected, unless you have agreed to an alternative purpose in writing or LEWIS is permitted in terms of national legislation of general application dealing primarily with the protection of personal information.
- 3.2.4 LEWIS will keep records of all personal Information collected from you for as long as is necessary to fulfil the purpose for which it was collected.
- 3.2.5 LEWIS may disclose personal information relating to you to its third party service providers in the event that it is necessary to fulfil the purpose for which your personal information was collected. LEWIS ensures that its' third party service providers agree in writing to, amongst others, to treat your personal information as confidential and that appropriate security measures are implemented to ensure the integrity thereof.
- 3.2.6 If personal information is released with your consent LEWIS will retain a record of the information released, the third party to which it was released, the reason for the release and the date of release, for a period of 1 (one) year from the date on which it was last used.
- 3.2.7 LEWIS will destroy or delete any personal information that is no longer needed by LEWIS for the purpose it was initially collected, or subsequently processed.
- 3.3 Note that, as permitted by the Electronic Communications and Transactions Act 25 of

2002, LEWIS may use personal information collected to compile profiles for statistical purposes. No information contained in the profiles or statistics will be able to be linked to any specific user.

4 USE OF THE PERSONAL INFORMATION OF A DATA SUBJECT

- 4.1 LEWIS may use the Personal information of a Data subject to:
- 4.1.1 Provide the Data subject with information and services including online events, such as webcast events, press releases, job postings, financial results and marketing communications about LEWIS products and services. LEWIS will obtain consent for marketing to the extent required by law;
- 4.1.2 Contact and interact with the Data subject, including to respond to requests from the Data subject (for instance in case the Data subject applied for employment) and provide important notices and updates (such as changes to terms, standard operating procedures, policies, security alerts and administrative messages);
- 4.1.3 Comply with applicable laws, regulations and guidance, and to comply with demands or requests made by regulators, governments, courts and law enforcement authorities;
- 4.1.4 Improve LEWIS's day-to-day operations, including for internal purposes such as auditing, data analysis and research to help LEWIS deliver and improve its digital platforms, content and services;
- 4.1.5 Monitor and analyse trends, usage and activities in connection with LEWIS products and services to understand which parts of LEWIS digital platforms and services are of the most interest and to improve the design and content of those platforms;
- 4.1.6 Improve LEWIS products and services and communications to the Data subject; and
- 4.1.7 Ensure that LEWIS has up-to-date contact information for the Data subject, where applicable.

5 COLLECTION OF ANONYMOUS DATA

- 5.1 LEWIS may use standard technology to collect information about the use of this website. This technology is not able to identify individual users but simply allows LEWIS to collect statistics.
- 5.2 LEWIS may utilise temporary or session cookies to keep track of users' browsing habits. A cookie is a small file that is placed on your hard drive in order to keep a record of your interaction with this website and facilitate user convenience.
- 5.2.1 Cookies by themselves will not be used to identify users personally but may be used

to compile identified statistics relating to use of services offered or to provide LEWIS

with feedback on the performance of this website.

5.2.2 The classes of information which may be collected in respect of users who have

enabled cookies include, but are not limited to, the following:

5.2.2.1 The browser software used;

5.2.2.2 IP address;

5.2.2.3 Date and time of activities while visiting the website; and

5.2.2.4 URLs of internal pages visited.

5.3 If you do not wish cookies to be employed to customize your interaction with this

website it is possible to alter the manner in which your browser handles cookies.

Please note that, if this is done, certain services on this website may not be available.

6 SECURITY

LEWIS takes reasonable measures to ensure the security and integrity of information

submitted to, or collected by, this website but cannot under any circumstances be held

liable for any loss or other damage sustained by you as a result of unlawful access to or

dissemination of any personal information by a third party.

LINKS TO OTHER WEBSITES 7

LEWIS has no control over and accepts no responsibility for the privacy practices of any

third party websites to which hyperlinks may have been provided and LEWIS strongly

recommends that you review the privacy policy of any website you visit before using it

further.

Approved: 10 July 2021