

Supplier Privacy Statement Telkom Group Procurement

Privacy Statement

TABLE OF CONTENTS

1	INTRODUCTION.....	3
2	APPLICATION OF THE PRIVACY STATEMENT	3
3	RESPONSIBLE PARTIES WITHIN TELKOM	3
4	COLLECTION OF PERSONAL INFORMATION	4
5	THE PERSONAL INFORMATION WE PROCESS AND WHY.....	4
6	PROVISION OF PERSONAL INFORMATION BY SUPPLIERS	6
7	PURPOSE FOR PROCESSING OF SUPPLIER PERSONAL INFORMATION	6
8	CONSENT TO PROCESS PERSONAL INFORMATION	7
9	QUALITY OF SUPPLIER PERSONAL INFORMATION	8
10	SECURITY AND CONFIDENTIALITY OF SUPPLIER PERSONAL INFORMATION	8
11	RETENTION OF SUPPLIER PERSONAL INFORMATION.....	8
12	SHARING OF SUPPLIER PERSONAL INFORMATION	9
13	RIGHTS OF SUPPLIERS	9
14	SUPPLIERS OBLIGATIONS	11
15	AMENDMENTS AND ADDENDUMS	11
16	OUR CONTACT PARTICULARS.....	11
17	APPENDIX A: DEFINITIONS, ACRONYMS, REFERENCE DOCUMENTS, LAWS & REGULATIONS	13

Privacy Statement

1 INTRODUCTION

- 1.1 Telkom SA SOC Limited (hereafter “Telkom” or “we” or “us” or “our”) respects your privacy, and the protection of your Personal Information is important to us. We are committed to ensuring the security and protection of the Personal Information of our Suppliers and customers is processed in accordance with the principles set out in the Protection of Personal Information Act (“POPIA”).
- 1.2 This Privacy Statement, together with the Telkom POPIA and PAIA manual, aims to let you know how Telkom will treat any Personal Information that it may have about your company and how you can access such personal information held. Reference made to “POPIA” means the Protection of Personal Information Act 4 of 2013, and reference made to “PAIA” means the Promotion of Access to Information 2 of 2000 as amended.
- 1.3 By visiting our website or communicating electronically with us and/or using our products and services, you consent to the processing and transfer of your personal information as set out in this Privacy Statement below. Telkom will take all reasonable measures, in accordance with this statement, to protect your personal information and to keep it confidential.
- 1.4 For purposes of this Privacy Statement, “Personal Information”, “Data Subject” and “Processing” will have the meanings given to them in POPIA.
- 1.5 We may collect website usage information using “cookies”, which allows us to collect standard internet visitor usage information. Details of all other documents pertaining to the terms and conditions of personal information are available on our website.
- 1.6 We reserve the right to amend this Privacy Statement at any time, without prior notice, by posting the amended statement on our website.

2 APPLICATION OF THE PRIVACY STATEMENT

- 2.1 This Privacy Statement applies to all Suppliers or prospective Suppliers who register on the Telkom Group Procurement Vendor database, or any other procurement system used by Telkom.
- 2.2 By registering on the Telkom Group Procurement System or any other vendor database used by Telkom, you consent to the Processing and transfer of your Personal Information as set out in this Privacy Statement.

3 RESPONSIBLE PARTIES WITHIN TELKOM

- 3.1 Telkom, as well as each of its subsidiaries within the Telkom Group of companies, is a Responsible Party in terms of POPIA. As such, each entity is responsible for determining the purposes and means for processing the Personal Information of suppliers.
- 3.2 When a Supplier provides its Personal Information to Telkom or any subsidiary within the Telkom Group, the information is deemed have been provided specifically to that entity.

Privacy Statement

- 3.3 A supplier may also, in certain circumstances, act as an Operator, an independent Responsible Party, or a joint Responsible Party (together with Telkom) as defined under POPIA. Notwithstanding the nature of the relationship, Telkom and its suppliers shall at all times remain independent contracting parties.

4 COLLECTION OF PERSONAL INFORMATION

- 4.1 The personal information may be provided to us by you and/or collected by us when you engage with us and/or you provide us with your products and services.
- 4.2 Telkom collects Personal Information about you from the following sources:
- I. Directly from you.
 - II. Through your interactions and engagements with us.
 - III. To obtain personal information from credit bureaux regarding a supplier's credit history.
 - IV. From criminal record checks and supplier risk management organisations, where applicable.
 - V. From CCTV footage obtained through our own surveillance systems or those of our landlords.

5 THE PERSONAL INFORMATION WE PROCESS AND WHY

- 5.1 Personal Information refers to any information relating to a Supplier being either a natural or juristic person) that identifies or can be used to identify the Supplier.
- 5.2 Where the Supplier is a juristic person, Telkom may collect and process Personal Information relating to its directors, officers, employees, beneficial owners, partners, shareholders, members, authorised signatories, representatives, agents, payers, payees, customers, guarantors (and their spouses), sureties (and their spouses), other security providers, and other related individuals, as applicable. These individuals are referred to as Supplier-related persons.
- 5.3 Where the Supplier provides Telkom with the Personal Information of its related persons or consents to such processing, the Supplier warrants that it has complied with all applicable obligations under POPIA. This includes ensuring that all necessary notices have been provided to such persons and, where required, that their consent has been obtained. The Supplier further warrants that it has the authority to share such Personal Information with Telkom and to permit Telkom and its affiliates or subcontractors (if any) to process it as necessary to fulfil the parties' obligations under this Agreement.
- 5.4 Telkom will process the Personal Information of related persons in accordance with this Privacy Statement, and references to "the Supplier" shall be deemed to include such related persons, where appropriate.
- 5.5 The Personal Information Telkom may collect and use includes, but is not limited to, the following:

Privacy Statement

- I. Financial information, including the Supplier's bank account details and financial records (such as bank statements) provided to Telkom.
 - II. invoices issued by the Supplier to Telkom.
 - III. The written contract or agreement between Telkom and the Supplier, including information related to the Supplier's performance under the agreement.
 - IV. Supplier responses to invitations to tender, Requests for Quotations, bids, and similar submissions.
 - V. Compliance documentation, including certification and statements of compliance (e.g. Broad Based Black Economic Empowerment accreditation, Certificates of Good Standing, quality certifications, etc.).
 - VI. Other identifying information, such as company registration number, VAT number, tax number, and contact details.
 - VII. Unique identifiers such as account numbers, identity numbers, or passport numbers.
 - VIII. physical addresses (including residential, business, or other location addresses
 - IX. information about the location (e.g. geolocation or GPS location) of a Supplier.
 - X. Online and other unique identifiers, which may include social media profiles, nationality, age, language, education, race, ethnic origin, gender, and similar information, where applicable and relevant.
 - XI. Biometric information, such as fingerprints, facial recognition data, voiceprints, or other biometric identifiers collected through Telkom's authenticated systems or CCTV, as applicable.
 - XII. criminal history information, where applicable and relevant.
 - XIII. Personal views, preferences, and opinions, where applicable and relevant
 - XIV. Confidential correspondence exchanged between Telkom and the Supplier.
 - XV. Opinions or views of others about the Supplier, where applicable and relevant.
- 5.6 Certain elements of Supplier Personal Information that may be collected and processed by Telkom, where applicable and relevant, are classified as special Personal Information under POPIA. This includes:
- I. Information related to criminal behaviour, including the alleged commission of an offence or any related legal proceedings or outcomes. This may be collected to comply with legal obligations (such as anti-money laundering laws) or when entering into a business relationship with Telkom.
 - II. Race or ethnic origin, for purposes such as vendor risk management, transformation reporting, or statistical analysis.
 - III. Trade union membership.
 - IV. Health-related information, including physical or mental health status, disability, or medical history, where necessary for assessing eligibility for grants, sponsorships, or other corporate social responsibility (CSR) initiative.
 - V. biometric information (e.g. to verify identity).

Privacy Statement

6 PROVISION OF PERSONAL INFORMATION BY SUPPLIERS

- 6.1 Where possible, Telkom will indicate which Personal Information is mandatory and which is voluntary for you to provide.
- 6.2 Mandatory Personal Information is required for the following purposes:
- I. For the conclusion, negotiation, execution, or performance of any contract or transactional arrangement to which the Supplier is a party, or for taking the necessary steps prior to entering into such contract;
 - II. To comply with all applicable legal, regulatory, governance, and policy obligations to which Telkom is subject;
 - III. To conduct supplier due diligence and risk vetting, including the verification of identity, beneficial ownership, financial standing, tax compliance and sanctions requirements;
 - IV. To prevent, detect, and investigate fraud, misconduct or any unlawful activity;
 - V. To support ongoing supplier monitoring, relationship and contract management, and reporting obligations, as required by Telkom.

7 PURPOSE FOR PROCESSING OF SUPPLIER PERSONAL INFORMATION

- 7.1 Supplier Personal Information will be processed by Telkom in the normal course of the management and dealings with Supplier for various purposes, which may include where applicable to the relationship with the Supplier, but are not limited to:
- I. Evaluation of tenders, proposals, and bids submitted by the Supplier.
 - II. Procuring products, goods, and services from the Supplier.
 - III. Administration of the contractual or transactional agreement between Telkom and the Supplier.
 - IV. Providing access to Telkom's systems as and when applicable.
 - V. Responding to enquiries and complaints from the Supplier.
 - VI. Maintaining the vendor and contract data of the Supplier.
 - VII. Collaborating with the Supplier, including for the joint provision of products or services to Telkom or its customers.
 - VIII. Complying with legislative, regulatory, risk and compliance requirements (including directives, sanctions, and rules), voluntary and involuntary codes of conduct and industry agreements or fulfilling reporting requirements and information requests.
 - IX. Performing vendor and other risk management processes, which may include obtaining references, profiles, and statistical data from credit bureaus or supplier risk management organisations.
 - X. Detecting, preventing, and reporting theft, fraud, money laundering, and other criminal activities. This may include conducting ongoing criminal, credit bureau, and sanctions checks, as well as anti-bribery and related due diligence on the Supplier or its business partners throughout the engagement period. Telkom may also be required to report on the Supplier's conduct to relevant authorities after the termination of the agreement.

Privacy Statement

- XI. Collaborating with the Supplier, including for the joint provision of products or service to Telkom or its customers.
- XII. Complying with all applicable laws authorising or requiring such processing, including (but not limited to):
 - a. Financial Intelligence Centre Act, 2001
 - b. Prevention and Combating of Corrupt Activities Act, 2004
 - c. Regulations to the Companies Act
 - d. Broad-Based Black Economic Empowerment Act, 53 of 2003 (as amended) including its regulations, codes, and guidelines.
- XIII. Enforcing or collecting amounts due under any agreement when the Supplier is in default or breach of contractual terms and conditions, including tracing the Supplier or to institute legal proceedings against the Supplier.
- XIV. Using data for historical, statistical, and research purposes, such as market segmentation or performance management.
- XV. Ensuring security, verifying identity, and confirming the accuracy of the Supplier's Personal Information
- XVI. Communicating with the Supplier or to carry out the instructions and requests of the Supplier.
- XVII. Enabling the Supplier's participation in Supplier development programmes (including training and evaluation to access resources like funding and banking) or assessing the eligibility of the Supplier for funding, which may be in the form of grants or sponsorships.
- XVIII. Exercising Telkom's rights and fulfilling its obligations under any agreement or contract with the Supplier.
- XIX. Any other related and lawful purpose necessary for the effective management of the Supplier relationship.

8 CONSENT TO PROCESS PERSONAL INFORMATION

- 8.1 In terms of POPIA, a "Responsible Party" (in this case Telkom) has a legal duty to process a "Data Subject's" Personal Information (in this case the Supplier) in a lawful, legitimate, and responsible manner.
- 8.2 To fulfil this obligation, Telkom requires Supplier's express and informed consent to process their Personal Information.
 - I. In the event of a Supplier refusing to give the required consent, Telkom may process a Supplier's Personal Information without their consent under the following circumstances:
 - II. Where the processing and use of the Supplier's Personal Information is necessary to give effect to a contractual relationship between the Supplier and Telkom.
 - III. Where such processing is required in terms of a law.
 - IV. Where such processing is necessary to protect the legitimate interests of Telkom or a third party.

Privacy Statement

8.3 All Personal Information provided by the Supplier to Telkom will only be used for the purposes for which it is collected.

8.4 Should a Supplier refuse or fail to provide the required consent or Personal Information when requested by Telkom, and such Personal Information is required to conclude or to manage a contract, transactional or business relationship with the Supplier, then Telkom will be unable to conclude or continue any such contractual or transactional relationship with the Supplier.

9 QUALITY OF SUPPLIER PERSONAL INFORMATION

9.1 Telkom will take all reasonable and practicable steps to ensure that the Personal Information of its Suppliers is complete, accurate and not misleading, and is updated as necessary.

9.2 Suppliers undertake to promptly update their Personal Information when changes occur. All updates must be made:

- I. Directly on the Vendor Registration Database; or
- II. Forwarding the request to the Procurement helpdesk; or
- III. Submitting the request to the relevant Procurement contact person within Telkom. The contact person will be the individual the Supplier engages with on Procurement related matters.

9.3 The Telkom's Procurement helpdesk can be contacted via email at ars@telkom.co.za.

10 SECURITY AND CONFIDENTIALITY OF SUPPLIER PERSONAL INFORMATION

10.1 All Personal Information provided by Suppliers to Telkom will be treated as confidential and stored electronically in a database. Where appropriate, certain information may be retained in hard copy. In both instances, appropriate safeguards will be in place, and regular audits will be conducted to ensure the ongoing security and integrity of the information.

10.2 Telkom will take reasonable, appropriate technical and organisational measures to protect the Personal Information of its Suppliers, in line with its internal information security policies and procedures and in accordance with applicable legislation.

10.3 Where Personal Information is stored electronically outside the borders of South Africa, such as through cloud-based services, Telkom will ensure that the data is stored in countries with privacy laws comparable to POPIA, or that the service providers offer data protection standards that are consistent with the requirements of POPIA.

11 RETENTION OF SUPPLIER PERSONAL INFORMATION

11.1 Personal Information will not be kept by Telkom for longer than is necessary for the purposes of the processing set out within this Privacy Statement.

11.2 Once this information is no longer required, such Personal Information will be safely and securely archived for a period as mentioned in Telkom's Document Retention and Archive Policy, or longer, should this be required by any other law applicable in South Africa, or where

Privacy Statement

a further retention period is required by the contract between the Supplier and Telkom. Thereafter, the Supplier's Personal Information will be destroyed to the extent practical and permissible in law.

12 SHARING OF SUPPLIER PERSONAL INFORMATION

12.1 Supplier Personal Information may be shared within Telkom, with its affiliates and with third parties engaged by Telkom to process such Personal on its behalf, in accordance with Telkom instructions and for specific, legitimate purposes. Access to Supplier's Personal Information may be granted to the following persons or departments within Telkom:

- I. **Third Parties:** Where Telkom engages third-party service providers to perform support services, those providers will be contractually bound to comply with Telkom's policies, including its privacy policy, insofar as access to Supplier Personal Information is required to fulfil their obligations.
- II. **Links to other websites:** While Telkom endeavours to provide link only to websites that uphold similarly high standards of privacy and security, Telkom is not responsible for the content, security measures, or privacy practices of such external sites. Suppliers are encouraged to always review the privacy and security policies of any third-party websites.
- III. **Personnel:** This includes management, Procurement practitioners, Telkom employees directly involved in managing and executing contracts or agreement with Suppliers, as well as auditors, legal practitioners, and relevant Government Departments.

12.2 Certain affiliates and third parties with whom Telkom shares Personal Information may be based outside of South Africa. In such instances, Telkom will ensure compliance with cross-border data transfer requirements as set out in POPIA.

12.3 Telkom will ensure that reasonable and appropriate safeguards are in place to protect Suppliers Personal Information when shared as outlined above.

13 RIGHTS OF SUPPLIERS

13.1 The right to be informed

This privacy statement has been developed to help Suppliers understand how Telkom collects, uses, and protects their Personal Information.

13.2 The right to access to information

- I. Suppliers have the right to access their Personal Information held by Telkom and may, at any time, request the following:
 - a. The details of the Personal Information that Telkom holds about them; and
 - b. The details on how the information was used or processed.
- II. A request for access to Supplier Personal Information held by Telkom Procurement Services must be made using the standard 'PAIA Form C Request for Access to Record of Private Body' as provided in the Telkom or subsidiary POPIA and PAIA Manual.

Privacy Statement

- III. The requester must at least provide sufficient particulars to enable Telkom to identify the record or records requested.
 - IV. The requester is required to:
 - a. Indicate which form of access is required.
 - b. Provide a postal address in the Republic.
 - c. Identify the specific right they seek to exercise or protect, and explain why access to the requested record is necessary to do so
 - d. Indicate if a response is requested in a manner other than writing, to specify the preferred method and provide the necessary details for communication
 - e. If the request is made on behalf of another person, to submit proof of authority or capacity to act on their behalf, to the reasonable satisfaction of Telkom
- 13.3 Subject to the POPIA provisions, the Supplier has the right to request the correction, destruction, deletion of, or to object to the processing of their Personal Information.
- I. On receipt of an objection from the Supplier, Telkom will suspend any further processing of the Personal Information until the matter is resolved has been resolved.
 - II. Suppliers may lodge an objection to the processing of their Personal Information by completing '**POPIA Form 1: Objection to the Processing of Personal Information**' ([POPIA Form 1 Objection to processing of personal information.pdf](#)) and submitting the duly completed form to the designated Telkom relationship manager.
 - III. POPIA requires that all Supplier Personal Information and related details supplied, must be complete, accurate and up to date.
 - IV. While Telkom will take reasonable steps to ensure the reliability of the Supplier's Personal Information, it remains the Supplier's responsibility to update their information on the Vendor Management Database or to notify Telkom of any changes to their information as they occur.
 - V. Requests for the correction or deletion of the Suppliers Personal Information must be made using **POPIA Form 2: Request for Correction or Deletion of Personal Information** ([POPIA Form 2 Correction or Deletion of personal information.pdf](#)) and submitted to the designated relationship manager at Telkom.
 - VI. A Supplier may also update their Personal Information via the Procurement helpdesk.
- 13.4 The right to object to direct marketing
- If the Personal Information of the Supplier has been used for direct marketing purposes, Telkom will afford the Supplier (and the related persons of the Supplier) an opportunity to opt out of receiving such direct marketing.
- 13.5 Suppliers have the right to request confirmation as to whether Telkom holds their personal information and, where applicable, to request access to such information. Any such request must be submitted in writing using **POPIA Form 23: Request for Access to Personal Information**, ([POPIA Form S23 Data Subject Access Request PI list.pdf](#)) and directed to the designated Telkom relationship manager.
- 13.6 The right to lodge a complaint to Telkom or to the Information Regulator (South Africa)

Privacy Statement

- I. Suppliers have the right to lodge a complaint directly to the Information Regulator (South Africa) regarding any alleged breach of the conditions for lawful processing of Personal Information as prescribed in POPIA.
- I. Alternatively, Suppliers may choose to submit complaints directly to Telkom for resolution before submission to the Information Regulator. Queries or complaints relating to the processing of Suppliers Personal Information may be directed to Telkom's Information Officer, or designated Deputy Information Officers as per the contact details outlined in paragraph 16 below, or those provided in the applicable Telkom subsidiary's POPIA and PAIA Manual.

14 SUPPLIERS OBLIGATIONS

- 14.1 The Supplier shall ensure that each of its affiliates (if any) complies with POPIA and any other applicable data protection and privacy laws.
- 14.2 and any other applicable data protection and privacy laws.
- 14.3 The Supplier must safeguard the integrity and confidentiality of Telkom's Personal Information, as well as any Personal Information processed on Telkom's behalf relating to third parties, by implementing appropriate and reasonable technical and organisational measures. These measures must ensure that such Personal Information is protected and processed in accordance with the principles set out in POPIA.
- 14.4 The Supplier must comply with all Telkom policies relating to data integrity and security, as communicated in writing from time to time.
- 14.5 The Supplier shall not transfer any Personal Information provided by Telkom, or processed on its behalf, outside the Republic of South Africa without obtaining Telkom's prior written consent.
- 14.6 The Supplier must immediately notify Telkom if there are reasonable grounds to believe that Personal Information has been accessed or acquired by any unauthorised person.
- 14.7 The Supplier shall ensure that each of its affiliates (if any) complies with POPIA

15 AMENDMENTS AND ADDENDUMS

Telkom reserve the right to amend this privacy statement at any time. Unless otherwise stated, the current version shall supersede and replace all previous versions of this privacy statement.

16 OUR CONTACT PARTICULARS

Information Officer	Serame Taukobong
Deputy Information Officers	Lunga Siyo, Consumer and Small Business Beauty Apleni, Openserve,

Privacy Statement

	Nonkululeko Dlamini, Group Finance
	Melody Lekota, Group Human Resources
E-Mail Address	popi@telkom.co.za
	paia@telkom.co.za
Address	The Information Officer
	61 Oak Avenue
	Highveld, Technopark
	Centurion
	0157

Information Regulator

You have the right to lodge a complaint with the Information Regulator in writing as per their website <https://www.justice.gov.za/infoereg/contact.html> to:

Complaints e-mail complaints.IR@justice.gov.za

General Enquiries enquiries@infoeregulator.org

Physical address Woodmead North Office Park
54 Maxwell Drive
Woodmead
2191

Postal address PO Box 31533, Braamfontein, Johannesburg, 2017

Privacy Statement

17 APPENDIX A: DEFINITIONS, ACRONYMS, REFERENCE DOCUMENTS, LAWS & REGULATIONS

17.1 Definitions

Definitions	Description
Agent	Means any person other than an employee of Telkom who acts on behalf of Telkom with the relevant authority
Consent	Means a voluntary, specific and informed expression of will in terms of which a data subject agrees to the processing of personal information relating to him or her.
Company or Telkom or Organisation	Means Telkom SA SOC Limited, a listed company with registration number 1991/005476/30 (including all Business Units) and all subsidiaries in which Telkom has a controlling interest
Data Subject	Means the person to whom personal information relates
Information Regulator	The Information Regulator established in terms of section 39 of POPIA
Personal Information	means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to— I. information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture language and birth of the person; II. information relating to the education or the medical, financial, criminal or employment history of the person; III. any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person; IV. the biometric information of the person; V. the personal opinions, views or preferences of the person; VI. correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence; VII. the views or opinions of another individual about the person; and VIII. the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person;
Processing	I. means any operation or activity or any set of operations, whether or not by automatic means, concerning personal information, including:

Privacy Statement

	II. the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use; III. dissemination by means of transmission, distribution or making available in any other form; or IV. merging, linking, as well as restriction, degradation, erasure or destruction of information;
Procurement System	Means the digital application that is used to regulate and execute the Procurement Processes
Supplier(s)	Means any natural or juristic person that provides works, goods, products, materials, labour, or services, including consultants, contractors and service providers as may be applicable (including potential future suppliers)
Telkom or Telkom Group	Means Telkom SA SOC Limited, a listed company with registration number 1991/005476/30 and all subsidiaries in which Telkom has a controlling interest

17.2 Acronyms

Acronyms and Abbreviations	Description
POPIA	Protection of Personal Information Act 4 of 2013
PAIA	Promotion of Access to Information Act 2 of 2000

17.3 Reference Documents

- I. Applicable Documentation
- II. Code of Ethics - Group
- III. Protection of Personal Information Act Compliance Framework Document summary
- IV. Protection of Personal Information Policy

17.4 Laws and Regulations

- I. All Suppliers and their employees, representatives, and sub-contractors shall comply with all applicable legislation, codes, and regulations, including but not limited to the below:
 - i. Promotion of Access to Information Act 2 of 2000
 - ii. Protection of Personal Information Act 4 of 2013 ("POPIA")
 - iii. Any other relevant legislation or applicable common law provisions