

DATA PROTECTION POLICY MESH B.V.

Mesh B.V. is committed to protecting the privacy and security of your personal information. This policy describes how we collect and use personal information about you during and after your working relationship with us, in accordance with the General Data Protection Regulation (GDPR) and Dutch law.

1. Contact

In order to help ensure that your privacy is optimally protected, Mesh B.V. has appointed Neels Claassen to oversee Mesh B.V.'s data protection policy and programmes. Neels is available via the following email address: neels@andile.net.

2. Categories of personal information

In the normal course of human resources and business activities, we process the following categories of personal information:

- personal identification information, such as your name, contact details, date of birth, gender, phone numbers, e-mail address, passport;
- immigration, right-to-work and residence status;
- family and emergency contact details;
- job-related information, such as years of service, work location, vacation absences, and contract data;
- educational and training information, such as your educational awards, certificates and licenses and in-house training attendance;
- recruitment-related data: such as references, qualifications (education, training courses and internships), and any other information you mentioned on your resume,
- performance-related data, such as objectives, ratings, comments, feedback results, career history, work equipment, career and succession planning, skills and competencies and other work-related qualifications;
- information needed for compliance and risk management, such as disciplinary records, background check reports and security data;
- payroll and payment or benefits related information, such as salary and insurance information, dependents, social security number, bank account details, employment related benefit information, information about family and dependent(s);
- travel information, such as travel data, expenses incurred, licence plate;
- details of any disabilities and any accommodations we may need to make for you in the workplace
- information related to your use of our information and communications systems;

3. Purpose for processing

Mesh B.V. will process personal your personal data for the following purposes:

- maintaining contact with you (by post, by telephone, by e-mail);
- conducting proper personnel administration and payroll administration;
- as an employer, fulfilling our obligations based on the employment relationship, such as paying your salary, providing salary slips and annual statements, effecting participation in a pension scheme and/or taking out the necessary insurance policies;
- as an employer, complying with legal obligations, such as obligations relating to absence and reintegration, tax payments, identification, payment of the correct salary, and with a view to being able to apply for and receive any benefits;
- giving you access to Mesh B.V.'s sites, buildings and premises;
- ensuring your safety and that of other persons and goods;
- pre-employment screening/background checks;
- terminating employment;
- Health and safety in the workplace;
- the purposes with regard to monitoring computer use are listed in our Information Security Policies;
- participate in any potential or actual purchase or sale, or joint venture, of all or part of a business or company, that Mesh B.V. or its affiliates wishes to participate in.

Mesh B.V. processes the obtained personal data for the above purposes only. If Mesh B.V. intends to process your personal data for other purposes, we will contact you to give you the opportunity to object to this processing. This will be done before any further processing and the information about that other purpose and all relevant further information will be shared with you.

4. Legal grounds for processing

Each of the processing operations in the context of the aforementioned purposes are conducted on the basis of at least one legal ground. These legal grounds are explained below.

Performance of an (employment) contract

In a large proportion of the abovementioned cases, Mesh B.V. processes your personal data in order to perform your employment contract.

Complying with a legal obligation

In another large proportion of cases Mesh B.V. processes your personal data in order to comply with a legal obligation that applies to Mesh B.V..

Legitimate interest

In addition, the processing of your personal data is necessary, in some cases, for the purpose of the legitimate interests of Mesh B.V. or those of a third party. In that case, Mesh B.V. assesses whether your interests and fundamental rights and/or freedoms outweigh those legitimate interests. In the case of carrying out background checks and/or monitoring your use of our information and communications systems, we do this on the legal basis of a legitimate interest. Our legitimate interest with regard to background checks is that these are used to ensure that we select and employ reliable employees. Our legitimate interest with regard to monitoring the use of information and communications systems is detailed in our computer use policy.

Consent

The processing of your personal data is generally based on one of the legal grounds for processing as described above. However, in some limited cases, your personal data may be processed on the basis of consent.

Processing on the basis of your consent requires that your consent is given freely, explicitly and unambiguously. Since there is a relationship of authority between Mesh B.V. and you, it is assumed that in most cases you cannot give your consent completely freely. There are exceptions to this basic assumption. If Mesh B.V. takes additional measures to ensure that you can freely consent or refuse to consent, without being liable to be prejudiced, then this is still free consent. In that case, Mesh B.V. can nevertheless base the processing on your consent. We may, for example, ask for your consent if we want to use a digital photo of you for internal use or for the purposes of employer branding on social media. If this situation occurs, you will be informed about this in advance and asked to give your consent. You are, at all times, free to give, refuse or withdraw consent and there will be no repercussions for anyone who does not or no longer wishes to consent to such a request. A request to withdraw consent can be submitted to Neels Claassen and does not affect the lawfulness of processing before the withdrawal of your consent.

5. Sensitive personal data

Sensitive personal information, such as information about your health, racial or ethnic origin, sexual orientation or trade union membership, require higher levels of protection. We are not allowed to process such data, unless we have further justification for collecting, storing and using this type of personal information. In general, we will not process sensitive personal information about you unless it is necessary for performing or exercising obligations or rights in connection with employment. The situations in which we will process your sensitive personal information are listed below. We have indicated the purpose or purposes for which we are processing or will process your more sensitive personal information.

We may use special categories of personal data in such ways as set out below:

- We will use information relating to leaves of absence, which may include sickness absence or family related leaves, to comply with employment and other laws (please note that this does not include medical information relating to the nature of the sickness);
- We will use information relating your health or disability status to provide appropriate workplace adjustments, to monitor and manage sickness absence and to administer benefits including government benefits and sick pay.
- If you voluntarily inform us of a medical condition and it can be considered useful for us to keep this information on file so that we know what actions to take in a medical emergency, we will ask for your consent to keep this information on file and may share it with others that may need to treat you. This could be the case with epilepsy, allergies or diabetes for example.

6. Consequences of not providing personal data

Mesh B.V. will inform you in advance of cases in which you are obliged to provide personal data that will then have to be processed by Mesh B.V. on the basis of:

- a legal or contractual obligation and/or;

- because this is a necessary condition to be able to conclude an agreement.

If you fail to provide this information when requested, we may not be able to perform the contract we have entered into with you (such as paying you or providing a benefit), or we may be prevented from complying with our legal obligations (such as to verify the identity of our employees). This may have consequences for you which will be communicated to you in writing.

7. Protection and security / retention

Mesh B.V. will process your data fairly and lawfully and only as needed and will limit access to your personal information on a need-to-know basis. We will only store data if it is really necessary and will delete/destroy any out-dated information if it is no longer required. To this end Mesh B.V. defined the maximum retention period of different categories of personal data, in each of its policies and which is checked regularly. This document is available on request.

8. Recipients of personal information

Mesh B.V. may have to share your information with third parties in order to perform the contract it has with you and to fulfil legal obligations pertaining to this. In these cases, Mesh B.V. will take measures to ensure that these parties also act in accordance with Mesh B.V.'s Data Protection Policy.

The third parties that Mesh B.V. shares your personal data are as follows:

- Tax and other government authorities
- Payroll provider(s)
- Occupational Health & Safety Service Provider(s)
- Legal and/or Immigration Advisor(s)
- Pension Fund(s)
- Insurance broker(s) and/or insurance companies

9. Transfer of your data outside of the European Economic Area (EEA)

Mesh B.V. stores information in systems whose servers are located outside of the EEA. In these cases, Mesh B.V. has taken adequate measures to ensure that these companies also treat your personal data in accordance with the principles of the GDPR. These parties are named below:

- IT Servers (Microsoft & Google) with servers based in the United States.
- HR Information System (BambooHR) with servers based in the United States.

All three of the above-named parties are covered by the US Privacy Shield which is an adequacy agreement, meaning that your data will be treated in accordance with the GDPR rules and regulations.

Your data will be transferred and processed outside the EEA, as Mesh B.V.'s head office (Andile) is based in South Africa. Transfer of your data to the head office or other entities of the company is necessary to ensure that you can be paid and that company policies are adhered to.

We share this information on the grounds that it is necessary for the performance of a contract between the data subject (you) and the controller (Mesh B.V.) or the implementation of pre-contractual measures taken at the data subject's request'.

10. Your data protection rights

10.1 Request to access personal data held by Mesh B.V. and/or your HR file

You can request to view or receive a copy of your personal data that is held on file by submitting a request by e-mail to neels@andile.net. In this request, it should be stated which information is particularly required. Mesh B.V. will respond to the request within one month. If access to or making copies of (part of the) file encroaches on the rights and freedoms of other individuals, access to or copies of (part of) the file may be refused. In cases where requests are complex or numerous, Mesh B.V. could decide to extend the response period with two months. You will be informed of this in writing (including the underlying justification) within one month of your initial request.

10.2 Request for erasure or modification of your data

Please ensure to keep the HR Department updated of any changes in your personal data, insofar as this is relevant to your employment with Mesh B.V.. If your data is incomplete or incorrect, please submit a request to have this modified.

In some cases, you may wish to submit a request that certain personal data is removed from your file. This is only possible in the following situations:

- the personal data is no longer necessary for the purpose for which it was collected/processed;
- there is no legitimate interest for the continuing of processing;
- your personal data has been unlawfully processed.

Such a request for removal or modification should be submitted in writing to Neels Claassen, stating which information you wish to have removed and/or modified and on which legitimate grounds. Mesh B.V. will respond to the request within one month. Mesh B.V. can only refuse to comply with your request on the grounds of one of the exemptions as detailed in article 23 of the GDPR.

In some cases, erasure may not be possible but restriction can be laid on the processing in the following cases:

- the accuracy of the personal data is contested by the employee, for a period enabling Mesh B.V. to verify the accuracy of the personal data;
- the processing is unlawful and the employee opposes the erasure of the personal data and requests the restriction of their use instead;
- Mesh B.V. no longer needs the personal data for the purposes of the processing, but they are required by the employee for the establishment, exercise or defence of legal claims;
- the employee has objected to processing pending the verification whether the legitimate grounds of the employer override those of the employee.

10.3 *Objection*

You can object the processing of particular personal data by sending a request to Neels Claassen. Mesh B.V. can only deny this request when there are compelling legitimate grounds that override your interests, right and freedoms, or it is necessary for the establishment, exercise or defence of legal claims.

10.4 *Restriction*

You may ask to have your personal data restricted by sending a request to Neels Claassen. Restriction means that your personal information is only stored by Mesh B.V., and not further processed, while your complaint is dealt with.

10.5 *Complaints*

If you are of the opinion that Mesh B.V. has acted in violation of the GDPR you are entitled to register a complaint with the relevant Data Protection Authority or seek legal advice.

11. Action in case of a data breach

In case of a personal data breach Mesh B.V. will inform the relevant supervisory authority within 72 hours (if feasible) of becoming aware of the breach. An internal document is available detailing what steps need to be taken in case of a data breach and can be found on Sharepoint, under the Information Security Management System section within Andile's Policy Centre.

If you yourself become aware of a data breach, you should register this immediately with you manager and with Neels Classen so that we can determine if further action is necessary.

Mesh B.V. will inform you if a data breach leads to a likely high risk affecting your rights and freedoms. Mesh B.V. will provide you with a description of the likely consequences of the personal data breach, a description of the measures taken, or proposed to be taken and a contact point where more information about the breach can be obtained.

12. Changes to this policy

Mesh B.V. reserves the right to update this privacy notice at any time and will provide you with a new data protection policy when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

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