

## South African supplementary privacy notice – external individuals

**Effective date: 1 August 2025**

Richards Bay Minerals (RBM), part of the Rio Tinto Group, carries out data analytics to enhance safety, integrity, and security in the workplace through responsible data use.

RBM is committed to using data responsibly, fairly, and proportionately to help protect our people, safeguard our operations, and uphold the values that matter most. Every step we take during the analysis of data is guided by legal, ethical, and human principles, with strong controls in place to ensure that personal information is handled with care and respect.

This supplementary notice is to be read together with the Rio Tinto [Privacy Statement](#) and provides additional information, in accordance with South Africa's Protection of Personal Information Act, 2013 (POPIA), specifically with regard to data analytics processing.

### 1. Information we collect and process

This is as set out in the Rio Tinto Privacy Statement.

In the context of data analytics, this includes (but is not limited to):

- **Identity and/or relationship information**
- **Business information** previously provided in the context of your relationship with RBM
- **Publicly available and third-party data**, including but not limited to information which the data subject has deliberately been made public, information from public websites and/or registers or obtained from third-party sources.
- **Access and security data**, including but not limited to records of entry and exit times to company premises (e.g. badge swipe data, access logs), CCTV footage, visitor logs and records of access to restricted areas
- **Activity, incident and investigation data**, including but not limited to unstructured data contained in site reports and notes, incident reports, investigation notes and findings, and details of any workplace accidents, security incidents and similar reports.

In certain cases, we may incidentally collect and process special personal information where such information is provided in unstructured data or free-text fields within reports, records or communications. If special personal information is incidentally collected, continued processing will only take place where such information is relevant to workplace safety, legal compliance or risk management and subject to strict controls.

We do not routinely monitor external persons or collect unnecessary data. Any information collected for processing is reviewed for necessity, proportionality, and relevance to a specific workplace risk.

### 2. Who we collect information from

This is as set out in the Rio Tinto Privacy Statement.

Furthermore, the provision of certain personal information is mandatory in order to comply with legal obligations and to ensure workplace safety and security. Failure to provide mandatory information may result in consequences such as inability to access company premises, participate in certain activities etc. Where the provision of information is mandatory or voluntary, this will be indicated at the point of collection.

### 3. Why we collect and use this information

This is as set out in the Rio Tinto Privacy Statement.

In the context of data analytics, we confirm our commitment to providing a safe, secure, and respectful working environment for everyone. That means being proactive in managing risks, not only physical risks, but also those that can threaten workplace trust, wellbeing, and integrity. To do this well, we need to use data.

RBM's Workplace Assurance Support Framework aims to:

- Detect, investigate, and mitigate threats
- Maintain the safety and security of our people, operations, and assets
- Comply with legal obligations to ensure a secure workplace
- Conduct pattern and risk analysis to proactively identify threats
- Enable escalation, investigation, or disciplinary action where appropriate
- Support compliance with internal policies and external legal or regulatory compliance

This processing is necessary for RBM's legitimate interests in protecting its operations, people, and assets, and is also required to meet certain legal obligations.

### 4. Legal basis for processing

This is as set out in the Rio Tinto Privacy Statement.

We rely on the following lawful grounds under POPIA, as applicable:

- **Legitimate interest**, where processing is necessary to pursue RBM's interest in maintaining safety, security, and operational continuity
- **Legal obligation**, where processing is required to comply with RBM's legal obligations and duties, including maintaining a safe working environment and supporting internal investigations

Where specific laws or regulations mandate the collection of personal information, this will be indicated at the point of collection.

Where special personal information is processed, it is done in accordance with a general authorisation concerning special personal information, in particular:

- **Section 27(1)(b) of POPIA**, which allows for such processing when necessary to establish, exercise or defend a legal right or obligation

### 5. Who we share your data with

In addition to what is set out in the Rio Tinto Privacy Statement, we may share your information, where necessary and subject to strict controls, with:

- Authorised Rio Tinto internal teams, including but not limited to Security, Legal, Privacy teams
- Third-party service providers supporting data analytics, including providers of any risk management system
- Approved investigators and/or legal advisors in connection with a specific risk or investigation

All sharing is subject to confidentiality obligations and appropriate safeguards.

## **6. Where your data is stored**

In addition to what is set out in the Rio Tinto Privacy Statement, your data is stored in a data lake hosted securely within Rio Tinto infrastructure. Some data may be transferred and stored in other countries for processing or system support purposes.

Where cross-border transfers occur, we ensure that:

The recipient of the information is subject to a law, binding corporate rules or binding agreement which provides an adequate level of protection, as contemplated in section 72(1)(a) of POPIA<sup>7</sup>

## **7. How long we retain your data**

In addition to what is set out in the Rio Tinto Privacy Statement, RBM has implemented deletion and anonymisation protocols to ensure that personal information which is no longer required is responsibly deleted or de-identified.

## **8. Your rights under POPIA**

Under POPIA, you have the right to:

- Request access to the personal information we hold about you
- Request the correction of any inaccurate or outdated personal information
- Object to the processing of your personal information, in certain circumstances
- Lodge a complaint to the Information Regulator at: [POPIAComplaints@inforegulator.org.za](mailto:POPIAComplaints@inforegulator.org.za) or through other channels as permitted by the Information Regulator (<https://inforegulator.org.za/complaints/>).

If you have any questions or wish to exercise your rights, you can contact the Rio Tinto Privacy Team at [askE&C@riotinto.com](mailto:askE&C@riotinto.com)

## **9. Additional information**

RBM's address is: The Admin Block, The Farm RBM, No. 16317, The Admin District of KwaZulu-Natal, Richards Bay

RBM does not make any decisions about you that would have legal or similarly significant effects, based solely on automated processing of your personal information. Should this change in the future, you will be notified and provided with information about your rights in relation to such processing.