



TENOVA ENERGY (PTY) LTD

COOKIE POLICY

Registration No. 2026/007850/07

17 Zasm Ave, Emgwenya, Mpumalanga 1195, South Africa

PO Box 204, Emgwenya, Mpumalanga 1195, South Africa

Email: info@tenova.energy

Website: <https://www.tenova.energy>

Effective date / Last updated: 26 September 2026

IMPORTANT IMPLEMENTATION NOTE

This policy is drafted so that Tenova Energy does not claim to use Google Analytics, advertising cookies, Meta Pixel or any other named tracking service unless that technology is actually enabled on the website. Before publication, the live Site.pro website should be audited and the cookie register in Appendix A completed.

1. INTRODUCTION

- 1.1 This Cookie Policy explains how Tenova Energy (Pty) Ltd ("Tenova Energy", "we", "us" or "our") uses cookies and similar technologies when a person visits <https://www.tenova.energy> or related webpages operated by Tenova Energy (collectively, the "Website").
- 1.2 This Cookie Policy should be read together with the Tenova Energy Privacy Policy and Website Terms & Conditions.
- 1.3 Where cookies or similar technologies process personal information, Tenova Energy will process that information in accordance with the Protection of Personal Information Act 4 of 2013 (POPIA) and other applicable law.
- 1.4 The technologies actually used on the Website may change. Tenova Energy will update this Policy and, where appropriate, its cookie preference mechanism when material changes are made.

2. WHAT ARE COOKIES?

- 2.1 Cookies are small text files or similar data files that a website places or reads on a user's browser or device when the user visits a website.
- 2.2 Cookies can enable a website to remember preferences, maintain sessions, support security, understand website performance and, where enabled, measure or personalise content.
- 2.3 Some cookies exist only for the duration of a browsing session (session cookies), while others remain on the device for a defined period or until deleted (persistent cookies).
- 2.4 Similar technologies may include pixels, tags, local storage, software development kits and other technologies that store or access information on a device or measure interaction with digital content.

3. FIRST-PARTY AND THIRD-PARTY COOKIES

- 3.1 First-party cookies are set by or on behalf of Tenova Energy through the Website.
- 3.2 Third-party cookies or similar technologies are set or accessed by an external service provider whose technology is embedded in or used by the Website.
- 3.3 Where third-party services are enabled, the third party may process information under its own privacy terms as an independent responsible party or may process information on Tenova Energy's behalf as an operator, depending on the arrangement.
- 3.4 Tenova Energy will not identify a particular third-party cookie provider in this Policy unless that provider is actually used on the Website.

4. CATEGORIES OF COOKIES WE MAY USE

- 4.1 Strictly Necessary Cookies. These cookies are required for core website functions, security, network management, session handling, fraud prevention or to remember a user's privacy choices. Disabling them may cause parts of the Website not to function correctly.
- 4.2 Preference or Functional Cookies. These cookies may remember choices such as language, display preferences or other settings to provide a more consistent user experience.
- 4.3 Analytics or Performance Cookies. Where enabled, these cookies or similar technologies may help Tenova Energy understand how visitors use the Website, which pages are visited, how long users remain on pages, navigation paths, technical errors and general website performance.
- 4.4 Marketing or Advertising Cookies. Tenova Energy may use these only if such functionality is deliberately introduced. They may be used to measure campaigns, understand interactions with marketing content or support advertising. If these technologies are not enabled on the Website, this category is not active.
- 4.5 Embedded Content and Media Technologies. If the Website embeds content from external video, map, social-media or other providers, those providers may set or access cookies when the embedded functionality is used, depending on the provider and configuration.

5. INFORMATION THAT MAY BE COLLECTED

- 5.1 Depending on the cookie or technology used, information may include IP address, browser type and version, device type, operating system, cookie or session identifiers, referring website, pages viewed, date and time of access, navigation paths, click interactions and general geographic location inferred from technical information such as an IP address.
- 5.2 Cookie information may constitute personal information where it identifies, relates to, or can reasonably be linked to an identifiable person or juristic person as contemplated by POPIA.

5.3 Tenova Energy will seek to limit cookie-related information to what is reasonably necessary for the relevant purpose.

6. WHY TENOVA ENERGY USES COOKIES

- 6.1 to provide and maintain essential Website functionality;
- 6.2 to protect the Website, users and systems against security threats, abuse and fraud;
- 6.3 to remember privacy choices and other user preferences;
- 6.4 to diagnose technical problems and improve Website reliability and performance;
- 6.5 where enabled, to understand aggregate Website usage and improve content and navigation;
- 6.6 where lawfully enabled, to measure the effectiveness of communications or campaigns; and
- 6.7 to comply with legal, regulatory, security and record-keeping requirements.

7. CONSENT AND COOKIE PREFERENCES

- 7.1 Strictly necessary cookies may be used where they are required to provide the Website, maintain security or remember a user's privacy choices, subject to applicable law.
- 7.2 Where consent is required for a non-essential cookie or tracking technology, Tenova Energy should not activate that technology until the user has made the relevant choice through the Website's cookie banner or preference mechanism.
- 7.3 Where a cookie preference mechanism is implemented, users should be able to accept or reject non-essential categories and subsequently change their preferences.
- 7.4 A user's refusal of non-essential cookies should not prevent access to ordinary Website content, although particular optional functionality may be unavailable where the relevant technology is required for that functionality.
- 7.5 Consent, where relied upon, must be voluntary, specific and informed and may be withdrawn, subject to applicable law.

8. COOKIE BANNER

- 8.1 If the Website uses non-essential cookies or similar tracking technologies, Tenova Energy should display a cookie banner or comparable preference tool on the user's first relevant visit.
- 8.2 The banner should provide clear choices and a link to this Cookie Policy. It should not state that continued browsing automatically constitutes consent where affirmative consent is legally required for the technology concerned.
- 8.3 A recommended implementation is to provide 'Accept all', 'Reject non-essential' and 'Manage preferences' options, while leaving strictly necessary cookies active.
- 8.4 The Website should record cookie preferences for a reasonable period so that users are not unnecessarily asked to make the same choice on every page visit.

9. ANALYTICS

- 9.1 Tenova Energy may use analytics tools to understand Website usage and improve performance, but only tools actually configured on the live Website should be listed in the cookie register.
- 9.2 Where analytics tools process personal information or track users beyond what is necessary for basic Website operation, Tenova Energy will apply the appropriate POPIA transparency, lawful-processing and consent controls.
- 9.3 Where reasonably available, Tenova Energy should configure analytics tools to minimise the collection of personal information, limit retention and reduce unnecessary cross-site or cross-service tracking.

10. ADVERTISING AND REMARKETING

- 10.1 Tenova Energy does not represent in this Policy that advertising or remarketing technologies are currently active.
- 10.2 If Tenova Energy later enables advertising pixels, remarketing tags or behavioural advertising technologies, the Cookie Policy and cookie register should be updated before or when those technologies are deployed.
- 10.3 Where required, such technologies should remain disabled until the user has provided the appropriate consent.
- 10.4 The use of cookie-derived contact or behavioural information for direct marketing must also comply with POPIA's requirements governing unsolicited electronic direct marketing.

11. EMBEDDED THIRD-PARTY CONTENT

- 11.1 The Website may from time to time include embedded videos, maps, social-media features or other third-party content.
- 11.2 An embedded provider may receive technical information about a user's device or interaction and may place cookies, depending on its configuration.
- 11.3 Where reasonably practicable and appropriate, Tenova Energy should use privacy-enhancing configurations or delay non-essential third-party embeds until the relevant preference has been selected.
- 11.4 Users should consult the privacy and cookie notices of the relevant third-party providers for information about their independent processing practices.

12. MANAGING COOKIES THROUGH YOUR BROWSER

- 12.1 Most browsers allow users to view, block, restrict or delete cookies through browser or device settings.
- 12.2 The method differs by browser and device. Users should consult the help or privacy settings provided by their browser or device manufacturer.
- 12.3 Deleting cookies may remove stored preferences and may cause the Website to request those preferences again.
- 12.4 Blocking all cookies, including strictly necessary cookies, may affect the availability or operation of some Website functions.

13. RETENTION

- 13.1 Cookie retention periods should be proportionate to the purpose for which each cookie is used.
- 13.2 Session cookies ordinarily expire when the browser session ends. Persistent cookies may remain for a defined period unless the user deletes them earlier.
- 13.3 The specific duration of material cookies used on the Website should be recorded in the cookie register in Appendix A or in the Website's live cookie preference tool.
- 13.4 Personal information derived from cookies will not be retained longer than authorised under Tenova Energy's Privacy Policy and applicable law.

14. SECURITY

- 14.1 Tenova Energy will take appropriate and reasonable technical and organisational measures to protect personal information processed through Website technologies against unlawful access, loss, damage, destruction or unauthorised processing.
- 14.2 Third-party cookie and technology providers should be assessed for appropriate privacy and security safeguards where they process personal information on Tenova Energy's behalf.
- 14.3 No internet technology can be guaranteed to be completely secure, and this Policy does not make an absolute guarantee against all security incidents.

15. CROSS-BORDER PROCESSING

- 15.1 Some website, hosting, analytics or technology providers may process information outside South Africa.
- 15.2 Where cookie-derived personal information is transferred outside South Africa, Tenova Energy will apply the requirements of section 72 of POPIA and the safeguards described in the Tenova Energy Privacy Policy.
- 15.3 The actual locations and providers used should be assessed as part of Tenova Energy's website and vendor compliance review.

16. DIRECT MARKETING

- 16.1 Cookies do not by themselves authorise Tenova Energy to send unsolicited electronic direct marketing.
- 16.2 Any use of personal information for electronic direct marketing must comply with section 69 of POPIA and other applicable law.
- 16.3 Where marketing consent is required, it should be obtained separately or through an appropriately clear mechanism and should not be bundled unnecessarily with consent to unrelated cookies.

17. CHILDREN

- 17.1 The Website is primarily intended for adults and business users and is not designed to profile children through advertising or tracking technologies.

- 17.2 If Tenova Energy later introduces functionality directed at children or knowingly processes children's personal information through tracking technologies, it will assess and implement the additional safeguards required by POPIA before that processing occurs.

18. YOUR PRIVACY RIGHTS

- 18.1 Where cookie-related data constitutes personal information, data subjects have the rights described in the Tenova Energy Privacy Policy, subject to POPIA.
- 18.2 These may include rights to request access, correction or deletion, object to certain processing, withdraw consent where consent is relied upon, and lodge a complaint with the Information Regulator.
- 18.3 Privacy requests may be sent to info@tenova.energy.

19. CHANGES TO THIS COOKIE POLICY

- 19.1 Tenova Energy may update this Cookie Policy when the Website, technologies, providers or applicable legal requirements change.
- 19.2 The latest version will be made available on the Website and will display its effective or last-updated date.
- 19.3 Where a material change affects a user's consent choice, Tenova Energy should request a new preference where appropriate.

20. CONTACT DETAILS

- 20.1 Questions about cookies, tracking technologies or this Policy may be directed to:

Tenova Energy (Pty) Ltd
Registration No. 2026/007850/07
Attention: Information Officer / Privacy Contact
17 Zasm Ave, Emgwenya, Mpumalanga 1195, South Africa
PO Box 204, Emgwenya, Mpumalanga 1195, South Africa
Email: info@tenova.energy
Website: <https://www.tenova.energy>

APPENDIX A - WEBSITE COOKIE REGISTER

Complete this register after auditing the live Tenova Energy website. Do not publish guessed cookie names, providers or durations. The live cookie preference tool may be used instead of this table if it provides the same information.

Cookie Technology /	Provider	Purpose	Category	Duration	Consent
[Audit required]	[Provider]	[Purpose]	Strictly necessary / Functional / Analytics / Marketing	[Session / period]	Required / Optional
[Audit required]	[Provider]	[Purpose]	[Category]	[Duration]	[Required / Optional]
[Audit required]	[Provider]	[Purpose]	[Category]	[Duration]	[Required / Optional]

APPENDIX B - RECOMMENDED COOKIE BANNER WORDING

Tenova Energy uses necessary cookies to operate and secure this website. With your permission, we may also use optional cookies for functionality, analytics or other purposes described in our Cookie Policy. You can accept all optional cookies, reject non-essential cookies, or manage your preferences.

Recommended buttons: ACCEPT ALL | REJECT NON-ESSENTIAL | MANAGE PREFERENCES

APPENDIX C - SITE.PRO IMPLEMENTATION CHECKLIST

1. Audit the published Site.pro website with the browser developer tools or an appropriate cookie scanner to identify every cookie, local-storage item, pixel and third-party embed.
2. Confirm whether Site.pro itself sets essential, functional or analytics cookies and record the exact cookie names and durations.
3. Confirm whether Google Analytics, Google Tag Manager, Google Ads, Meta Pixel, YouTube, Vimeo, maps, chat widgets or social-media plugins are actually enabled.
4. Do not list Google Analytics or advertising cookies merely because they appeared in the old Tenova Energy privacy document.
5. If non-essential tracking is active, configure a cookie banner/preference mechanism that can block those technologies until the required preference is selected.
6. Provide a genuine 'Reject non-essential' option as well as an 'Accept all' option if optional cookies are used.
7. Make the Cookie Policy accessible from the website footer and from the cookie banner.
8. Keep the Privacy Policy and Cookie Policy consistent regarding providers, international transfers, analytics and marketing.
9. Re-audit cookies whenever Site.pro plugins, analytics, advertising, embedded media or website functionality changes.
10. Keep evidence of the cookie audit, consent configuration and material changes as part of Tenova Energy's POPIA compliance records.

APPENDIX D - LEGAL AND OPERATIONAL NOTE

This policy is a POPIA-aligned operational draft for Tenova Energy's South African website. South African law does not provide a single standalone 'cookie law' identical to every overseas regime; the legal treatment depends on whether and how cookie technologies process personal information, their purpose, and the applicable lawful-processing and transparency requirements. The live website configuration must therefore be checked before this document is published as a factual statement of Tenova Energy's practices.