



TENOVA ENERGY (PTY) LTD

WEBSITE & DIGITAL SERVICES

PRIVACY POLICY

Protection of Personal Information Act 4 of 2013 (POPIA)

Registration number: 2026/007850/07

Physical address: 17 Zasm Ave, Emgwenya, Mpumalanga 1195, South Africa

Postal address: PO Box 204, Emgwenya, Mpumalanga 1195, South Africa

Email: info@tenova.energy

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

Effective date / Last updated: 26 September 2026

LEGAL REVIEW NOTE

This revised policy is structured as a South African POPIA privacy notice. Operational details such as the appointed Information Officer's name and any specific third-party analytics, hosting, payment, KYC or cloud providers should be confirmed.

DOCUMENT REVIEW AND KEY CORRECTIONS

The uploaded policy contained useful privacy concepts, but also contained legacy references, duplicated provisions, unrelated website terms, and statements that should not remain unless factually verified. This version separates the privacy notice from general website terms and aligns the notice more closely with POPIA.

Important: Tenova Energy should separately maintain and publish its PAIA Manual and ensure its Information Officer is registered with the Information Regulator. The privacy policy itself does not replace those compliance obligations.

1. INTRODUCTION AND PURPOSE

- 1.1 Tenova Energy (Pty) Ltd ("Tenova Energy", "we", "us" or "our") respects privacy and is committed to processing personal information lawfully, reasonably and transparently.
- 1.2 This Privacy Policy explains what personal information we collect or receive, why and how we process it, who we may share it with, how long we keep it, how we protect it, and the rights available to data subjects.
- 1.3 This Policy is intended to serve, where applicable, as a notification to data subjects in terms of section 18 of the Protection of Personal Information Act 4 of 2013 ("POPIA").
- 1.4 This Policy applies to www.tenova.energy and to Tenova Energy's related digital forms, portals, applications and online services that expressly refer or link to this Policy (collectively, the "Services").
- 1.5 A separate privacy notice may apply where a particular project, service, recruitment process, investor process, supplier process or technology deployment requires additional or different processing.

2. RESPONSIBLE PARTY AND CONTACT DETAILS

- 2.1 For purposes of POPIA, the party responsible is Tenova Energy (Pty) Ltd, registration number 2026/007850/07.
- 2.2 Our physical address is 17 Zasm Ave, Emgwenya, Mpumalanga 1195, South Africa. Our postal address is PO Box 204, Emgwenya, Mpumalanga 1195, South Africa.
- 2.3 Privacy enquiries may be directed to info@tenova.energy.
- 2.4 Information Officer: [INSERT FULL NAME OF REGISTERED INFORMATION OFFICER BEFORE PUBLICATION]. The Information Officer may be contacted through info@tenova.energy unless a dedicated POPIA address is published by Tenova Energy.
- 2.5 Tenova Energy should keep its Information Officer registration and contact particulars current with the Information Regulator.

3. DEFINITIONS

- 3.1 **Personal information** has the meaning given in POPIA and includes information relating to an identifiable, natural living person and, where applicable, an identifiable existing juristic person.
- 3.2 **Processing** includes collecting, receiving, recording, organising, storing, updating, retrieving, using, disseminating, merging, restricting, erasing or destroying personal information.
- 3.3 **Data subject** means the person to whom personal information relates.
- 3.4 **Operator** means a person who processes personal information for Tenova Energy in terms of a contract or mandate without coming under Tenova Energy's direct authority.
- 3.5 **Special personal information** and "personal information of children" have the meanings and protections assigned to them by POPIA.

4. PERSONAL INFORMATION WE MAY COLLECT

- 4.2 Depending on your interaction with us, we may process identification information such as name, surname, title, date of birth, identity or passport information where legitimately required.
- 4.3 We may process contact and business information, including email address, telephone number, postal or physical address, organisation, position, professional details and correspondence.
- 4.4 Where relevant to a transaction, project or lawful verification process, we may process financial, banking, invoicing, payment or transaction information. Payment card information may be processed by an authorised payment service provider rather than stored directly by Tenova Energy.
- 4.5 We may process technical and usage information, including IP address, browser and device information, operating system, referring pages, log data, cookie identifiers, approximate location derived from technical information, and information about how you interact with the Services.
- 4.6 We may process information contained in enquiries, proposals, applications, project submissions, supplier records, investor communications, contracts, surveys and other information voluntarily submitted to us.

- 4.7 Where identity, KYC, KYB, anti-fraud or compliance verification is genuinely required, we may process supporting identification and verification information. Biometric or other special personal information will only be processed where permitted by law and subject to the safeguards required by POPIA.
- 4.8 We do not intentionally collect information that is excessive or unrelated to a legitimate, specified purpose.

5. SOURCES OF PERSONAL INFORMATION

- 5.1 We generally collect personal information directly from you when you contact us, complete a form, enter into discussions or agreements with us, use the Services, attend an event, submit a proposal, or otherwise communicate with Tenova Energy.
- 5.2 Where permitted by law, information may also be obtained from your employer or organisation, authorised representatives, business partners, service providers, public registers, public websites, professional networks, verification providers, regulators or other lawful sources.
- 5.3 Where personal information is not collected directly from you, Tenova Energy will take reasonably practicable steps to provide the information required by POPIA, unless an applicable statutory exception applies.

6. PURPOSES FOR WHICH WE PROCESS PERSONAL INFORMATION

- 6.1 to operate, administer, secure, maintain and improve the Services;
- 6.2 to respond to enquiries, requests, proposals and communications;
- 6.3 to establish and manage business, customer, supplier, partner, investor and project relationships;
- 6.4 to perform contracts, administer transactions, issue or process invoices and maintain business records;
- 6.5 to conduct lawful identity, due diligence, KYC/KYB, sanctions, fraud-prevention, risk and compliance checks where applicable;
- 6.6 to protect Tenova Energy, its systems, users, partners and property against fraud, misuse, cyber threats or unlawful activity;
- 6.7 to comply with legal, regulatory, tax, accounting, corporate-governance and record-keeping obligations;
- 6.8 to establish, exercise or defend legal rights and claims;
- 6.9 to perform analytics, research, service improvement and business planning using information that is appropriately limited, aggregated or de-identified where practicable;
- 6.10 to send service, administrative, security or transactional communications; and
- 6.11 to conduct direct marketing only in accordance with applicable law and the choices described in this Policy.

7. LAWFUL BASIS AND PROCESSING LIMITATION

- 7.1 Tenova Energy will process personal information only where a lawful justification exists under POPIA. Depending on the circumstances, processing may be based on consent, the conclusion or performance of a contract, compliance with a legal obligation, protection of a legitimate interest of the data subject, performance of a public-law duty where applicable, or pursuit of Tenova Energy's or a third party's legitimate interests, subject to POPIA.
- 7.2 Where consent is the applicable legal basis, consent may be withdrawn, subject to legal and contractual limitations and without affecting processing that was lawful before withdrawal.
- 7.3 Tenova Energy will seek to ensure that personal information is adequate, relevant and not excessive for the purpose for which it is processed.

8. VOLUNTARY OR MANDATORY SUPPLY OF INFORMATION

- 8.1 Unless a law, contract, regulatory requirement or legitimate operational requirement makes information necessary, providing personal information to Tenova Energy is generally voluntary.
- 8.2 If information required to conclude or perform a contract, verify identity, meet a legal obligation, respond to a request, or provide a requested service is not supplied, Tenova Energy may be unable to proceed with the relevant transaction, relationship, request or service.
- 8.3 Where a particular law requires the collection of specified information, Tenova Energy will identify that requirement where reasonably practicable in the relevant form, process, contract or notice.

9 DISCLOSURE AND RECIPIENTS

- 9.1 Tenova Energy does not sell personal information as a business practice.
- 9.2 Personal information may be disclosed, on a need-to-know basis and subject to appropriate safeguards, to authorised employees, directors, professional advisers, auditors, insurers, banks, payment processors, hosting and cloud providers, IT and cybersecurity providers, communications providers, verification or compliance providers, project partners, contractors and other operators that assist Tenova Energy.
- 9.3 We may disclose information to regulators, courts, law-enforcement authorities, government bodies or other people where required or permitted by law, or where reasonably necessary to protect lawful rights and interests.
- 9.4 If Tenova Energy undergoes a merger, restructuring, financing, sale of assets or other corporate transactions, relevant information may be disclosed to advisers and prospective or actual transaction parties subject to lawful confidentiality and privacy safeguards.
- 9.5 Operators processing personal information for Tenova Energy must be subject to appropriate contractual and security obligations required by POPIA.

10 CROSS-BORDER TRANSFERS

- 10.1 Some service providers or technology infrastructure used by Tenova Energy may process or store information outside South Africa.
- 10.2 Tenova Energy will transfer personal information outside the Republic only where permitted by section 72 of POPIA, including where the recipient is subject to an adequate law, binding corporate rules or binding agreement providing an adequate level of protection, where the data subject consents, or where another statutory ground for transfer applies.
- 10.3 Where a contemplated transfer involves special personal information or children's information and prior authorisation is legally required, Tenova Energy will obtain the required authorisation before commencing that processing.

11 DIRECT MARKETING

- 11.1 Tenova Energy will conduct direct marketing by electronic communication in accordance with POPIA and other applicable laws.
- 11.2 Where required, Tenova Energy will obtain consent before sending unsolicited electronic direct marketing. Where the recipient is an existing customer, marketing will be limited to circumstances permitted by law.
- 11.3 Every qualifying electronic marketing communication will provide a reasonably accessible opportunity to opt out or unsubscribe.
- 11.4 A person may object to direct marketing or withdraw marketing consent by using the unsubscribe facility in the communication or by contacting info@tenova.energy. Tenova Energy may retain minimal suppression information necessary to honour an opt-out.

12 COOKIES AND SIMILAR TECHNOLOGIES

- 12.1 The Services may use cookies and similar technologies for functions such as security, session management, preferences, performance measurement and analytics.
- 12.2 Strictly necessary cookies may be required for the operation and security of the Services. Where consent is legally required for non-essential analytics, advertising or similar technologies, Tenova Energy will seek the appropriate consent before activating them.
- 12.3 Users can control certain cookies through browser settings and, where implemented, through Tenova Energy's cookie preference tool. Blocking cookies may affect website functionality.
- 12.4 Tenova Energy should publish or maintain a separate Cookie Notice where the website uses non-essential cookies, analytics or advertising technologies, identifying the categories and relevant third parties actually in use.

13 INFORMATION QUALITY

- 13.1 Tenova Energy will take reasonably practicable steps to ensure that personal information is complete, accurate, not misleading and updated where necessary, having regard to the purpose for which it is collected or further processed.
- 13.2 Data subjects are encouraged to notify Tenova Energy when relevant personal information changes or is inaccurate.

14 RETENTION, DELETION AND DE-IDENTIFICATION

- 14.1 Tenova Energy will not retain records of personal information for longer than is necessary to achieve the purpose for which the information was collected or subsequently processed, unless retention is required or authorised by law, reasonably required for lawful business purposes, required by contract, or consented to where applicable.
- 14.2 Retention periods may vary according to the nature of the information, the relevant relationship, legal limitation periods, tax and accounting obligations, regulatory requirements, dispute requirements and legitimate evidential needs.
- 14.3 When Tenova Energy is no longer authorised to retain a record, it will destroy, delete or de-identify the information as soon as reasonably practicable and in a manner that prevents reconstruction where required by POPIA.
- 14.4 Tenova Energy may restrict processing where required by POPIA, including while the accuracy of information is being contested or where information must be preserved as evidence.

15 SECURITY SAFEGUARDS AND SECURITY COMPROMISES

- 15.1 Tenova Energy will take appropriate, reasonable technical and organisational measures designed to prevent loss of, damage to, unauthorised destruction of, unlawful access to or unlawful processing of personal information.
- 15.2 Safeguards may include access controls, authentication, encryption where appropriate, backups, secure configuration, network protection, confidentiality obligations, operator controls, staff awareness, monitoring and incident-response measures, having regard to the risks and available technology.
- 15.3 No electronic transmission or storage system can be guaranteed to be completely secure. Tenova Energy therefore does not make an absolute guarantee that a security incident can never occur.
- 15.4 Where there are reasonable grounds to believe that personal information has been accessed or acquired by an unauthorised person, Tenova Energy will notify the Information Regulator and affected data subjects in accordance with section 22 of POPIA, subject to the exceptions and timing requirements permitted by law.

16 SPECIAL PERSONAL INFORMATION AND CHILDREN

- 16.1 Tenova Energy will not intentionally process special personal information unless a lawful authorisation or exception under POPIA applies.
- 16.2 The Services are primarily directed at adults and business users. Tenova Energy does not knowingly solicit personal information from children through the general website.
- 16.3 Where a legitimate Tenova Energy activity requires processing a child's personal information, such processing will occur only where permitted by POPIA, including with the authorisation of a competent person or another applicable legal basis, and with appropriate safeguards.

17 AUTOMATED DECISION-MAKING

- 17.1 Tenova Energy will not subject a data subject to a decision based solely on automated processing that produces legal consequences or substantially affects that person where POPIA prohibits such a decision, unless an applicable statutory exception applies.
- 17.2 If Tenova Energy introduces material automated decision-making, profiling or artificial-intelligence functionality involving personal information, it will assess the privacy impact and provide additional notice where required.

18 DATA SUBJECT RIGHTS

- 18.1 be informed that personal information is being collected and, where applicable, of a qualifying security compromise;
- 18.2 ask whether Tenova Energy holds personal information about the data subject and request access to it, subject to POPIA and PAIA;
- 18.3 request correction or deletion of personal information that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or unlawfully obtained;
- 18.4 request destruction or deletion of records Tenova Energy is no longer authorised to retain, subject to lawful retention requirements;
- 18.5 object, on grounds permitted by POPIA, to certain processing;
- 18.6 object at any time to direct marketing and withdraw marketing consent;
- 18.7 withdraw consent where consent is the applicable legal basis, without affecting prior lawful processing;
- 18.8 request restriction of processing in circumstances recognised by POPIA; and
- 18.9 lodge a complaint with the Information Regulator or pursue other remedies available under law.
- 18.10 Requests may be sent to info@tenova.energy. Tenova Energy may require reasonable proof of identity before disclosing, correcting or deleting personal information and may process requests in accordance with POPIA, PAIA and prescribed forms or fees where applicable.

19 PAIA AND INFORMATION REGULATOR

- 19.1 Access to records may be subject to the Promotion of Access to Information Act 2 of 2000 ("PAIA") and Tenova Energy's PAIA Manual.
- 19.2 Tenova Energy should make its current PAIA Manual available through its website and at its office as required by applicable law.
- 19.3 A data subject who is dissatisfied with Tenova Energy's handling of personal information may lodge a complaint with the Information Regulator (South Africa).
- 19.4 Information Regulator contact details at the date of this Policy: Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg; PO Box 31533, Braamfontein, Johannesburg, 2017; telephone 010 023 5200; email enquiries@inforegulator.org.za; website <https://inforegulator.org.za>.
- 19.5 The Regulator's contact details may change. Users should consult the Regulator's official website for current complaint channels and prescribed forms.

20 THIRD-PARTY WEBSITES AND SERVICES

- 20.1 The Services may contain links to websites, platforms or services operated by third parties. Tenova Energy does not control the privacy practices of independent third parties.
- 20.2 Users should review the privacy notices of third parties before providing personal information to them. Where a third-party acts as Tenova Energy's operator, Tenova Energy will address that relationship in accordance with applicable law.

21 FOREIGN PRIVACY LAWS

- 21.1 This Policy is primarily drafted for Tenova Energy's South African operations and POPIA compliance.
- 21.2 If Tenova Energy's activities are subject to another jurisdiction's privacy law, including the GDPR, that law will apply only to the extent that Tenova Energy falls within its territorial and material scope. Nothing in this Policy should be read as an admission that a foreign privacy law applies to every Tenova Energy activity.

22 CHANGES TO THIS PRIVACY-POLICY

- 22.1 Tenova Energy may update this Policy to reflect changes in law, technology, services or processing practices.
- 22.2 The current version and effective date will be published on www.tenova.energy. Where a change materially affects the way personal information is processed, Tenova Energy will take reasonable steps to provide additional notice where required.
- 22.3 Changes will not retrospectively legitimise processing that was unlawful when undertaken.

23 CONTACT TENOVA ENERGY

- 23.1 For privacy enquiries, objections, access requests, correction or deletion requests, or complaints, contact:
Tenova Energy (Pty) Ltd
Registration number: 2026/007850/07
Attention: Information Officer
Physical address: 17 Zasm Ave, Emgwenya, Mpumalanga 1195, South Africa
Postal address: PO Box 204, Emgwenya, Mpumalanga 1195, South Africa
Email: info@tenova.energy
Website: <https://www.tenova.energy>
- 23.2 Before publication, Tenova Energy should insert the full name and, if different, the official contact details of its registered Information Officer.

APPENDIX A - PUBLICATION AND COMPLIANCE CHECKLIST

1. Insert the full name of Tenova Energy's registered Information Officer.
2. Confirm that the Information Officer is registered with the Information Regulator.
3. Publish and maintain a compliant PAIA Manual and required prescribed forms.
4. Confirm all actual hosting, cloud, analytics, CRM, email, payment, KYC/KYB and security providers and update the policy/cookie notice where necessary.
5. Implement a cookie consent mechanism if non-essential cookies or tracking technologies are used.
6. Maintain operator/data-processing agreements with service providers that process personal information for Tenova Energy.
7. Maintain an internal retention schedule rather than retaining information indefinitely.
8. Maintain a documented security-incident and POPIA section 22 notification procedure.
9. Maintain procedures for access, correction/deletion, objection, direct-marketing opt-out and complaints.
10. Assess cross-border transfers and document the applicable section 72 safeguard.
11. Assess whether any processing triggers prior authorisation under section 57 of POPIA before that processing begins.
12. Keep Website Terms & Conditions, financial/investment disclaimers, intellectual-property terms, payment terms and the Privacy Policy as separate legal documents.

APPENDIX B - LEGAL BASIS USED FOR THIS REVISION

This revision was prepared with reference to POPIA, including the lawful-processing conditions, section 18 notification requirements, security-compromise obligations, direct-marketing rules and transborder information-flow requirements, together with PAIA and the Information Regulator's current public compliance resources. It is a practical compliance draft and should be reviewed by Tenova Energy's South African legal adviser against the company's actual systems and processing activities before final publication.