ADDENDUM TO EXTERNAL PRIVACY NOTICE:
BOTSWANA

No	Topic	Description
1	**What is the purpose of this notice?**	This addendum ("**Addendum**") supplements Astron Energy Proprietary Limited's "*External Privacy Notice*" (the "**Main Notice**"). This notice relates to Astron Energy Botswana Proprietary Limited ("**we**", "**us**", "**our**"). As a company registered and operating in Botswana, we are a "**data controller**" in terms of the Botswana Data Protection Act of 2024 ("**DPA**"). We are required to comply with the DPA and any other laws which apply to our relationship with you. This Addendum should be read in conjunction with the Main Notice to notify you about how we collect, store, retain, transfer, share, delete, and otherwise "**process**" your personal data. The Main Notice and this addendum are collectively referred to as the "**Botswana Notice**" or the "**notice**". This Addendum contains key differences with the Main Notice and additional information of which you should be aware. The terms upon which we process your personal data only differs to the extent indicated in this Addendum; the remaining terms are indicated in the Main Notice.
2	**How should this notice be interpreted?**	When considering the Botswana Notice (i.e. the Main Notice and / or the Addendum), any reference to - • "**Information Regulator**" should be interpreted as reference to the "**Commissioner**", being the data protection authority in Botswana; • "**POPIA**" should be interpreted to refer to the "**DPA**"; • "**personal information**" means "**personal data**" as defined in the DPA; • "**South Africa**" should be interpreted as a reference to "**Botswana**"; • "**special personal information**" means "**sensitive personal data**" as defined in the DPA; • "**you**", "**your**" or "**yours**" applies to you if you are a natural person / individual; and • a South African entity, regulator, concept or process, should be interpreted as a reference to the analogous entity, regulator, concept or process in Botswana. Terms used and not otherwise defined in the Addendum are defined in the Main Notice, alternatively, in the DPA.
3	**Who does this notice apply to?**	Unlike POPIA, the Botswana DPA only applies to individuals. The Botswana Notice therefore applies to any natural person / individual listed in 3 of the Main Notice.

No	Topic	Description
4	**What other documents are applicable?**	See 6 of the Main Notice, excluding 6.1.2.
5	**Why do we process your personal data?**	We process your personal data based on the lawful bases and reasons indicated in 8 of the Main Notice, but that we will not process your personal data solely based on your legitimate interests. We may however process your personal data where it is for your vital interests (life or limb). This will be limited to emergency situations where there is no other option available.
6	**Do we process your sensitive personal data and criminal data?**	See 9 of the Main Notice subject to that we may also process your sensitive personal data if it is in your vital interests that we do so.
7	**How and where is your personal data stored?**	See 11 of the Main Notice but that personal data may be stored electronically on servers located in South Africa and Botswana. Hard copies of documents may also be stored at our offices with the details indicated at 14.
8	**Who do we share your personal data with?**	See 13 of the Main Notice but that we may disclose your personal data to comply with legal, regulatory or administrative obligations or requests, including in relation to Commissioner, Botswana Unified Revenue Service, Botswana Police Service, Attorney General, and Director of Public Prosecutions
9	**Do we transfer your personal data overseas?**	See 14 of the Main Notice subject to that - • personal data may be transferred to any Group Company in the United Kingdom, Switzerland, and South Africa; • where we transfer your personal data, we ensure that - (a) the country we are transferring to has been determined to have an "adequate" level of protection relating to personal data by the Commissioner; or (b) in the absence of an adequacy decision, appropriate safeguards are provided in the form of (i) binding corporate rules; (ii) standard contractual clauses; or (iii) a Code of Conduct, in each case approved by the Commissioner. You have the right to request a copy of any appropriate safeguards. The Commissioner has declared adequacy decisions for South Africa, Switzerland, and the United Kingdom, and lawful transfers are permitted to these countries without further protections.
10	**How long do we keep your personal data for?**	See 15 of the Main Notice, but that personal data will not be kept for longer than is necessary for the purpose for which it is processed. We have systems and processes in place to delete personal data when no longer required.
11	**Are there any specific laws authorising our processing of your personal data?**	Paragraph 16 of the Main Notice does not apply as it relates to South African laws. We may process your personal data in relation to Botswana company, tax, anti-money laundering, and other laws.

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<tr><th>No</th><th>Topic</th><th>Description</th></tr>
<tr><td>12</td><td>What happens if my personal data is accessed by an unauthorised person?</td><td>Paragraph 17 of the Main Notice does not apply as it relates to South African processes. If a data breach occurs, and it is likely to result in risk to the rights and freedoms of a data subject, we will notify -
the Commissioner without undue delay but no later than 72 hours following discovery; and
data subjects without undue delay.</td></tr>
<tr><td>13</td><td>What are my rights?</td><td>You have the rights afforded to you in the DPA, including the rights set out below:
<table>
<tr><th>Right</th><th>Description</th></tr>
<tr><td>Access</td><td>You have the right to request that we confirm that we process your personal data, what personal data is being processed and the further terms thereof, including (i) purpose of processing; (ii) categories of processing; (iii) recipients; (iv) period of processing; (v) sources; (vi) applicable rights; and (vii) the existence of automated decision-making.</td></tr>
<tr><td>Rectification</td><td>You have the right to request rectification if your information is inaccurate or incomplete</td></tr>
<tr><td>Erasure</td><td>You have the right to request erasure of personal data where (i) personal data is no longer necessary; (ii) there is no longer a legal ground for processing; (iii) the data subject objects to the processing and there are no overriding legitimate grounds for the processing; (iv) personal data has been unlawfully processed; or (v) personal data has to be erased in compliance with a legal obligation
to which the data controller is subject.</td></tr>
<tr><td>Restriction</td><td>You have the right to request that we restrict the processing of your personal data where (i) its accuracy is being contested; (ii) processing is unlawful but the data subject requests restriction rather than erasure; (iii) the controller no longer needs the data but the data subject needs it for the exercise or establishment of a legal claim or defence; (iv) the data subject has objected to the processing pending verification of the lawfulness of such processing.</td></tr>
<tr><td>Data portability</td><td>Where (i) your data is processed by automated means; and (ii) we rely on either consent or the performance of a contract as legal basis for processing, you may request that we transfer your personal data to another data controller in a commonly used format.</td></tr>
<tr><td>Objection</td><td>Where we rely on our legitimate interests as a lawful basis for processing, you have the right to object to that processing. Following an objection, we are only permitted to process your personal data where we demonstrate compelling reasons to do so.

You also have the right to object to processing for purposes of direct marketing.</td></tr>
<tr><td>Withdraw consent</td><td>Where we rely on your consent to process personal data, you have the right to withdraw consent at any time without affecting the lawfulness of the processing which occurred before the withdrawal.</td></tr>
<tr><td>Automated decision making</td><td>You have the right not to be subject to automated decision making, including profiling which has legal or similar significant effects</td></tr>
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<tr><th>No</th><th>Topic</th><th>Description</th></tr>
<tr><td></td><td></td><td>We may request proof of identification to verify your request. We are also entitled to charge a fee or refuse requests which are manifestly unfounded or excessive.

We will respond to any data subject request without undue delay, but in any event within one month. However, taking into account the complexity and number of the requests, and with the approval of the Commission, this period may be extended for a further period not exceeding two months.

We would appreciate if you could give us the opportunity to resolve any data protection related issue you may have by contacting us at the details indicated in 14. If we are unable to do so, you may lodge a complaint with the Commissioner, at the following details:

<table><tr><td>Email:</td><td>privacy@bocra.org.bw</td></tr><tr><td>Telephone No.:</td><td>+267 3957755</td></tr><tr><td>Physical and Postal Address:</td><td>Plot 50671, Independence Avenue, Gaborone, Botswana</td></tr></table></td></tr>
<tr><td>14</td><td>Who should I contact if I have an issue?</td><td>We are not required to have a data protection officer in terms of the DPA. However, should you wish to exercise your rights or have any other question / query, please feel free to contact our data protection representative:

<table><tr><td>Representative:</td><td>Bruce Buno</td></tr><tr><td>Email:</td><td>Bruce.buno@astronenergy.co.za</td></tr><tr><td>Telephone No.:</td><td>+26 77 131 8779</td></tr><tr><td>Physical and Postal Address:</td><td>Astron Energy Botswana
Lot 1220, Nkrumah Road
Industrial Site
Gaborone
Botswana</td></tr></table></td></tr>
<tr><td>Annex A</td><td>Categories, types, and sources of personal data</td><td>See annexure A of the Main Notice, but that only categories, types, and sources of personal data relating to individuals and not companies will apply.</td></tr>
<tr><td>Annex B</td><td>Purpose and lawful basis of processing</td><td>See annexure B of the Main Notice, but that all references to legitimate interests of a data subject should be ignored.</td></tr>
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