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## Consent Management Framework

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**APPROVAL AND OWNERSHIP**

<b>Policy Owner</b>	<b>Date</b>
Group General Counsel	February 2023

<b>Approved By</b>	<b>Date</b>
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## DEFINITIONS AND ABBREVIATIONS

Table 1: Definitions

Terminology	Description
	Refer to the Barloworld Group Privacy Policy

Table 2: Abbreviations

Abbreviation	Description
POPIA	Protection of Personal Information Act
GDPR	European Union's General Data Protection Regulation

### 1 Preamble and Summary

Barloworld Group ("Barloworld") recognises information protection as a business imperative first and foremost, and secondly as a regulatory, legal and reputational issue. The evolving global Privacy regulatory landscape encourages the need for organisations such as Barloworld to strive to comply with applicable information protection laws and regulations related to Information Privacy ("Privacy") in countries where it operates.

In South Africa, the Protection of Personal Information Act ("POPIA") exists as the country's first piece of comprehensive data protection legislation. POPIA aims to protect the Personal Information of individuals and juristic persons by regulating how organisations such as Barloworld process the Personal Information of individuals and juristic persons. Further, POPIA seeks to promote transparency concerning the collection and processing of Personal Information.

Due to the nature of operations in Barloworld, Privacy compliance practices are aligned with the local Privacy laws as well as other globally recognised and leading laws and regulations such as the European Union's General Data Protection Regulation ("GDPR").

Barloworld's reputation relies on a culture of integrity and accountability that is reflected in the behaviours of our people and our suppliers involved in the processing of Personal Information on behalf of Barloworld. Therefore, Barloworld has zero tolerance for deliberate misconduct that undermines this standard. Instances of unintended ethical failures as it relates to the processing of Personal Information will be addressed on a prioritised basis.

### 2 Purpose and Objective

The purpose of this Consent Management Framework is to provide principles for consent management within Barloworld, in alignment with the Barloworld Group Privacy Policy, Data Privacy Framework and applicable Information Privacy requirements including the POPIA and GDPR provisions.

### 3 Scope

The requirements contained in this framework apply to Barloworld and its subsidiary companies or divisions and all employees (temporary and/or permanent), contractors, service providers and consultants, or any other person assigned with specific duties of processing Personal Information on behalf of Barloworld.

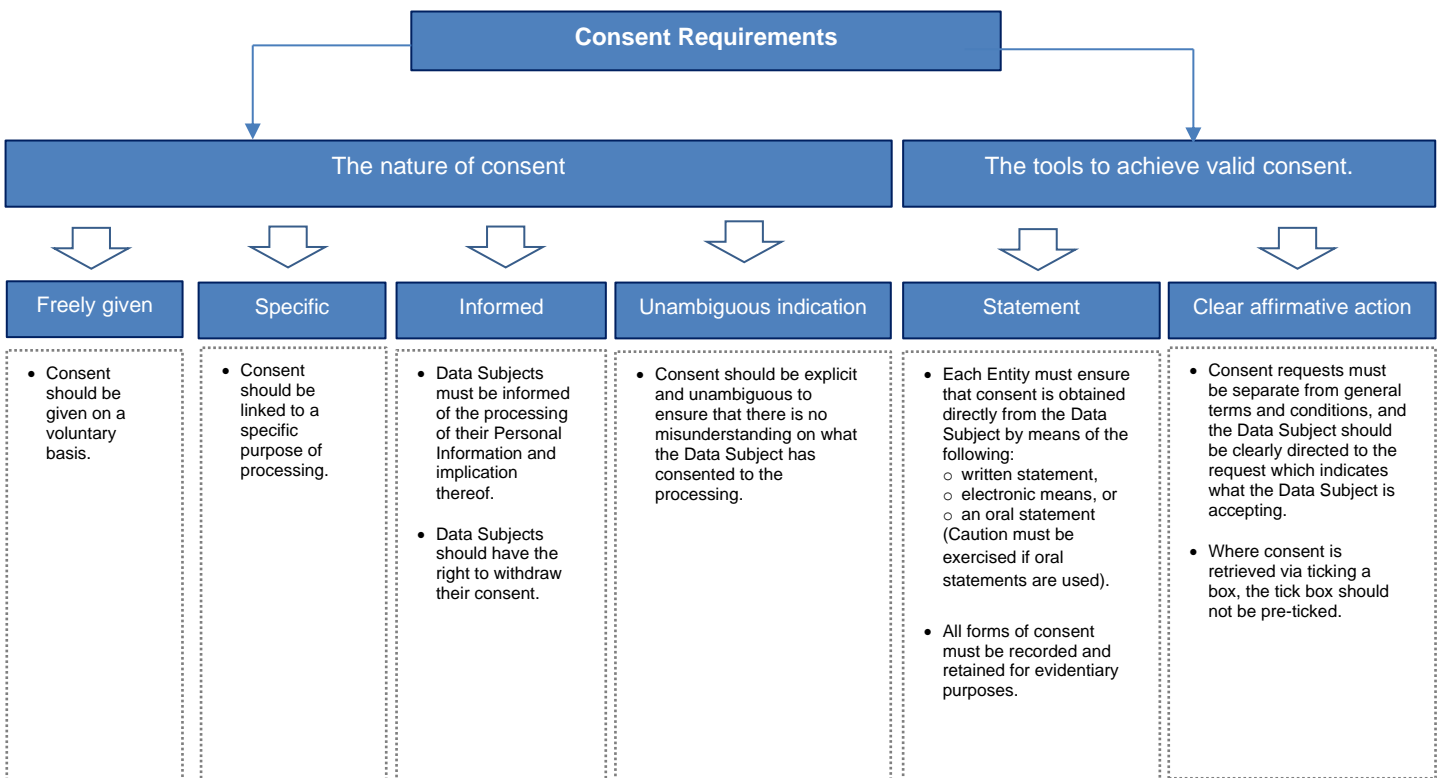
### 4 Consent Management Overview

Obtaining consent is one of the lawful bases for the processing of Personal Information. This enables organisations to comply with applicable Information Privacy requirements, including the Protection of Personal Information Act (POPIA) and EU General Data Protection Regulation (GDPR) provisions. More specifically:

- POPIA Section 11 (Consent, justification, and objection)
- GDPR Article 7, (Conditions for consent)

#### 4.1 Consent requirements

To ensure that Barloworld complies with the applicable POPIA and GDPR provisions, consent should be managed in accordance to the defined consent requirements. The figure below is an overview of consent requirements.



*Figure 1: Consent Requirements*

#### 4.2 Consent tools / mechanisms

The following consent mechanisms may be used by Barloworld to obtain consent:

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- Signing and/or completing of any form or document (hardcopy or electronic).
- Agreeing to consent via electronic means (emails, technical settings, or preference such as cookies).
- Opting in.
- Answering yes to a clear verbal consent request; and
- Any other means through which consent could be established as per Barloworld's business requirements.

### 4.3 Recording of Consent

All consent should be recorded, and evidence of the recording should be kept in alignment with the Barloworld Records Retention and Destruction policy, or for as long as Barloworld is still processing the Personal Information based on consent.

The consent should be recorded/stored, and the records of the consent should demonstrate the following:

- Who consented.
- When the consent was obtained.
- What the Data Subject was consenting to.
- Nature of the consent.
- When consent was withdrawn.

### 4.4 Managing Consent

The following should be considered for the effective management of consent.

- Biennial reviews of the consent should be conducted to verify that the Personal Information processing and purpose have not changed.
- Each Entity must have a mechanism for Data Subjects to be able to easily withdraw their consent at any time.
- Requests to withdraw consent should be addressed within a 48-hour period.

### 4.5 Consent for further processing

- Where further processing is required, the processing must be in accordance or compatible with the purpose for which the Personal Information was originally collected.
- Where the purpose of further processing is not compatible with the purpose the Personal Information was initially collected for, then the Data Subject needs to be informed and additional consent must be obtained.

#### **4.6 Cookies**

The use of cookies is limited to cases where Data Subjects have given Barloworld consent by selecting to enable cookies on their web browser. The following settings should be enabled relating to cookies:

- Data Subjects should be given the option to disable the cookies from their browser and delete all cookies stored on their computer.
- Data Subjects should be given the option to delete cookies at any time or can set their browser to reject or disable cookies on their devices.
- Data Subjects should be made aware regarding the use of cookies by Third parties sites linked to Barloworld sites.

#### **4.7 Direct marketing consent management**

Please refer to the Group Privacy Policy under the Policy Statement “6.10 Direct Marketing”.

### **5 Related Policies and Other Documents**

Document Name
Group Privacy Policy
Privacy Statement of Barloworld
Group Privacy Framework

### **6 Raising Concerns and Seeking Guidance**

If any person becomes aware of a circumstance or action that violates or appears to violate this framework on bribery and corruption, they are encouraged to contact their manager, the Group General Counsel, the Group Compliance Manager, or alternatively the Barloworld Ethics Line at [www.tip-offs.com](http://www.tip-offs.com).

The Barloworld Ethics Line is an independent and confidential system for reporting allegations of unethical behaviour, illegal actions, or actions that violate the Barloworld Worldwide Code of Conduct.

The Barloworld Global Whistleblowing Policy applies to the use of the Barloworld Ethics Line, and it contains the contact details pertaining to each company, division, or business unit.

Barloworld is committed to ensuring that no employee suffers any occupational detriment as a result of reporting a genuine concern in good faith.

### **7 Breach of Framework**

Compliance with the Framework is the responsibility of all Barloworld employees including Policy Owners and Stakeholders and failure to do so could amount to misconduct and a material breach of the contract of employment.

## **8 Deviation of Framework**

It is the responsibility of divisional executive management to ensure that this framework is adopted and approved by an appropriate divisional executive committee.

Any deviations to this Framework that amend the meaning or lower the minimum standard of the Group policy requirements must be pre-approved, in writing by Group Information Officer. Once approved, such deviations must be tabled, approved and recorded at an appropriate Group and divisional executive meeting.

Any deviations that add more specific requirements, and therefore higher the minimum standard required by this Policy, may be included at the discretion of divisional executive management and then tabled, approved and recorded at an appropriate divisional executive meeting. .

Language translations of Barloworld documents must be conducted or checked by a professional language translator to avoid translation errors that may change the meaning of the policy requirements.