

LUCID CARE (PTY) LTD

DATA RETENTION POLICY

MARCH 2026 – VERSION 1

Lucid^α

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DATA RETENTION POLICY

INTRODUCTION

A. SCOPE

This “**Policy on Retention of Personal Information**” sets out the criteria used by Lucid Care Proprietary Limited with registration number 2017/479116/07 trading as LucidCX that are subject to application of the Personal Protection of Personal Information Act No. 4 of 2013 (“POPI”) (individually or collectively, the “**Responsible Party**”) in relation to retention of Personal Information.

Unless otherwise provided herein, all terms in capital letters in this document refer to the definitions provided for in Section 1 of POPI.

CRITERIA FOR RETENTION OF PERSONAL INFORMATION

In terms of POPI, the Responsible Party must define the period for which Personal Information will be stored or, if not possible, the criteria used to determine that period.

Given that defining abstract criteria for retention is simpler and methodologically more appropriate than defining a specific Personal Information retention period, the Responsible Party has formulated a list of macro-criteria for determining retention period(s).

Subsequently, the Responsible Party will then define, where possible, specific retention periods, applying the 8 (eight) Conditions of POPI.

These criteria and specific retention periods shall, as required, be constantly updated in the Record of Processing Activities, and, in any event, in the relevant Privacy Policies.

A. ACCOUNTABILITY

The Responsible Party must ensure that the obligations imposed are given effect to.

The Responsible Party will retain any Personal Information as required by applicable legislation for the period defined by the applicable legislation.

B. PROCESSING LIMITATION

The processing of Personal Information must be lawful.

C. PURPOSE SPECIFIC

Personal Information must be collected for a specific, explicitly defined, and legitimate purpose. The Responsible Party will retain any Personal Information necessary for the purpose for which it has been collected for as long as it remains necessary for that purpose.

D. FURTHER PROCESSING LIMITATION

Personal Information may not be further processed in a manner that is not in accordance with and incompatible with its intended purpose.

E. INFORMATION QUALITY

The Responsible Party must take reasonable steps to ensure that the Personal Information collected is complete, accurate, not misleading and updated where necessary.

F. TRANSPARENCY

The Data Subject must be informed that their Personal Information is collected and the purpose of its collection.

G. SECURITY SAFEGUARDS

The Responsible Party must take appropriate, reasonable, technical, and organisational steps to ensure that Personal Information is protected.

H. DATA SUBJECT PARTICIPATION

Data Subjects may request access to Personal Information and to the correction and/or deletion of Personal Information.

The table below defines the specific Personal Information retention period as required by LucidCX. LucidCX's specific Personal Information retention is to be applied in accordance with "**Annexure A**" which is required by the relevant legislation.

BUSINESS PROCESS	TYPE OF PERSONAL INFORMATION OR DOCUMENTS	PERSONAL INFORMATION RETENTION PERIOD AS REQUIRED BY LUCID CX
<u>Human Resources</u>	Recruitment of Candidates	6 months
	Administrative management of employees, temporary workers, interns and consultants, related to: <ul style="list-style-type: none"> • establishment of the relationship, subsequent career path (eg: transfer between companies within the same Group, change of duties, promotion, etc.) and termination of the employment relationship • verification of presence • identification documents and bank details • information of family members • tax returns and information necessary for the tax withholding agent • benefits • business travel • corporate welfare • personnel evaluations • union memberships • wage/salary records, severance indemnity • other documentation relating to employee remuneration 	6 months or for as long as it is required by law, tax or otherwise and for so long as the financial records are necessary for accounting purposes.
	Accidents at work and professional illnesses	For as long as it is required by law, Occupational Health and Safety, Insurance and otherwise

	Management of labour-related proceedings	3 years as otherwise determined by law.
	Images recorded by video surveillance systems	To be determined by LucidCX

<u>Legal Affairs</u>	Agreements	5 Years or as otherwise determined by law.
	Legal proceedings	5 Years or as otherwise determined by law.
	Trademarks, Patents and Copyrights	5 Years or as otherwise determined by law.
	Corporate documents	5 Years or as otherwise determined by law.
<u>Finance</u>	Stakeholder / third-party and partner /supplier invoices and financial documents	5 Years or as otherwise determined by law.
	Tax returns and other tax-related documents	5 Years or as otherwise determined by law.
<u>ICT</u>	User access profiles (including log in history)	5 Years or as otherwise determined by law.
	Asset Management	5 Years or as otherwise determined by law.
<u>Historical Archives</u>	Information relating to deceased workers maintained in historical archives	5 Years or as otherwise determined by law.

ANNEXURE A

COMPANIES

The table below is in respect of the **Companies Act No.71 of 2008** (section 24)

Document	Retention Period
Any documents, accounts, books, writing, records or other information that a company is required to retain in terms of the Act or any other public regulation must be kept in written form, or other form or manner that allows that information to be converted into written form within a reasonable time.	7 Years (or longer as specified in other public regulation)
Memorandum of Incorporation, and any amendments or alterations to it, and any rules of the company including the register of company secretaries and auditors.	Retained for as long as the relevant entity remains registered as a company.
A record of previous and current directors.	7 Years
Copies of reports presented at an annual general meeting of the company.	7 Years
Copies of annual financial statements as required by the Act.	7 Years
Copies of accounting records as required by the Act.	7 Years
Notice and minutes of all shareholders meetings including resolutions adopted and any document made available to the holders of securities.	7 Years
Written communications to holders of securities.	7 Years
Minutes of all meetings and resolutions of directors' meetings, directors' committees, and audit committee.	7 Years
Reference to section 50	
Securities register and uncertificated securities register	Indefinite

LABOUR RELATIONS / EMPLOYMENT

The table below is in respect of the **Basic Conditions of Employment Act No. 75 of 1997**

Document	Retention Period
The employee's name and occupation.	3 Years
The time worked by each employee.	3 Years
The remuneration paid to each employee.	3 Years
Written particulars of an employee after the termination of employment.	3 Years

The table below is in respect of the **Labour Relations Act No. 66 of 1995** and the **Protection of Personal Information Act No.4 of 2013**

Document	Retention Period
Registered trade unions and registered employers' organisation must retain the following documents in original or reproduced form – a. books of account; b. supporting vouchers c. records of subscriptions or levies paid by its members; d. income and expenditure statements; e. balance sheets; and f. auditor's report.	3 Years
Registered trade unions and registered employers' organisation must retain a list of its members.	Records of Personal Information must not be retained any longer than is necessary for achieving the purpose for which the information was collected or subsequently processed.
Registered trade unions and registered employers' organisation must retain the minutes of its meetings and the ballot papers.	3 Years

<p>An employer must retain the records in original or reproduced form that an employer is required to keep in compliance with –</p> <ul style="list-style-type: none"> a. collective agreement; or b. arbitration award. 	<p>3 Years</p>
<p>An employer must retain a record of the prescribed details of any strike, lock-out or protest action involving its employees.</p>	<p>Records of Personal Information must not be retained any longer than is necessary for achieving the purpose for which the information was collected or subsequently processed.</p>
<p>An employer should retain records for each employee specifying the nature of any disciplinary transgressions, the actions taken by the employer and the reasons for the actions.</p>	<p>Records of Personal Information must not be retained any longer than is necessary for achieving the purpose for which the information was collected or subsequently processed.</p>

ELECTRONIC COMMUNICATION

Electronic Communication and Transaction Act 25 of 2002

1. The Electronic Communication and Transaction Act 25 of 2002 regulates electronic communication and prohibits the abuse of information.
2. Section 51 of the ECT Act was repealed by the implementation of POPI and therefore to determine timeframes for retention of documents you have to refer to POPI.

POPIA

Protection of Personal Information Act No 4 of 2013.

POPIA should always be considered when deciding on how long information will be retained.