THE BENEFIT COUNSELLOR (PTY) LTD: DATA RETENTION POLICY

1 INTRODUCTION

1.1 Rent My Ride (Pty) Ltd ("**the Company**") is a technology company that offers a platform to connects people interested in rent an vehicle to people who have vehicle that they would like to offer for rent via an online platform ("**Rent My Ride Platform**").

1.2 The Company seeks to ensure that it retains only data necessary to effectively conduct its business and to fulfil the functions of the Rent My Ride Platform, and to ensure that data is only retained for the period legally required or otherwise as necessary for the purpose for which it was collected, and is fully deleted when no longer required.

1.3 This document sets forth the Company's policy on data retention, including:

1.3.1 What data needs to be retained;

1.3.2 How long data should be stored; and

1.3.3 Whether the data should eventually be archived or deleted.

2 SCOPE

2.1 This Policy covers all data collected by the Company and stored on the Company's owned or leased systems and media, regardless of location, and applies to both data collected and held electronically or as hard copies or paper files.

2.2 The Company will retain information in such format and for such period as may be required by any applicable South African law; including but not limited to; legislation relevant to companies, electronic communication, financial advisory and intermediatory services, financial intelligence, labour relations and tax laws.

3 REASONS FOR DATA RETENTION

3.1 The Company retains data that is necessary to effectively conduct its business and to provide access to and use of the Rent My Ride Platform and to comply with applicable laws and regulations, and other regulatory requirements.

4 RETENTION REQUIREMENTS

4.1 The following guidelines apply to the retention and destruction of data collected and stored by the Company:

4.2 *Financial / Accounting records*

4.2.1 Annual financial statements (7 years)

4.2.2 Tax returns (7 years)

4.2.3 Audit reports conducted for the Company (7 years)

4.2.4 Bank facilities and account details (7 years)

4.2.5 Details of accounting officer or auditors (indefinite)

4.2.6 Formal books of account and other financial statements (7 years)

4.2.7 Source documents (7 years)

4.2.8 Banking records (7 years)

4.3 *Company records*

4.3.1 Company name documents (indefinite or 7 years from date of deregistration of company ("**indefinite**")

4.3.2 Company registration documents (indefinite)

4.3.3 Founding statement or Memorandum of Incorporation (indefinite)

4.3.4 Share register and other statutory registers (indefinite)

4.3.5 Minutes of meetings (7 years)

4.4 *Human Resources records*

4.4.1 List of employees (7 years after termination of employment)

4.4.2 Contracts of employment with employees of the Company (7 years after termination of employment)

4.4.3 Personnel records of each employee of the Company (7 years after termination of employment)

4.4.4 Disciplinary records (Indefinite)

4.4.5 Compensation or redundancy payments (7 years)

4.4.6 Records relating to conditions of employment (7 years after termination of employment)

4.4.7 Employment Equity Plan of the Company (7 years)

4.4.8 Pension and provident fund records (7 years)

4.4.9 Employee tax information (7 years after termination of employment)

4.4.10 Files relating to client matters (7 years)

4.4.11 Payroll records (7 years)

4.4.12 Internal policies and procedures (indefinite)

4.5 *Client records*

4.5.1 Client documentation in terms of Financial Intelligence Centre Act No. 38 of 2001 (5 years)

4.5.2 Correspondence with clients (5 years)

4.5.3 Correspondence with third parties (5 years)

4.5.4 Client vehicle data uploaded to the platform (5 years)

4.5.5 Client personal information and bank account information (5 years)

4.5.6 Other information relating to, or held on behalf of the Company clients (5 years)

4.6 *Intellectual property*

4.6.1 Trade-marks, copyrights and designs held by the Company (indefinite)

4.6.2 Software licenses (expiration or termination or life of software + 6 years)

4.6.3 Records relating to domain names (life of IP right + 10 years)

4.7 *Immovable and movable property records*

4.7.1 Agreements for the lease of immovable property by the Company (6 years after expiration of contract)

4.7.2 Agreements for the lease or sale of movable property by the Company (5 years)

4.7.3 Records regarding insurance in respect of movable property (5 years)

4.7.4 Records regarding insurance in respect of immovable property (5 years)

4.7.5 Asset register (7 years from date of registration)

4.8 *Personal Information processed in terms of the Protection of Personal Information Act 4/2013* ("**POPI**")

4.8.1 In accordance with the provisions of POPI and the Privacy Policy of the Company

4.9 *Information technology*

4.9.1 Records regarding computer systems and programs held by the Company (5 years)