

TONTRAC SYSTEMS ANALYTICS WEBSITE PRIVACY POLICY

Tontrac Systems Analytics is committed to ensuring the privacy of all our Clients, Suppliers, Partners, and Staff. This policy represents our commitment as an organisation to your right to privacy, giving you a clear explanation about how we use your information and your rights over that information.

Our commitment spans the privacy planes of South African Laws as well as International privacy laws and standards. In the Republic of South Africa, the Protection of Personal Information Act, 2013 ("POPI") became fully effective in July 2021, this means that we have certain responsibilities and duties under POPI that we must follow, in particular for the processing of personal information of our Clients, Suppliers, Partners, Distributors and Staff, whilst maintaining the same advanced privacy standards or higher standard when dealing with international data.

Safeguarding your personal information is of utmost importance to us, and we've taken steps to ensure its protection and confidentiality. In addition to serving as our privacy policy, this document also functions as our notification to you, the data subject, as required by section 18 of POPI. It outlines what personal information we collect, why we collect it, how we use it, and the security measures in place to protect it.

When we talk about "processing," we mean how we collect, use, store, share, update, or handle your personal information. Generally, we'll only process your personal information when it's necessary to provide a service, offer a product, or complete a transaction. As such, we may combine your personal information and use it for the purposes outlined in this Privacy Policy.

In this document, any reference to "we," "us," or "our" pertains to Tontrac Systems Analytics. By using our services, goods, and/or products, you agree to our processing of your personal information as described in this Privacy Policy. We may also update this Privacy Policy as required by law or changes in our business practices. As such, the version of the Privacy Policy displayed on our website at the time of your interaction with us will apply.

1. What is personal information?

Personal information refers to any information that identifies you or is related to you in a specific way. This includes, but is not limited to, the following details about you:

- Age
- Biometric information
- Criminal history
- Disability
- Email address
- Employment history
- Ethnic origin
- Financial history
- Gender
- Health Information
- Identity number
- Marital Status
- Name
- Nationality
- Personal opinions, preferences, or views
- Physical address
- Religion
- Telephone number

2. Is the supply of personal information voluntary or mandatory?

The provision of certain personal information is mandatory, meaning we are required by law to collect this information. Not sharing this information means we can't meet our legal duties or business obligations with you which can inhibit our business practice. Therefore, we collect personal information as required under the laws of Republic of South Africa and as applicable for international standards.

In other cases, providing personal information is voluntary, but necessary for us to deliver products and services to you.

3. When will we process your personal information?

We will only process your personal information for lawful purposes related to our business under the following circumstances:

- a) If you have given your consent;
- b) If a legally authorized person, the law, or a court has provided consent;
- c) If necessary to fulfil a contract, we have with you;
- d) If required or permitted by law; or
- e) If necessary to protect or pursue your, our, or a third party's legitimate interest.

4. When and from where do we obtain personal information about you?

We may collect personal information about you from various sources:

- Directly from your public records;
- From publicly shared information;
- Based on your interactions with our products, services, or channels;
- Through engagement or interaction with us via our social media accounts, support desks, emails, letters, telephone calls, and surveys;
- From third parties with your consent; or
- From other sources with your permission or as required by law.

If the law mandates it, we will seek your consent before obtaining personal information from third parties. Third parties may include our partners, your spouse, dependents, employers, attorneys, payment processors, insurers, law enforcement agencies, regulatory authorities, service providers, courts, and other relevant entities.

5. Reasons we need to process your personal information

We will process your personal information for various reasons, including:

- Providing you with products, goods, and services;
- Marketing our products and services to you;
- Responding to your inquiries and complaints;
- Complying with legislative, regulatory, and compliance requirements, including directives, sanctions, and rules;
- Developing, testing, and improving products and services;
- Statistical and research purposes, such as market segmentation;
- Processing payment instruments;

- Creating, manufacturing, and printing payment issues, like payslips;
- Enabling the delivery of goods, documents, or notices to you;
- Ensuring security, identity verification, and accuracy of your personal information;
- Communicating with you and fulfilling your instructions and requests;
- Handling insurance claims and related matters; and
- Processing and assessing insurance or assurance claims / Providing insurance and assurance policies, products, and services.

6. When, how, and with whom we share your personal information?

We will share your personal information under the following conditions:

- With your consent;
- When necessary to fulfil a contract with you;
- When required by law; or
- To protect or pursue legitimate interests.

7. Under what circumstances will we transfer your information to other countries?

We transfer your personal information to other countries in the following situations:

- When your information will be adequately protected under the recipient country's laws or an agreement with the third party;
- When transfer is necessary for a contract in your interest;
- With your consent;
- When obtaining consent is not reasonably practical, but transfer is in your interest;
- If you give us an email address that's hosted outside South Africa;
- To administer certain services, for example, cloud services; or
- For all other purposes set out in this privacy policy.

We'll make sure any country, company, or person that we pass your personal information to agrees to treat your information with the same level of protection as we do.

8. How we secure your personal information

We employ appropriate and reasonable technical and organizational measures to safeguard your personal information in accordance with industry best practices. Security measures include monitoring access and usage, secure storage of records, controlled access to facilities and records, and secure record disposal. Compliance with best practice standards is ensured.

9. How long do we keep your personal information?

We retain your personal information as long as necessary under various circumstances:

- As required by law;
- As dictated by contracts
- With your consent;
- To fulfil the purposes outlined in this Privacy Policy;
- For statistical or research purposes;
- For code of conduct compliance; or
- For lawful business purposes.

We may retain your information even after the termination of our relationship, if required by applicable laws.

10. Your right to request access to your personal information

You have the right to know what personal information we hold about you, including:

- Confirmation that we possess your personal information;
- A copy or description of the record containing your personal information; or
- Identification or categories of third parties who accessed your personal information.

If you want to receive a copy of yours or other personal information, please complete the Request Form in our PAIA Manual. We will address access requests within a reasonable timeframe and may charge a reasonable fee for copies or descriptions of records or information about third parties. You will be informed of any applicable fees before we process your request. If you object, wish to amend or delete information that we may hold on you please refer to the process request process and forms for completion that can be easily accessed in our PAIA Manual.

If you've consented to processing, you may withdraw your consent. We will explain the consequences, and even if consent is withdrawn, processing may continue if the law allows or requires it. If you believe there has been a violation of your personal information protection rights, you have the right to file a complaint with us or with the South African Information Regulator. We will address your complaint to the best of our ability.

Information Regulator contact details

Postal address : PO Box 31533, Braamfontein, Johannesburg, 2017

Physical address : JD House, 27 Stiemens Street, Braamfontein, Johannesburg,
2001

Telephone number : (010) 023 5200

Email address : enquiries@infoeregulator.org.za

Website : <https://justice.gov.za/infoereg/>

How to get in touch with us

For any inquiries regarding this letter or the processing of your personal information, please contact our Information Officer:

Information Officer : **William Butler**

Contact Number : 011 465 9663 / 9783

Email Address : **Popia@Tontrac.co.za**