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9.17.1 INTRODUCTION

Welcome to our Privacy Policy. We are Unitrans, a provider of integrated operational services. This policy is applicable to us and all of our businesses. This includes Unitrans Holdings (Pty) Ltd. and Unitrans Passenger (Pty) Ltd., as well as all of their entities.

We respect your privacy and take the protection of personal information very seriously. The purpose of this policy is to describe the way that we collect, store, use, disclose and protect information.

9.17.2 AUDIENCE

This policy applies to you if you are:

- A visitor to our website;
- Supplier or service provider; or
- A customer who has ordered the goods or services that we provide.

9.17.3 PERSONAL INFORMATION

Your **personal information** includes information we collect:

- automatically when you visit our website;
- on your registration or submission;
- telephonically;
- when you apply for and use certain services;
- when you use some of our products;
- through an order, booking, or purchase; or
- when you provide it voluntarily.

It excludes anonymous, de-identified and statistical information.

Common examples

Common examples of the types of personal information which we may collect and process include your:

- **Identifying information** – such as your name, surname, date of birth or identification number of any kind;
- **Contact information** – such as your phone number or email address;
- **Address information** – such as your physical or postal address; or
- **Company information** – such as your company incorporation records, tax and VAT records, credit history, invoices and statements, insurance information and partner details.

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Sensitive personal information

Depending on the goods or services that you require, we may also collect sensitive personal information including your:

- **Financial information** – such as your bank account details;
- **Criminal information** – such as information about your commission or alleged commission of any offence or about any related legal proceedings through our external or internal disclosure channels.

9.17.4 ACCEPTANCE

Acceptance required

You may not use our website, any services we provide, or order any of our goods, if you do not accept this policy or any changes to it.

Legal capacity

You may not access our website or order our goods or services if you are younger than 18 years old or do not have legal capacity to conclude legally binding contracts.

Your obligations

You may only send us your own personal information or the information of another data subject where you have their permission to do so.

9.17.5 CHANGES

We may change this policy at any time and will notify you of the changes on our website, through our application, or by email. The changed policy applies to you if you continue using our website, our application, or our goods or services following the notification.

9.17.6 COLLECTION

Automatically through website.

When you visit our website, we automatically collect your internet usage information (including your IP address, browser details and usage information) through your browser, which we may use to display our website correctly, track your activities on it, or for other necessary purposes.

On registration

Once you register on our website or application, you will no longer be anonymous to us. You will provide us with certain personal information.

This personal information may include:

- Your name and surname;
- Your email address;
- Your telephone number;

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- Your company name, company registration number, and VAT number;
- Your postal address or street address; and
- Your username and password.

We will use this personal information to fulfil your account, provide additional services and information to you as we reasonably think appropriate, and for any other purposes set out in this policy.

On order

When you order any goods or services from us, you will be asked to provide us with additional information (goods information or services information).

Events

You will provide us with personal information when you attend an event that we host.

Cookies

We may place small text files called 'cookies' on your device when you visit our website. For more information about the cookies we use please read our **Unitrans Cookie Policy**.

Third Party Cookies

Some of our business partners use their own cookies or widgets on our website. We have no access to or control over them. Information collected by any of those cookies or widgets is governed by the privacy policy of the company that created it, and not by us.

Web beacons

Our website may contain electronic image requests (called a single-pixel gif or web beacon request) that allow us to count page views and to access cookies. Any electronic image viewed as part of a web page (including an ad banner) can act as a web beacon. Our web beacons do not collect, gather, monitor or share any of your personal information. We merely use them to compile anonymous information about our website.

Optional details

You may also provide additional information to us on a voluntary basis (optional information). This includes content or products that you decide to upload or download from our website or when you enter competitions, take advantage or promotions, respond to surveys, order certain additional goods or services, or otherwise use the optional features and functionality of our website or social media pages.

Recording calls

We may monitor and record any telephone calls that you make to us, unless you specifically request us not to.

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Purpose for collection

We may use or process any goods information, services information, or optional information that you provide to us for the purposes that you indicated when you agreed to provide it to us. Processing includes gathering your personal information, disclosing it, and combining it with other personal information. We generally collect and process your personal information for various purposes, including:

- **Goods or services purposes** – such as:
 - Collecting orders or requests for and providing our goods or services,
 - Managing our contracts with various data subjects,
 - Managing customer credit in general,
 - Processing customer requests or complaints,
 - Keeping our data subject records and information up to date,
 - Understanding our data subject’s needs better, and
 - Providing support to our customers.
- **Marketing purposes** – such as:
 - Marketing to customers,
 - Marketing to prospects, and
 - Running promotional competitions for business.
- **Business purposes** – such as:
 - Managing third party employee personal information,
 - Auditing,
 - Accounting, and
 - Business planning and due diligence, and joint ventures, disposals of business, or other proposed and actual transactions.
- **Legal purposes** – such as:
 - Handling claims and enforcing debts, and
 - Complying with regulations, or pursuing good governance.

Consent to collection

When we need explicit consent, we will get your consent to collect your personal information in accordance with applicable law when you provide us with it. You have the right to withdraw your consent at any time. This will not affect the validity of the processing prior to the withdrawal of your consent.

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9.17.7

USE

Our obligations

We may process your personal information to fulfil our obligations to you. We will only process your personal information:

- With your explicit consent;
- Where it is necessary to carry out actions for the conclusion or performance of a contract with you;
- Where it is necessary for us to comply with a legal obligation; or
- Where we can show legitimate grounds for processing your personal information.

Messages and updates

We may send administrative messages and email updates to you about the website. In some cases, we may also send you primarily promotional messages. You can choose to opt-out of promotional messages.

Targeted content

While you are logged into the website, we may display targeted adverts and other relevant information based on your personal information. In a completely automated process, computers process the personal information and match it to adverts or related information. We never share personal information with any advertiser, unless you specifically provide us with your consent to do so. Advertisers receive a record of the total number of impressions and clicks for each advert. They do not receive any personal information. If you click on an advert, we may send a referring URL to the advertiser’s website identifying that a customer is visiting from the website. We do not send personal information to advertisers with the referring URL. Once you are on the advertiser’s website however, the advertiser is able to collect your personal information.

9.17.8

DISCLOSURE

Sharing

We may share your personal information with:

- Other divisions or companies within the group of companies to which we belong so as to provide joint content and services like registration, for transactions and customer support, to help detect and prevent potentially illegal acts and violations of our policies, and to guide decisions about our products, services, and communications (they will only use this information to send you marketing communications if you have requested their goods or services);
- An affiliate, in which case we will seek to require the affiliates to honor this privacy policy;
- Our goods suppliers or service providers under contract who help supply certain goods or help with parts of our business operations, including fraud prevention, bill

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collection, marketing, technology services (our contracts dictate that these goods suppliers or service providers only use your information in connection with the goods they supply or services they perform for us and not for their own benefit);

- Credit bureaus to report account information, as permitted by law; and
- Other third parties who provide us with relevant services where appropriate.

Regulators

We may disclose your personal information as required by law or governmental audit.

Law enforcement

We may disclose personal information if required:

- By a subpoena or court order;
- To comply with any law;
- To protect the safety of any individual or the general public; and
- To prevent violation of our customer relationship terms.

No selling

We will not sell personal information. No personal information will be disclosed to anyone except as provided in this privacy policy.

Marketing purposes

We may disclose aggregate statistics (information about the customer population in general terms) about the personal information to advertisers or business partners.

Personnel

We may need to disclose personal information to our personnel to do their jobs but will not do so unnecessarily. All personnel are bound by appropriate confidentiality clauses.

Change of ownership

We may assign our rights to the personal information we process to our new owners if our ownership changes for any reason.

9.17.9

SECURITY

We take the security of personal information very seriously. We endeavour to do our best to comply with applicable data protection laws, when processing your personal information collected through our site, from other marketing efforts, as well as through our services. Our hosting company will host our website in a secure server environment that uses a firewall and other advanced security measures to prevent interference or access from outside intruders. We authorise access to personal information only for those personnel who require it to fulfil their job responsibilities. We implement disaster recover procedures where appropriate.

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9.17.10 ACCURATE AND UP TO DATE

We will try to keep the personal information we collect as accurate, complete and up to date as is necessary for the purposes defined in this policy. From time to time we may request you to update your personal information on the website. You are able to review or update any personal information that we hold on you by accessing your account online, emailing us, or phoning us. Please note that in order to better protect you and safeguard your personal information, we take steps to verify your identity before granting you access to your account or making any corrections to your personal information.

9.17.11 RETENTION

We will only retain your personal information for as long as it is necessary to fulfil the purposes explicitly set out in this policy, unless:

- Retention of the record is required or authorised by law; or
- You have consented to the retention of the record.

During the period of retention, we will continue to abide by our non-disclosure obligations and will not share or sell your personal information.

We may retain your personal information in physical or electronic records at our discretion. We retain the copyright in our databases of personal information.

9.17.12 RESTRICTION OF PROCESSING

You may request that we restrict the use of your personal information. When we restrict your personal information, we still have the right to store it but not use it.

9.17.13 TRANSFER TO ANOTHER COUNTRY

The personal information that we collect from you may be transferred to, stored and processed by our affiliates, properly vetted sub-processors and third party service providers. We may transfer your personal information outside of the country where it was collected to a foreign country. By submitting your personal information, you agree to us transferring, storing or processing it in a foreign country with less stringent data protection laws than the country in which it was collected. We will take all steps reasonably necessary to ensure that your personal information is treated securely. All sub-processors and third party service providers are under appropriate contractual obligations to ensure the safety and confidentiality of your personal information.

9.17.14 YOUR RIGHTS

Request what information we hold on you

You may request access to your personal information to receive a copy of the personal information that we hold on you.

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Updating or removing

You may choose to correct or update the personal information you have submitted to us, by clicking the relevant menu in any of the pages on our website or contacting us by phone or email.

Withdrawal of consent or objection to processing

You may withdraw your consent where we are relying on consent as a lawful justification to process. You may also object to our processing where we are relying on another lawful justification for processing. Please note that if you do so, we might not be able to provide services to you.

We may need to request additional information from you to verify your identity for you to access these rights. This is to ensure that your personal information is not disclosed to an unauthorised person.

Exercising your rights

To exercise any of your data subject rights please contact us at informationofficer@unitrans.co.za.

9.17.15 DATA BREACHES

Where we have reasonable grounds to believe that an unauthorised third party has accessed your personal information and if required by law, we will notify the relevant Regulator and you of the breach. If the law requires us to notify you, we will provide you with sufficient information to allow you to take protective measures against the potential consequences of the breach.

9.17.16 LIMITATION

We are not responsible for, give no warranties, nor make any representations in respect of the privacy policies or practices of linked or any third-party websites.

9.17.17 INFORMATION REGULATOR

If you have any concerns regarding our processing of personal information you can contact us informationofficer@unitrans.co.za or the Information Regulator at POPIAComplaints@inforegulator.org.za.

9.17.18 ENQUIRIES

Please contact us by email at informationofficer@unitrans.co.za if you have any questions about this privacy policy or how we handle your personal information.

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