

# SA TAXI HOLDINGS (PTY) LTD (“SA Taxi”)

## Privacy Policy (including personal information processing consent) (“Policy”)

### Introduction

This Policy sets out how your personal information is collected and will be used by SA Taxi, its websites and mobile applications, as well as any of our affiliated companies. The policy applies to any information, including personal and special personal information, which you provide to SA Taxi, or which SA Taxi may legitimately collect from third parties.

It is important that you read this Policy carefully before submitting any personal information to SA Taxi. By submitting any personal information to SA Taxi, you provide consent to the processing of your personal information as set out in this Policy.

The provisions of this Policy are subject to mandatory, unalterable provisions of Applicable Laws.

Please do not submit any personal information to SA Taxi if you do not agree to any of the provisions of this Policy. However, you are made aware that if you do not consent to the provisions of this Policy, or parts of the Policy, SA Taxi may not be able to provide its products and services to you.

For purposes of this Policy:

“**Applicable Laws**” means any laws, regulations, treaties and codes, including the Consumer Protection Act 68 of 2008, the Financial Intelligence Centre Act 38 of 2001, the National Credit Act 34 of 2005 and the Protection of Personal Information Act 4 of 2013, which may be applicable to your relationship with us;

“**Client**” or “**you**” means any prospective, new or existing client of SA Taxi; and

“**Personal Information**” means information as set out in in section 1 of the Protection of Personal Information Act 4 of 2013;

“**SA Taxi**”, “**we**” or “**us**” means SA Taxi Finance Holdings (Pty) Ltd or any of its subsidiaries;

“**Special Personal Information**” means information as set out in section 26 of the Protection of Personal Information Act 4 of 2013.

### Privacy and Indemnity

SA Taxi takes your privacy and the protection of your personal information very seriously. SA Taxi will take all reasonable steps to ensure that we will only use your personal information in accordance with this Policy and Applicable Laws, and that we protect your information from wrongful access. However, this privacy is a dual responsibility, and it is therefore important that you the user of SA Taxi services and channels, take all necessary and appropriate steps to protect your personal information yourself

(for example, by ensuring that all passwords for online auctions are kept secure or that your preferences are accurately recorded with us).

**You hereby indemnify and hold SA Taxi harmless from any loss, damages or injury that you may incur as a result of any unintentional disclosures of your personal information to unauthorised persons or the provision of incorrect or incomplete personal information to SA Taxi.**

## Personal Information Collected by SA Taxi

SA Taxi, and its affiliated companies, may collect the following personal and special personal information about you:

- Identifying information (full names and surname, birth date, place of birth, driver's license details, identity number and/or passport number and/or other valid permit number issued by the Department of Home Affairs);
- Contact details (postal and physical addresses, phone numbers, mobile numbers, email addresses);
- Billing details (banking details, loyalty program details);
- Financial details (details about your employment, tax number and financial information);
- Vehicle details (vehicle registration numbers, engine numbers, vin numbers, association membership details);
- Records of correspondence or enquiries from you or anyone acting on your behalf (emails, online enquiries, telephonic recordings);
- Details of contracts, credit agreements or insurance policies you enter with us; and
- Your credit history and where you have applied for credit.

We will also collect, store and use the following categories of Special Personal Information (SPI) as defined in POPIA:

- Biometric Data (images, fingerprints and voiceprints);
- Information about criminal convictions/allegations and offences

We may require you to provide additional personal information, in order for us to meet our legal or regulatory obligations. Where you provide us with the personal information of third parties, such as a person who may act as surety for your debt, or on whose behalf you buy a vehicle, you should take steps to inform the third party that you need to disclose their details to us and clearly identifying us (SA Taxi). We will process their personal information in accordance with this Policy.

## How We Collect Information

### Non-automated information collection

SA Taxi may collect information directly from you or indirectly through a legitimate third-party source (such as an agent acting on your behalf, a government institution such as Home Affairs, or a verified third-party data vendor). Information is collected by completing an application from, or requesting further

information about our vehicles, services and/or offerings, whether in writing, through our website, over the telephone, CCTV cameras, electronic communication or any other means.

We may also collect your personal information from your appointed agent, any regulator, or other third party that may hold such information to either verify information as required by law, or to improve our processes and enhance your experience with SA Taxi.

In instances where you have applied for credit, we may conduct searches at credit bureaus. Details of our searches will be kept by the credit bureau and will be available to other businesses that conduct searches with that agency for the purposes of meeting our regulatory obligations, credit assessments, debt recovery, prevention of money laundering and fraud and statistical analysis.

### Automated data collection

When you visit the SA Taxi website (sataxi.co.za), or login to one of our digital platforms (e.g. SA Taxi App), we automatically collect certain information about you, including your device, browser, IP address, location and time zone. Additionally, we may track how you use the site and/or digital platform, including how long it takes you to find what you are looking for, your browsing patterns, the links and pages you browse through and how long you spend on each one.

This information is collected by placing **Cookies** on your device and/or browser.

Cookies store information on your hard drive or browser, allowing the website to recognise that you have visited these before.

In order to collect the anonymous data (i.e. data that does not identify you personally but purely statistical data), we may use temporary “cookies” that remain in the cookies file of your browser until the browser is closed.

Cookies are small, often encrypted text files, located in browser directories. They help users navigate websites efficiently and allow certain functions, such as buying products online. When you visit websites, cookies may be stored on your computer. They are used to store a variety of information about you and your preferences, which is afterwards sent back to the visited website.

Cookies do not damage your computer. You can set your browser to notify you when you receive a cookie. This enables you to decide if you want to accept it or not. If you choose not to accept cookies from our website this may limit their functionalities or performance. You can stop your browsers from accepting cookies by changing the settings on your web browser. Explore the settings and options on your browser to disable or enable cookies.

SA Taxi uses cookies to enable more user-friendly, efficient, and safe visits to our website. We use cookies for several reasons:

- to identify you as an authorised user;
- to provide you with safe restricted access areas;
- to remember you so that when you come back to our Websites you do not need to enter your information again; and
- to understand what brought you to our Websites and what pages you have visited.

Besides these we may also use cookies which enables us to save your preference from each of your visits to our website and present you with a version of our website which reflects your preferences. Our

system is therefore able to recognize you each time you visit our website, without requiring you to systematically log in each time you visit.

You can find more information about cookies at: <http://www.allaboutcookies.org/> and for a video about cookies visit <http://www.google.com/policies/technologies/cookies/>.

## **Use of Information Collected**

We may use, transfer and disclose your personal information for the purposes of:

- Providing you with the vehicle, services, or offerings you have requested, and notifying you about important changes to these;
- Managing your contractual arrangement or relationship with us and complying with your instructions or requests;
- Detecting and preventing fraud and money laundering and/or in the interest of security and crime prevention;
- Assessing and dealing with complaints and requests;
- Operational, marketing, auditing, statistical, legal and record keeping requirements;
- Conducting sanctions and politically exposed person screening against any relevant list which SA Taxi may in its sole discretion determine;
- Verifying your identity;
- Requesting your consumer credit reports or those of any other security provider from one or more credit reporting agency in connection with any agreement between you and SA TAXI and you direct us to do so, where applicable;
- Transmitting to a registered credit bureau any information concerning your application for credit, our agreement with you, termination and non-compliance with the terms thereof;
- Transferring your personal information outside of the Republic of South Africa, including to such countries that may not offer the same level of data protection as the Republic of South Africa, including for cloud storage purposes and the use our website;
- Complying with Applicable Laws, including lawful requests for information received from local or foreign law enforcement, government and tax collection agencies;
- Recording and/or monitoring your telephone calls and electronic communications to/with SA Taxi in order to keep record thereof, accurately carry out your instructions and requests, to use as evidence and in the interests of crime prevention;
- Conducting market research;
- Where you have unsubscribed from certain direct marketing communications, for the purposes of ensuring that we do not send such direct marketing to you again;
- To disclose your personal information to third parties for reasons set out in this Policy or where it is not unlawful to do so; and
- Improving or evaluating the effectiveness of our business, vehicles, services or offerings.

## **Automated Decision Making**

In order to provide you with our products and services it may necessitate that an automated decision is taken resulting in legal consequences for you. Such automated decision will be taken in order to

conclude or execute a contract between yourself and us. In all instances the appropriate measures will be taken to protect your legitimate interests.

## Using your Personal Information for Communication Purposes

### Direct Marketing

We may from time to time contact you about our vehicles, services, and offerings, which we believe may be of interest to you, by email, phone, text or other electronic means, unless you have unsubscribed from receiving such communications.

If you no longer wish to receive e-mails from us and want to be removed from our mailing list, please e-mail us at the address [popi@sataxi.co.za](mailto:popi@sataxi.co.za)

If you choose to unsubscribe from our mailing lists, we will hold your contact details on file marked so that we do not contact you again. This is so that we do not contact you if your details are subsequently provided to us by a third party.

### Mandatory Communication

You acknowledge and agree that even if you have opted out of direct marketing communication, SA Taxi has a legal and regulatory obligation to communicate with you regarding

- Changes to any products you hold with SA Taxi
- Your account statements
- Your payment status / history

The choice to opt-out of communication will therefore not include any such communication, and should you not wish to receive such communication, SA Taxi will no longer be able to retain you as a client.

## Disclosure of your Information

Your personal information may be shared with our agents and sub-contractors and selected third parties who process the information on our behalf.

We may also disclose your personal information to third parties when we are entitled or obliged to do so under Applicable Law, including to:

- arrange insurance, rewards, vehicle maintenance or improvements, credit and the like;
- determine which vehicles, services and offerings may be of interest to you and/or to send you information about these, unless you object or choose not to receive such communications;
- have a better understanding of your circumstances and needs to provide and improve our credit offering, insurance products and related services;
- prevent, detect and report fraud and criminal activities, and to identify the proceeds of unlawful activities and the combatting of crime; and
- comply with requests from third parties, including regulators, including those in foreign jurisdictions, if SA Taxi is required to do so in terms of Applicable Laws; or to protect the rights, property or safety of SA Taxi, clients or other third parties.

We may transfer your information to an agent, sub-contractor or third party who carries on business in another country, including one which may not have data protection laws similar to those of the Republic

of South Africa. If this happens, we will ensure that anyone to whom we pass your information agrees to treat your information with the same level of protection as if we were dealing with it.

If you do not wish us to disclose this information to third parties, please contact our Information Officer at the contact details set out below. We may, however, not be able to provide credit, vehicles, services or offerings to you if such disclosure is necessary.

## **Retention of Personal Information**

We may retain your personal information indefinitely, unless you object, in which case we will only retain it if we are permitted or required to do so in terms of Applicable Laws. However, as a general rule, we will retain your information in accordance with retention periods set out in Applicable Laws, unless we need to retain it for longer for a lawful purpose.

## **Access to, Correction and Deletion Personal Information**

You may request details of personal information which we hold about you under the Protection of Personal Information Act 4 of 2013 or about third parties where your rights are affected by such information under the Promotion of Access to Information Act 2 of 2000 (“**PAIA**”). Fees to obtain copy or a description of such personal information are prescribed in terms of PAIA. Confirmation of whether or not we hold personal information about you may be requested free of charge.

You also have the right to contact relevant credit bureau, to have the credit record(s) disclosed and to correct any inaccurate information.

You may request the correction of personal information SA Taxi holds about you. Please ensure that the information we hold about you is complete, accurate and up to date. If you fail to keep your information updated, or if your information is incorrect, SA Taxi may limit the credit, vehicles, services and offerings offered to you.

You have a right in certain circumstances to request the destruction or deletion of and, where applicable, to obtain restriction on the processing of personal information held about you. If you wish to exercise this right, please contact us using the contact details set out below.

You have a right to object on reasonable grounds to the processing of your personal information. For more information in this regard please read our PAIA manual.

## **Linking**

Our website contains hyperlinks to other pages on our websites. We may use technology to track how often these links are used and which pages on our website our visitors choose to view. This technology does not identify you personally: it simply enables us to compile statistics about the use of these hyperlinks.

You may link to another website which is outside of our control. Once you have left our website, SA Taxi does not remain responsible for the protection and privacy of any information which you provide.

It is imperative that you exercise caution and look at the privacy statement applicable to the website of any third party.

## **Amendment of this Policy**

This Policy may be amended from time to time for any of the following reasons:

- To provide for the introduction of new systems, methods of operation, services, products, offerings and/or facilities;
- To comply with changes to any legal or regulatory requirements;
- To ensure that our Policy is clearer and more favourable to you or us;
- To rectify any mistake that might be discovered from time to time; and/or
- For any other reason which we, in our sole discretion, may deem reasonable or necessary.

Any such amendment will come into effect and become part of any agreement you have with SA Taxi when notice is given to you of the change by publication on our website. It is your responsibility to check the website often.

## **Feedback**

We welcome comments about this Policy. If you have any questions about this Policy, you may contact us by e-mailing our Information Officer at [ncandiotess@sataxi.co.za](mailto:ncandiotess@sataxi.co.za). We will store any correspondence from you at our offices.

## **How to Contact Us**

If you have any comments or questions about this Policy please contact the Information Officer, Nigel Candiotes ([popi@sataxi.co.za](mailto:popi@sataxi.co.za)).

## **Complaints**

Should you believe that we have utilised your personal information contrary to Applicable Laws, you undertake to first attempt to resolve any concerns with us.

If you are not satisfied with such process, you may have the right to lodge a complaint with the Information Regulator, using the contact details listed below:

Tel: 010 023 5200

Email: [enquiries@inforegulator.org.za](mailto:enquiries@inforegulator.org.za). ; [POPIAComplaints@inforegulator.org.za](mailto:POPIAComplaints@inforegulator.org.za)