

Atrium Building (9th Floor), 5th Street, Sandton
Tel: +72 (0)10 003 0783
E-mail Address: info@433transport.co.za
Web Address: www.433transport.co.za

PRIVACY POLICY

1. INTRODUCTION

This is the Privacy Policy of the 4 3 3 Transport Proprietary Limited (“**4 3 3 Transport**”) and is designed to protect the personal information of its customers, employees, directors, shareholders, contractors, suppliers and consultants. 4 3 3 Transport is committed to protecting its Data Subjects’ privacy and ensuring that their personal information is used appropriately, transparently, securely and in accordance with applicable laws. All Data Subjects agree to be bound by the terms of this Privacy Policy and any amendments from time-to-time.

2. DEFINITIONS

“**Data Subject**” means the person to whom personal information applies, such as but not limited to, customers, employees, directors, shareholders, contractors, suppliers and consultants.

“**Operator**” means a person who processes personal information on behalf of 4 3 3 Transport in terms of a contract or mandate, without coming under the direct authority of 4 3 3 Transport.

“**PAIA**” means the Promotion of Access to Information Act, 2000.

“**Personal information**” is information that identifies you as an individual, and includes:

- Information relating to your race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth;
- Information relating to medical (including biometrics), financial, criminal or employment history;
- Biometric information;
- Correspondence sent by a person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;

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- Any identifying number symbol, e-mail address, telephone number, location information, or online identifier;
- The name of a person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person.

“Processing” means any activity concerning personal information including collection, receipt, recording, organisation, collation, storage, updating, modification, retrieval, alteration, consultation or use, dissemination by means of transmission, distribution, merging, linking, restriction, degradation, erasure or destruction of information.

“Regulator” means the Information Regulator established in terms of POPI.

“Special personal information” means the religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life or biometric information or criminal behaviour of a Data Subject.

3. PERSONAL INFORMATION COLLECTED

Subject to a Data Subject’s consent, 4 3 3 Transport collects personal information for purposes which are directly related to its business, functions or activities, and only when it is necessary for or directly related to such purposes.

Subject to a Data Subject’s consent, 4 3 3 Transport also collects and processes information for marketing purposes in order to ensure that our products and services remain relevant to our customers and potential customers.

4 3 3 Transport will not collect personal information of individuals under the age of 18 years.

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4. USAGE OF PERSONAL INFORMATION

The Data Subject's personal information will only be used for the purpose for which it was collected and as agreed.

5. DISCLOSURE OF PERSONAL INFORMATION

4 3 3 Transport will not share the personal information of a Data Subject with other organisations or anyone else unless the disclosure is for business purposes that are consistent with the purpose for which the personal information was initially collected, where it has a duty or a right to disclose in terms of applicable legislation, the law or where it may be deemed necessary in order to protect 4 3 3 Transport's rights at law.

Subject to the further processing limitations placed on 4 3 3 Transport in terms of section 15 (Further processing to be compatible with purpose of collection) of POPI, 4 3 3 Transport will occasionally and within reason, share the personal information of a Data Subject with third parties with whom we are linked. Such third parties are not permitted to use that information for any other purposes than as agreed to by 4 3 3 Transport.

4 3 3 Transport will not be responsible for the security of personal information shared by Data Subject's on 4 3 3 Transport's social media channels. 4 3 3 Transport will only utilise the information in accordance with this Privacy Policy but cannot be responsible for other users collecting and utilising personal information made available on these platforms.

6. SAFEGUARDING OF PERSONAL INFORMATION

It is a requirement in terms of POPI for 4 3 3 Transport to adequately protect personal information that 4 3 3 Transport collects. 4 3 3 Transport takes steps to protect the personal information it holds against loss, interference, unauthorised access, use, modification or disclosure and against other misuse. These steps include password protection for electronic files, securing paper files and physical access restrictions. 4 3 3 Transport will continuously review its security controls and processes to ensure that security controls are well aligned with identified security risks, ensuring as far as possible that personal information is secure. In the event of a data breach, 4 3 3 Transport undertakes to notify the affected Data Subject(s), provided that

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that notification will not impede any state criminal investigation.

7. SPECIAL PERSONAL INFORMATION

A general prohibition applies to 4 3 3 Transport, against the processing of special personal information. Data Subjects are hereby advised that POPI contains exceptions to the general prohibition against the processing of special personal information. Provided that any of these exceptions apply, then 4 3 3 Transport may process special personal information within the ambit of the relevant exception or exceptions.

8. THIRD PARTY OPERATORS

4 3 3 Transport ensures that the following standards are met by all its operators:

- Personal information can only be processed with the written consent of 4 3 3 Transport, and strictly within the ambit of that consent;
- Operators must treat personal information that comes to their knowledge as confidential and must not disclose it to anybody unless required by law and 4 3 3 Transport has provided prior written consent thereto.

4 3 3 Transport further ensures that it only appoints operators that know of and are committed to complying with the processing requirements outlined in POPI. It is an express 4 3 3 Transport requirement that operators establish and maintain robust security measures.

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9. ACCESS AND CORRECTION OF PERSONAL INFORMATION

Data Subjects have a right to access the personal information 4 3 3 Transport holds about them, and have the right to ask 4 3 3 Transport to update, correct or delete their personal information on reasonable grounds. Once a Data Subject objects to the processing of their personal information, 4 3 3 Transport may no longer process said personal information. 4 3 3 Transport will take all reasonable steps to confirm the Data Subject’s identity before providing details of their personal information or making changes to their personal information.

The rights of Data Subjects to access their personal information held by 4 3 3 Transport shall always be subject to PAIA Part 3 (Access to records of private bodies) Chapter 4 (Grounds for refusal of access to records).

Data Subjects may complain about a suspected breach of the POPI principles by submitting the complaint in writing to 4 3 3 Transport’s Information Officer, using the contact details below. Any complaint should set out in as much detail as possible all the relevant particulars relating to the complaint.

The details of 4 3 3 Transport’s Information Officer and Head Office are as follows:

NAME	Steven Ndlovu
TITLE	Information Officer
EMAIL ADDRESS	stevenn@gatsheniadvisory.co.za
CONTACT NUMBER	074 854 3354
POSTAL ADDRESS	The Atrium Building (9 th Floor), 5 th Street, Sandton
PHYSICAL ADDRESS	The Atrium Building (9 th Floor), 5 th Street, Sandton
WEBSITE	www.433Transport.co.za

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10. DESTRUCTION OF DOCUMENTS

Documents may be destroyed after the termination of the retention periods prescribed by legislation. Each department is responsible for attending to the destruction of its documents, which will be done on a regular basis. Files will be checked in order to ensure they may be destroyed and to establish if there are important original documents in the file. Original documents will be returned to the holder thereof, failing which, they will be retained by 4 3 3 Transport pending such return.

The head of department shall authorise the removal and destruction of the documents. The documents will then be made available for collection by the removers of 4 3 3 Transport's documents, who will ensure that the documents are shredded before disposal.

Documents may also be stored off site, in storage facilities approved by 4 3 3 Transport.

11. AMENDMENTS TO THIS POLICY

Amendments to or a review of this Policy will take place on an ad hoc basis. Data Subjects are advised to access 4 3 3 Transport's website periodically to keep abreast of any changes.