

WEBSITE, EMAIL AND SOCIAL MEDIA PRIVACY POLICY

KARABO PARKING MANAGEMENT (PTY) LTD (*the Company*) is committed to protecting the privacy and accuracy of confidential personal client/customer information to the extent possible, subject to provisions of the *PROTECTION OF PERSONAL INFORMATION ACT 4 OF 2013* (*'POPIA'* or *'the Act'*).

CONSENT TO PROCESS PERSONAL INFORMATION IN TERMS OF THE ACT

POPIA gives effect to the constitutional right to data privacy in terms of Section 14 of the Bill of Rights of the Constitution.

The responsible use of the Company's website and related resources in respect of data privacy is important to the Company.

Whilst the Company is committed to protecting all person's rights to privacy and who in consequence will ensure that all person's Personal Information is used appropriately, transparently and according to applicable law, the Company has to ensure that these rights to privacy are balanced with other rights such as the right to use and have access to the Company's Information and Services including its online and social media platforms and applications.

This Policy sets out the responsibilities and obligations of all persons who make use of, or access or receive the Company's Information and Communications via its electronic communication facilities and resources including its website, email and social media platforms and how all users of these facilities and resources are to ensure that when using these resources that they respect and process another's Personal Information lawfully and in accordance with the provisions of POPIA and the 8 Personal Information Processing Principles.

PLEASE READ THE DOCUMENT before you make use of the Company's electronic facilities or provide the Company with any personal information.

BY PROVIDING THE COMPANY WITH YOUR PERSONAL INFORMATION, you consent to the Company's processing of your personal information, which the Company undertakes to process strictly in accordance with this privacy policy.

DEFINITIONS

In this Policy (as defined below), unless the context requires otherwise, the following words and expressions bear the meanings assigned to them and cognate expressions bear corresponding meanings–

"*Data Breach*" means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, Personal Information under the control of or in the possession of the Company.

"*Data Subject*" has the meaning ascribed thereto under POPIA.

"*Direct Marketing*" means to approach a person, by electronic communication, for the purpose of promoting or offering to supply, in the ordinary course of business, any goods or services to the data subject.

"*Direct Marketer*" means a supplier who employs Direct Marketing as an advertising mechanism.

"*Employees*" means any employee of the Company.

"*Government*" means the Government of the Republic of South Africa.

"*the Company*" means Karabo Parking Management (Pty) Ltd" registration number (2012 / 155415 / 07), with its registered address at 385 Lois Avenue, Waterkloof Glen, Pretoria, Gauteng.

"*Operator*" means a person or entity who Processes Personal Information for a Responsible Party in terms of a contract or mandate, without coming under the direct authority of that Responsible Party.

"*PAIA*" means the *PROMOTION OF ACCESS TO INFORMATION ACT 2 OF 2000*.

"*Personal Information*" has the meaning ascribed thereto under POPIA and specifically includes any form of information that can be used to identify a Data Subject.

"*Policy*" means this Privacy Policy.

"*POPIA*" means the *PROTECTION OF PERSONAL INFORMATION ACT 4 OF 2013*.

"*Processing*" has the meaning ascribed thereto under POPIA. "*Process*" has a corresponding meaning.

"*Regulator*" means the Information Regulator established in terms of POPIA.

"*Responsible Party*" means a public or private body or any other person which alone or in conjunction with others, determines the purpose of and means for Processing Personal Information.

"*Special Personal Information*" means Personal Information concerning a Data Subject's religious or philosophical beliefs, race or ethnic origin, trade union membership, political opinions, health, sexual life, biometric information or criminal behaviour; and

"*Third Party*" means any independent contractor, agent, consultant, sub-contractor or other representative of the Company.

PURPOSE OF THIS POLICY

The purpose of this Policy is to inform Data Subjects about how the Company Processes their Personal Information.

The Company, in its capacity as Responsible Party (and/or Operator, where applicable), shall strive to observe, and comply with its obligations under POPIA as well as accepted information protection principles, practices and guidelines when it Processes Personal Information from or in respect of a Data Subject.

This Policy applies to Personal Information collected by the Company in connection with the products and services which the Company provides. This includes information collected directly from you as a Data Subject, as well as information we collect indirectly through our service providers who collect your information on our behalf.

This Privacy Policy does not apply to the information practices of Third Party companies who we may engage with in relation to our business operations (including, without limitation, their websites, platforms and/or applications) which we do not own or control; or individuals that the Company does not manage or employ. These Third Party sites may have their own privacy policies and terms and conditions and we encourage you to read them before using them.

PROCESS OF COLLECTING PERSONAL INFORMATION

The Company collects Personal Information directly from Data Subjects as and when required for a defined purpose, unless an exception is applicable (such as, for example, where the Data Subject has made the Personal Information public or the Personal Information is contained in or derived from a public record).

The Company will always collect Personal Information in a fair, lawful and reasonable manner to ensure that it protects the Data Subject's privacy and will Process the Personal Information based on legitimate grounds in a manner that does not adversely affect the Data Subject in question.

The Company often collects Personal Information directly from the Data Subject and/or in some cases, from Third Parties. Where the Company obtains Personal Information from Third Parties, the Company will ensure that it obtains the consent of the Data Subject to do so or will only Process the Personal Information without the Data Subject's consent where the Company is permitted to do so in terms of the above clause or the applicable law.

An example of such Third Parties includes: (i) recruitment agencies; (ii) other companies providing services to the Company; and (iii) where the Company makes use of publicly available sources of information (e.g. the Companies and Intellectual Property Commission, an agency of the Department of Trade and Industry in South Africa (CIPC)).

LAWFUL PROCESSING OF PERSONAL INFORMATION

Where the Company is the Responsible Party, it will only Process a Data Subject's Personal Information (other than for Special Personal Information) where –

- consent of the Data Subject is obtained.
- Processing is necessary to carry out the actions for conclusion of a contract to which a Data Subject is party.
- Processing complies with an obligation imposed by law on the Company.
- Processing protects a legitimate interest of the Data Subject, and/or
- Processing is necessary for pursuing the legitimate interests of the Company or of a third party to whom the information is supplied.

The Company will only Process Personal Information where one of the legal bases referred to above are present.

The Company will make the manner and reason for which the Personal Information will be Processed clear to the Data Subject.

Where the Company is relying on a Data Subject's consent as the legal basis for Processing Personal Information, the Data Subject may withdraw his/her/its consent or may object to the Company's Processing of the Personal Information at any time.

However, this will not affect the lawfulness of any Processing carried out prior to the withdrawal of consent or any Processing justified by any other legal ground provided under POPIA.

If the consent is withdrawn or if there is otherwise a justified objection against the use or the Processing of such Personal Information, the Company will ensure that the Personal Information is no longer Processed.

PURPOSE FOR PROCESSING PERSONAL INFORMATION

The Company understands its obligation to make Data Subjects aware of the fact that it is Processing their Personal Information and inform them of the purpose for which the Company Processes such Personal Information.

The Company will only Process a Data Subject's Personal Information for a specific, lawful and clear purpose (or for specific, lawful and clear purposes) and will ensure that it makes the Data Subject aware of such purpose(s) as far as possible.

The Company will ensure that there is a legal basis for the Processing of any Personal Information. Further, the Company will ensure that Processing will relate only to the purpose for and of which the Data Subject has been made aware (and where relevant, consented to) and will not Process any Personal Information for any other purpose(s).

KEEPING PERSONAL INFORMATION ACCURATE

The Company will take reasonable steps to ensure that all Personal Information is kept as accurate, complete and up to date as reasonably possible depending on the purpose for which Personal Information is collected or further processed.

The Company may not always expressly request the Data Subject to verify and update his/her/its Personal Information unless this process is specifically necessary.

The Company, however, expects that the Data Subject will notify the Company from time to time in writing of any updates required in respect of his/her/its Personal Information.

STORAGE AND PROCESSING OF PERSONAL INFORMATION BY THE COMPANY AND THIRD PARTY SERVICE PROVIDERS

The Company may store your Personal Information in hardcopy format and/or in electronic format using the Company's own secure on-site servers or other internally hosted technology.

Your Personal Information may also be stored by Third Parties, via cloud services or other technology, with whom the Company has contracted with, to support the Company's operations.

The Company's Third Party service providers, including data storage and processing providers, may from time to time also have access to a Data Subject's Personal Information in connection with purposes for which the Personal Information was initially collected to be Processed.

The Company will ensure that such Third Party service providers will Process the Personal Information in accordance with the provisions of this Policy, all other relevant internal policies and procedures and POPIA.

These Third Parties do not use or have access to the Data Subject's Personal Information other than for purposes specified by the Company, and the Company requires such parties to employ at least the same level of security that the Company uses to protect the Data Subject's personal data.

Your Personal Information may be Processed in South Africa or another country where the Company, its affiliates and their Third Party service providers maintain servers and facilities and the Company will take steps, including by way of contracts, to ensure that it continues to be protected, regardless of its location, in a manner consistent with the standards of protection required under applicable law, including POPIA.

PERSONAL INFORMATION FOR DIRECT MARKETING PURPOSES

To the extent that the Company acts in its capacity as a Direct Marketer, it shall strive to observe, and comply with its obligations under POPIA when implementing principles and practices in relation to Direct Marketing.

The Company acknowledges that it may only use Personal Information to contact the Data Subject for purposes of Direct Marketing from time to time where it is permissible to do so.

It may use Personal Information to contact any Data Subject and/or market the Company's services directly to the Data Subject(s) if the Data Subject is one of the Company's existing clients, the Data Subject has requested to receive marketing material from the Company or the Company has the Data Subject's consent to market its services directly to the Data Subject.

If the Data Subject is an existing client, the Company will only use his/her/its Personal Information if it has obtained the Personal Information through the provision of a service to the Data Subject and only in relation to similar services to the ones the Company previously provided to the Data Subject.

The Company will ensure that a reasonable opportunity is given to the Data Subject to object to the use of their Personal Information for the Company's marketing purposes when collecting the Personal Information and on the occasion of each communication to the Data Subject for purposes of Direct Marketing.

The Company will not use your Personal Information to send you marketing materials if you have requested not to receive them. If you request that we stop Processing your Personal Information for marketing purposes, the Company shall do so. We encourage that such requests to opt-out of marketing be made via forms and links provided for that purpose in the marketing materials sent to you.

RETENTION OF PERSONAL INFORMATION

The Company may keep records of the Personal Information, correspondence, or comments it has collected in an electronic or hardcopy file format.

In terms of POPIA, the Company may not retain Personal Information for a period longer than is necessary to achieve the purpose for which it was collected or processed and is required to delete, destroy (in such a way that it cannot be reconstructed) or de-identify the information as soon as is reasonably practicable once the purpose has been achieved. This prohibition will not apply in the following circumstances –

- where the retention of the record is required or authorised by law or by any Government authority.
- the Company requires the record to fulfil its lawful functions or activities.
- retention of the record is required by a contract between the parties thereto.
- the Data Subject has consented to such longer retention, or
- the record is retained for historical, research, archival or statistical purposes provided safeguards are put in place to prevent use for any other purpose.

Accordingly, the Company will, subject to the exceptions noted in this Policy, retain Personal Information for as long as necessary to fulfil the purposes for which that Personal Information was collected and/or as permitted or required by applicable law.

Where the Company retains Personal Information for longer periods for statistical, historical, archival or research purposes, the Company will ensure that appropriate safeguards have been put in place to ensure that all recorded Personal Information will continue to be Processed in accordance with this Policy and applicable laws.

Once the purpose for which the Personal Information was initially collected and Processed no longer applies or becomes obsolete, the Company will ensure that the Personal Information is deleted, destroyed or de-identified sufficiently so that a person cannot re-identify such Personal Information. In instances where we de-identify your Personal Information, the Company may use such de-identified information indefinitely.

FAILURE TO PROVIDE PERSONAL INFORMATION

Should the Company need to collect Personal Information by law or under its obligations as an employer or product or service provider, and you fail to provide the Personal Information when requested, we may be unable to perform our duties as an employer, in terms of the applicable law or in terms of providing the product to you.

Should the Company need to collect Personal Information for any of the purposes set out above and you fail to provide the Personal Information when requested, your failure to provide such Personal Information may have negative consequences, including that the Company may not be able to effectively perform its obligations as an employer (where the Company needs to Process your Personal Information in order to perform its obligations as an employer) or product or service provider (where the Company needs to Process your Personal Information in order to provide you with its products or services), have to decline to receive the relevant services from you as a supplier, and you will be notified where this is the case).

SAFE-KEEPING OF PERSONAL INFORMATION

The Company shall preserve the security of Personal Information and, in particular, prevent its alteration, loss and damage, or access by non-authorised third parties.

The Company will ensure the security and integrity of Personal Information in its possession or under its control with appropriate, reasonable technical and organisational measures to prevent loss, unlawful access and unauthorised destruction of Personal Information.

The Company has implemented physical, organisational, contractual and technological security measures (having regard to generally accepted information security practices or industry specific requirements or professional rules) to keep all Personal Information secure, including measures protecting any Personal Information from loss or theft, and unauthorised access,

disclosure, copying, use or modification. Further, the Company maintains and regularly verifies that the security measures are effective and regularly updates same in response to new risks.

BREACHES OF PERSONAL INFORMATION

A Data Breach refers to any incident in terms of which reasonable grounds exist to believe that the Personal Information of a Data Subject has been accessed or acquired by any unauthorised person.

A Data Breach can happen for many reasons, which include: (a) loss or theft of data or equipment on which Personal Information is stored; (b) inappropriate access controls allowing unauthorised use; (c) equipment failure; (d) human error; (e) unforeseen circumstances, such as a fire or flood; (f) deliberate attacks on systems, such as hacking, viruses or phishing scams; and/or (g) alteration of Personal Information without permission and loss of availability of Personal Information.

The Company will address any Data Breach in accordance with the terms of POPIA.

The Company will notify the Regulator and the affected Data Subject (unless the applicable law or a Government authority requires that we delay notification to the Data Subject) in writing in the event of a Data Breach (or a reasonable belief of a Data Breach) in respect of that Data Subject's Personal Information.

The Company will provide such notification as soon as reasonably possible after it has become aware of any Data Breach in respect of such Data Subject's Personal Information.

Where the Company acts as an '*Operator*' for purposes of POPIA and should any Data Breach affect the data of Data Subjects whose information the Company Processes as an Operator, the Company shall (in terms of POPIA) notify the relevant Responsible Party immediately where there are reasonable grounds to believe that the Personal Information of relevant Data Subjects has been accessed or acquired by any unauthorised person.

PROVISION OF PERSONAL INFORMATION TO THIRD PARTY SERVICE PROVIDERS

The Company may disclose Personal Information to Third Parties and will enter into written agreements with such Third Parties to ensure that they Process any Personal Information in accordance with the provisions of this Policy, and POPIA.

The Company notes that such Third Parties may assist the Company with the purposes listed in paragraphs above – for example, service providers may be used, inter alia –

-
- for data storage
 - to assist the Company with auditing processes (external auditors).
 - for providing outsourced services to the Company, including in respect of its (i) legal, (ii) data storage requirements and (iii) upskilling of its Employees, and/or
 - to notify the Data Subjects of any pertinent information concerning the Company.

The Company will disclose Personal Information with the consent of the Data Subject or if the Company is permitted to do so without such consent in accordance with applicable laws.

Further, the Company may also send Personal Information to a foreign jurisdiction outside of the Republic of South Africa, including for Processing and storage by Third Parties.

When Personal Information is transferred to a jurisdiction outside of the Republic of South Africa including to any cloud, data centre or server located outside of the South Africa, the Company will obtain the necessary consent to transfer the Personal Information to such foreign jurisdiction or may transfer the Personal Information where the Company is permitted to do so in accordance with the provisions applicable to cross-border flows of Personal Information under POPIA.

The Data Subject should also take note that the Processing of Personal Information in a foreign jurisdiction, if and to the extent such Processing does occur, may be subject to the laws of the country in which the Personal Information is held, and may be subject to disclosure to the governments, courts of law, enforcement or regulatory agencies of such other country, pursuant to the laws of such country.

ACCESS TO PERSONAL INFORMATION

POPIA read with the relevant provisions of PAIA confers certain access rights on Data Subjects.

These rights include –

A right of access –

A Data Subject having provided adequate proof of identity has the right to:

- request a Responsible Party to confirm whether any Personal Information is held about the Data Subject; and/or
- (ii) request from a Responsible Party a description of the Personal Information held by the Responsible Party including information about Third Parties who have or have had access to the Personal Information.

A Data Subject may request:

- the Company to confirm, free of charge, whether it holds any Personal Information about him/her/it; and
- to obtain from the Company the record or description of Personal Information concerning him/her/it and any information regarding the recipients or categories of recipients who have or had access to the Personal Information. Such record or description is to be provided: (a) within a reasonable time; and (b) in a reasonable manner and format and in a form that is generally understandable.

A right to request correction or deletion –

A Data Subject may also request the Company to:

- correct or delete Personal Information about the Data Subject in its possession or under its control that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully; or
- destroy or delete a record of Personal Information about the Data Subject that Kellogg is no longer authorised to retain records in terms of POPIA's retention and restriction of records provisions.

On receipt of such a request, the Company is required to, as soon as is reasonably practicable:

- correct the information.
- delete or destroy the information.
- provide the Data Subject with evidence in support of the information; or
- where the Data Subject and Responsible Party cannot reach agreement on the request and if the Data Subject requests this, the Company will take reasonable steps to attach to the information an indication that correction has been requested but has not been made;

A right to withdraw consent and to object to processing –

a Data Subject that has previously consented to the Processing of his/her/its Personal Information has the right to withdraw such consent and may do so by providing the Company with notice to such effect at the address set out below. Further, a Data Subject may object, on reasonable grounds, to the Processing of Personal Information relating to him/her/it.

Accordingly, the Company may request the Data Subject to provide sufficient identification to permit access to, or provide information regarding the existence, use or disclosure of the Data

Subject's Personal Information. Any such identifying information shall only be used for the purpose of facilitating access to or information regarding the Personal Information.

The Data Subject can request in writing to review any Personal Information about the Data Subject that the Company holds including Personal Information that the Company has collected, utilised or disclosed.

The Company shall respond to these requests in accordance with POPIA and PAIA and provide the Data Subject with any such Personal Information to the extent required by law and any of the Company's policies and procedures which apply in terms of the PAIA.

The Data Subject can challenge the accuracy or completeness of his/her/its Personal Information in the Company's records at any time in accordance with the process set out in the PAIA Manual for accessing information.

If a Data Subject successfully demonstrates that their Personal Information in the Company's records is inaccurate or incomplete, the Company will ensure that such Personal Information is amended or deleted as required (including by any Third Parties).

TIME PERIODS

The Company will respond to each written request of a Data Subject not later than 30 (thirty) days after receipt of such requests.

Under certain circumstances, the Company may, however, extend the original period of 30 days once for a further period of not more than 30 (thirty) days.

A Data Subject has the right to make a complaint to the Company in respect of this time limit by contacting the Company using the contact details provided below.

COSTS TO ACCESS TO PERSONAL INFORMATION

The prescribed fees to be paid for copies of the Data Subject's Personal Information are listed the PAIA Manual.

CHANGES TO THIS POLICY

The Company reserves the right to make amendments to this Policy from time to time and will use reasonable efforts to notify Data Subjects of such amendments.

The current version of this Policy will govern the respective rights and obligations between the Data Subject and the Company each time that the Data Subject access and use the Company's site.

OUR DETAILS

The Company is registered in South Africa under registration number [2012 / 155415 / 07], and our registered office is at 385 Lois Avenue, Waterkloof Glen, Pretoria Gauteng.

You can contact us:

Head Office: 087 806 5390

Email: info@karaboparking.co.za

Website: www.karaboparking.co.za

INFORMATION OFFICER - ZANDRÉ COLOMBO

Address: 385 Lois Avenue, Waterkloof Glen, Pretoria Gauteng

Tel: 087 806 5390

Email: zandre@karaboparking.co.za

DEPUTY INFORMATION OFFICER - LYNETTE HENNING

Address: 385 Lois Avenue, Waterkloof Glen, Pretoria Gauteng

Tel: 087 806 5390

Email: hr@karaboparking.co.za