

PRIVACY POLICY

1. Introduction and Overview

1.1 This policy explains how we obtain, use and disclose your personal information, in accordance with the requirements of the Protection of Personal Information Act ("POPIA"). At Themba Trans (Pty) Ltd. we are committed to protecting your privacy and to ensure that your personal information is collected and used properly, lawfully, and transparently.

2. Audience

2.1 This policy applies to you if you are:

- A visitor to our website; or
- A customer/supplier who has ordered or requested the services that we provide.

3. Personal Information we collect

3.1 Personal information includes

- Certain information that we collect automatically when you visit our website;
- Certain information collected on registration; and
- Certain information collected on submission.

3.2 We collect and process your personal information mainly to contact you for the purposes of conducting business with you, understanding your business growth requirements, and delivering services accordingly. We collect information directly from you where you provide us your personal details or additional information.

3.3 We collect the following (if applicable to your specific service requirements):

- Name
- Telephone contact details
- Identification number
- Location (physical- and postal addresses)
- Financial details
- Email address
- Confidential correspondence
- Your business staff information for account relating issues
- Insurance details
- Company details (COR, VAT, BEE)
- Criminal information
- Employment information

3.4 Collection on registration (website):

3.4.1 Once you register on our website, you will no longer be anonymous to us. You will provide us with certain personal information which will include:

- Name
- Surname
- Email address
- Mobile number
- Telephone number
- Company name
- Username and password

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

3.6 Recording calls:

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

3.7 Collection from browser

3.7.1 We automatically receive and record Internet usage information on our server logs from your browser, such as your Internet Protocol address (IP address), browsing habits, click patterns, version of software installed, system type, screen resolutions, colour capabilities, plug-ins, language settings, cookie preferences, search engine keywords, JavaScript enablement, the content and pages that you access on the website, and the dates and times that you visit the website, paths taken, and time spent on sites and pages within the website (usage information). Please note that other websites visited before entering our website might place personal information within your URL during a visit to it, and we have no control over such websites. Accordingly, a subsequent website that collects URL information may log some personal information.

3.8 Cookies

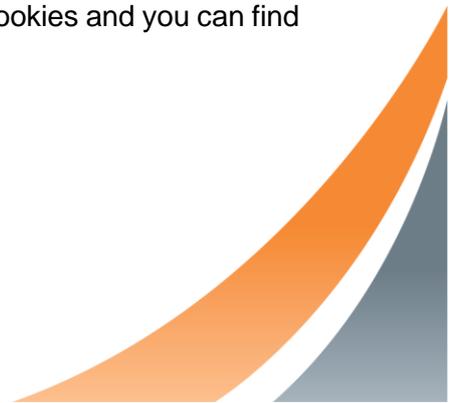
3.8.1 We may place small text files called 'cookies' on your device when you visit our website. These files do not contain personal information, but they do contain a personal identifier allowing us to associate your personal information with a certain device. These files serve a number of useful purposes for you, including:

- Granting you access to age restricted content;
- Tailoring our website's functionality to you personally by letting us remember your preferences; and
- Improving how our website performs.

3.8.2 Your internet browser generally accepts cookies automatically, but you can often change this setting to stop accepting them. You can also delete cookies manually. However, no longer accepting cookies or deleting them will prevent you from accessing certain aspects of our website where cookies are necessary. Many websites use cookies and you can find out more about them at www.allaboutcookies.org.

Themba Trans (Pty) Ltd

Executive Directors: JJ Wehmeyer (MD), AGE van der Merwe (Marketing)
Reg No 2012/111450/07 / VAT No 4160262806



3.9 Web beacons

3.9.1 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.

4. Personal Information we do not collect

4.1 We do not collect or process personal data for any other purposes than what is outlined in this policy or instructed by data subjects and controllers.

4.2 We do not collect or process any sensitive personal data such as:

- Religious or philosophical beliefs
- Genetic or biometric data
- Political opinions
- Health-related data
- Data concerning sex life
- Trade union membership

5. Purpose for collection

5.1 We may use or process any 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:

- Services purposes – such as collecting orders or requests for and providing our services;
- Marketing purposes – such as pursuing lawful related marketing activities;
- Business purposes – such as internal audit, accounting, business planning, or other proposed and actual transactions; and
- Legal purposes – such as handling claims, complying with regulations, or pursuing good governance.

6. How do we protect your personal information?

6.1 We limit the amount of personal information collected only to what is fit for the purpose. We restrict, secure, and control all of our information assets against unauthorized access, damage, loss, or destruction; whether physical or electronic.

6.2 We retain personal information only for as long as is required to deliver our service to you, to respond to your requests, or longer if required by law. If we retain your personal information for historical or statistical purposes, we ensure that the personal information cannot be used further. While in our possession, together with your assistance, we try to maintain the accuracy of your personal information.

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7. Messages

7.1 We may send you primarily promotional- and/or administrative messages about our services. You can choose to opt-out of these promotional messages.

8. Privacy principles

As your service provider, management of your personal information is critical to us and a responsibility that we embrace. We will abide by the following principles when collecting, recording, storing, and destroying your personal information:

8.1 Consent

8.1.1 We will obtain your consent to collect personal information:

- In accordance with applicable law;
- When you provide us with any registration information.

8.2 Cancellation

8.2.1 We will delete all personal information if you cancel your services with us, except for statistics and invoicing records which we store in a de-identified and aggregated manner. Please note that after cancellation, your invoicing records are normally kept for up to 7 years in accordance with legislation. Cancelled accounts will be archived by the account's administrator and classified as inactive.

8.3 Security

8.3.1 We take measures to ensure personal information is kept safe and prevent loss of, damage to, or unauthorized destruction of such data, and unlawful access to or processing of personal information.

8.3.2 Software files and personal information will be kept in a secure server environment that uses a firewall and other advanced security measures to prevent interference or access from outside intruders. We authorize access to personal information only for those employees who require it to fulfil their job responsibilities.

8.3.3 Paper records and files containing personal information are locked away when not in use and are handled in such a way as to restrict access to only those persons with business reasons to access them. We shred all discarded paper records that contain confidential information. Other secure disposal methods are in place and properly used for confidential material, not on paper.

8.3.4 Passwords are used to access PC's, applications, databases, etc., and are created for employees via our technical administrators. This ensures that passwords are securely managed and comply with best practices. Laptops are physically secured if left in the office overnight. When out of the office, the device is kept secure at all times. When replacing or selling laptops, hard drives are formatted.

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8.3.5 Data transfers only take place via secure online channels. Back-ups on portable hard drives are locked away in a secure environment and only accessible by the responsible party.

8.3.6 We have a breach management plan to follow should an incident occur.

8.4 Sharing

8.4.1 We do not share your personal information.

OR

8.4.2 We may share your personal information with:

8.4.2.1 Other divisions within the group of companies to which we belong 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 services and communications;

8.4.2.2 An affiliate, in which case we will seek to require the affiliates to honour this privacy policy;

8.4.2.3 Our services providers under contract who help provide certain services or help with parts of our business operations (our contracts dictate that these services providers only use your information in connection with the services they supply or services they perform for us and not for their own benefit);

8.4.2.4 Credit bureaus to report account information, as permitted by law;

8.4.2.5 Banking partners as required by credit card association rules for inclusion on their list of terminated merchants (in the event that you utilize the services to receive payments and you meet their criteria); and

8.4.2.6 Other third parties who provide us with relevant services where appropriate.

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

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

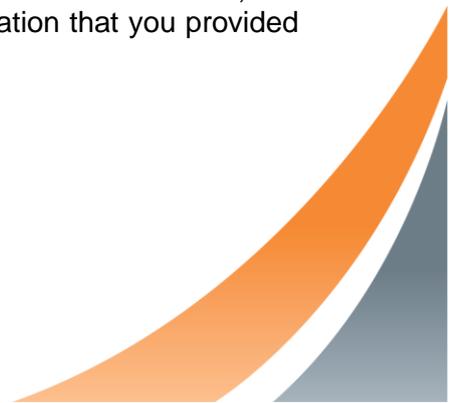
8.4.5 We may need to disclose personal information to our employees that require the personal information to do their jobs. These include our responsible management, human resources, accounting, audit, compliance, information technology, or other personnel.

8.5 Access

8.5.1 We will give you access to any of your personal information that your request unless the request is unlawful. If your personally identifiable information changes (e.g. your address, contact details, banking details), or if you no longer desire to use our services, we encourage you to correct, update, or remove the personal information that you provided by contacting us.

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8.6 Contacting us

8.6.1 Information officer: Jaco Wehmeyer, Managing Director

8.6.2 Personal information updates: danelle@thembatrans.co.za

8.6.2.1 If you'd like access to your personal information, requests must be submitted to us in writing and these requests will be handled in accordance with POPIA.

8.6.3 Any concerns, complaints, or questions you may have pertaining to our above-stated policies can be directed to us at privacy@thembatrans.co.za.

Address: Quantico House
Loerie Park
Paul Kruger Street
Durbanville
7551

9. Physical access to our office

9.1 We employ the following physical safety measures within our office:

- Access code required for staff entranceway.
- Intercom front-door access.
- A receptionist to welcome/identify visitors.

10. Staff

10.1 A client/supplier is assigned a consultant and they will have access to client/supplier information in order to support their clients/suppliers. These employees are moderated by their employment contracts, and the gravity of their access rights is reinforced during induction.

10.2 Staff members can only access client data if they have permission to do so. All staff and contractors attest to terms and conditions that specifically outline privacy, information security, and confidentiality.

10.3 Staff are also trained and have immediate access to the following policies:

- Client Confidentiality Agreement
- General operational procedures
- Equipment, property, and software restrictions and requirements
- Data storage
- Breach management

10.4 Staff who retire, transfer from any internal department, resign, etc. are removed immediately from mailing lists and access control lists. Relevant changes also occur when staff transfer to other internal assignments.

10.5 New staff are carefully coached and trained before being allowed to access confidential or personal files.

10.6 Contractors, consultants, and external service providers employed at Themba Trans (Pty) Ltd are subject to strict a formal contract in line with the provisions of POPIA.

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- 10.7 Themba Trans (Pty) Ltd has an up-to-date Company Property and Equipment Policy concerning the use of any office technology and software by its staff.
- 10.8 Staff ensures that callers to the office or other unauthorised persons are unable to view personal or sensitive information, whether held on paper documents or information displayed on PC monitors, etc.
- 10.9 All staff ensures that PC's are logged off or "locked" when left unattended for any period of time. Where possible, staff is restricted from saving files to the local disk. Users are instructed to only save files to their allocated network drive.
- 10.10 Breach of this policy will lead to serious disciplinary consequences for Themba Trans's staff.

11. Acceptance

- 11.1 You must accept all the terms of this policy when you're requesting our services. If you do not agree with anything in this policy, then you may not request our services. By accepting this policy, you are deemed to have read, understood, accepted, and agreed to be bound by all of its terms.

12. Legal capacity

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

13. Obligations

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

