

CARTRACK PRIVACY NOTICE

1. DEFINITIONS

Cartrack	Cartrack is a Responsible Party as envisaged in the Protection of Personal Information Act 4 of 2013 (POPIA) and where reference is made to Cartrack, this may include reference to other companies within the Cartrack group of companies in South Africa. For further information, refer to the PAIA Manual available on Cartrack's website in this regard.
Data Subject	Means the person to whom Personal Information relates.
Information Officer	Means the chief executive officer, or equivalent officer, of Cartrack or the person who is acting as such whose information is set out below.
PAIA Manual	Means the manual which sets out the process for accessing information as envisaged by sections 14 and 51 of the Promotion of Access to Information Act 2 of 2002 (PAIA) and which is available on Cartrack's website.
Personal Information	Means any information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person. It is information or pieces of information that could identify that natural or juristic person, either directly (e.g. by name) or indirectly (e.g. through pseudonymised data) and includes things like email/home addresses, usernames, profile pictures, user generated content, financial information, and geolocation.

2. INTRODUCTION AND PURPOSE OF THIS NOTICE

Cartrack recognises its Data Subjects' rights to privacy and is committed to protecting and controlling the use of the Personal Information that it collects, in accordance with the regulatory requirements of the jurisdictions in which it operates.

In accordance with the data privacy laws, and because our clients' privacy is important to us, please take note of this Privacy Notice, as it describes how we process Personal Information, including the receipt, collection, use, disclosure, sharing, retention and importantly the protection of Personal Information in accordance with the provisions of POPIA.

3. WHO WE ARE

Cartrack is a leading global provider of real-time mobility data analytics for smart transportation. The Company's comprehensive software-as-a-service platform for connected vehicles and other assets provides customers with differentiated insights and analytics to optimize their business and workforce, increase efficiency and decrease costs, improve safety, monitor environmental impact and manage risk. Its highly scalable platform serves large multinational enterprises and individual consumers alike, enabling it to address a large, growing and underpenetrated global market.

4. APPLICATION OF THE PRIVACY NOTICE

This Privacy Notice applies to Cartrack, as defined, including all employees, as well as third parties who provide services to Cartrack and covers Personal Information collected and managed by Cartrack. It also applies to a Data Subject when the Data Subject visits Cartrack's websites, uses its electronic applications, or makes use of Cartrack's services as a customer.

5. PRINCIPLES FOR THE COLLECTION AND PROCESSING OF PERSONAL INFORMATION

5.1 Collection, processing and purpose

Cartrack will only collect Personal Information when it is necessary to comply with legal obligations that apply, or when such processing is necessary for the performance of a contract or pre-contractual procedures.

Cartrack may also process information if it has a legitimate interest, provided that in each case our interest is in accordance with applicable law and the rights of the Data Subject.

When none of the other lawful processing conditions support the data processing operation, Cartrack will only process Personal Information if it has obtained the consent of the Data Subject to process said Personal Information for specific, explicit and legitimate purposes.

Cartrack will only use Personal Information for the fulfilment of the specific purposes for which it was obtained, or for other lawful processing.

5.2 Accuracy

Cartrack will take all reasonable steps to ensure that Personal Information that it processes is accurate, complete and up to date.

5.3 Openness

Cartrack is committed to openness regarding its policies and practices of handling of Personal Information.

Also refer to our Disclaimer on our website for the terms of using Cartrack's website.

5.4 Security

Cartrack will ensure that appropriate security safeguards are in place to protect Personal Information from loss, unauthorised access, destruction, use, modification or disclosure.

5.5 Transfers and sharing

Cartrack may transfer Personal Information outside South Africa or the European Union to be processed by some of its service providers, companies associated with and/or belonging to the Cartrack Group. In this case, Cartrack ensures that this transfer takes place in accordance with the legislation in force and that an adequate level of protection of Personal Information is guaranteed based on standard data protection clauses adopted.

Cartrack will only disclose Personal Information for the fulfilment of the specific purposes for which it was obtained, or for other lawful processing.

Under no circumstances does Cartrack transfer or share Personal Information, outside the conditions described above, or sell Personal Information to third parties.

5.6 Retention

Cartrack will retain Personal Information for as long as is necessary for the purposes for which it was collected. In some cases, data retention may occur for longer periods, especially when applicable law so requires.

5.7 Access

The Data Subject may request a copy of their Personal Information from Cartrack and, where required, instruct Cartrack to effect changes to correct the data or to permanently delete their Personal Information, in accordance with local regulations.

6. INFORMATION ABOUT OTHERS

If the Data Subject provides Cartrack with Personal Information about someone else, the Data Subject is responsible for ensuring that it complies with any obligation and consent obligations under applicable data protection laws in relation to such disclosure. In so far as required by applicable data protection laws, the Data Subject must ensure that it has provided the required notices and has obtained the other person's consent to provide Cartrack with his/her/its Personal Information and

that the Data Subject explains to them how Cartrack collects, uses, discloses and retains their Personal Information or direct them to read this Privacy Notice.

7. FURTHER PROCESSING AND MARKETING

Cartrack and/or its carefully selected third party service providers will from time to time further process a Data Subject's Personal Information for the purpose of informing and providing the Data Subject with Cartrack and third party services, products and other beneficial optional products. Cartrack may also share a Data Subject's information with Cartrack's affiliates and subsidiary companies so that they may contact the Data Subject with information about their products or services which may be of benefit or interest to the Data Subject.

Should the Data Subject not want to receive communications pertaining to these services or products provided by Cartrack or by other third-party service providers, the Data Subject may opt out of this communication by emailing a completed Form 1 under Annexures to dataprotection@cartrack.com.

8. CONSENT

By providing Cartrack with its Personal Information the Data Subject consents to Cartrack processing and further processing its Personal Information as and where required, provided that Cartrack will always ensure that such processing is done in a lawful and legitimate manner and in line with this Privacy Notice and applicable legislation.

9. RIGHTS OF THE DATA SUBJECT

Whilst the provision of Personal Information is voluntary, withdrawing consent or choosing to delete some types of Personal Information may prevent Cartrack from supplying certain services to a Data Subject, or responding to queries as a prospective employee or supplier. In order to better protect and safeguard Personal Information, Cartrack takes steps to verify the identity of a Data Subject before granting access or making changes to Personal Information.

Rights	Explanation
Information	The Data Subject has the right to be provided with clear, transparent and easily understandable information about how we use Personal Information, and what the Data Subject's rights are
Access	The Data Subject has a right to access, and to receive a copy of, any Personal Information we hold about the individual (subject to certain restrictions). A reasonable fee may be charged for providing such access but only where permitted by law. Refer to Cartrack's PAIA Manual.
Rectification	The Data Subject has the right to have Personal Information rectified if it is incorrect or outdated and/or completed if it is incomplete.

	Email Form 2 under Annexures to dataprotection@cartrack.com for correction of Personal Information
To be forgotten	The Data Subject has the right to have Personal Information erased or deleted; subject to legal or legitimate grounds for retaining the Personal Information
Direct marketing	The Data Subject may unsubscribe or opt out of direct marketing communication at any time. Email Form 1 under Annexures to dataprotection@cartrack.com to opt out.
Withdrawal of consent	The Data Subject may withdraw consent to our processing of Personal Information when such processing is based on consent. Where consent is withdrawn, the lawfulness of processing prior to withdrawal is not affected Email Form 1 under Annexures to dataprotection@cartrack.com to withdraw consent.
Objection to processing	The Data Subject may object to the processing of Personal Information when such processing is based on the legitimate interests pursued by the data controller, such as the: <ul style="list-style-type: none"> ○ Enhancement of our communication with the Data Subject ○ Proper administration of our website ○ Risk management ○ Protection of legal rights Email Form 1 under Annexures to dataprotection@cartrack.com to object to processing.
Lodge a complaint	The Data Subject has the right to contact the relevant data protection authority to lodge a complaint against our data protection and privacy practices
Data portability	The Data Subject has the right to move, copy or transfer Personal Information from our database to another. This only applies to Personal Information that the Data Subject has provided, where processing is based on a contract or explicit consent, and the processing is carried out by automated means
Restriction	In circumstances limited by legislation, the Data Subject may restrict the processing of Personal Information, so that it can be stored, but not used or processed further, such as: <ul style="list-style-type: none"> ○ Inaccurate data contested by the Data Subject must be restricted until verified and corrected ○ Processing is unlawful but the Data Subject objects to the erasure thereof

	<ul style="list-style-type: none">○ Cartrack no longer requires the Data Subject's data but the Data Subject requires it to be stored for the establishment, exercise or defence of legal claims○ The Data Subject objects to processing based on Cartrack's legitimate interests, until verification of overriding rights
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10. INFORMATION OFFICER

Data Subjects that have any queries regarding Cartrack's data protection policies or procedures may send an email to dataprotection@cartrack.com.

Details of Cartrack's Information Officer can be found in Cartrack's PAIA Manual

11. COMPLAINTS

Data Subjects have the right to submit a complaint to the local supervisory authority if unsatisfied with Cartrack's handling of the Data Subject's Personal Information, or about any complaint made to Cartrack.

Information Regulator in South Africa:

JD House
27 Stiemens Street
Braamfontein
Johannesburg
2001

P.O Box 31533, Braamfontein, Johannesburg, 2017

Complaints email: complaints.IR@justice.gov.za

<https://www.justice.gov.za/infoereg/index.html>

12. CHANGES TO THIS PRIVACY NOTICE

Cartrack may change this Privacy Notice from time to time without notice to the Data Subject, unless the amendment is material. The most updated version will be always be available on Cartrack's website and we encourage Data Subjects to visit Cartrack's website frequently in order to keep abreast with any changes.

13. ANNEXURES

Form 1: OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION IN TERMS OF SECTION 11(3) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013) REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018 [Regulation 2]

Form 2: REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION OR DESTROYING OR DELETION OF RECORD OF PERSONAL INFORMATION IN TERMS OF SECTION 24(1) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013) REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018 [Regulation 3]

FORM 1

OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION IN TERMS OF SECTION 11(3) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013)

REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018

[Regulation 2]

Note:

1. *Affidavits or other documentary evidence as applicable in support of the objection may be attached.*
2. *If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.*
3. *Complete as is applicable.*

A	DETAILS OF THE DATA SUBJECT
Name(s) and surname /registered name of data subject:	
Unique identifier/Identity Number:	
Residential, postal or business address:	
	Code ()
Contact number(s):	
Fax number/E-mail address:	
B	DETAILS OF RESPONSIBLE PARTY
Name(s) and surname / registered name of responsible party:	
Residential, postal or business address:	
	Code ()
Contact number(s):	
Fax number/ E-mail address:	
C	REASONS FOR OBJECTION IN TERMS OF SECTION 11(1)(d) to (f) (Please provide detailed reasons for the objection)

Signed at this day of20.....

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Signature of data subject/ designated person

FORM 2

REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION OR DESTROYING OR DELETION OF RECORD OF PERSONAL INFORMATION IN TERMS OF SECTION 24(1) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO.4 OF 2013)

REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018
[Regulation 3]

Note:

4. Affidavits or other documentary evidence as applicable in support of the request may be attached.
5. If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.
6. Complete as is applicable. Mark the appropriate box with an "x". Request for:

Mark the appropriate box with an "x".

Request for:

Correction or deletion of the personal information about the data subject which is in possession or under the control of the responsible party

Destroying or deletion of a record of personal information about the data subject which is in possession or under the control of the responsible party and who is no longer authorised to retain the record of information

A	DETAILS OF THE DATA SUBJECT
Name(s) and surname /registered name of data subject:	
Unique identifier/Identity Number:	
Residential, postal or business address:	
	Code ()
Contact number(s):	
Fax number/E-mail address:	
B	DETAILS OF RESPONSIBLE PARTY
Name(s) and surname / registered name of responsible party:	
Residential, postal or business address:	
	Code ()
Contact number(s):	
Fax number/ E-mail address:	

C	INFORMATION TO BE CORRECTED/DELETED/ DESTRUCTED/ DESTROYED
D	<p>REASONS FOR *CORRECTION OR DELETION OF THE PERSONAL INFORMATION ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24(1)(a) WHICH IS IN POSSESSION OR UNDER THE CONTROL OF THE RESPONSIBLE PARTY ; and or REASONS FOR *DESTRUCTION OR DELETION OF A RECORD OF PERSONAL INFORMATION ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24(1)(b) WHICH THE RESPONSIBLE PARTY IS NO LONGER AUTHORISED TO RETAIN. <i>(Please provide detailed reasons for the request)</i></p>

Signed at this day of20.....

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Signature of data subject/ designated person