

Tru-Trac Privacy Notice

Introduction:

This Privacy Notice describes the way that Tru-Trac Rollers (Pty) Ltd, Tru-Trac Manufacturing (Pty) Ltd and TruTrac Supplies (Herein after referred to as Tru-Trac), will meet its legal obligations and requirements concerning confidentiality and information security standards. The requirements within the Policy are primarily based upon the Protection of Personal Information Act, No 4 of 2013.

At Tru-Trac we are committed to protecting your privacy and to ensure that your personal information is collected and used properly, lawfully and transparently.

Who we are:

Tru-Trac Rollers (Pty) Ltd. trading as Tru-Trac Rollers (Pty) Ltd. conducts business as a Private Company. We are the world's leading supplier of solutions relating to problems experienced with the tracking and aligning of conveyor belts.

The type of personal information we collect:

We collect information that is adequate, necessary, and relevant to enable us to effectively render a service, comply with relevant legislation or assist in any manner required.

We currently collect and process the following information:

Customers: Names, Contact Details, Physical and Postal Addresses, Financial Information, Registration Number, Tax related information, Authorised Signatories, BBBEE Information

Suppliers and 3rd Parties: Names, Contact Details, Physical and Postal Adresses, Financial Information, Registration Number, Tax related information, Authorised Signatories, BBBEE Information

Employees: Gender; pregnancy; marital status; colour, race; age; language; education information; financial information; employment history; ID number; physical and postal address; contact details; opinions; criminal records; well-being

Other: Information received from electronic communications; information sent in response to vacancy advertisements; technical information through the use of cookies; etc.

How we get the personal information and what we use it for:

Most of the personal information we process is provided to us directly by you for one of the following reasons:

- Conducting credit reference checks and assessments
- Administration of agreements and/or contracts
- Providing products and services to customers
- Billing Purposes
- Detecting and prevention of fraud, crime, money laundering and other malpractice
- In connection with legal proceedings and/ or complying with legal and regulatory requirements

- Staff administration
- Recruitment and Staffing Purposes
- Keeping of accounts and records
- Marketing and/ or events communications
- Communication of important notices and updates, such as changes to terms, standard operating procedures (SOPs), policies, security alerts and administrative messages

We also receive personal information indirectly, from the following sources in the following scenarios:

- All information available on any public domain for example the internet, social media and any publications. This information is collected for the purposes of marketing and providing services and solutions related to our products.

We may share this information with:

We may share the Personal Information with our agents, affiliates, and associated companies who may use this information to send the Data Subject information on products and services.

We may supply the Personal Information to any party to whom we may have assigned or transferred any of our rights or obligations under any agreement, and/or to service providers who render the following services:

- Capturing, sorting and organising of data;
- Sending of emails and other correspondence to customers;
- Conducting due diligence checks;
- Administration of the Payroll, Medical Aid and Pension Schemes;
- Parties who provide us with technology services such as data analytics, hosting and technical support
- Our professional advisors, auditors and business partners;
- Regulators, governments and law enforcement authorities; and other third parties in connection with re-organising all or any part of the business.

Personal Information may be transmitted transborder to our authorised dealers and its suppliers in other countries, and Personal Information may be stored in data servers hosted outside South Africa, which may not have adequate data protection laws. The Group will endeavour to ensure that its dealers and suppliers will make all reasonable efforts to secure said data and Personal Information.

When will we process your personal information:

In terms of the Protection of Personal Information Act (POPIA), the justification ground which we base our processing on consist out of the following:

- The data subject or a competent person where the data subject is a child **consents** to the processing. Kindly note that you have the right to withdraw your consent;
- The processing is **necessary** to carry out actions for the conclusion or performance of a contract to which the data subject is a party;

- The processing complies with an **obligation** imposed by law on the business;
 - The processing protects a **legitimate** interest of the data subject;
 - The processing is necessary for the proper performance of a **public law** duty by the business;
- Or
- The processing is necessary for pursuing the legitimate **interests** of the business or of a third party to whom the information is supplied.

How we store your personal information:

Personal information is stored electronically and in some instances hard copies are kept where appropriate in secure files which are locked with limited access.

We use our best endeavours to provide adequate protection for the personal information we hold and to stop unauthorized access and use of personal information. We will, on an on-going basis, continue to review our security controls and related processes to ensure that your personal information remains secure.

We use a variety of security measures and technologies to help protect Personal information of a Data subject from unauthorised access, use, disclosure, alteration or destruction in line with applicable Personal information protection and privacy laws.

Measures include: Firewalls; Virus protection software and update protocols; Logical and physical access control; Secure setup of hardware and software making up the IT infrastructure;

When we contract with third parties, we impose appropriate security, privacy and confidentiality obligations on them to ensure that personal information that we remain responsible for, is kept secure.

The transmission of information via the internet or a mobile phone network connections may not be completely secure and any transmission is at the Data subject's risk. Despite the security measures that we have in place to protect Personal information of a Data subject (firewalls, password access and encryption methods), the Data subject acknowledges that it may be accessed by an unauthorised third party, e.g. as a result of an illegal activity.

From time to time we may provide links to websites or mobile applications that it does not own or control. This Notice does not apply to those websites. If a Data subject chooses to use those websites, he must check the legal and privacy policies or statements posted on each website or mobile application he accesses to understand their privacy practices.

We authorize access to personal information only for those employees who require it to fulfil their job responsibilities.

We will always keep the Personal information of a Data subject for the period required by law, for the provision of services as set out in this notice and where it needs to do so in connection with legal action or an investigation in which it is involved.

Your data protection rights:

- You are entitled to access your personal data by sending a written request to our Deputy Information Officer. We may charge you a fee for this service as set out in terms of Condition 8 of POPIA.
- You may also make a request to correct or supplement any of your personal data which we will undertake as soon as practicable.

- Should you wish to make a request for the destruction of your personal data, the Deputy Information Officer will consider your request in light of any other laws or regulations prohibiting us from destroying your personal data.

You will not be required to pay any charge for exercising your rights. Should you make a request, we will use our best endeavours to respond as soon as possible, however we have a turnaround time of 30 days to do so.

Contact details:

For any questions or requests regarding this Notice or if a Data subject would like to exercise his/her rights including contacting the Information officer, please use the following contact information:

The Deputy Information officer

Name: Yolandi Brand

Title: HR Manager/ Deputy Information Officer

Address: 590 Barolong Street, Sunderland Ridge, Centurion, 0157

Phone Number: 012 661 9531

E-mail: yolandi@tru-trac.com

The Information Regulator (South Africa)

33 Hoofd Street

Forum III, 3rd Floor Braampark

P.O Box 31533

Braamfontein, Johannesburg, 2017

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