



Privacy Policy

1. Purpose of this privacy policy:

- The purpose of this privacy policy is to set out the basis upon which we process personal information when making use of our products and/or our services (“Products/Services”) or any of our platforms (herein after collectively referred to as our “Site/s”)
- By utilising our Products/Services or any of our Sites, you are accepting and consenting to the practice described in this privacy policy.

2. Interpretation and definitions:

- Words that are defined in the Protection of Personal Information Act No. 4 of 2013 (“POPIA”) and used in this privacy policy will bear the same meaning as in POPIA unless the context requires otherwise;
- Reference to “consent” shall include any electronic means by which you convey your acceptance and acknowledgement that you agree to us processing your personal information, whether it be by the clicking of a button, or through biometric means, subscribing, submitting or sending of a message, updating your profile or clicking “I Agree” button or pressing the “enter” button, or by any other means, to submit/convey any information to us; or signing of any documentation;
- Any reference to singular shall include plural, and any reference to a certain gender shall include the opposite gender.

3. Introduction:

We recognise the importance of protecting your privacy in respect of your personal information collected by us.

- In adopting this privacy policy, we wish to balance our legitimate business interests and your reasonable expectation of privacy. Accordingly, we will take appropriate and reasonable technical and organisational steps to prevent unauthorised access to, or disclosure of your personal information. However, we do not guarantee that your personal information shall be 100% secure.

- Where there are reasonable grounds to believe that your personal information has been accessed or acquired by any unauthorised person, we will notify you and the Information Regulator which is appointed in terms of POPIA.
- We will delay notifying you of the unauthorised access or acquisition of your personal information if a public body responsible for detection, prevention or investigation of offences or the Information Regulator informs us that notifying you will impede a criminal investigation.
- When we notify you of the compromise to the security of your personal information, we will provide you with sufficient information to allow you to take protective measures against the potential consequences of the compromise.

4. Consent:

- By continuing to use our Products/Services and/or our Site:
 - You agree to the terms set out in this privacy policy. If you do not agree with this privacy policy, please do not continue to use our Products/Services and/or our Site and/or the Products/Services provided by any of our partners; and
 - You agree that we may process your personal information for, amongst other things, (i) the purposes of providing you with access to our Products/Services, our Site; and (ii) for any other purposes set out in this privacy policy.

5. Variation of privacy policy:

We reserve the right to vary the terms of this privacy policy. We will notify you of any such change and give you an opportunity to review the revised policy before you choose to continue to make use of our Products/Services and/or our Site. It is your responsibility to familiarise yourself with the most recent version of this privacy policy each time you access our Products/Services and/or our Site and before you elect to continue to make use of our Products/Services and/or our Site.

6. What type of personal information do we process:

The personal information that we may process includes information necessary for us to provide you with the Sale/Products/Services and to protect and ensure our legitimate business interests. This may include all of the categories of personal information listed in POPIA, and amongst other, include at least all of the following information: –

- **Information and content you provide.** We collect the consent, communications and other information you provide when you use our Products/Services, including when you sign up for an account, create or share content, and message or communicate with us via our Site or via any other means.

- Our systems automatically process content and communications you and others provide to analyse context and what's in them for the purposes described below. We specifically process your name and identity number, e-mail and physical addresses, postal address, contact information, information relating to your race, gender, and age, and such other information regarding yourself and/or your views if you choose to share same via our Site;
- **Your usage.** We collect information about how you use our Products/Services and/or our Site, such as the types of content you view or engage with; the features you use; the actions you take; the accounts you interact with; and the time, frequency and duration of your activities. For example, we log when you're using and have last used our Products/Services and/or our Site, and what posts, pages and other content you view on our Site. We also collect information about how you use certain features of our Products/Services and/or our Site;
- **Vehicle Information.** As described below, we collect information from and about the vehicles through our DMS system as well as financial platforms and OEM provided information every time a customer visits our site or makes use of our services.
- Information we may obtain from these sources include:
 - Vehicle attributes: information such as the specification of the vehicle, VIN/Engine and Registration numbers, service intervals, repairs done and accessories and parts specifically manufactured for the vehicle, battery tests and any other campaigns or information relating to your vehicle or part purchased.

7. When will we process your personal information:

- Personal information may be processed by us when:
 - You visit, browse, register, subscribe and/or apply for and use our Products/Services and/or our Site;
 - You register to receive any notifications from us in respect of our email authentication service and/or our text message authentication service;
 - We carry out research; and
 - When or if required by law; and
 - When and if it is in your best interest.
- You acknowledge that all personal information processed by us may be stored by us and used, inter alia, for any of the purposes, but not exclusively, listed in clause 8 below.

8. How do we use your personal information:

- We may use your personal information:
 - to deliver our Products/Services, including to personalise features and content (such as services, products and advertisements) and make suggestions for you (such as pages, services and information you may

be interested in or topics you may want to follow) on or about our Products/Services or on our Site. To create personalised content that are unique and relevant to you, we use your connections, preferences, interests and activities based on the data we collect and learn from you and others (including any data with special protections you choose to provide); how you use and interact with our Site; and the people, places, or things you're connected to and interested in, on and off our Site.

- to develop, test and improve our Products/Services and/or our Site, including by conducting surveys and research, and testing and troubleshooting new products and services and features.
- to select and personalise advertisements, offers and other sponsored content that we show you;
- we are not in the business of selling personal information and therefore we will not disclose your personal information to anyone except as provided in this policy. We may for marketing purposes disclose aggregate statistics (information about the user population in general terms) about your personal information to our advertisers or business partners. It may be necessary for us to disclose personal information to suppliers, affiliates or agents (for example in order to deliver products to you which you have bought) in order to provide you with our services. We will obviously need to disclose personal information to employees of ours who require such information to do their jobs. There may be situations where the law requires us to disclose your personal information. In all other situations we will not disclose your personal information without giving you notice thereof and an opportunity to indicate that your personal information should not be disclosed. to promote safety, integrity and security. We use the information we have to verify accounts and activity, combat harmful conduct, detect and prevent spam and other bad experiences, maintain the integrity of our Products/Services, and promote safety and security on and off of our Products/Services. For example, we use data we have to investigate suspicious activity or violations of our terms or policies;
- to communicate with you. We use the information we have to send you marketing communications, communicate with you about our Products/Services, and let you know about our policies and terms. We also use your information to respond to you when you contact us;
- For helping us in any future dealings with you; and
- For any other purpose as legally authorised to do and as is allowed by law.

9. Where we store your personal information

- All of the information you provide to us is stored manually, and/or on our secure cloud based platform and/or servers operated, maintained and protected in the Republic of South Africa (RSA);
- Records of the personal information will not be retained for no longer than is necessary for operational or archiving purposes, unless retention of record is required or authorised by law. Records of the information may be retained for periods in excess of those contemplated for historical, statistical or research purposes. This will be subject to us establishing appropriate safeguards (which can include de-identifying the records) against the records being used for any other purpose;
- Unfortunately, the transmission of information via the internet is not completely secure. We will use appropriate and reasonable technical and organisational measurements to protect the information, we cannot however guarantee the security of your data transmitted to our Site or to any other location by electronic means. Any transmission is at your own risk. However, once we have received the information, we will use appropriate and reasonable technical organisational measurements to try and prevent unauthorised access.

10. Sharing of your personal information:

- We will not disclose any of your personal information to any person, except when we have your consent and/or permission to do so or where we are required to do so in terms of law or if same is in your best interest;
- You agree that your personal information may be shared: –
 - to our holding companies, subsidiary companies, agents, advisers, partners, service providers and suppliers, or in the event of a change control if the ownership or control of all or a part of our Products/Services changes, we may transfer your information to such new owner.
 - where the law requires that we disclose your personal information to a party, and where we have reason to believe that a disclosure of personal information is necessary to identify, contact or bring legal action against a party who may be in breach of the terms or may be causing injury to or interference with (either intentionally or unintentionally) our rights or property, other users, or anyone else that could be harmed by such activities, or where the disclosure of your personal information would be in your best interest.

11. Your rights:

- **You have the right** to, in accordance with these terms, request that we correct, destroy or delete any of your personal information that we have

processed on our Products/Services and/or our Site. The personal information that you may request us to correct, destroy or delete is personal information that has been processed in accordance with these terms that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, obtained unlawfully or that we are no longer authorised to retain.

- **You have the right** to withdraw your consent for us to process your personal information at any time. The withdrawal of your consent can only be made by you on the condition that the withdrawal of your consent does not affect the processing of your personal information before the withdrawal of your consent; or that the withdrawal of your consent does not affect the processing of your personal information if the processing is in compliance with an obligation imposed by law on us; or that the withdrawal of your consent does not affect the processing of your personal information where such processing is necessary for the proper performance of a public law duty by a public body; or that the withdrawal of your consent does not affect the processing of your personal information as required by law; or that the withdrawal of your consent does not affect the processing of your personal information as required to finalise the performance of a contract in which you are a party; or that the withdrawal of your consent does not affect the processing of your personal information as required to protect your legitimate interests or our own legitimate interests or the legitimate interests of a third party to whom the information is supplied.
- **You have the right** to object to the processing of your personal information at any time, on reasonable grounds relating to your particular situation, unless the processing is required by law. You can make the objection if the processing of your personal information is not necessary for the proper performance of a public law duty by a public body; or if the processing of your personal information is not necessary to pursue your legitimate interests, our legitimate interests or the legitimate interests of a third party the information is supplied to.
- **You have the right** to object to the processing of your personal information, at any time, if the processing is for purposes of direct marketing other than direct marketing by means of unsolicited electronic communications and you have not given your consent for that processing.
- **You have the right** to not have your personal information processed for purposes of direct marketing by means of unsolicited electronic communications from third parties unknown to you.
- **You have the right** to submit a complaint to the Information Regulator regarding an alleged interference with the protection of personal information processed in accordance with these terms. The Information Regulator's contact details are published by the government from time to time in terms of POPIA. When they are published POPIA places a duty on us to inform you what those contact details are and we will do so via our Products/Services and/or our Site.

- **You have the right** to institute civil proceedings regarding an alleged interference with the protection of your personal information processed in accordance with these terms.

12. Use of cookies:

- We sometimes use "cookies". "Cookies" are programs that we transfer to your computer's hard drive. The purpose of "cookies" is to enhance your future visits to our website. You can set your browser to notify you if "cookies" are to be transferred or to reject "cookies" but this may prevent your use of some of our web pages.

13. Links to other Sites:

When you use our Products/Services and/or our Site, you could be directed to other site/s that are beyond our control. These other site/s may send their own cookies to you, collect data or solicit personal information. We do not control the privacy policies of those third party and we cannot be held liable for the use thereof by you for any reason whatsoever.

14. Direct Marketing:

- We may process your personal information for the purposes of providing you with information regarding services that may be of interest to you. You may unsubscribe for free at any time.
- If you currently receive marketing information from us which you would prefer not to receive in the future please email us or alternatively, unsubscribe using the unsubscribe function when receiving marketing communication from us.

16. Contact Details:

You may contact us at –

- The POPIA Information Officer:
- Attention: Mr. Mark Jonathan White
- Contact Number: 011 840 1960
- Email address: markw@mwn.co.za

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