

TRANSSEC

Privacy Policy (“Policy”)

Introduction

This Policy sets out how Personal Information of Data Subjects is collected and will be used by Transsec and applies to any information, including Personal and Special Personal Information, which Data Subjects provide to Transsec, or which Transsec may legitimately collect from third parties.

The provisions of this Policy are subject to mandatory, unalterable provisions of Applicable Laws.

For purposes of this Policy:

“**Applicable Laws**” means, in relation to Transsec or any Data Subject, any laws, regulations, treaties and codes, including the Protection of Personal Information Act 4 of 2013, the Financial Intelligence Centre Act 38 of 2001, the Consumer Protection Act 68 of 2008 and the National Credit Act 34 of 2005, which may be applicable to Transsec or such Data Subject (as the case may be);

“**Data Subject**” means a person to whom Personal Information relates, as contemplated in section 1 of the Protection of Personal Information Act 4 of 2013;

“**operator**” means any person who processes Personal Information for a responsible party in terms of a contract or mandate, without coming under the direct authority of that party, as contemplated in section 1 of the Protection of Personal Information Act 4 of 2013;

“**Personal Information**” means information as set out in section 1 of the Protection of Personal Information Act 4 of 2013;

“**Special Personal Information**” means information as set out in section 26 of the Protection of Personal Information Act 4 of 2013; and

“**Transsec**” means:

1. Transsec 3 (RF) Limited, a company with limited liability registered and incorporated in accordance with the laws of South Africa under registration number 2016/117311/06 and with registered address 179, 15th Road, Randjespark, Midrand, 1685;
2. Transsec 4 (RF) Limited, a company with limited liability registered and incorporated in accordance with the laws of South Africa under registration number 2018/268776/06 and with registered address 179, 15th Road, Randjespark, Midrand, 1685;
3. Transsec 5 (RF) Limited, a company with limited liability registered and incorporated in accordance with the laws of South Africa under registration number 2020/886422/06 and with registered address 179, 15th Road, Randjespark, Midrand, 1685;
4. any other special purpose vehicle established for the purpose of issuing notes and acquiring eligible assets under a securitisation scheme arranged or co-arranged by SA Taxi Holdings Proprietary Limited; and/or

5. any operator, agent, contractor, sub-contractor or selected third party who processes Personal Information for any entity referred to in clauses 1 to 4 and acting in its capacity as such.

Privacy

Transsec takes the privacy and the protection of Personal Information very seriously. Transsec will take all reasonable steps to ensure that it will only use Personal Information of Data Subjects in accordance with this Policy and Applicable Laws and that it will protect such information from wrongful access. However, this is a dual responsibility, and it is therefore important that Data Subjects take all necessary and appropriate steps to protect their Personal Information themselves (for example, by ensuring that all passwords are kept secure).

Personal Information Collected by Transsec

Transsec may collect the following information about a Data Subject:

- Personal Information and Special Personal Information;
- Records of correspondence or enquiries from a Data Subject or anyone acting on behalf of a Data Subject;
- Details of any transactions Transsec carries out with a Data Subject;
- Details of any contracts or mandates entered into, or to be entered into, between Transsec and a Data Subject;
- Sensitive or special categories of Personal Information, including biometric data (for example, images, fingerprints and voiceprints) and information about criminal convictions/allegations and offences; and
- Any other record (as that term is defined in section 1 of the Protection of Personal Information Act 4 of 2013), as determined by Transsec from time to time.

Save as otherwise required by Applicable Laws, the provision of Personal Information by a Data Subject to Transsec is voluntary. However, in the event that a Data Subject does not provide Transsec with Personal Information required by Transsec, Transsec may not be in a position to transact with such Data Subject.

Where a Data Subject provides Transsec with the Personal Information of a third party, the Data Subject should take steps to inform the third party that they need to disclose such Personal Information to Transsec and clearly identify Transsec. Transsec will process the third party's Personal Information in accordance with this Policy.

How Transsec Collects Information

Non-automated information collection

Transsec may collect information directly from a Data Subject or indirectly through a legitimate third-party source (such as an agent acting on the Data Subject's behalf, a government institution, a regulator, a verified third-party data vendor or other third party that may hold such information).

In instances where a Data Subject has applied for credit, Transsec may conduct searches at credit bureaus. Details of Transsec's searches will be kept by the credit bureau and will be available to other

businesses that conduct searches with that agency for the purposes of meeting Transsec's regulatory obligations, credit assessments, debt recovery, prevention of money laundering and fraud and statistical analysis.

Automated data collection

When a Data Subject visits the website [<https://www.transactioncapital.co.za/transsec5.php>] (the "**Transsec Website**") or login to one of Transsec's digital platforms (e.g. SA Taxi App)], Transsec automatically collects certain information about such Data Subject, including such Data Subject's device, browser, IP address, location and time zone. Additionally, Transsec may track how a Data Subject uses the site and/or digital platform, including how long it takes such Data Subject to find what they are looking for, their browsing patterns, the links and pages they browse through and how long they spend on each one.

This information is collected by placing **Cookies** on a Data Subject's device and/or browser.

Cookies store information on a Data Subject's hard drive or browser, allowing the website to recognise that such Data Subject has visited these before.

In order to collect the anonymous data (i.e. data that does not identify a Data Subject personally but purely statistical data), Transsec may use temporary "cookies" that remain in the cookies file of a Data Subject's browser until the browser is closed.

Cookies are small, often encrypted text files, located in browser directories. They help users navigate websites efficiently and allow certain functions, such as buying products online. When a Data Subject visits websites, cookies may be stored on such Data Subject's computer. They are used to store a variety of information about such Data Subject and such Data Subject's preferences, which is afterwards sent back to the visited website.

Cookies do not damage a computer. A Data Subject can set their browser to notify them when they receive a cookie. This enables the Data Subject to decide if they want to accept it or not. If a Data Subject chooses not to accept cookies from the website this may limit the website's functionalities or performance. A Data Subject can stop their browsers from accepting cookies by changing the settings on their web browser.

Transsec uses cookies for several reasons:

- to enable more user-friendly, efficient and safe visits to the Transsec Website;
- to identify Data Subjects as authorised users;
- to provide Data Subjects with safe restricted access areas;
- to remember Data Subjects so that when any such Data Subject returns to the websites they do not need to enter their information again; and
- to understand what brought Data Subjects to the Transsec Website and what pages they have visited.

Besides these Transsec may also use cookies which enables Transsec to save a Data Subject's preferences from each of their visits to the Transsec Website and present such Data Subject with a version of the Transsec Website which reflects their preferences. Transsec's system is therefore able to recognize a Data Subject each time they visit the Transsec Website, without requiring such Data Subject to systematically log in each time they visit.

More information about cookies is available at: <http://www.allaboutcookies.org/> and <http://www.google.com/policies/technologies/cookies/>.

Use of Information Collected

Transsec may use, transfer and disclose a Data Subject's Personal Information for the purposes of:

- Providing a Data Subject with the services, products or offerings such Data Subject has requested, and notifying such Data Subject about important changes to these;
- Managing and/or implementing any contractual arrangement or relationship between a Data Subject and Transsec;
- Complying with a Data Subject's instructions or requests;
- Detecting and preventing fraud and money laundering in the interest of security and crime prevention;
- Assessing and dealing with complaints and requests;
- Operational, marketing, auditing, statistical, legal and record keeping requirements;
- Conducting sanctions and politically exposed person screening against any relevant list which Transsec may in its sole discretion determine;
- Verifying a Data Subject's identity;
- Requesting a Data Subject's consumer credit reports or those of any security provider from one or more credit reporting agencies in connection with any agreement between such Data Subject and Transsec;
- Transmitting to a registered credit bureau any information concerning a Data Subject's application for credit, any agreement between a Data Subject and Transsec, termination and non-compliance with the terms thereof;
- Transferring a Data Subject's Personal Information outside of the Republic of South Africa, including to such countries that may not offer the same level of data protection as the Republic of South Africa, including for cloud storage purposes and the use the Transsec Website. If this happens, Transsec will ensure that anyone to whom it passes a Data Subject's information agrees to treat such information with the same level of protection as if Transsec was dealing with it;
- Complying with Applicable Laws, including lawful requests for information received from local or foreign law enforcement, government and tax collection agencies;
- Recording and/or monitoring a Data Subject's telephone calls and communications (including electronic communications) to/with Transsec in order to keep record thereof, accurately carry out such Data Subject's instructions and requests and/or use as evidence and in the interests of crime prevention;
- Conducting market research;
- Where a Data Subject has unsubscribed from certain direct marketing communications, for the purposes of ensuring that Transsec does not send such direct marketing to such Data Subject again;
- To disclose a Data Subject's Personal Information to third parties for reasons set out in this Policy or where it is not unlawful to do so; and
- Improving or evaluating the effectiveness of Transsec's business, products, services or offerings.

Using a Data Subject's Personal Information for Communication Purposes

Direct Marketing

Transsec may from time to time contact a Data Subject about Transsec's services, products and offerings, which Transsec believes may be of interest to such Data Subject, by email, phone, text or other electronic means, unless such Data Subject has unsubscribed from receiving such communications.

If a Data Subject no longer wishes to receive e-mails from Transsec and want to be removed from Transsec's mailing list, such Data Subject must e-mail Transsec at the address popi@sataxi.co.za.

If a Data Subject chooses to unsubscribe from Transsec's mailing lists, Transsec will hold such Data Subject's contact details on file marked so that it does not contact such Data Subject again. This is so that Transsec does not contact a Data Subject if such Data Subject's details are subsequently provided to Transsec by a third party.

Mandatory Communication

Even if a Data Subject has opted out of direct marketing communication, Transsec has a legal and regulatory obligation to communicate with such Data Subject regarding:

- Changes to any contractual arrangement or relationship between such Data Subject and Transsec;
- Changes to any products such Data Subject holds with Transsec;
- Such Data Subject's account statements (if applicable);
- Such Data Subject's payment status / history (if applicable).

The choice to opt-out of communication will therefore not include any such communication, and should a Data Subject not wish to receive such communication, Transsec may not be in a position to transact with such Data Subject.

Disclosure of Information

Personal Information of a Data Subject may be shared with Transsec's operators, agents, contractors, sub-contractors and selected third parties who process the information on their behalf.

Transsec may also disclose Personal Information of a Data Subject to third parties when it is entitled or obliged to do so under Applicable Law, including to:

- prevent, detect and report fraud and criminal activities and to identify the proceeds of unlawful activities and the combatting of crime;
- comply with requests from third parties, including regulators, including those in foreign jurisdictions, if Transsec is required to do so in terms of Applicable Laws; or
- protect the rights, property or safety of Transsec or third parties.

Transsec may transfer a Data Subject's information to an operator, agent, contractor, sub-contractor or selected third party who carries on business in another country, including one which may not have data protection laws similar to those of the Republic of South Africa. If this happens, Transsec will ensure that anyone to whom it passes a Data Subject's information agrees to treat such information with the same level of protection as if Transsec was dealing with it.

If a Data Subject does not wish for Transsec to disclose this information to third parties, such Data Subject must contact the Information Officer at the contact details set out below. Transsec may, however, not be in a position to transact with a Data Subject if such disclosure is necessary.

Retention of Personal Information

Transsec may retain a Data Subject's Personal Information indefinitely, unless such Data Subject objects, in which case Transsec will only retain it if Transsec is permitted or required to do so in terms of Applicable Laws. However, as a general rule, Transsec will retain a Data Subject's information in accordance with retention periods set out in Applicable Laws, unless Transsec needs to retain it for longer for a lawful purpose.

Access to, Correction and Deletion of Personal Information

A Data Subject may request details of Personal Information which Transsec holds about such Data Subject under the Protection of Personal Information Act 4 of 2013 or about third parties where such Data Subjects rights are affected by such information under the Promotion of Access to Information Act 2 of 2000 (“**PAIA**”). Fees to obtain a copy or a description of such Personal Information are prescribed in terms of PAIA. Confirmation of whether or not Transsec holds Personal Information about a Data Subject may be requested by such Data Subject free of charge.

A Data Subject also have the right to contact the relevant credit bureau, to have the credit record(s) disclosed and to correct any inaccurate information.

A Data Subject may request the correction of Personal Information Transsec holds about such Data Subject. A Data Subject must ensure that the information Transsec holds about them is complete, accurate and up to date. If a Data Subject fails to keep their information updated, or if their information is incorrect, Transsec may limit the services, products and offerings offered to such Data Subject.

A Data Subject has a right in certain circumstances to request the destruction or deletion of and, where applicable, to obtain restriction on the processing of, Personal Information held about such Data Subject. If a Data Subject wishes to exercise this right, they should contact Transsec using the contact details set out below.

A Data Subject has a right to object on reasonable grounds to the processing of their Personal Information. For more information in this regard please read the Transsec PAIA manual.

Linking

Transsec's website contain hyperlinks to other pages on its websites. Transsec may use technology to track how often these links are used and which pages on its website its visitors choose to view. This technology does not identify a Data Subject personally; it simply enables Transsec to compile statistics about the use of these hyperlinks.

A Data Subject may link to another website which is outside of Transsec's control. Once such Data Subject has left Transsec's website, Transsec does not remain responsible for the protection and privacy of any information which such Data Subject provides. It is imperative that a Data Subject exercises caution and look at the privacy statement applicable to the website of any third party.

Amendment of this Policy

This Policy may be amended by Transsec from time to time for any of the following reasons:

- To provide for the introduction of new systems, methods of operation, services, products, offerings and/or facilities;
- To comply with changes to any legal or regulatory requirements;
- To ensure that this Policy is clearer and more favourable to a Data Subject or Transsec;
- To rectify any mistake that might be discovered from time to time; and/or
- For any other reason which Transsec, in its sole discretion, may deem reasonable or necessary.

Any such amendment will come into effect when notice is given to Data Subjects of the change by publication on the Transsec Website. It is a Data Subject's responsibility to check the Transsec Website often.

How to Contact Transsec

If a Data Subject has any comments or questions about this Policy, such Data Subject may contact the Information Officer Nigel Candiotes at ncandiotes@sataxi.co.za.

Complaints

Should a Data Subject believe that Transsec has utilised such Data Subject's Personal Information contrary to Applicable Laws, Transsec requests that such Data Subject first attempts to resolve any concerns with Transsec.

If a Data Subject not satisfied with such process, such Data Subject may have the right to lodge a complaint with the Information Regulator, using the contact details listed below:

Tel: 012 406 4818

Fax: 086 500 3351

Email: inforeg@justice.gov.za.