

DealerSA Privacy Policy

Last updated on 24 June 2021

1. Introduction

DealerSA is committed to protecting your privacy. Whether you deal with DealerSA as a customer, supplier or employee, you are entitled to the protection of your Personal Information. This DealerSA Privacy Policy describes the categories of Personal Information we process in connection with your use of our website www.dealersa.co.za and the services, features or content we offer, the purposes for which Personal Information is collected, the third parties with whom we share it, the security measures we take to protect your Personal Information, in particular in the event of cross-border data transfers. It also informs you about your rights and choices with respect to your Personal Information, and how you can contact us to inquire about our data protection practices. Should you disagree with any provision in this Privacy Policy, please do not use our Website or provide any Personal Information. This Privacy Policy may change from time to time, for more information about Notice amendments see Section 11 below.

Link to this Privacy Policy on our website:

https://www.dealersa.co.za/Assets/docs/DealerSA_Privacy.pdf

Who can you contact in case you have questions or requests?

For the purpose of this Privacy Policy, **DealerSA ("DealerSA")** is responsible for the processing of your Personal Information as the Responsible Party. We have set up a Data Protection Contact Point that will handle any questions or requests you may have concerning this Privacy Policy, your Personal Information, and its processing.

For any questions, requests or complaints concerning the application of this Privacy Policy or for exercising your rights, as described in this Privacy Policy, you can contact our Information Officer using the below contact information:

David Thomas: david@dealersa.co.za or in writing to: Dealer|SA P.O Box 26475 Hout Bay 7800

3. Personal Information We Collect About You and How We Collect It

"Personal Information" means any information relating to an identified or identifiable natural person or juristic entity; an identifiable natural person or juristic entity is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

When visiting our Website you have the option to provide us with Personal Information relating to you. Additionally, when you use our Services we automatically collect certain information about you and your usage of our Website. The specific categories of Personal Information concerned and the sources from which we obtain them are linked to the way you

interact with our Website and Services. More information about the categories of Personal Information and the ways in which we collect it are described below.

(1) Personal Information You Give to Us

Our Website offers you the possibility to (i) participate in our offers and services, including but not limited to forms for auctions, valuations and customer service support requests. The Personal Information thereby collected includes:

- Identification data: Registration and ID number, name, title, address, email address, telephone and/or mobile number;
- Personal characteristics: age, gender, date of birth, place of birth, occupation and nationality;
- IDs assigned by us, such as a DealerSA user account ID, types of formal identification data such as passport, driving license and utilities bill (when we need to verify your ID or driver's licence for e.g. DealerSA Rent-a-Car).

(2) Personal Information We Automatically Collect

As you navigate through our Website, we use automatic data collection technologies to collect certain Personal Information about your device, browsing activity, and patterns, including:

- Log usage data of your visits to our Website, including technical session and connection information, resources that you access, traffic data, location data, date and time of access and frequency;
- Personal Information about your computer and internet connection, hardware and software, including your IP address, operating system, host domain, browser type, language settings, web pages you viewed on our Website, search terms and times of your visit; and
- Details of referring websites (URL) and web pages you visited prior to ours.

(3) Cookies Used On Our Website

We use cookies, beacons and similar technologies on our Website. Cookies are small data files that are stored on a user's computer for record keeping purposes. We use them in public areas of our Website.

Our Website use single-session (temporary) and multi-session (persistent) cookies. Temporary cookies last only as long as your web browser is open, and are used for technical purposes such as enabling better navigation on our Website. Once you close your browser, the cookie disappears. Persistent cookies are stored on your computer for longer periods and are used for purposes which include tracking the number of unique visitors to our Website and Personal Information such as the number of views a page gets, how much time a user spends on a page, and other pertinent web statistics. This Personal Information identifies your browser to our servers when you visit the Website.

Most web browsers are set to accept cookies by default. If users prefer, they can usually choose to set their browsers to remove and reject cookies. In some cases, removing or rejecting cookies may affect certain features or services on our Website. If you want to disable the use of cookies or remove them from your computer, you can disable or delete them at any time using your browser (consult your browser's "Help" menu to learn how to delete cookies).

(4) Personal Information from Social Media

1. Facebook Insights Data

When you use our Facebook fan page, Facebook may collect insights data, i.e., how often you visit the Facebook fan page, whether you recommend it in a post or comment, etc. Subsequently, Facebook provides anonymous statistics and insights about the usage of the Facebook fan page to DealerSA, (such as number of followers, number of interactions with a post, etc.) to help us understand how users are engaging with our Facebook fan page.

DealerSA's legal basis for processing insights data is our legitimate business interest to steadily improve our Facebook online content and to better respond to the interests of our users.

2. Other social media

We may collect and/or receive Personal Information from DealerSA's presence on social media platforms such as YouTube, Twitter, LinkedIn, and Instagram, consistent with your settings within the social media platform, regarding gender and age, occupation, location, check-ins, famous posts, escape rate, access date and time, use of messaging functions, followers and likes. We aggregate this Personal Information and divide large groups of users into sub-groups based on the same type of shared characteristics such as geography, behaviour, or demographics, in order to provide better, more personalized services for the users.

3. Social Media Plugins

When using our Website we allow you to share information with social media sites and to access our social media profiles through so-called plugins. Social networks are able to retrieve Personal Information through those plugins, even if you don't interact with them. Moreover, if you are logged onto a social network while visiting our Website with social plugins imbedded in them, the network can collect and store information about such visit and link it to your social network user account. As we have no control over the data collected by social media networks through their plugins, we encourage you to read their applicable data privacy policies to learn more about them.

Once you choose to share information of our Website on social media or when you connect with our social media profiles through the plugins, those social media sites allow us to automatically access Personal Information retained by them about you consisting of content viewed by you, content liked by you and information about the advertisements you have been shown or have clicked on. You can restrict our access to your Personal Information by changing your privacy setting on the respective social media site.

Also, you can access our Website via a third-party service, e.g. from our profiles on social networks. In those cases, we may collect Personal Information from your social media user account consisting of your first and last name, email address and phone number and any other information you have made public.

4. For Which Purposes We Process Your Personal Information and on What Legal Bases

We will only process your Personal Information for specific, explicit and legitimate purposes. We will not process your Personal Information for any further purposes than the ones the data was originally intended for unless the new purpose is compatible with the original one and in your best interests. In the absence of compatibility, the processing of Personal Information for further purposes is subject to your consent, either explicitly or contractually.

The following table lists the purposes for which we process your Personal Information and the legal bases we rely on.

Purpose of Processing	Legal Basis
Managing your on-line auction and valuation information through our Website.	Processing is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract.
Managing your service requests for issues on our Website.	(i) Processing is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract; and (ii) our legitimate interests consisting of customer relationship management, including complaint management and carrying out marketing and promotional activities.
When required to comply with any provisions in any applicable laws and regulations or follow any governmental notification and/or guidelines.	Processing is necessary for compliance with a legal obligation we are subject to.
Commercial purposes involving the presentation of goods and services that we provide.	Processing is necessary for the purposes of our legitimate interests consisting of carrying out marketing and promotional activities.
Promoting DealerSA's business activities.	Processing is necessary for the purposes of our legitimate interests consisting of carrying out marketing and promotional activities.
Conducting surveys through online questionnaires in order to enable us to manage planning, research and development, quality improvement and/or developing any measure to improve customer satisfaction.	Processing is necessary for the purposes of our legitimate interests consisting of customer relationship management and quality assurance.
Ensuring the quality of our products and services and for developing new DealerSA products and services.	Processing is necessary for the purposes of our legitimate interests consisting of quality assurance, product support and development.
Social media content moderation and analytics.	Processing is necessary for the purposes of our legitimate interests consisting of personalised social media content and services.

5. How Long Do We Keep Your Personal Information

We will not retain your Personal Information for longer than is allowed under the applicable data protection laws or for longer that is necessary in relation to the purposes for which it was originally collected or otherwise processed. As a general rule, we will delete your Personal Information after 5 years, unless statutory retention periods apply.

In the absence of statutory retention periods, alternatively after completion of those periods, we will erase your Personal Information. Further, we will erase your Personal Information where one of the following applies: (i) when you withdraw your consent (where lawfulness of processing was based on your consent) and there is no other legal ground for the processing; (ii) when you object to the processing and there are no overriding legitimate grounds for the processing; (iii) when your Personal Information has been unlawfully processed; and (iv) when it is necessary to comply with legal obligations.

6. Protecting Your Personal Information

We have taken into account the technology, costs of implementation and the nature, scope, context and purposes of processing as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons and juristic entities, and implemented appropriate technical and organisational measures to ensure a level of security appropriate to the risk, including inter alia as appropriate

- the pseudonymisation and encryption of Personal Information;
- the ability to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services;
- the ability to restore the availability and access to Personal Information in a timely manner in the event of a physical or technical incident; and/or
- process for regularly testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing.

7. Disclosure of Personal Information

For the purposes for which we collect your Personal Information, we may disclose it to the following categories of recipients:

a) Within our organisations and our brand environment

- Our authorised staff members;
- Our affiliates and subsidiary companies; and/or
- Members of our business network which you have been in contact with.

b) Third party business partners

- Advertising, marketing and promotional agencies: to help us deliver and analyse the effectiveness of our advertising campaigns and promotions;
- Business partners: trusted companies that may use your Personal Information to provide you with the services and/or the products you requested and/or that may provide you with marketing materials (provided that you have consented to receiving such marketing materials); and/or
- Service providers of DealerSA: companies that provide services for or on behalf of DealerSA, for the purposes of providing such services (for example, DealerSA may share your Personal Information with external providers of IT-related services).

c) Other third parties

- when required by law or as lawfully necessary to protect DealerSA
 - to comply with the law, requests from authorities, court orders, legal procedures;
 - to verify or enforce compliance with DealerSA's policies and agreements; and/or
 - to protect the rights, property or safety of DealerSA and/or its customers.
- in connection with corporate transactions: in the context of a transfer or divestiture of all or a portion of its business, or otherwise in connection with a merger, consolidation, change in control, reorganisation or liquidation of all or part of DealerSA's business.

8. Specific Contact with Our Authorised Retailers and Repairers

If you purchase a vehicle or another product or service from our business network or if you give them your Personal Information, you will have a separate relationship with this Authorised Dealer. In this case, they are the Responsible Party of your Personal Information. For all questions or requests about the collection and use of your Personal Information by one of the Authorised Dealers, please contact them directly.

9. International Data Transfers

International data transfers refer to transfers of Personal Information outside of South Africa. We are a company which may expand operations around the world. Accordingly, our business may require the transfer of Personal Information to and from other group companies or third parties, which may be located outside South Africa. We will only transfer Personal Information to countries that provide for an adequate data protection standard meeting the requirements as set out by POPIA. Data transfers to countries not meeting that threshold will only occur in accordance with international data transfer agreements and standards.

10. Your Rights with Regard to Your Personal Information

We want to be as transparent as possible with you, so that you can make meaningful choices about how you want us to use your Personal Information. We remind you that you can at any time exercise certain data protection rights:

- The right to request access to your Personal Information, which includes the right to obtain confirmation from us as to whether or not Personal Information concerning you is being processed, and where that is the case, access to the Personal Information and information related to how it is processed. You may always contact via the Information Officer (see section 2 "Who can you contact in case you have questions or requests?") to find out what Personal Information we have concerning you and its origin.
- The right to rectification or erasure of your Personal Information, which includes the right to have incomplete Personal Information completed, including by means of providing a supplementary statement, certain rights to request us to erase your Personal Information without undue delay.
- The right to restrict or object to processing concerning your Personal Information, which includes restricting us from continuing to process your Personal Information under certain circumstances (e.g., where you contest the accuracy of your Personal Information, processing is unlawful, your Personal Information is no longer needed

for the purposes of processing, or you have otherwise objected to processing related to automated individual decision-making).

- The right to data portability, which includes certain rights to have your Personal Information transmitted from us to another Responsible Party or Operator.
- Where data processing is based on your consent, the right to withdraw consent at any time.
- The right to lodge a complaint with a data protection supervisory authority (the Regulator).

Any requests related to the above rights can be made by sending an email to the DealerSA Information Officer listed above.

11. Amendments to This Privacy Policy

We reserve the right to amend this Privacy Policy from time to time consistent with applicable data protection laws and regulations. Any changes to this Privacy Policy will be posted on this page. If we make material changes to how we treat your Personal Information, we will notify you through a new version of this Privacy Policy on the website home page. The date this Privacy Policy was last revised is identified at the top of the page.