SANTOVA GROUP

DATA PROTECTION - PRIVACY POLICY

Who are we, and what is this document for?

The Santova Limited Group of Companies ("Santova Group") is made up of different legal entities, details of which can be found in Annexure 1 to this policy below. This privacy policy is issued on behalf of the Santova Group so when we mention "the Company", "we", "us" or "our" in this privacy policy, we are referring to the relevant company in the Santova Group responsible for processing your data . We will let you know which entity will be the controller/Responsible Party for your data when you purchase a product or service from us. We are committed to protecting the privacy and security of your personal information.

"Personal information" or "personal data" means any information about an individual from which that person can be identified, either on its own or by combining it with other information the Company has. In the jurisdiction of South Africa "personal information" or "personal data" shall also include the definition of "personal information" or "personal data" as contained in the Protection of Personal Information Act, 2013, as amended from time to time ("POPIA"), which includes information about a juristic entity as well. In the jurisdiction of Australia, "personal information" shall also include the definition of "personal information" as contained in the Privacy Act 1988 (Cth), as amended from time to time ("Privacy Act").

This privacy policy describes how we look after your personal data generally, offline and online, and when you visit any of our various data collection channels such as our website (regardless of where you visit it from), electronic applications, social networks, customer engagement initiatives, points of sale, events ("websites") as well as when we provide any services from us and describes your privacy rights under data protection laws, as applicable.

Our websites are not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy policy together with any other privacy notice or policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements those other notices and policies and is not intended to override them.

Please note that we might aggregate personal information from different channels as set out above and across different devices which may require combining personal information originally collected by different Santova entities and by using our websites and providing the required personal information, you agree for us, which includes and extends to our directors, employees, agents, consultants, service providers, subcontractors, affiliates and/or third parties, processing your personal information for the purposes as stated in this Policy however if you do not agree with the terms of this Policy and our processing activities described, please do not use our website.

We may update this policy at any time.

The Company is the "controller" in terms of the General Data Protection Regulation, as amended from time to time ("GDPR") or the 'Responsible Party' in terms of POPIA, and responsible for any personal data we hold about you, and for this website. This means that we are responsible for deciding how we hold and use that information, and are required under applicable data protection laws to notify you of the information contained in this privacy policy.

We have appointed a Data Manager responsible for dealing with any issues relating to this policy, for both **GDPR issues and data protection in general outside of South Africa**, who can be contacted via email at: datamanager@santova.com.In the event that the relevant company in the Santova Group responsible for processing this data is outside the European Union, the Company's representative in the European Union for data protection matters is the Data Manager who can be contacted via email at: datamanager@santova.com.

In the jurisdiction of South Africa we have also appointed an Information Officer from within our organisation who is responsible for dealing with any issues relating to this policy in respect of compliance with **POPIA and data protection in general within South Africa**, and can be contacted via email at: informationofficer@santova.com.

It is important that you read this policy and any other privacy notices and policies we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements.

When you leave our website, we encourage you to read the privacy policy of every website you visit.

Cookies

In the event that we utilise cookies on our websites, you can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. However if you allow the website to function with the use of cookies, then you agree that we may use your personal information collected from these cookies which use shall be strictly in terms of this Policy.

What kinds of personal information do we hold about you?

We will collect, store, and use the following categories of personal information about you:

- Names and titles
- Addresses, including physical, registered, invoice, delivery and site addresses
- Contact details such as telephone numbers, mobile numbers, facsimile numbers, relevant membership numbers (e.g. medical aids, insurance providers) and email addresses
- Registration details such as Company Registration Number, Government Business Code, Government Corporation Code, AEO Number, Chamber of Commerce Number, Credit Agency Code, Driving Licence Number, Global Tracking Name, Road Carrier Registration Number, SEPA Creditor Identifier, Shipping Company Carrier / Principal Code and Standard Industrial Classification
- Customs information including Customs Carrier Code, Customs Client Code, Customs Controlled Premises Code, Customs Manifest Provider Code, Customs Supplier Code, Trader Excise Number, Deferment Approval Number
- Tax status information including Company VAT, EORI and Deferment Number
- Bank account details including Sort Code, Account Number, Account Name, I Ban, any credit/debit card details (such as cardholder name, card number, expiration date etc…) or other forms of payment (if such are available)
- Information concerning your financial standing/status and credit worthiness
- Preferred language, date of birth and nationality
- Passport and identity information
- Information from computer devices used to access websites such as Internet Protocol address used to connect your computer or device to the internet, operating system type, web browser type and version; and information extracted through Google analytics
- If accessing our websites via a mobile device (smartphone, tablet, handheld smaller electronic devices) then this will include information, where required, such as your device's unique device ID, advertising ID, geo-location, device identification number, browser information (such as Internet Service Provider (ISP) and Internet Protocol (IP) addresses), any device and browser identifiers and information (such as browser type, version, plug in type and version, operating system, user agent, language, time zone and any other information technical information), advertising identifiers, cookie identifiers, similar date, usage information, browsing history, usage metrics (such as usage rates, occurrences of technical errors, diagnostic reports, settings preferences, backup information, API calls and other logs) and any other similar data
- Payment defaults, civil legal matters and judgements
- Security access to any of our/Santova Group offices, premise, building or location and includes information such as vehicle registration details, CCTV footage and any other similar data
- Information about your use of our information and communications systems and websites such as content interactions (including searches, views, downloads, prints, shares, streams, display or playback details, statistics on your interaction and/or any other similar information, as applicable), user history (such as clickstreams, page navigation, URLs, timestamps, content viewed or searched for, page response times, page interaction information including scrolling, clicks, mouse-overs and download errors), advertising interactions (click rates, marketing preferences, comments and downloads) and any other similar data which is captured through automated technologies (such as cookies and web beacons and may be collected through the use of third party tracking for analytics and advertising purposes) – which you can object to as set out above

- We may use photographs of you, video, voice or other similar date where necessary for identification or security purposes or in other cases for use on the Company's website and social media pages in instances of consumer-generated content which is shared on third-party social networks or professional networks and, where permitted, we collect and publish consumer-generated content in connection with any website community features, consumer engagement initiatives and/or other similar marketing campaigns, where applicable.

- Any information that you share publicly on a third-party social network or information that is part of your profile on a third-party social network and that you allow the third-party social network to share with us (such as basic account information (e.g. name, email address, gender, birthday, current city, profile picture, etc.) and any other additional information or activities that you permit the third-party social network to share, in the event you utilise a third-party social network to interact with/access information from our Company. We may receive your third-party social network profile information (or parts of it) every time you download or interact with any Santova Group website on a third-party social network, every time you use a social networking feature that is integrated within an Santova Group site or every time you interact with us through a third-party social network. To learn more about how your information from a third-party social network is obtained by us or to opt-out of sharing such social network information, please visit the website of the relevant third-party social network being accessed.

- We may also ask you, on a voluntary basis, to complete any surveys or market related feedback which we may conduct for business and/or research purposes from time to time, although you do not have to respond to them.

Sensitive data/Special personal information

Unless required by law in a specific jurisdiction, we do not anticipate needing to collect, store or use "special category" (more sensitive) personal information, which means information about your:

- racial or ethnic origin
- political opinions
- religious or philosophical beliefs
- trade union membership
- genetic / biometric data
- health or sex life / sexual orientation

If this changes, we will inform you and, where required by law, obtain your clear consent before doing so.

We do not expect that we will need to process information about you regarding criminal proceedings and convictions ('**Criminal Data**'). We will only process Criminal Data:

- if we are required to do so by law;
- to assess risk and establish legal compliance for customs and other government departments which may be required in terms of our working relationship.

If we do need to process Criminal Data, we will keep you informed as necessary where this is permitted by law.

How do we collect your personal information?

We collect personal information about customers, clients, suppliers, shareholders, website users and others, either directly from the individuals themselves or sometimes from a third party such as a credit bureau.

We will collect additional personal information in the course of our service-related activities throughout our relationship with you.

How will we use your personal information?

We need all the categories of information listed above (under 'What kinds of information do we hold about you?') mainly so we can:

- perform our contract with you; and
- comply with our legal obligations.

We will use your personal information to pursue legitimate interests of our own or those of third parties, provided your own interests and fundamental rights do not override those interests. The situations in which we will process your personal information include:

- Determining the terms on which our relationship can develop to a formal contract
- Administering our contract with you
- Providing you with a quote, proposal or estimate of our service offering
- Providing our services to you, which may be in conjunction with any third party whom we have a separate relationship, including responding to your enquiries as well as manage and administer your relationship with us and the services you have asked we provide you
- To respond to your needs, requirements and preferences in our service offering as requested and for any similar general business purposes
- Registering you for access to any of our offered websites
- Identifying you and your account with us as well as maintaining and keeping records of your requirements and management and operation of our communications
- Invoicing you and allocating payments
- Paying you or receiving payment from you
- Managing and planning our business, including accounting and auditing
- Contacting you regarding past, current or future business
- Providing you any details required for contractual, service, regulatory or legal obligations including details of our terms and conditions, any applicable policies and procedures in order to enforce/apply same
- Conducting performance (service level) reviews, managing performance and determining performance requirements
- Using Google Analytics, or similar analytics, for the measurement, collection, analysis and reporting of web page data for purposes of understanding and optimizing web page usage as well as improving our customer service platforms, prevent/detect any fraud or abuses on our website and enable third parties to carry out any required technical, logistical or other functions on our behalf.
- Establishing your credit worthiness and the granting of responsible credit if appropriate
- process payments and maintain your account on record
- Interacting with customs, border control or other government agencies as part of our working relationship with you
- Establishing, pursuing or defending legal claims
- Complying with laws and regulations including customs laws and health and safety obligations, disclosing personal information to relevant third parties where required by applicable law, in response to any legal proceedings, protect any of our rights, privacy, safety and/or legitimate business interests or the public or to enforce terms of any agreement/website
- Preventing fraud and for other security protocol such as detecting, preventing, investigating any crime, illegal/prohibited activities or to otherwise protect our legal rights (which may include liaising with regulators and law enforcement agencies for these purposes) and management as well as operation of our IT and security systems
- Monitoring as well as recording your use of our information and communication systems to ensure compliance with our IT terms of use and policies as well as to meet any legal and regulatory obligations generally
- Safeguarding network and information security, including preventing unauthorised access to our computer and electronic communications systems, and preventing malicious software distribution
- Conducting data analytics studies to review and better understand our service levels and product delivery, to research, develop, provide and improve our services as well as for purposes of monitoring, maintaining,

administering, running any internal tests, protecting and improving performance of our websites as well as any monitoring, carrying out of any statistical analysis and benchmarking (provided that such is on an aggregated basis and will not be linked back to you)

- for marketing and business development purposes such as communicating with you on any updates/newsletters regarding our/Santova Group's service offerings, to interact with us, our affiliates, service providers or other relevant referred entities as contained in our updates/newsletters, confirm on any Santova Group hosted events/seminars/webinars and/or any other related content, where you have opted in to receive such communications from us which will mainly be done by email communications and/or run on any website.

Some of the above grounds for processing will overlap and some processing of your personal information may be based on several grounds.

We may also enhance the personal information collected from you with information we obtain from third parties that we are entitled to share that information (e.g. credit agencies, search information providers, public sources and other similar entities) but in each case, to the extent permissible by applicable laws.

If you fail to provide personal information

If you fail to provide certain personal information when requested, we may be unable to comply with our legal obligations or perform the contract we have with you, or are trying to enter into with you (for example, to provide you with our products or services). We will notify you at the time if this is the case.

Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for a different purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, where this is required or permitted by law.

Automated decision-making

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. We are allowed to use automated decision-making using your personal information if:

1. we have notified you of the decision and given you 21 days to request a reconsideration; or
2. the automated decision-making is necessary to perform our contract with you and appropriate measures are in place to safeguard your rights; or
3. in limited circumstances, with your explicit written consent and where appropriate measures are in place to safeguard your rights.

We will only make an automated decision about you on the basis of any particularly sensitive personal information if:

- we have your explicit written consent or
- the processing is justified in the public interest, and
- we have also put in place appropriate measures to safeguard your rights.

We do not envisage that any decisions will be taken about you based solely on automated decision-making, but we will notify you in writing if this position changes.

Sharing your information with others

We may need to share your personal information with third parties, including government or regulatory authorities, third-party service providers, any partners (such as independent software vendors and developers, third party payment facilitators), a third party you hava a relationship with and have consented to us sending such information to, any verification agencies, third parties in order to meet our legal and regulatory obligations, professional advisors (such as attorneys or auditors) and other entities in the Santova Group of Companies, so we or our Group can supply you with our products and services. Further details on the Santova Group of Companies may be found in Annexure 1 below.

Where we do share your information with third parties, they will be under binding contractual obligations to respect the security of your data and to treat it in accordance with the law.

We may transfer your personal information from within to outside the United Kingdom ("UK") and European Economic Area ("EEA") and/or in or out of South Africa, but if we do, any such transfer will be subject to the necessary legal measures for safeguarding that information in accordance with any applicable data protection legislation.

Why might we share your personal information with third parties?

We will share your personal information with third parties:

- where required by law,
- where it is necessary to administer the working relationship with you, or
- where we have another legitimate interest in doing so.

For example, we may share your personal information with other entities in our group as part of our regular reporting activities on company performance, in the context of a business reorganisation or group restructuring exercise, for system maintenance support and hosting of data.

All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes - they are only permitted to process your personal information for specified purposes and in accordance with our instructions.

Data security

We have put in place:

- Appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. Details of these measures are available upon request.
- Procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.
- Appropriate measures to verify identification of any request for access to any of your personal information which means we may request proof of identify or other information before we disclose personal information to you, should this be requested.

Please note, however, that these protections do not apply to information which you choose to share in public areas such as third-party social networks. While we implement the above measures, transmission of information via the Internet is, unfortunately, not completely secure and while we ensure best practices to protect your personal information, we cannot guarantee the security of the data during transmission through the websites.

We also restrict access to your personal information to those of our employees, agents, contractors and other third parties who have a business need to know, and on the basis that

- they will only process your personal information according to our instructions; and
- they are subject to an enforceable duty of confidentiality.

Cross-border transfers of data

Data protection laws restrict transfers of personal information to other countries unless certain conditions are met. As you are working with an International group of companies, we may transfer data within the Group, in particular between our parent company in South Africa and our subsidiary entities and affiliates located around the world and as set out in Annexure 1.

For purposes of GDPR, we will however only transfer personal data outside the UK / EEA if we have a proper legal basis for doing so and at least one of the following conditions applies:

(a) the European Commission has issued a decision confirming that the country to which we transfer the personal data ensures an adequate level of protection for the data subjects' rights and freedoms; or

(b) appropriate and recognised legal safeguards are in place, such as

- binding corporate rules (BCR),
- standard contractual clauses approved by the European Commission,
- an approved code of conduct, or

- a recognised certification mechanism.

For the purposes of POPIA, we confirm that there may also be instances where the personal information we collect within South Africa may be transferred to and stored at another destination located outside of South Africa. In these instances we shall take all required reasonable steps and ensure contractual measures are in place to ensure:

(a) your personal information is processed by such third party service provider/entity for the purposes which it has indicated to us; and

(b) the service provider and/or entity receiving your personal information has implemented the required levels of protection in terms of POPIA in order to safeguard the personal information.

How long will we keep your information?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. We will also not retain the above personal information and/or special personal information/sensitive data for longer than the period as allowed in terms of applicable laws unless there is a lawful basis/legal requirement which we are required to comply with which requires we retain such information for longer.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you no longer have a working relationship with the company, we will retain and securely destroy your personal information in accordance with applicable laws and regulations.

Updating your information

It is important that the personal information we hold about you is accurate and up-to-date. Please let us know if your personal information changes during your working relationship with us.

Your rights in connection with personal information

Under certain circumstances, you have the right by law to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you if, for example, if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact our Data Manager at datamanager@santova.com if you are located within the EEA and/or the UK alternatively if you are located in South Africa then please contact our Information Officer at informationofficer@santova.com.

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, if your request for access is clearly unfounded or excessive, we may charge a reasonable fee or refuse to comply with the request.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Direct Marketing

We may send you direct marketing communications and information about our services, opportunities, or events

that we consider may be of interest to you in terms of the local law and practice applicable to your jurisdiction, such as GDPR, POPIA and the Australian Spam Act 2003 (Cth). These communications may be sent in various forms.

Right to withdraw consent

In the limited circumstances where we have relied on your consent for the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw that consent at any time. To withdraw your consent, please contact our Data Manager at datamanager@santova.com if you are located within the EEA and/or the UK alternatively the Information Officer at informationofficer@santova.com if you are located within South Africa and/or Australia. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis in law for doing so.

Questions and complaints

We have appointed a manager responsible for overseeing compliance with this privacy policy and any privacy notice we may issue. If you have any questions or complaint about this policy or any notice or how we handle your personal information, or any requests to exercise your rights in relation to your data, please contact our Data Manager at datamanager@santova.com if you are located within the EEA and/or the UK alternatively the Information Officer at informationofficer@santova.com if you are located within South Africa and/or Australia. All communications will be treated in a confidential manner.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues relating to the EEA/UK alternatively if you are based in South Africa you may refer your compliant to the Information Regulator.

Changes to this privacy policy

We reserve the right to update this privacy policy or any privacy notice at any time. Any changes we may make to this policy in the future will be posted on this page, so we recommend that you check this page from time to time to take policy of any changes we make, as they are binding on you if you provide us with information after such a change has been made. We may also notify you in other ways from time to time about the processing of your personal information. Unless stated otherwise, our current privacy policy applies to all information which we may have about you. If any provision of this Privacy Notice is judged to be illegal, void or unenforceable due to applicable law or by order of a court of competent jurisdiction it shall be deemed deleted and the continuation in full force and effect of the remainder of the provisions will not be prejudiced.

Other sites and Social Media

If you follow a link from our websites to another site or service, this privacy notice will no longer apply. We are not responsible for the information handling practices of third-party sites or services and we encourage you to read the privacy notices appearing on those sites or services.

Information provided to us about others

If you provide us with personal information about someone else, you are responsible for ensuring that you comply 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, you must ensure that you have provided the required notices and have obtained the individual's consent to provide us with this/her/its Personal Information and that you explain to them how we collect, use, disclose and retain their personal information or direct them to read this privacy notice.

Annexure 1 – The Santova Limited Group of Companies

Santova Limited	South Africa	1998/018118/06
Santova Corporate Services (Pty) Ltd	South Africa	2016/126718/07
Santova Logistics (Pty) Ltd	South Africa	1987/001296/07
Santova Financial Services (Pty) Ltd	South Africa	2002/004034/07
Santova International Holdings (Pty) Ltd	South Africa	2005/008170/07
Santova International Trade Solutions (Pty) Ltd	South Africa	2005/042259/07
Santova NVOCC (Pty) Ltd	South Africa	2004/031099/07
Santova Express South Africa (Pty) Ltd	South Africa	2020/835592/07
Santova Logistics Pty Ltd	Australia	ABN 20 093 012 901
Santova Logistics Limited	United Kingdom	02337432
Santova Logistics B.V.	Netherlands	24457789
Santova Logistics Ltd	Hong Kong	BR: 36495437 (CN: 1009949)
Tradeway (Shipping) Ltd	United Kingdom	01475410
Santova Logistics Pte. Ltd.	Singapore	200911711K
Santova Logistics Vietnam Co., Ltd	Vietnam	316346967
Santova Corporate Services UK Ltd	United Kingdom	12852155
Santova Express Singapore Pte Ltd	Singapore	202104625E
Tradeway North West Ltd	United Kingdom	04911489
Santova USA Holdings Inc.	USA	6879843
SAI Logistics Ltd	United Kingdom	6455595
Santova Logistics GmbH	Germany	HRB176419
ASM Global Logistics Limited	Mauritius	C18159219
Atlantic Pacific Agencies Ltd	Hong Kong	BR: 73013791 (CI: 3050880)
Seabourne Group Limited	United Kingdom	01060736
Seabourne Mail Solutions Limited	United Kingdom	03185532
Seabourne Express Courrier	France	325 141 299 R.C.S Lyon
Seabourne Express Courier B,V,	Netherlands	800327615
Seabourne Forwarding Limited	United Kingdom	01532534
Santova Logistics CN Ltd	China	440300280664935

Any other entity listed as a member of the Santova Limited Group of Companies is available on our website www.santova.com from time to time.