

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 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.

This privacy policy describes how we look after your personal data generally and when you visit our website (regardless of where you visit it from), and describes your privacy rights under data protection laws.

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.

We may update this policy at any time.

The Company is the "controller" of 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 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, who can be contacted via email at: datamanager@santova.com

In the event that the relevant company in the Santova Group responsible for processing your 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

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.

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 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
- Information concerning your financial standing and credit worthiness
- Preferred language, date of birth and nationality
- Passport and identity information
- Information extracted through Google analytics
- Payment defaults, civil legal matters and judgements
- CCTV footage
- Information about your use of our information and communications systems
- We may use photographs of you where necessary for identification or security purposes or in other cases for use on the Company's website and social media pages.

Sensitive data

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
- Identifying you and your account with us
- 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

- Conducting performance (service level) reviews, managing performance and determining performance requirements
- Using Google Analytics for the measurement, collection, analysis and reporting of web page data for purposes of understanding and optimizing web page usage.
- Establishing your credit worthiness and the granting of responsible credit if appropriate
- 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
- Preventing fraud
- Monitoring your use of our information and communication systems to ensure compliance with our IT terms of use and policies
- 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

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

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 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 outside the UK and European Economic Area (EEA), but if we do, any such transfer will be subject to the necessary legal measures for safeguarding that information.

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.

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 to our parent company in South Africa.

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.

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.

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

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.

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 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

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. Details of how to make a complaint are available on the ICO website at <https://ico.org.uk/>

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.

Annexure 1 – The Santova Limited Group of Companies

Santova Limited
Registration No: 1998/018118/06
(South Africa)

Subsidiaries:

Santova Financial Services (Pty) Ltd
Registration No: 2002/004034/07
(South Africa)

Santova NVOCC (Pty) Ltd
Registration No: 2004/031099/07
(South Africa)

Santova International Holdings (Pty) Ltd
Registration No: 2005/008170/07
(South Africa)

Santova Logistics Limited
Business Registration No: 36495437
(Hong Kong)

Santova Patent Logistics Co., Ltd
Business Registration No: 36771425
(Hong Kong)

Santova Logistics Limited
Registration Number: 2463065
(United Kingdom)

Santova Logistics Pty Ltd *(Australia)*
ACN 093 012 901
(Australia)

Santova Logistics (Pty) Ltd
Registration No: 1987/001296/07
(South Africa)

Santova International Trade Solutions (Pty) Ltd
Registration No: 2005/042259/07
(South Africa)

Santova Logistics BV
Dossiënummer: 24457789
(The Netherlands)

W.M. Shipping Limited
Registration No. 02337432
(United Kingdom)

Santova Logistics GmbH
Registration No: HRB 82904
(Germany)

Santova Corporate Services (Pty) Ltd
Registration No: 2016/126718/07
(South Africa)

Santova Logistics Limited (Formerly Jet-Freight Services Limited)
Business Registration Number: C06010043
(Mauritius)

Santova PLC
Company Number: 10371258
(United Kingdom)

Tradeway Shipping (UK) Limited
Business Registered Number: 01475410
(United Kingdom)

Tradeway North West Limited
Business Registered Number: 04911489
(United Kingdom)

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