

# Spartan Truck Hire (Pty) Ltd

T/A SPARTAN TRUCK HIRE (PTY) LTD REGISTRATION NUMBER: 1988/005507/07

# **CUSTOMER PRIVACY NOTICE**

Spartan Truck Hire (Pty) Ltd recognizes that one of its fundamental responsibilities is to ensure that Spartan Truck Hire (Pty) Ltd protects Personal Information entrusted to Spartan Truck Hire (Pty) Ltd by its Customers. This is critical for the maintenance of the Spartan Truck Hire (Pty) Ltd's reputation and for complying with its legal and regulatory Obligations to protect the Spartan Truck Hire (Pty) Ltd's Customer Information. Spartan Truck Hire (Pty) Ltd also follows a transparent Policy to handle Personal Information of its Customers.

In this Policy, Personal Information means any Information that relates to a natural or juristic person, which either directly or indirectly, in combination with other Information available or likely to be available with the Spartan Truck Hire (Pty) Ltd, is capable of identifying such person (e.g., telephone number, name, address, transaction history etc.).

The Policy is in compliance with the PoPI Act, Act 4 of 2013.

## **Applicability**

Spartan Truck Hire (Pty) Ltd collects three types of Information: Personal Information, Special Personal Information and non-Personal Information.

Special Personal Information or Information of a person means such Personal Information which consists of Information relating to passwords, financial Information such as Bank account or credit card or debit card or other payment instrument details, sexual orientation, physical physiological and mental health condition, medical records and history, biometric Information, details of nominees and national identifiers including but not limited to bank account number, passport number, and income etc. For Customers enrolled in services provided by Spartan Truck Hire (Pty) Ltd, such as online bill payment, Personal Information about the transaction is collected.

Any Information that is freely available or accessible in the public domain or furnished under the PAIA or any other Law for the time being in force shall not be regarded as Special Personal Information or Information for the purpose of this Policy.

The Information Customers provide online is held by Spartan Truck Hire (Pty) Ltd business that maintains the account or is processing the application for a new product or service.

Non-Personal Information includes the IP address of the device used to connect to Spartan Truck Hire (Pty) Ltd's website along with other Information such as browser details, operating system used, the name of the website that redirected the visitor to Spartan Truck Hire (Pty) Ltd's website, etc. Also, when you browse our site or receive one of our emails, Spartan Truck Hire (Pty) Ltd and our affiliated companies, use cookies and/or pixel tags to collect Information and store your online preferences.

This Policy is applicable to Personal Information (including Special Personal Information) collected by Spartan Truck Hire (Pty) Ltd directly from the Customer or through Spartan Truck Hire (Pty) Ltd's online portals, electronic communications and also any Information collected by Spartan Truck Hire (Pty) Ltd's server from the Customer's browser.

#### Accuracy

Spartan Truck Hire (Pty) Ltd shall have processes in place to ensure that the Personal Information residing with it is complete, accurate and current. If at any point of time, there is a reason to believe that Personal Information residing with Spartan Truck Hire (Pty) Ltd is incorrect, the Customer should inform Spartan Truck Hire (Pty) Ltd in this regard. Spartan Truck Hire (Pty) Ltd shall correct the erroneous Information as quickly as possible.

## **Purpose of Collection and Usage of Personal Information**

Spartan Truck Hire (Pty) Ltd shall use the Information collected to manage its business and offer an enhanced, personalised online experience on its website. Further, it shall enable Spartan Truck Hire (Pty) Ltd to:

- Process applications, requests and transactions
- Maintain internal Records as per regulatory guidelines
- Provide services to Customers, including responding to customer requests
- Comply with all applicable Laws and regulations
- Recognise the Customer when he/she conducts online banking
- Understand the needs and provide relevant product and service offers.

If a Customer does not wish to provide consent for usage of its Special Personal Information or Information or later withdraws the consent, Spartan Truck Hire (Pty) Ltd shall have the Right not to provide services or to withdraw the services for which the Information was sought from the Customer.

### **Disclosure / Sharing of Information**

Spartan Truck Hire (Pty) Ltd shall not disclose Personal Information of its Customers without their prior consent unless such disclosure has been agreed to in a contract between Spartan Truck Hire (Pty) Ltd and Customer, or where the disclosure is necessary for compliance of a legal obligation. In case Spartan Truck Hire (Pty) Ltd discloses the Personal Information to Third Parties, such Third Parties shall be bound contractually to ensure that they protect customer Personal Information in accordance with applicable Laws.

The above Obligations relating to sharing of Personal Information or Special Personal Information shall not apply to Information shared with Government mandated under the Law to obtain such Information or by an Order under Law for the time being in force. Further, if any Personal Information or Information is freely available or accessible in the public domain, Spartan Truck Hire (Pty) Ltd shall not have any obligations regarding the same.

No specific Information about customer accounts or other personally identifiable Personal Information shall be shared with non-affiliated Third Parties unless any of the following conditions is met:

- To help complete a transaction initiated by the Customer
- To perform support services through an outsourced entity provided it conforms to the Privacy Policy of Spartan Truck Hire (Pty) Ltd
- The Customer has specifically authorised it
- To conform to legal requirements or comply with legal process
- The Information is shared with Government agencies mandated under law
- The Information is shared with any Third Party by an order under the law
- Enforce the terms and conditions of the products or services
- Act to protect the Rights, Interests or property of Spartan Truck Hire (Pty) Ltd, or its Members or of other persons.

#### **Security Practices**

The security of Personal Information is a priority and shall be ensured by maintaining physical, electronic, and procedural Safeguards that meet applicable Laws to protect Customer Information against loss, misuse, damage and unauthorised access, modifications or disclosures. Employees shall be trained in the proper handling of Personal Information. When other companies are used to provide services on behalf of Spartan Truck Hire (Pty) Ltd, it shall ensure that such companies protect the confidentiality of Personal Information they receive in the same manner Spartan Truck Hire (Pty) Ltd protects the Personal Information. Spartan Truck Hire (Pty) Ltd shall continuously review and enhance its Security Policies and Security Measures to consistently maintain a high level of security.

#### **Amendments**

Spartan Truck Hire (Pty) Ltd shall reserve the Right to change or update this Policy or practice, at any time with reasonable notice to Customers on Spartan Truck Hire (Pty) Ltd's website so that Customers are always aware of the Information which is collected, for what purpose Spartan Truck Hire (Pty) Ltd uses it, and under what circumstances, if any, Spartan Truck Hire (Pty) Ltd may disclose it.

By virtue of this privacy Policy, the Customer assents to the collection, use, transfer, disclosure, retention and other processing of her/his Personal Information, including Special Personal Information, as described in this Policy.

## **Response to Enquiries and Complaints**

Spartan Truck Hire (Pty) Ltd shall encourage Customer enquiries, feedback and complaints which shall help it identify and improve the services provided to the Customers.

## **Changes To this Policy**

Spartan Truck Hire (Pty) Ltd reserves the Right to amend, alter and terminate this Policy at any time.

#### INFORMATION OFFICER DETAILS

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