



Spartan Truck Hire (Pty) Ltd

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

PRIVACY NOTICE FOR SUPPLIERS

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1. ABOUT THIS PRIVACY NOTICE

1.1 Who and What is this Notice for?

This Notice applies to the Personal Information of Natural Persons working for our Suppliers or acting as Agent or Representative of our Suppliers ("**you**", "**your**"). Suppliers are understood as any Third Party that provides Goods or Services to Responsible Party (such as a Consultant, Contractor, Advisor or Vendor).

This Notice explains what types of Personal Information are gathered from our Suppliers, how the Personal Information is used, and with whom the Personal Information is shared. It also sets out our Suppliers' Rights in relation to Personal Information.

1.2 Who controls your Personal Information?

Spartan Truck Hire (Pty) Ltd takes its Personal Information protection obligations seriously. We, Spartan Truck Hire (Pty) Ltd, with registered office at 18 Derrick Road, Spartan, Kempton Park, 1620 and registered under registration number 1988/005507/07, is the Controller of your Personal Information and are therefore responsible for processing it in accordance with the Law.

2. PERSONAL INFORMATION

2.1 What Personal Information do we collect from you and why?

The primary reason we process your Personal Information is to approve, manage, administer or effect an Agreement between Spartan Truck Hire (Pty) Ltd and the Supplier you represent or work for. In this respect, we use your Personal Information, to organise our sourcing activities, issue purchase orders, process payments, perform accounting, manage our Contract or review the Services or Products you supply us with.

In addition, we process Personal Information to meet our legal obligations such as record keeping obligations as well as to manage our risks and operations for instance to prevent and detect security threats, exercise or defend legal claims.

More details are provided in the Table below.

| Purposes of the Processing | Types of Personal Data |
|--------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Administration and Reporting | <ul style="list-style-type: none">• Business card details¹• IT and telephone²• System and applications²• Transactions reporting² |
| Sourcing | <ul style="list-style-type: none">• Business card details¹• Professional / Educational background checks• Rates / prices• CVs² |
| Contract Management | <ul style="list-style-type: none">• Business card details¹• Agreement• Management of Supplier relationship• Criminal record²• Financial status²• Contact persons in case of emergency² |
| Assessment of Suppliers' Performance | <ul style="list-style-type: none">• Business card details¹• Information/surveys on performance of Supplier |
| Access and Security Management | <ul style="list-style-type: none">• Business card details¹• Access and authorities• Photography• Recorded material on surveillance cameras |
| Payment of Invoices | <ul style="list-style-type: none">• Business card details¹• Financial details• Invoice details |

¹ Business card details include name, title, company, mailing address, and telephone numbers.

² Only applicable to Contractors / Consultants

2.2 What is the Legal Basis for processing your Personal Information?

We normally only process Personal Information about you where:

- It is necessary to enter into a Contract or carry out a Contract with the Entity you represent;
- It is necessary to comply with our Legal obligations, e.g. verifying working permits; or
- It is in our legitimate business interests e.g. building security if you visit our office, or to protect our IT infrastructure.

2.3 How long is Personal Information kept?

As a general rule, we keep Personal Information as long as we have a relationship with the supplier you represent or work for. After a contractual relationship ends we must keep it for a period of 7 years (to answer any contractual liability issues following the statutory period of limitations).

Images recorded by security cameras in and around our premises are kept for 30 days from the visit, except otherwise requested by the police / public prosecutor and / or legal department. This will notably be the case if the recorded images show potential criminal activity or incidents.

2.4 Where does your Personal Information come from?

The Personal Information we collect from you come from the following sources:

1. Personal Information you give us

We collect Personal Information from you when you:

- send us Personal Information on forms and e-forms, such as your name, address, telephone number, tax identification number, date of birth, copy of passport or ID card;
- provide us Personal Information necessary to enter into a Contract, such as your name, address, professional phone number and e-mail address, function and/or position held within our supplier's organisation; or
- provide us Personal Information during the performance of your services.

2. Information we receive from other sources

We collect your Personal Information through:

- background information from Third Party providers;
- our Employees or business relationships, such as feedback on you we receive from other contractors or our employees;
- publicly available sources to confirm signatory powers.

2.5 Who do we share your Personal Information with?

1. Transfer within Spartan Truck Hire (Pty) Ltd or to Third Parties

- We may transfer Personal Information only to other Responsible Parties entities or our business partners (e.g. joint venture companies), which are or will be involved in receiving services from our Suppliers. We take precautions to allow access to Personal Information only to those staff members who have a legitimate business need for access and with a contractual prohibition of using the Personal Information for any other purpose.
- Spartan Truck Hire (Pty) Ltd may also provide your Personal Information to any competent Law enforcement body, Regulatory, Government agency, Court or other Third Party such as but not limited to, the police, the financial supervisory authorities, the tax and social security agencies, as well as Courts, where we believe disclosure is necessary (i) as a matter of applicable Law or regulation, or (ii) to exercise, establish or defend our Legal Rights.
- We also disclose your Personal Information to our Third Party vendors, service providers and partners who provide Personal Information processing services to us (e.g. IT platform management or support services, infrastructure and application services, data analytics, security agents), or who otherwise process Personal Information for purposes that are described in this Privacy Notice or notified to you when we collect your Personal Information.
- We may also disclose your Personal Information with our auditors, advisors, legal representatives and similar agents in connection with the advisory services they provide to us for legitimate business purposes and under contractual prohibition of using the Personal Information for any other purpose.

2. International Personal Information Transfers

- Our group companies and Third Party contractors and consultants operate around the world. This means that we may process Personal Information outside the Republic of South Africa. However, we have taken appropriate safeguards to require that your Personal Information will remain protected in accordance with this Notice. These include implementing Personal Information transfer clauses with our Third Party vendors, contractors and consultants and binding Corporate Rules for transfers of Personal Information within our group.

2.6 What are your Rights regarding Personal Information?

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|-----------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| The Right to be Informed | Spartan Truck Hire (Pty) Ltd is publishing this Privacy Notice to keep you informed as to what we do with your Personal Information. We strive to be transparent about how we use your Personal Information. |
| The Right to Access | You have the Right to access your Personal Information. Please contact Spartan Truck Hire (Pty) Ltd's Information Officer if you wish to access the Personal Information Spartan Truck Hire (Pty) Ltd holds about you. |
| The Right to Rectification | If the Personal Information Spartan Truck Hire (Pty) Ltd holds about you is inaccurate, not complete or up to date, you have the Right to ask us to rectify or update it. If such Personal Information has been disclosed to a Third Party in accordance with this Privacy Notice, we shall also ask them to rectify or update your Personal Information. Please contact our Information Officer if you need us to rectify your Information. |
| The Right to Erasure | If you want to request Spartan Truck Hire (Pty) Ltd to erase your Personal Information and we do not have a legal reason to continue to process and hold it, please contact our Information Officer. |
| The Right to Restrict Processing | In some circumstances, you have the Right to ask Spartan Truck Hire (Pty) Ltd to restrict how we process your Personal Information. This means we are permitted to store the Personal Information but not further process it. If you want us to restrict processing of your Personal Information, please contact our Information Officer. |

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| The Right to Data Portability | In some circumstances, Spartan Truck Hire (Pty) Ltd allows you to obtain the Personal Information we hold about you in a structured, commonly used and machine-readable format and to transmit those Personal Information to another Responsible Party without any hindrance. Please contact our Information Officer at the address mentioned in Section 4 of this Notice, if you want information how to transfer your Personal Information elsewhere. This Right only applies to Personal Information that you have provided to us as a Responsible Party. The Personal Information must be processed on the basis of your consent or for the performance of a Contract and processing of your Personal Information must be carried out by automated means. |
| The Right to Object | In some circumstances, you have the Right to object to Spartan Truck Hire (Pty) Ltd processing your Personal Information. If you wish to object please contact our Information Officer. |
| The Right to Withdraw Consent | If you have given us your consent to process your Personal Information but would change your mind later, you have the Right to withdraw your consent at any time, and Spartan Truck Hire (Pty) Ltd will then stop processing your Personal Information. If you want to withdraw your consent, please contact our Information Officer. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your Personal Information conducted in reliance on lawful processing grounds other than consent. |
| Right to Opt-out of Marketing Communications | You have the Right to opt-out of marketing communications we send you at any time. You can exercise this Right by clicking on the “unsubscribe” or “opt-out” link in the marketing e-mails we send you. To opt-out of other forms of marketing (such as postal marketing), please contact our Information Officer. |
| The Right to Complain to a Supervisory Authority | You have the Right to complain to the Information about our collection and use of your Personal Information if you feel that Spartan Truck Hire (Pty) Ltd has not sufficiently addressed a concern or complaint. For more information, please contact the Regulator. |

2.7 What about Personal Information Security and Quality?

We implement Risk-appropriate Measures and Processes that are designed to provide a level of security appropriate to the risk of processing your Personal Information to help us to keep your Personal Information secure and to maintain its quality.

To keep your Personal Information secure, we have implemented a number of Security Measures:

- **Secure operating environments** - We store your Personal Information in secure operating environments and only accessible to Spartan Truck Hire (Pty) Ltd’s Employees, Agents and Contractors on a need-to-know basis. Spartan Truck Hire (Pty) Ltd also follows generally accepted industry standards in this respect.
- **Encryption** - We use industry-standard encryption to provide protection for Personal Information that is transmitted to us.
- **Prior authentication for IT access and access to premises** - We require our Staff and Contractors to verify their identity (e.g. through login ID, password, pin codes and badges) before they can access IT bases and business premises. This is aimed to prevent unauthorised accesses.

2.8 What if you choose not to give us your Personal Information?

If you do not want to give us your Personal Information and the Personal Information is necessary in order to enter a Contract or pursue business relations with our Supplier then we will not be able to enter into that Contract or pursue our contractual relationship.

3. Updates to this Notice

We may update this Notice from time to time in response to changing legal, technical or business developments.

4. Questions or Concerns?

If you want to request information about this Notice, you can contact our Information Officer.

5. 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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|--------------------------------------------|----------------------------------------------|
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