



Tractionel Enterprise

Prop. TENSION OVERHEAD ELECTRIFICATION (PTY) LTD
ELECTRICAL INFRASTRUCTURE SPECIALISTS

Date:	2021/07/06	Doc. No.:	QUAL POL 8
Author:	COO	Page:	1 of 6
		Rev. No.:	000

PRIVACY NOTICE

Thank you for choosing to be part of the Tractionel group of companies. Whenever we refer to the Tractionel Group, it shall be interpreted to include Tractionel Group Holdings (Pty) Ltd, Tension Overhead Electrification (Pty) Ltd, Tractionel Maintenance Services (Pty) Ltd, Tractionel Specialised Plant (Pty) Ltd and Overhead Track Equipment (Pty) Ltd collectively or individually. The Tractionel Group is committed to protecting your personal information and your right to privacy. If you have any questions or concerns about this privacy notice, or the Tractionel Group's practices with regards to your personal information, please contact us at info@traction.co.za.

When you visit the Tractionel Group website <http://www.traction.co.za>, and more generally, use any of the Tractionel Group's services, the Tractionel Group appreciate that you are trusting the Tractionel Group with your personal information. The Tractionel Group take your privacy very seriously. In this privacy notice, The Tractionel Group seek to explain to you in the clearest way possible what information the Tractionel Group collect, how the Tractionel Group use it and what rights you have in relation to it. The Tractionel Group hope you take some time to read through this policy carefully, as it is important. If there are any terms in this privacy notice that you do not agree with, please discontinue use of the Services immediately.

This privacy notice applies to all information collected through the Tractionel Group's services which, as described above, includes our website, as well as any related services, sales, marketing or events.

TABLE OF CONTENTS

1. WHAT INFORMATION DO WE COLLECT?
2. HOW DO WE USE YOUR INFORMATION?
3. WILL YOUR INFORMATION BE SHARED WITH ANYONE?
4. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?
5. HOW LONG DO WE KEEP YOUR INFORMATION?
6. HOW DO WE KEEP YOUR INFORMATION SAFE?
7. WHAT ARE YOUR PRIVACY RIGHTS?
8. CONTROLS FOR DO-NOT-TRACK FEATURES
9. DO WE MAKE UPDATES TO THIS NOTICE?
10. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?
11. HOW CAN YOU REVIEW, UPDATE OR DELETE THE DATA WE COLLECT FROM YOU?

1. WHAT INFORMATION DO WE COLLECT?

1.1 Personal information you disclose to the Tractionel Group.

The Tractionel Group collect personal information that you provide to any entity within the Tractionel Group. The Tractionel Group collect personal information that you voluntarily provide to any entity within the Tractionel Group when you express an interest in obtaining information about the Tractionel Group, our products and services, when you participate in activities on the website or otherwise when you contact any entity in the Tractionel Group.



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Prop. TENSION OVERHEAD ELECTRIFICATION (PTY) LTD
ELECTRICAL INFRASTRUCTURE SPECIALISTS

Date:

2021/07/06

Doc. No.:

QUAL POL 8

Page:

2 of 6

Author:

COO

Rev. No.:

000

The personal information that the Tractionel Group collect depends on the context of your interactions with us and the website, the choices you make and the products and features you use. The personal information the Tractionel Group collect may include the following:

1.1.1 **Personal Information Provided by you.** The Tractionel Groupe collect names; phone numbers; email addresses; and other similar information. All personal information that you provide to any entity in the Tractionel Group must be true, complete and accurate, and you must notify us of any changes to such personal information.

1.2 Information automatically collected.

Some information, such as your Internet Protocol (IP) address and/or browser and device characteristics, are collected automatically when you visit the Tractionel Group website.

The Tractionel Group automatically collect certain information when you visit, use or navigate the website. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use the Tractionel Group website and other technical information. This information is primarily needed to maintain the security and operation of the Tractionel Group website, and for our internal analytics and reporting purposes.

Like many businesses, the Tractionel Group also collect information through cookies and similar technologies. The information we collect includes:

1.2.1 **Log and Usage Data.** Log and usage data is service-related, diagnostic, usage and performance information our servers automatically collect when you access or use our website and which the Tractionel Group record in log files. Depending on how you interact with the Tractionel Group, this log data may include your IP address, device information, browser type and settings and information about your activity in the website (such as the date/time stamps associated with your usage, pages and files viewed, searches and other actions you take such as which features you use), device event information (such as system activity, error reports (sometimes called 'crash dumps') and hardware settings).

1.2.2 **Device Data.** The Tractionel Group collect device data such as information about your computer, phone, tablet or other device you use to access the website. Depending on the device used, this device data may include information such as your IP address (or proxy server), device and application identification numbers, location, browser type, hardware model, Internet service provider and/or mobile carrier, operating system and system configuration information.

1.2.3 **Location Data.** The Tractionel Group collect location data such as information about your device's location, which can be either precise or imprecise. How much information the Tractionel Group collect depends on the type and settings of the device you use to access the website. For example, the Tractionel Group may use GPS and other technologies to collect geolocation data that tells us your current location (based on your IP address). You can opt out of allowing us to collect this information either by refusing access to the information or by disabling your location setting on your device. Note however, if you choose to opt out, you may not be able to use certain aspects of the Services.

1.3 Information collected from other sources.



Tractionel Enterprise

Prop. TENSION OVERHEAD ELECTRIFICATION (PTY) LTD
ELECTRICAL INFRASTRUCTURE SPECIALISTS

Date:	2021/07/06	Doc. No.:	QUAL POL 8
Author:	COO	Page:	3 of 6
		Rev. No.:	000

The Tractionel Group may collect limited data from public databases, marketing partners, and other outside sources.

To enhance the Tractionel Group's ability to provide relevant marketing, offers and services to you and update our records, we may obtain information about you from other sources, such as public databases, joint marketing partners, affiliate programs, data providers, as well as from other third parties. This information includes mailing addresses, job titles, email addresses, phone numbers, intent data (or user behaviour data), Internet Protocol (IP) addresses, social media profiles, social media URLs and custom profiles, for purposes of targeted advertising and event promotion.

2. HOW DO WE USE YOUR INFORMATION?

The Tractionel Group process your information for purposes based on legitimate business interests, the fulfilment of our contract with you, compliance with our legal obligations, and/or your consent.

The Tractionel Group use personal information collected via our website for a variety of business purposes described below. The Tractionel Group process your personal information for these purposes in reliance on our legitimate business interests, to conclude or perform a contract with you, with your consent, and/or for compliance with our legal obligations. We indicate the specific processing grounds we rely on next to each purpose listed below.

- 2.1 The Tractionel Group use the information we collect or receive:
 - 2.1.1 **To send administrative information to you.** The Tractionel Group may use your personal information to send you product, service and new feature information and/or information about changes to our terms, conditions, and policies.
 - 2.1.2 **To protect our services.** The Tractionel Group may use your information as part of our efforts to keep our website safe and secure for example, for fraud monitoring and prevention.
 - 2.1.3 **To enforce the Tractionel Group's terms, conditions and policies for business purposes, to comply with legal and regulatory requirements or in connection with our contract.**
 - 2.1.4 **To respond to legal requests and prevent harm.** If any company in the Tractionel Group receive a subpoena or other legal request, we may need to inspect the data we hold to determine how to respond.
 - 2.1.5 **To send you marketing and promotional communications.** The Tractionel Group and/or our third-party marketing partners may use the personal information you send to the Tractionel Group for our marketing purposes, if this is in accordance with your marketing preferences. For example, when expressing an interest in obtaining information about any Company in the Tractionel Group or our Website, subscribing to marketing or otherwise contacting us, we will collect personal information from you. You can opt-out of our marketing emails at any time by following the guidelines in the paragraph entitled "WHAT ARE YOUR PRIVACY RIGHTS?" below.
 - 2.1.6 **Deliver targeted advertising to you.** The Tractionel Group may use your information to develop and display personalized content and advertising (and work with third parties who do so) tailored to your interests and/or location and to measure its effectiveness.
 - 2.1.7 **For other business purposes.** The Tractionel Group may use your information for other business purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our website, products, marketing



Tractionel Enterprise

Prop. TENSION OVERHEAD ELECTRIFICATION (PTY) LTD
ELECTRICAL INFRASTRUCTURE SPECIALISTS

Date:	2021/07/06	Doc. No.:	QUAL POL 8
Author:	COO	Page:	4 of 6
		Rev. No.:	000

and your experience. The Tractionel Group may use and store this information in aggregated and anonymized form so that it is not associated with individual end users and does not include personal information. The Tractionel Group will not use identifiable personal information without your consent.

3. WILL YOUR INFORMATION BE SHARED WITH ANYONE?

The Tractionel Group only share information with your consent, to comply with laws, to provide you with services, to protect your rights, or to fulfil business obligations. The Tractionel Group may process or share your data that we hold based on the following legal basis:

3.1 Consent

The Tractionel Group may process your data if you have given us specific consent to use your personal information for a specific purpose.

3.2 Legitimate Interests

The Tractionel Group may process your data when it is reasonably necessary to achieve our legitimate business interests.

3.3 Performance of a Contract

Where any company within the Tractionel Group have concluded a contract with you, the Tractionel Group may process your personal information to fulfil the terms of our contract which may include sending your information across South Africa's borders.

3.4 Legal Obligations

The Tractionel Group may disclose your information where we are legally required to do so to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).

3.5 Vital Interests

The Tractionel Group may disclose your information where we believe it is necessary to investigate, prevent, or act regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved. The Tractionel Group may need to process your data or share your personal information in the following situations:

3.5.1 Business Transfers. The Tractionel Group may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.

4. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?

In Short, the Tractionel Group may use cookies and other tracking technologies to collect and store your information. We may use cookies and similar tracking technologies (like web beacons and pixels) to access or store information. Specific information about how we use such technologies and how you can refuse certain cookies is set out in our Cookie Notice.

5. HOW LONG DO WE KEEP YOUR INFORMATION?

In Short, the Tractionel Group keep your information for as long as necessary to fulfil the purposes outlined in this privacy notice unless otherwise required by law.



Tractionel Enterprise

Prop. TENSION OVERHEAD ELECTRIFICATION (PTY) LTD
ELECTRICAL INFRASTRUCTURE SPECIALISTS

Date:	2021/07/06	Doc. No.:	QUAL POL 8
Author:	COO	Page:	5 of 6
		Rev. No.:	000

The Tractionel Group will only keep your personal information for as long as it is necessary for the purposes set out in this privacy notice, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements).

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

6. HOW DO WE KEEP YOUR INFORMATION SAFE?

In Short, the Tractionel Group aim to protect your personal information through a system of organizational and technical security measures.

The Tractionel Group have implemented appropriate technical and organizational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure. To this extent, the Tractionel Group cannot promise or guarantee that hackers, cybercriminals or other unauthorized third parties will not be able to defeat our security, and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our website is at your own risk. You should only access the Tractionel Group website within a secure environment.

7. WHAT ARE YOUR PRIVACY RIGHTS?

In Short, in some regions, such as the European Economic Area (EEA) and United Kingdom (UK), you have rights that allow you greater access to and control over your personal information. You may review, change, or terminate your account at any time.

In some regions (like the EEA and UK), you have certain rights under applicable data protection laws. These may include the right (i) to request access and obtain a copy of your personal information, (ii) to request rectification or erasure; (iii) to restrict the processing of your personal information; and (iv) if applicable, to data portability. In certain circumstances, you may also have the right to object to the processing of your personal information. To make such a request, please use the contact details provided below. We will consider and act upon any request in accordance with applicable data protection laws.

If the Tractionel Group is relying on your consent to process your personal information, you have the right to withdraw your consent at any time. Please note however that this will not affect the lawfulness of the processing before its withdrawal, nor will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

If you are a resident in the EEA or UK and you believe we are unlawfully processing your personal information, you also have the right to complain to your local data protection supervisory authority. You can find their contact details here: http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm .

If you are a resident in Switzerland, the contact details for the data protection authorities are available here: <https://www.edoeb.admin.ch/edoeb/en/home.html> .

Cookies and similar technologies: Most Web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services of our website. To opt-out of interest-based advertising by advertisers on the Tractionel Group website visit <http://www.aboutads.info/choices/> .

8. CONTROLS FOR DO-NOT-TRACK FEATURES



Tractionel Enterprise

Prop. TENSION OVERHEAD ELECTRIFICATION (PTY) LTD
ELECTRICAL INFRASTRUCTURE SPECIALISTS

Date:	2021/07/06	Doc. No.:	QUAL POL 8
Author:	COO	Page:	6 of 6
		Rev. No.:	000

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ("DNT") feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage no uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, the Tractionel Group do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy notice.

9. DO WE MAKE UPDATES TO THIS NOTICE?

In Short, yes, the Tractionel Group will update this notice as necessary to stay compliant with relevant laws.

We may update this privacy notice from time to time. The updated version will be indicated by an updated "Revised" date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy notice, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy notice frequently to be informed of how we are protecting your information.

10. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?

If you have questions or comments about this notice, you may contact our Data Protection Officer (DPO) by email at edrich@traction.co.za or by phone at 086-18-19-600 or by post to:

The Data Protection Officer
Tractionel Group
Edrich Groenewaldt
P.O Box 2030
Wilropark
Roodepoort
1731

11. HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?

Based on the applicable laws of your country, you may have the right to request access to the personal information the Tractionel Group collect from you, change that information, or delete it in some circumstances. To request to review, update, or delete your personal information, please contact the Data Protection Officer.