

CLOETE'S SAND AND STONE (PTY) LIMITED PRIVACY POLICY

The Protection of Personal Information Act, 4 of 2013 gives effect to the constitutional right to data privacy in terms of Section 14 of the Bill of Rights of the Constitution of the Republic of South Africa.

Cloete's Sand and Stone (Pty) Limited, and its affiliated companies and subsidiaries ("Cloete's"), understands the need to manage personal information and has put policies and procedures in place to do that responsibly. This Privacy Policy describes the types of personal information that we may collect about you, the purposes for which we use the information, the circumstances in which we may share the information and the steps that we take to safeguard the information to protect your privacy. It sets out the responsibilities and obligations of all persons who make use of, or access or receive Cloete's information and communications via its electronic communication facilities and resources including its website, email and social media platforms or otherwise and how all users of these facilities and resources are to ensure that when using these resources that they respect and process Personal Information lawfully and in accordance with the provisions of the Protection of Personal Information Act, 4 of 2013 ("POPI Act").

INTRODUCTION

1. Cloete's conducts business in transport and, logistics and has affiliates with interests in property development and quarrying and to carry out its business does, and will, on an ongoing basis, receive, provide and process Personal Information.
2. In terms of the POPI Act everyone has the right to privacy, including the right to the lawful collection, retention, dissemination and use of one's Personal Information.
3. To give effect to this right, Cloete's is under a duty to provide any person whose Personal Information is processed by it, (known as a "Data Subject") with several details pertaining to the use of and subsequent processing of the Data Subject's Personal Information, before such Personal Information may be used or processed.
4. Cloete's sets out below the reasons why it will have to process a Data Subject's Personal Information, the conditions under which it will receive and use a Data Subjects Personal Information, how Cloete's will use and handle this Personal Information, as well as the conditions under which it will provide its own Personal Information.

APPLICATION

5. This Privacy Policy is applicable to -

- 5.1 all Cloete's electronic platforms and facilities, including social media, websites and/or email, whether owned by, established by, used by, hosted by and/or accessed by Cloete's;
- 5.2 all and any Data Subjects, who may access and make use of the aforementioned electronic platforms and facilities, including employees and staff, consumers and customers, vendors, contractors, service providers and/or other third parties;
- 5.3 all the Personal Information which is owned by Cloete's and which is provided to any responsible parties and/or operators because of such person accessing or making use of its social media and electronic platforms.

ACCOUNTABILITY

6. Cloete's will only process a Data Subject's Personal Information in accordance with the POPI Act and the terms of this Privacy Policy.
7. In turn, where Cloete's provides any of its Personal Information to a Responsible Party or Operator, then such person will be required as a condition of receiving such information, to process such Personal Information in accordance with the POPI Act and the terms of this Privacy Policy.
8. Accordingly, the relevant data privacy principles relating to the processing of Personal Information, whether that belonging to Cloete's or a Data Subject will apply to all and any Personal Information provided by Cloete's to another or received by Cloete's as a result of the use of the Cloete's electronic platforms and facilities.

AGREEMENT TO BE BOUND AND CONSENT

9. By accessing or using the Cloete's electronic platforms and facilities and/or when sending or receiving emails, the Data Subject –
 - 9.1 acknowledges that it has read and understood this Privacy Policy and related provisions;
 - 9.2 agrees to be bound by this Privacy Policy;
 - 9.3 agrees to comply with this Privacy Policy; and,
 - 9.4 gives Cloete's consent to process and further process the required Personal Information for the required purpose, in accordance with this Privacy Policy.

RECEIPT, USE AND SHARING OF PERSONAL INFORMATION

10. Cloete's will receive Personal Information pertaining to a Data Subject when the Data Subject submits a query or request via its electronic platforms or facilities, including via its website, or by way of email, telephone or via social media or in writing.
11. On receipt of the request or query, Cloete's will thereafter use and process the Data Subject's Personal Information for the purpose of the query and for a variety of related purposes, which will all depend on the query or request, and which without detracting from the generality thereof may include –
 - 11.1 for the purposes of identifying and / or verifying the Data Subject's details;
 - 11.2 for the purposes of providing information, products and/or services or details in connection therewith or pertaining thereto, that the Data Subject, may have requested;
 - 11.3 for trade and credit application and/or purchasing purposes;
 - 11.4 to enrol the Data Subject as a customer, business partner or vendor;
 - 11.5 for the purpose of concluding an employment relationship with an applicant;
 - 11.6 for the purposes of managing any information pertaining to the Data Subject;
 - 11.7 for further processing or general administration purposes;
 - 11.8 for legal or contractual purposes;
 - 11.9 to help Cloete's improve the quality of its products and services;
 - 11.10 to help Cloete's detect and prevent fraud and money laundering;
 - 11.11 for the purpose of debt collection;
 - 11.12 for the purposes of research, analytical and statistical purposes; and,
 - 11.13 for the purposes of identify other products and services which might be of interest to the Data Subjects;
12. To correctly handle any request or query, and to perform the purposes described above, Cloete's may from time to time share a Data Subject's Personal Information with the following parties –
 - 12.1 Cloete's employees;
 - 12.2 Cloete's suppliers, which will only be done on a need to know basis;
 - 12.3 Cloete's carefully selected business partners and service providers which will only be done on a need to know basis;
 - 12.4 Cloete's does not share a Data Subject's Personal Information with any third parties who have not been described above, unless -

- 12.4.1 Cloete's is legally obliged to provide such information to another for legal or regulatory purposes;
- 12.4.2 Cloete's is required to do so for purposes of existing or future legal proceedings;
- 12.4.3 the onward transmission or sharing of Personal Information is necessary for the pursuance or protection of Cloete's legitimate interests; and,
- 12.4.4 Cloete's is involved in the prevention of fraud, loss, bribery or corruption and are using another agent or service provider under a mandate to provide such service, and the agent or service provider needs to process the Data Subject's Personal Information for the purpose of investigating and or preventing any act of fraud, loss, bribery or corruption,

and under all the abovementioned circumstances, Cloete's will take reasonable measures to ensure that such Personal Information is only provided to the recipient, if such recipient undertakes to keep the Personal Information confidential and secure.

RECEIPT, USE AND TYPES OF PERSONAL INFORMATION

- 13. On receipt of, and in response to, a query or request received from a Data Subject, Cloete's may transmit via its website, in writing, or by way of email, telephone or via social media, its own Personal Information, which Personal Information on receipt by the requesting or receiving party, may only be used for the purpose relating to the initiating of the request or query and for no other purpose. Furthermore, the recipient undertakes that it will not use this Personal Information for any other purpose or share this information with any other party, save where it has been given express permission to do so by Cloete's.
- 14. The information Cloete's may collect from its customers and suppliers help it to continually improve its products and services. This Personal Information may include names and contact information; ID/passport numbers; date of birth; preferred communication methods; bank details and credit card details.
- 15. Cloete's may also collect the following information –
 - 15.1 Special Personal Information being information relating to a Data Subject's religious or philosophical beliefs, race or ethnic origin, trade union membership, political opinions, health, sexual life or criminal behaviour. By providing this information to us, you are consenting to our using it in the manner set out in this policy.
 - 15.2 Personal Information from children (under 18 years of age) only with the permission of their parent or guardian.
 - 15.3 Photographs for employment identity cards. By providing the digital photograph to us, you are consenting to our using it in the manner set out in this Privacy Policy;

- 15.4 When a Data Subject uses the website or any mobile application or contact us by post, telephone, fax, email, SMS or BBM, Cloete's collects, stores and uses certain Personal Information that is disclosed;
- 15.5 CCTV footage from CCTV cameras on its sites for health and security reasons. If you have any queries in relation to the use of CCTV operating on the sites, please contact us; and,
- 15.6 Surveys for research purposes from time to time, although you do not have to respond to them.

INFORMATION QUALITY/OPENNESS/DATA SUBJECT PARTICIPATION

16. Whilst Cloete's will make all effort to ensure the integrity and accuracy of a Data Subject's Personal Information, this may not be possible. The Data Subject accepts the responsibility for keeping his/her/its Personal Information up to date and undertakes to inform Cloete's of any changes to that Personal Information.
17. A Data Subject has a right of access to any Personal Information which Cloete's may have and where applicable may ask it to correct any inaccuracies in or to any such Personal Information.
18. Any access request must be done by way of a formal request in terms of the Promotion of Access to Information Act, 2 of 2000.

SECURITY OF PERSONAL INFORMATION

19. Cloete's makes all reasonable effort to keep its social media and electronic platforms including its website, secure at all times, however, it cannot guarantee the security of any information provided via its website, e-mail, internet or social media sites. Cloete's cannot be held responsible for any loss or unauthorised use or interception of information transmitted via these social media and electronic platforms or sites which is beyond its reasonable control.
20. The Cloete's website may contain links to other websites and Cloete's is not responsible for the content, privacy or security of these third party-controlled websites.
21. Cloete's has placed cookies on its website which contacts a Data Subject's device to help make its social media and electronic platforms website operate better.
22. Cloete's makes use of social plugins of social networks such as Facebook and YouTube. Please note that Cloete's has no influence on or control over the extent of the data retrieved by the social networks' interfaces and Cloete's can accordingly not be held

responsible or liable for any processing or use of Personal Information transmitted via these social plugins.

23. Subject to the provisions above, Cloete's has implemented the appropriate technical and organisational security measures which are required to protect all Personal Information and related data which it holds from and/or against unauthorised access, accidental or wilful manipulation, loss or destruction.

CONTACT DETAILS

24. You can contact Cloete's in relation to this Privacy Policy by writing to us at vincentb@cloetesand.co.za or by contacting the Information Officer at 011 967 2152

REVISION OF POLICIES

25. Cloete's reserves the right to and may from time to time update this Privacy Policy. Any such revision will be published as an amended version on its website.