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LCS Group (Pty) Ltd

Privacy Policy

1. LCS Group of Companies

- 1.1. The LCS Group of Companies (“LCS Group”) is a diversified Supply Chain Group of Companies which operate in the Republic of South Africa and provide end-to-end supply chain services in the logistics industry.
- 1.2. In this document, references to the LCS Group must be construed as references to LCS Group (Pty) Ltd and its subsidiary companies. Certain entities which are associated with the Group may be excluded from the scope of this Privacy Policy. An example of such an excluded entity would be LCS Group employee benefit trusts. For the purpose of this notice, the relevant entities include:

	LCS Group (Pty) Ltd	2008/013920/07
	LCS Commercial (Pty) Ltd	2011/002754/07
	LCS Fuels (Pty) Ltd	2011/002819/07
	LCS Logistics (Pty) Ltd	2006/013769/07
	LCS Transport Solutions (Pty) Ltd	2002/001334/07
	Bay Shipping (Pty) Ltd	2016/286094/07
	LCS Property Investments (Pty) Ltd	2001/028357/07
	LCS Empowerment (Pty) Ltd	2013/198090/07
	LCS Evolution (Pty) Ltd	2017/659891/07
	Yellow Jersey Logistics (Pty) Ltd	2017/238227/07

POWERED BY THE LCS GROUP

LCS Group (Pty) Ltd | Reg: 2008/013920/07 | VAT: 4530249095

Directors: RJ Britz (CEO), R Barnard (COO), W Smit (CFO), GG Britz, KJ Siyoko, I McDonald (Non-Exec Chairman)

L E A D I N G C U S T O M E R S O L U T I O N S

2. Introduction And Scope

- 2.1. LCS Group (“we”, “us”, “our”) strives to ensure that our processing of the Personal Information of data subjects is lawful, reasonable, relevant to our business activities and compliant with the provisions of the Protection of Personal Information Act, 4 of 2013 (“POPIA”) and applicable privacy laws.
- 2.2. This Privacy Policy explains how we will treat your Personal Information whether provided by you to us or collected by us through other means in your ordinary use of our services, which includes access to our website (“our Website”). This Privacy Policy describes our approach and practices in respect of your Personal Information and our treatment thereof.
- 2.3. This Privacy Policy must be read together with our Website terms and conditions and any other documents or agreements that describe the manner in which we, in specific circumstances, collect or process Personal Information about you. This will enable you to understand how LCS Group will process your Personal Information.
- 2.4. This Privacy Policy supplements such other documents and agreements, but shall not supersede them and in the event of a conflict, the terms of the particular document or agreement will prevail.
- 2.5. LCS Group have appointed an Information Officer(s) responsible for overseeing questions in relation to this Privacy Policy. You may contact our Information Officer(s) at Dataprivacy@lcsgroup.co.za to discuss this Privacy Policy or your rights under data protection laws applicable to you.

3. What Personal Information Do We Collect?

- 3.1. LCS Group may collect, acquire, receive, record, organise, collate, store, update, change, retrieve, read, process, analyse, use and share your Personal Information in the manner as set out in this Privacy Policy. When we perform one or more of these actions, we are "Processing" your Personal Information.
- 3.2. “Personal Information” refers to private information about an identifiable natural or juristic person. Personal Information does not include information that does not identify a person or anonymized information.

- 3.3.** The Personal Information we collect may differ according to the services you receive from LCS Group. We may process various categories of personal information as follows:
- 3.3.1. Identity Information, which includes information concerning your name, company name, marital status, title, date of birth, gender, race and legal status, copies of your identity documents or passport, photographs, identity number, signature for proof of delivery, and registration number;
 - 3.3.2. Contact Information, which includes your billing address, delivery addresses, e-mail address and telephone numbers;
 - 3.3.3. Financial Information, which includes bank account details, insurance information, financial statements, VAT registration numbers;
 - 3.3.4. Location and Shipping Information, which includes data identifying the actual location of your physical address using GPS data and geocodes, information regarding contents of shipments only to the extent that an identifiable person can be linked to such content, sender's / consignee's name, physical address, email address and telephone number.
 - 3.3.5. Technical Information, which includes your internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access our Website.
 - 3.3.6. Usage Information, which includes information as to your access to and use of our Website, products and services.
 - 3.3.7. Marketing and Communications Information, which includes your preferences in respect of receiving marketing information from us and your communication preferences.
 - 3.3.8. Video footage, which includes CCTV footage or telephonic communications that have been recorded and stored when you visit our business premises, depots or other sites at which we have implemented such security controls.
- 3.4.** LCS Group also processes, collects, stores and/or uses aggregated data, which may include historical or statistical data ("Aggregated Data") for any purpose. Aggregated Data is not considered Personal Information as this data does not directly or indirectly reveal your identity. However, if we combine or connect Aggregated Data with your Personal Information in a manner that can identify you, we will treat the combined data as Personal Information, which will be managed in accordance with this Privacy Policy.

3.5. POPIA also differentiates between Personal Information and Special Personal Information, which may include :

3.5.1. religious or philosophical beliefs;

3.5.2. race or ethnic origin;

3.5.3. trade union membership;

3.5.4. political persuasion;

3.5.5. health or sex life;

3.5.6. biometric information; or

3.5.7. criminal behaviour (relating to an alleged offence by Data Subject or any criminal proceedings against a Data Subject).

4. How We Collect Personal Information?

4.1. You directly provide LCS Group with most of the Personal Information we process. We collect and process Personal Information in three ways, namely:

4.1.1. Through direct or active interactions with you;

4.1.2. Through automated or passive interactions with you;

4.1.3. From third parties.

4.2. Direct or active collection

4.2.1. We may require that you submit certain information to enable you to access portions of our Website, to make use of our services, to facilitate the negotiation and conclusion of an agreement with us, or that is necessary for our compliance with our statutory or regulatory obligations.

4.2.2. We collect Personal Information for compliance with health and safety regulations as well as security purposes when you visit any one of our offices, depots or warehousing facilities. Such information may include CCTV footage.

4.2.3. We also collect Personal Information when you communicate directly with us. For example:

(a) Via email and telephone calls;

- (b) When you register online or place an order for any of our products or services;
- (c) When you voluntarily complete a customer survey or provide feedback.

4.2.4. If you contact us, we reserve the right to retain a record of that correspondence, which may include Personal Information.

4.2.5. The Personal Information we collect from you may include any of the categories listed in paragraph 3 above.

4.3. Passive collection

4.3.1. LCS Group may passively collect certain categories of your Personal Information from the devices that you use to access and navigate our Website or to make use of our services (“Access Devices”) using server logs and your browser’s cookies.

4.3.2. The categories of Personal Information we passively collect from your Access Device may include your:

- a) Identity Information;
- b) Contact Information;
- c) Technical Information;
- d) Usage Information;
- e) Marketing and Communications Information; and/or
- f) Any other Personal Information which you expressly permit us, from time-to-time, to passive collect from your Access Device.

4.4. Indirect collection (from third parties)

4.4.1. LCS Group may also receive your personal information indirectly from the following sources (including public parties):

- a) our information technology suppliers;
- b) our companies or subsidiaries within the LCS Group;
- c) Financial Services Board;
- d) customs and excise control authorities.

5. How We Use Your Personal Information

- 5.1. We use the Personal Information we collect to maintain and improve our Website and to improve the experience of its users, and to facilitate the provision of our services to you, and to comply with our statutory and regulatory obligations.
- 5.2. LCS Group collects and processes your Personal Information so that we can:
- 5.2.1. provide products and services you request (such as logistics, supply chain management, customs clearance and brokerage services, and related services);
 - 5.2.2. process and collect payment for services rendered;
 - 5.2.3. provide customer support and respond to and communicate with you about your requests, questions and comments.
 - 5.2.4. offer products or services we believe may be of interest to you;
 - 5.2.5. send you tracking updates (from LCS Group and/or its manufacturing/courier partners);
 - 5.2.6. establish and manage your account with LCS Group;
 - 5.2.7. process claims we receive in connection with our services;
 - 5.2.8. communicate with you and retain a record of our communications with you and your communications with us;
 - 5.2.9. record telephone calls with you for purposes of 5.2.8 above;
 - 5.2.10. detect, prevent, manage or protect against actual or alleged fraud, security breaches, misuse, and other prohibited or illegal activity, claims and other liabilities;
 - 5.2.11. protect our rights in any litigation that may involve you;
 - 5.2.12. comply with our regulatory reporting obligations, including submissions to the Financial Sector Conduct Authority and/or the Prudential Authority and/or the South African Reserve Bank and/or Ports Authority.
 - 5.2.13. analyse and compare the types of Access Devices that you and other users make use of and your physical location;

- 5.2.14. for other lawful purposes that are relevant to our business activities or regulatory functions.
 - 5.2.15. conduct LCS Group's recruitment and hiring process, which includes conducting criminal record and credit checks, referrals, capturing job applicant's details and providing status updates to job applicants.
 - 5.2.16. operate, evaluate and improve our business (including developing new products and services; managing our communications; determining the effectiveness of our sales, marketing and advertising; analysing and enhancing our products, services, websites and apps; ensuring the security of our networks and information systems; performing accounting, auditing, invoicing, reconciliation and collection activities; and improving and maintaining the quality of our customer service.
 - 5.2.17. protect your personal safety when on our premises; and
 - 5.2.18. investigate, detect or prevent crime on any of our business premises or in respect of any of our customer property for which we are responsible and to assist authorities apprehend or prosecute offenders therefor.
- 5.3. LCS Group will restrict its processing of your Personal Information to the original purpose for which it was collected.

6. Compulsory Personal Information And Consequences Of Not Sharing With Us

- 6.1. Where LCS Group is required to process certain Personal Information by law, or in terms of a contract that we have entered into with you, and you fail to provide such Personal Information when requested to do so, LCS Group may be unable to perform in terms of the contract in place or are trying to enter into with you. In such a case, LCS Group may be required to terminate the contract and/or relationship with you, upon due notification to you, which termination shall be done in accordance with the terms of that contract and any applicable legislation.
- 6.2. Important: Please note that by entering any of our business premises, you acknowledge that you are aware that we may monitor and record activities that are in plain view on our premises using closed-circuit television (CCTV) cameras and consent to us disclosing CCTV footage to authorised persons and specialized private investigators for the purposes set out in 5.2.17 and 5.2.18 above. This category of processing is mandatory should you wish to enter our premises. If you do not intend to consent to processing of your personal information by means of CCTV footage, please do not enter our premises.

7. Sharing Of Personal Information

7.1. We will not intentionally disclose your Personal Information, whether for commercial gain or otherwise, other than with your permission or in accordance with this Privacy Policy.

7.2. LCS Group may share your Personal Information under the following circumstances:

7.2.1. Within the LCS Group of Companies who have agreed to be bound by this Privacy Policy;

7.2.2. With our contracted agents, advisers, service providers, suppliers and banking partners whose assistance we require to conduct our business operations and that:

(a) have agreed to be bound by this Privacy Policy or by similar terms offering the same level of protection as this Privacy Policy;

(b) where such Personal Information is necessary for the performance of their obligations to or on behalf of LCS Group (i.e. sharing Location, Contact and Shipping Information with third parties such as airlines, customs brokers, logistics service providers, shippers, consignees, third party payers and recipients); and

(c) based on our instructions, are not authorised by us to use or disclose the information except as strictly necessary to perform the services on our behalf as instructed or to comply with legal requirements.

7.2.3. With our employees, suppliers, service providers and agents to the extent that they require such specific Personal Information in the provision of services for or to us, which include hosting, development and administration, technical support and other support services relating to our Website and/or the operation of the LCS Group's business divisions. We will only authorise the processing of any Personal Information by a third party on our behalf by, among others, entering into agreements with those third parties governing our relationship with them and highlighting confidentiality and non-disclosure obligations.

7.2.4. With the credit bureaux for certain specified information, as allowed in terms of the law.

7.2.5. to enable us to enforce, implement, or apply any other contract between you and us.

- 7.2.6. to protect our rights, property or safety or that of our customers, employees, contractors, suppliers, service providers, agents, and brokers.
- 7.2.7. to mitigate any actual or reasonably perceived risk to us, our customers, employees, contractors, agents, brokers or any other third party.
- 7.2.8. With governmental agencies, exchanges and other regulatory or self-regulatory bodies, if required to do so by law or there is a reasonable belief that such is necessary for:
- (a) compliance with the law or with any legal process;
 - (b) the protection and defence of the rights, property or safety of LCS Group, our customers, employees, contractors, suppliers, services providers, agents, brokers or any third party;
 - (c) the detection, prevention and management of actual or alleged fraud, security breaches, technical issues, or the misuse or unauthorized use of the Website and any other contravention of this Privacy Policy'
 - (d) the protection of the rights, property or safety of members of the public (if you provide false or deceptive information or make misrepresentations, we may proactively disclose such information to appropriate regulatory bodies).
- 7.2.9. While providing logistics and supply chain management services we may obtain, use, and disclose Personal Information about our customer's customers. In these instances, we process the Personal Information in accordance with this Privacy Policy unless specifically agreed otherwise with our customer.

8. Storage And Transfer Of Personal Information

- 8.1.** We have engaged Microsoft Azure Services of the Microsoft Corporation as a sub-processor (operator) to provide data storage and cloud services to securely store your information on servers located in South Africa.
- 8.2.** We reserve the right to transfer to and/or store your Personal Information on servers in a jurisdiction other than where it was collected, or outside of South Africa in a jurisdiction that may not have comparable data protection legislation; Provided that if the location does not have substantially similar laws to those of South Africa, we will take reasonably practicable steps, including the imposing of suitable contractual terms to ensure that your Personal Information is adequately protected in that jurisdiction.

9. Security And Integrity

- 9.1. We take reasonable technical and organisation measures to secure the integrity of retained information and protect it from misuse, loss, alternation, and destruction through the use of accepted technological standards that prevent unauthorised access to or disclosure of your Personal Information.
- 9.2. Our Microsoft Azure Cloud servers run in secure data centres and access is restricted to authorised personnel. Microsoft Azure implements best security practices and is ISO 27001 certified for information security management. Further information of this operator is set out in paragraph 15 below.
- 9.3. Personal Information including banking details, name and addresses are encrypted as it is transmitted over the internet using SSL. LCS Group's internet servers are also protected by firewalls and access to personal information is limited to minimal authorised personnel of LCS Group. The security of the LCS Group's website and systems is also tested on a regular basis, and every effort is made to ensure that security is at an optimum level at all times.
- 9.4. We periodically review our personal information collection, storage and processing practices, including physical and digital security measures.
- 9.5. We do not make any warranties or guarantees that content shall be entirely 100% safe or secure. However, we are subject to the Protection of Personal Information Act 4 of 2013, which we comply with.
- 9.6. LCS Group has established and implemented data breach management procedures to address actual and suspected data breaches and will notify you and the relevant regulatory authorities of breaches where LCS Group is legally required to do so and within the period in which such notification is necessary.

10. Retention And Deletion

- 10.1. LCS Group may retain and process some or all of your Personal Information if and for as long as:
 - 10.1.1. we are required or permitted by law, or contract with you, to do so;
 - 10.1.2. it is for lawful purposes that are related to our performance of our obligations and activities; or
 - 10.1.3. you agree to us retaining it for a specified further period.

10.2. Unless there is a lawful purpose for LCS Group to continue processing or storing your Personal Information, we will delete your Personal Information in the following circumstances:

10.2.1. the Personal Information is no longer necessary for the purpose for which it was collected or processed; or

10.2.2. you withdraw your consent to the processing of your Personal Information;

or

10.2.3. you object to the processing of your Personal Information.

10.3. We determine the appropriate retention period for Personal Information by considering, among other things, the nature and sensitivity of the Personal Information, the potential risks or harm that may result from its unauthorised use or disclosure, the purposes for which we process it and whether those purposes may be achieved through other means. LCS Group will always comply with applicable legal, regulatory, tax, accounting, labour, or other requirements as they apply to the retention of Personal Information.

10.4. We will delete your data using effective methods including, among others, shredding.

11. Maintenance, Corrections And Access

11.1. We are required to take all necessary steps to ensure that your Personal Information is accurate, complete, not misleading and up to date.

11.2. Anyone about whom we maintain Personal Information may request to inspect and, if appropriate, correct the Personal Information held by us. It is your responsibility to inform us, or the persons responsible for the maintenance of your Personal Information, should your Personal Information be incorrect, incomplete, misleading or out-of-date by notifying us at contact details in paragraph 2.4 above. We may require additional information from the requesting party to assure itself of the legitimate basis for the request and the identity and authority of the requestor. Upon receipt and verification of the corrected Personal Information, we will adjust our data or records accordingly.

11.3. A request for correction/deletion of Personal Information or destruction/deletion of a record of Personal Information must be submitted using the prescribed Form 2 which is available in our Promotion of Access to Information Manual and the Information Regulator's website.

12. Your Data Protection Rights

12.1. Data protection laws may grant you with, among others, the following rights:

- 12.1.1. Request access to your Personal Information – enabling you to receive a copy of the Personal Information retained about you;
- 12.1.2. Request the correction of your Personal Information – to ensure any incomplete or inaccurate Personal Information is corrected;
- 12.1.3. Request erasure of your Personal Information – where there is no lawful basis for the retention or continued processing of your Personal Information;
- 12.1.4. Object to the processing of your Personal Information for a legitimate interest (or those of a third party) - under certain conditions where you feel it impacts your fundamental rights and freedoms;
- 12.1.5. Request restriction of processing of your Personal Information – to restrict or suspend the processing of your Personal Information to limited circumstances;
- 12.1.6. Withdraw consent given in respect of the processing of your Personal Information at any time – withdrawal of consent will not affect the lawfulness of any processing carried out prior to your withdrawal notice. But may not affect the continued processing of your Personal Information in instances where your consent is not required.

12.2. If an above request/objection is to be made, please use the contact information at paragraph 2.4 above and we will revert within 30 calendar days.

13. Direct Marketing

13.1. LCS Group would like to send you information about LCS Group's product and service offerings we believe may be of interest to you.

13.2. If you have agreed to receive direct marketing, you may opt-out at a later date.

13.3. You have the right to, at any time, to stop LCS Group or any of its member entities from contacting you for direct marketing purposes or sharing your Personal Information to other members of our LCS Group of Companies.

13.4. If you no longer wish to be contacted for direct marketing purposes, please email Dataprivacy@lcsgroup.co.za. Alternatively, you may utilize the contact details of the relevant LCS Group entity as stipulated in the Direct Marketing communications you receive.

13.5. Once you have chosen to opt-out, we may send you written confirmation of receipt of your opt-out request (which may be in electronic form), and we will thereafter not send any further direct marketing communication to you. However, you may continue to receive communication from LCS Group on matters of a regulatory nature, which are not marketing related.

14. Children

14.1. Our Website and LCS Group's services are not targeted at people under the age of 18. We will not knowingly collect Personal Information in respect of persons in this age group without express permission to do so.

15. Special Personal Information

15.1. In certain instances, we may process your special personal information. These circumstances include:

15.1.1. if the processing is needed to create, use or protect a right or obligation in law;

15.1.2. if the processing is for statistical or research purposes, and the conditions imposed by POPIA are met;

15.1.3. processing is necessary to comply with an obligation of international public law;

15.1.4. if the special personal information was made public by the Data Subject;

15.1.5. if the processing is required by law; or

15.1.6. if you have consented to the processing.

16. Third Party Sub-Processors/Operators

16.1. LCS Group uses various sub-processors (operators) to assist in the delivery of their products and services. We reserve the right to change our below sub-processors at any time without further notice to you, but we will ensure our sub-processors are bound by this Privacy Policy or similar terms providing the same or higher level of protection.

16.1.1. Microsoft

Infrastructure sub-processor/operator (data storage & cloud hosting services)

Privacy policy at: <https://www.microsoft.com/en-us/trust-center/privacy>

Security controls at: <https://docs.microsoft.com/en-us/azure/security/fundamentals/physical-security>.

Data centre location: South Africa

16.1.2. Datatex

Telephone recording and quality management

Privacy policy and security controls at: <https://www.datatex.co.za/terms-and-conditions/>

16.1.3. CTrack SA

Vehicle and fleet management

Privacy Policy and security controls at: <https://ctrack.com/za/legal/>

16.1.4. Pointer SA

Vehicle and fleet tracking telematics

16.1.5. LexisNexis

Customer and Supplier Due Diligence checks

Privacy Policy and security controls at:

<https://www.lexisnexis.com/global/privacy/en/article-14-uk.page>

and

<https://www.lexisnexis.com/global/privacy/en/privacy-policy-za.page>

16.1.6. Intellectual HR Solutions (Pty) Ltd

Human Resource Management and Recruitment services

17. Cookies

17.1. We may place small text files called “cookies” on your device when you visit our Website. Cookies do not contain Personal Information, but they do contain a personal identifier allowing us to associate your personal data with a certain device. Cookies serve useful purposes for you, including:

17.1.1. tailoring our Website’s functionality to you by letting us remember your preferences;

17.1.2. improving our Website’s performance;

17.1.3. allowing third parties to provide services to our website; and

17.1.4. helping us deliver targeted advertising where appropriate in compliance with the applicable laws.

17.2. Your internet browser may accept cookies automatically and you can delete cookies manually. However, no longer accepting cookies or deleting them may prevent you from accessing certain aspects of our Website where cookies are necessary. Many websites use cookies and more information is available at: www.allaboutcookies.org.

18. Third Party Cookies

18.1. Some of our business partners use their own cookies or widgets on our website. We have no access to or control over them. Information collected by such cookies is governed by the privacy policy of that company which created it, and not by us.

19. Privacy Policies Of Other Websites

19.1. Our Website may contain links to other websites. Our Privacy Policy applies only to our Website and services.

20. Governing Law

20.1. This Privacy Policy is governed by South African law.

20.2. If any provision of this Privacy Policy is determined to be illegal, void or unenforceable due to applicable law or by order of court, it shall be deemed to be deleted and the continuation in full force and effect of the remaining provisions shall not be prejudiced.

21. Changes To This Policy

21.1. We may amend this Privacy Policy from time-to-time and we will take reasonably practicable steps to inform you when changes are made. Without limiting the manner in which we may inform you, we may notify you by email, “pop-up” notification on our Website, or notification when you access our Website.

22. Queries, Complaints And Information Regulator

22.1. If you have any questions or complaints about your privacy rights or this Privacy Policy, please address your concerns to our Information Officer at Dataprivacy@lcsgroup.co.za. If you feel our attempts at resolving the matter have been inadequate, you may lodge a complaint with the South African Information Regulator at the address hereunder:

4th Floor, JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

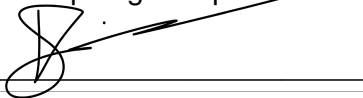

P.O Box 31533, Braamfontein, Johannesburg, 2017

Complaints email: complaints.IR@justice.gov.za

General enquiries email: infoereg@justice.gov.za

22.2. If you are located outside of South Africa, you may contact the appropriate regulator in your country of domicile.

Document Control

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Approved by	LCS Group Information Officer  LCS Group Risk and Ethics Committee 