

EUROPCAR SOUTH AFRICA, A DIVISION OF MOTUS GROUP LIMITED NOTIFICATION OF HOW WE PROCESS PERSONAL INFORMATION IN TERMS OF SECTION 18 OF THE PROTECTION OF PERSONAL INFORMATION ACT, 4 OF 2013

Europcar South Africa, a division of Motus Group Limited – Registration Number: 1983/009088/06 ("Europcar") is a vehicle rental company and provides vehicle rental services to private individuals and corporate customers. Our registered head office is situated at 1 Van Buuren Road, Corner of Geldenhuis Road and Dort Street, Bedfordview 2008.

We collect personal information to comply with our statutory obligations and enable us to facilitate vehicle rental transactions with our customers and ancillary purposes.

1. Key Definitions

"data subject" means the person to whom personal information relates;

"operator" means a person who processes personal information for a responsible party in terms of a contract or mandate, without coming under the direct authority of that party;

"personal information" means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to -

- a. information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;
- b. information relating to the education or the medical, financial, criminal or employment history of the person;
- c. any identifying number, symbol, e-mail address, physical address, telephone number or other particular assignment to the person;
- d. the blood type or any other biometric information of the person;
- e. the personal opinions, views or preferences of the person;
- f. correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
- g. the views or opinions of another individual about the person; and
- h. the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person;

"processing" means any operation or activity or any set of operations, whether or not by automatic means, concerning personal information, including:

- a. the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;
- b. dissemination by means of transmission, distribution or making available in any other form; or
- c. merging, linking, as well as blocking, degradation, erasure or destruction of information;

"responsible party" means a public or private body or any other person which, alone or in conjunction with others, determines the purpose of and means for processing personal information.

2. Method of Collection of Personal Data:

We collect your personal data directly from you when visiting any one of our branches or when you make use of our web-based reservation functions or referral partners. Where you complete a reservation request or rental agreement, either in person at any one of our branches or via our web-based reservation functions or trusted partners, this data may be sent to any company within the Europcar International Group (either through a web link or other means not in control of or under the direction of Europcar) to enable our processing of your request to provide a vehicle rental service.

3. Supply of Personal Information to Us:

To enable us to facilitate your request for vehicle rental services, it is mandatory for you to supply to us certain information, such as your "KYC" details that includes your Identity details and Document (or digital extract from Home Affairs), Address, Driver's Licence and contact details to comply with the provision of the Administrative Adjudication of Road Traffic Offences Act, 1998. All other information is voluntarily provided by you to enable the conclusion of the contract governing our relationship and the supply of products or services requested by you.

4. Consequences of Failure to provide information to us:

Mandatory Information as set out above is required in order to comply with legislative requirements and to facilitate the rental transaction and failure to do so will result in us being unable to conclude any transaction or offer services. If requested voluntary information is not supplied, we will not be able to provide vehicle rental services to you.

5. Lawful Basis for Processing:

We will only process your personal information to comply with legislative and contractual requirements where we are the Responsible Party and our contractual requirements where we are the Operator.

6. Purposes for Processing Data:

In addition to collecting your information for the purpose of complying with legislative obligations as described above, we process your personal information to allow you to utilise our offered vehicle rental services. The purpose of processing your personal information will be to:

- i. record your details on the Europcar system to facilitate and manage bookings and reservations (including validation of the driver's license and driver status with relevant authorities);
- ii. facilitate the conclusion of a Rental Agreement with you;
- iii. facilitate invoicing to and payment by you in terms of the Rental Agreement;
- iv. use in surveys to improve Europcar services;
- v. to provide online assistance;
- vi. to provide you with Europcar marketing activities (direct marketing consent will be obtained as required by law) that comply with all South African legislation.
- vii. Your personal information is used to communicate with you and assisting in obtaining appropriate finance and/or value-added products;
- viii. to facilitate tracing and recovering (which includes triangulation of cellular phones, in accordance with RICA Act, Act 70 of 2002) of the rental vehicle from you if the rental vehicle is not returned to Europcar at the agreed time and date reflected on the Rental Agreement;
- ix. to institute legal proceedings against you and/or administer, negotiate and settle Third Party claims with third parties resulting from any vehicle accident you may have been involved in during your Rental Period and/or to administer traffic fines received for traffic violations that occurred during your Rental Period and to comply with other legal requirements;
- x. credit worthiness assessments if and when required;
- xi. security and access control.

The rental vehicle may be fitted with a vehicle management system, which is used inter alia, to record speed and other information relating to the rental vehicle and the use thereof. Europcar shall be entitled to use such information received from the vehicle management system to protect its asset and to monitor driver behaviour (including but not limited to claims adjudication and legal proceedings) throughout the rental period.

7. Disclosure of Personal Data to Third Parties:

Europcar may disclose or transfer your personal data to our suppliers and business partners for the purposes of providing our services, ensuring secure processing of your personal information, responding to, resolving, and contacting you with regard to your inquiries, responding to your requests for information related to our products and services, ensuring safe use of the systems and improving user experience; to Europcar International group companies/franchisees and other business partners we are affiliated with for the purposes of auditing and reporting.

When disclosing your personal data, Europcar meets the requirements set out in the Act and takes any technical and administrative measure to protect the security of your data. We may engage external service providers as Operators that support our business operations. These service providers process data only as instructed by us, under our control and solely for the purposes mentioned in this notification. Personal information may also be disclosed to third parties during the claims process and legal proceedings resulting from vehicle accident(s) you may have been involved in during your Rental Period.

8. Retention of your personal data:

Your personal information is retained by us as long as you have a vehicle Rental Agreement in place with us and for a period of 3 (three) years thereafter (prescription period for vehicle related accidents), or for such periods prescribed by law.

9. Data processing outside the Republic of South Africa:

Although Europcar is located in South Africa, your personal data may be processed in South Africa and also outside of South Africa (example: If your booking comes from a country outside South Africa or you book via any of our booking platforms to make use of vehicle rental outside South Africa. We apply generally accepted information security practices to protect your personal information. Where we share your personal information with a third party (inside or outside South Africa), we conclude written contracts with the third party requiring them to implement and maintain the security measures necessary to protect the information as required by the Act.

10. Your Rights:

Subject to applicable laws and regulations, you own your personal information. You may exercise a number of rights, including the right;

- a. to be informed whether your personal information is being processed;
- b. to request details of how we process your personal information;
- c. to request access to copies of your personal information retained by us;
- d. to be informed about the purpose of the processing of your personal information;
- e. to be informed of the justification that is relied on by us to process your personal information;
- f. to be informed about any third parties your personal data was disclosed to (locally or internationally);
- g. to request the correction of inaccuracies in the records containing your personal information and, if applicable, completion of your data;
- h. to object to the processing of your personal information;
- i. to request the destruction or deletion of your personal information;
- j. to request that any third parties that have records containing your personal information provided by us to them are notified and required to correct, complete, destroy or delete your personal information;
- k. to lodge complaints regarding any adverse outcomes that may result from the analysis of your personal information by automated systems;
- l. to seek damages should you sustain any harm as a result of the unlawful processing of your personal information;
- m. to withdraw your consent to the processing of your personal information after the date of withdrawal (any processing up to that date will remain lawful);
- n. to request a restriction of the processing of your personal information if you dispute the correctness of your personal information, or if the processing is unlawful, but you do not wish to have your personal information deleted;
- o. to receive the personal information in our possession in a structured, standardized machine-readable format and to have this information provided to third parties;
- p. to raise a complaint to the Information Regulator or any other approved competent authority if you are of the opinion that the processing of your personal information by us is unlawful.