

Securitas South Africa External Privacy Policy

1. INTRODUCTION

- 1.1. Securitas SA Holdings (Pty) Ltd, Securitas SA (Pty) Ltd and Securitas Specialised Services (Pty) Ltd – collectively "**Securitas**" offers protective services to clients in a variety of industries and segments. In the framework of its activities, Securitas sometimes collects, holds, discloses or otherwise processes personal information.
- 1.2. We, at Securitas, are committed to ensuring the privacy and safety of personal information in compliance with applicable data protection legislation. This Privacy Policy provides you with general information about how Securitas manages your personal information. The Privacy Policy also describes your rights in respect of your personal information which we process and how you can exercise those rights. Please also refer to our PAIA and POPIA manual accessible at www.securitas-rsa.co.za which sets out further details on our processing activities as well as details on how to access your information.
- 1.3. We may amend this Privacy Policy from time to time. You can always view or request the latest version by visiting this webpage: www.securitas-rsa.co.za or contacting the Securitas designated Information Officer at sue.ponting@securitas-rsa.co.za.
- 1.4. If you have any other question or request in relation to the processing of your personal information, you may contact us at any time in writing at the address indicated above. You may also contact our Information Officer at sue.ponting@securitas-rsa.co.za.

2. GENERAL DATA PROTECTION PRINCIPLES THAT WE ABIDE TO

- 2.1. Securitas processes personal information in accordance with the Protection of Personal Information Act, 4 of 2013 ("**POPIA**") and all other relevant laws on data protection.
- 2.2. Securitas highly values and respects the privacy and the security of your personal data. Personal information means any information relating to an identified or identifiable natural or juristic person (the '**data subject**').
- 2.3. In the framework of our activities, Securitas aims to ensure, at all times, that personal information is:
 - processed lawfully, fairly and in a transparent manner ('*accountability*');
 - collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes ('*purpose specific*');
 - adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('*information quality*');
 - secure and that the integrity and confidentiality of your personal information by taking appropriate, reasonable technical and organisational measures to prevent loss, damage or unauthorised access to personal information and to take steps to notify you in the event of a breach ('*security safeguards*');
 - relevant, not excessive and adequate for the purpose for which it has been provided ('*processing limitation*');
 - collected with your consent ('*further processing limitation*');



- complete, accurate and not misleading ('openness');
- accessible and can, upon request be deleted or destroyed ('data subject participation')

2.4. Processing of your personal data will only be performed for achieving specific legitimate purposes of Securitas as more fully detailed in the PAIA and POPIA Manual.

3. WHAT CATEGORIES OF DATA DO WE PROCESS?

3.1. Securitas may have to collect or otherwise process the following personal information:

- your name;
- your address, email, phone number or other contact details;
- your language preferences;
- information about the use you make of our products or services;
- your company name;
- your company address, e mail, contact number or other contact details;
- your company registration number

3.2. Depending on the product or service you are interested in, you may also be asked to provide us with the following information:

- bank account details;
- insurance, financial, credit or bankruptcy history

Please refer to the PAIA and POPIA manual for more specific details.

4. HOW DO WE COLLECT YOUR PERSONAL DATA?

4.1. When providing our services or products to you, we may collect or receive your information via different channels:

- via written forms;
- via the internet, including our website, online forms or emails;
- via telephone contact;
- in person-to-person contact;

4.2. We may receive your personal information directly from you, from another entity of the Securitas Group, from a business partner or from publicly available information. Securitas will only disclose or receive personal data from a third-party in compliance with the applicable data protection legislation.

5. PURPOSES OF THE PROCESSING: WHY DO WE PROCESS YOUR PERSONAL DATA?

5.1. The collection and processing of your personal information is necessary for us to achieve specific legitimate purposes in the conduct of our business activities. In particular, we process your personal information for the following purposes:

- to provide you our protective services and products;
- to improve our services and products;
- for customer administration, for example to answer requests or questions from customers, customer satisfaction surveys, or manage complaints on a specific product or service;
- for supplier administration;



- for administration and management of personnel and intermediaries ;
- for management of commercial relationships with third parties;
- for administrative purposes within the Securitas Group;
- for back-up or archiving purposes;
- to respect our legal obligations vis-à-vis the authorities or in the framework of judicial proceedings;
- for statistical research or market research;
- for direct marketing purposes;
- for combating fraud and breaches by clientele;
- for dispute management;
- for protection of society, own sector or organisation;
- for account management;
- for credit approval and management;
- for global overview of clientele;
- for brokerage / agency services ;
- for management of personal insurances

5.2. Please refer to the PAIA and POPIA manual for more specific details.

5.3. Securitas commits not to process or further process your personal data in a manner that is incompatible with the above-mentioned purposes.

6. LEGAL BASIS FOR THE PROCESSING OF YOUR PERSONAL DATA

- 6.1. Securitas commits to process your personal information lawfully, i.e. relying on one of the valid legal bases, as explained below.
- 6.2. Your personal information will primarily be processed when necessary for the performance of the contract concluded between you and us, or in order to take steps at your request prior to entering into a contract.
- 6.3. Your personal information might be processed based on your consent. In that case, we will always ensure to have received your free, specific, informed and unambiguous consent.
- 6.4. Your personal information might be processed based on the legitimate interests pursued by us for example, for administrative purposes, or for the purpose of research and development.
- 6.5. Your personal information might be processed because it is necessary for compliance with a legal **obligation** which we are subject to.

7. TO WHOM WE MAY DISCLOSE YOUR PERSONAL INFORMATION?

- 7.1. Securitas may disclose your personal data to another entity within the Securitas Group, our agents, representatives or other intermediaries as part of the purpose of processing detailed in this Privacy Policy.
- 7.2. Other recipients of your personal information may include our service providers or business partners, such as:
 - IT service providers;
 - marketing services providers;
 - claims management service providers ;



- analytic consultants;
- data storage service provider;
- research and development organisations
- if Securitas purchase or sell a company or company assets, Securitas may disclose your personal data to a potential buyer or seller of such company or company assets;
- if Securitas or a substantial part of Securitas assets is acquired by a third party, your personal data may be disclosed to that third party buyer;

- 7.3. In some specific circumstances, we may also disclose your personal information to government, public authorities, statutory or regulatory bodies and enforcement bodies, when compelled to do so.
- 7.4. Securitas will only disclose your personal data to parties providing sufficient guarantees to ensure the protection of your information and the realisation of your rights as data subject.

8. TRANSFER OF YOUR PERSONAL INFORMATION OUTSIDE SOUTH AFRICA

- 8.1. Although Securitas always strives to process your personal information within South Africa, your personal data may have to be transferred to countries outside South Africa in order to achieve one of the processing purposes detailed in this Privacy Policy.
- 8.2. Securitas will only transfer your information to a third-party located in countries outside South Africa after a careful assessment to ensure that this third-party:
- provides appropriate safeguards regarding the level of protection of your personal information;
 - ensures the enforceability of your rights as a data subject; and
 - provides effective legal remedies to you.
- 8.3. You may always obtain a copy of the information transferred to these third parties upon request to us.

9. HOW LONG DO WE STORE YOUR PERSONAL INFORMATION?

- 9.1. Securitas will not store your personal information for longer than is necessary for the performance of our contract and/or for achieving one of the other purposes described in this Privacy Policy. Please note that Securitas may also be legally obliged to store your personal information for a minimum time period to comply with statutory requirements.
- 9.2. We will perform regular checks to identify personal information which no longer serves any purpose in order to delete or anonymise such personal information.

10. WHAT ARE YOUR RIGHTS AS DATA SUBJECT?

- 10.1. You have the following rights as a data subject:
- **The right to access:** you may at any time request to access your personal information. Upon request, we will provide you with a copy of your personal data which we process. For any further copies, we may charge a reasonable fee based on administrative costs. If you request a copy of your information by electronic means, and unless otherwise requested, we will provide you all relevant information in a commonly used electronic form.
 - **The right to rectification:** you have the right to request that we, without undue delay, the rectify or update any inaccurate or incomplete personal information held by us concerning you.
 - **The right to object:** you may object at any time to the processing of all of or part of your personal information, in which case, we will no longer process your personal information,



unless we have compelling legitimate grounds to do so, or because such processing is necessary in the establishment, exercise or defence of a legal claim.

- **The right of restriction of processing:** you may request that we restrict the processing of your personal information in the following situations:
 - (i) when contesting the accuracy of your information;
 - (ii) when the processing appears to be unlawful;
 - (iii) when we no longer need your personal information for the purposes of the processing; or
 - (iv) pending verification, whether our legitimate grounds override yours in the framework of an objection.
- **The right to withdraw your consent:** when processing is based on your consent, you remain free at all times to withdraw your consent. This may however affect our ability to perform services or otherwise fulfil obligations to you.

- 10.2. If you have any concerns around our processing of your personal information or any other privacy concerns, please address these to our designated Information Officer at sue.ponting@securitas-rsa.co.za. You may also lodge a complaint with the Information Regulator in South Africa, being the regulatory body established in terms of the Protection of Personal Information Act, 4 of 2013.

11. HOW DO WE ENSURE THE SECURITY OF YOUR PERSONAL DATA?

- 11.1. Securitas highly values the security of your data. We, at Securitas, take all the necessary administrative, technical and organisational measures to ensure the security and confidentiality of your personal data and to protect your personal data against unauthorised or accidental access, loss, misuse, disclosure, alteration or destruction.
- 11.2. Prior to disclosing your personal data to a third-party / data processor, we will always ensure that this third-party / data processor offers an adequate level of security.

We encourage you to review and check our website regularly for any updates to this Privacy Policy. If you would like a copy of this Privacy Policy, please contact:

sue.ponting@securitas-rsa.co.za

Securitas Privacy Policy was last updated 1 July 2021.