

POLICY ON THE PROTECTION AND PROCESSING OF INFORMATION

AFRICA AUTOMOTIVE HOLDINGS (PTY) LTD

Trading as LDV South Africa

Registration Number: 2023/277064/07

Prepared in accordance with the Protection of Personal Information Act 4 of 2013 ("POPIA")

Amended: March 2025

1. Introduction

Africa Automotive Holdings (Pty) Ltd, trading as LDV South Africa ("the Company"), is an automotive brand committed to protecting the personal information of its clients, staff and other data subjects in compliance with the Protection of Personal Information Act 4 of 2013 ("POPIA") and the Promotion of Access to Information Act 2 of 2000 ("PAIA"). This Policy outlines the Company's approach to collecting, processing, accessing, storing and sharing personal information across all Company operations, including its websites www.ldvsouthafrica.co.za and www.ldvauto.co.za.

2. Definitions

In this Policy, the following definitions apply:

- "Business" means the business of Africa Automotive Holdings (Pty) Ltd, including all operations and all matters reasonably connected thereto.
- "The Company" means Africa Automotive Holdings (Pty) Ltd, Registration Number 2023/277064/07.
- "Data Subject" means any identifiable person whose personal information is processed by the Company.
- "Information Officer" means the person appointed in terms of clause 12.4 of this Policy.
- "Information Regulator" means the body described in clause 12.5 of this Policy.
- "Personal Information" has the meaning assigned to it in section 1 of POPIA.
- "Process" and "Processing" includes any operation performed on personal information, whether automated or not, including collection, storage, use, disclosure and destruction.
- "Special Personal Information" means personal information as contemplated in section 26 of POPIA, including health, biometric, race, religious and political information.

3. Background of POPIA

POPIA is South Africa's primary data protection legislation. It promotes the protection of personal information by prescribing minimum requirements for processing, including the eight principles set out in clause 6 of this Policy.

4. Policy Statement

The Company is committed to protecting the personal information of its employees, clients, service providers and other data subjects. The Company complies with POPIA and PAIA and ensures that personal information is used appropriately, transparently, securely and lawfully.

This Policy sets out how the Company handles personal information and how data subjects may exercise their rights.

In addition to this Policy, the Company has developed a PAIA Manual available on the Company's website and at its registered premises.

5. Purpose of this Policy

The purpose of this Policy is to record how the Company processes personal information of its data subjects and to ensure compliance with POPIA and PAIA. From time to time in the conduct of its business, the Company will come into possession of personal information and this Policy governs how such information is handled.

6. The Eight Principles of POPIA

6.1 Accountability

The Company appoints an Information Officer responsible for ensuring compliance with POPIA and for overseeing the implementation of this Policy.

6.2 Processing Limitation

The Company collects only the personal information that is necessary for its lawful business purposes, directly from the relevant data subjects and with their consent where required.

6.3 Purpose Specification

Personal information is collected for specific, explicitly defined and lawful purposes, and data subjects are informed of the purpose at the time of collection.

6.4 Further Processing Limitation

Any further processing of personal information must be compatible with the purpose for which it was originally collected.

6.5 Information Quality

The Company takes reasonable steps to ensure that personal information in its possession is complete, accurate, not misleading and kept up to date.

6.6 Openness

The Company is transparent in its processing activities. It notifies data subjects of the nature and purpose of processing at the time of collection, and ensures this Policy is readily accessible.

6.7 Security Safeguards

The Company implements appropriate technical and organisational measures to protect personal information against loss, damage, unauthorised access, disclosure or destruction.

6.8 Data Subject Participation

Data subjects have the right to request confirmation that the Company holds personal information about them, and may request access to, correction of, or deletion of such information.

7. Collection of Personal Information

Depending on the circumstances, the Company may collect and process the following categories of personal information:

- Full name, contact details (email, telephone, physical and postal address).
- Date of birth, age, gender, nationality and language preferences.
- Identity number, passport number and photograph.
- Vehicle registration number, driving licence details.
- Biometric information (where applicable), including fingerprints and facial recognition data.
- Banking details (verified).
- Company registration number, VAT/Tax number.
- Employment details and insurance information.
- Correspondence of a private or confidential nature.
- Trade union membership and political persuasion (only where relevant and lawful).

Personal information may be collected from the following sources:

- Directly from the data subject.
- During interactions with the Company (in person, telephonically or electronically).
- Via the Company's websites (www.ldvsouthafrica.co.za and www.ldvauto.co.za) or social media platforms.
- From publicly available sources.
- From authorised third parties.
- Via mobile or other software applications used in the Company's business.

8. How and Why We Process Personal Information

The Company processes personal information for the following purposes, among others:

- Providing product quotes and responding to client enquiries.
- Processing applications for products and services.
- Verifying client identities and conducting due diligence.
- Administering sales transactions and after-sales services.
- Staff administration, payroll and human resources management.
- Compliance with applicable laws and regulatory reporting.
- Marketing and communications (subject to consent).
- Website analytics and improvement of services.

Processing is carried out on the basis of consent, contract performance, legal obligation, legitimate interest, or the protection of the data subject's vital interests, as applicable.

9. Who We Share Personal Information With

The Company may disclose personal information to the following categories of recipients, where necessary and lawful:

- Professional advisors, consultants and service providers engaged by the Company.
- IT and data storage service providers.
- Government and law enforcement authorities (where required by law).
- Financial institutions and insurers.
- Any person with the data subject's explicit consent.

The Company takes reasonable steps to ensure that all recipients treat personal information in accordance with POPIA and the purposes for which it was shared.

10. Access to Information

Data subjects may request a copy of the personal information held by the Company by contacting the Information Officer using the details set out in clause 12.4. Requests will be processed in accordance with POPIA and the Company's PAIA Manual. A reasonable administrative fee may be charged for the provision of information in certain formats.

11. Cross-Border Transfers of Personal Information

The Company will not transfer personal information to a recipient in a foreign country unless:

- The recipient is subject to a law or binding agreement that provides adequate protection.
- The data subject has consented to the transfer.
- The transfer is necessary for the performance of a contract with the data subject.
- The transfer is in the data subject's interest and consent is not reasonably practicable to obtain.

Where cross-border transfers occur, the Company will implement appropriate safeguards to ensure equivalent protection.

12. Safeguarding of Personal Information

12.1 Security Measures

The Company implements appropriate, reasonable technical and organisational measures to prevent the loss, damage, unauthorised access, disclosure, alteration or destruction of personal information. These measures include password-controlled access, encryption of data in transit, anti-virus and anti-malware software, cross-shredding of physical records, and access control protocols.

12.2 Internet Transmission

The Company employs commercially reasonable security measures for all data transmitted via the internet, including encrypted connections where available. Users are advised that no internet-based transmission can be guaranteed to be completely secure, and are encouraged to take appropriate precautions when submitting personal information online.

12.3 Security Reviews

The Company reviews its security controls and processes on a regular basis to ensure ongoing protection of personal information.

12.4 Information Officer

The Company has appointed an Information Officer who is responsible for ensuring compliance with POPIA and overseeing this Policy:

Contact Person: Gerhard Moolman (Chief Executive Officer)

Physical Address: Block A, 4 Pieter Wenning Road, Sandton, Gauteng, 2191

Postal Address: P O Box 5042, Dainfern North, Johannesburg, Gauteng, 2055

Telephone: +27 (0)10 006 0449

Email: info@ldvsouthafrica.co.za

Website: www.ldvsouthafrica.co.za

The Information Officer role carries statutory responsibility under POPIA. Any queries, complaints or requests relating to personal information must be directed to the Information Officer in the first instance.

12.5 The Information Regulator

Where a data subject is unable to resolve a concern with the Information Officer, they may contact the Information Regulator:

Physical Address: JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

Telephone: 010 023 5241 / 010 023 5242

Email (general): Enquiries@infoeregulator.org.za

Email (complaints): POPIAcomplaints@infoeregulator.org.za

Website: www.infoeregulator.org.za

13. Data Retention

The Company retains personal information only for as long as is necessary to fulfil the purposes for which it was collected, or as required by applicable law. The following retention schedule applies as a minimum standard:

Data Category	Minimum Retention Period	Legal Basis
Client transaction records	5 years	VAT Act; Income Tax Act; general commercial law
Employee records	5 years post-employment	Basic Conditions of Employment Act; Labour Relations Act
Financial and accounting records	5 years	Companies Act; Income Tax Act; VAT Act
CCTV footage	30 days (unless relevant to an incident)	Operational security; POPIA
Marketing consent records	Duration of relationship + 3 years	POPIA; ECT Act
Website enquiry data	3 years	Legitimate interest; statutory limitation periods
Biometric data	Duration of employment or access requirement	POPIA section 26; employee contract

Once the applicable retention period has expired, personal information will be securely destroyed or anonymised, unless a longer period is required by applicable law or regulation.

14. Direct Marketing

The Company will not process personal information for direct marketing by electronic means (including SMS, email or automated calls) unless the data subject has provided prior consent or is an existing client. Data subjects may withdraw consent for marketing at any time by contacting the Information Officer or by using the unsubscribe mechanism included in all marketing communications.

15. Surveillance Systems

Video footage and voice recordings processed via CCTV or other surveillance systems on Company premises constitute personal information under POPIA. The Company will notify employees, clients and visitors of the use of surveillance systems at relevant premises by means of appropriate signage or written notification.

16. Security Breaches

Should the Company become aware of a security breach affecting personal information, it will within a reasonable period — and in any event no later than is practicable under the circumstances — take the following steps:

- Assess the nature, scope and likely consequences of the breach.
- Notify the Information Regulator as soon as reasonably possible where there are reasonable grounds to believe that personal information has been compromised.
- Notify affected data subjects where their information has been compromised and they can be identified, unless the Information Regulator directs otherwise.

All security breaches will be documented internally in a breach register maintained by the Information Officer.

17. Special Personal Information

The Company will not process Special Personal Information (as defined in section 26 of POPIA, including information relating to health, biometrics, race, ethnicity, religious beliefs, sexual orientation or criminal record) without:

- The explicit written consent of the data subject; or
- A specific statutory authorisation permitting such processing; or
- Such processing being necessary to comply with an obligation imposed by law; or
- Such processing being necessary for the establishment, exercise or defence of a right or obligation in law.

Consent for the processing of Special Personal Information will be obtained using a dedicated consent form which specifies the category of special information, the purpose of processing, and the data subject's right to withdraw consent. All such consent records will be stored securely by the Information Officer.

18. Correction, Amendment and Deletion of Personal Information

Data subjects may request the Company to correct, amend, update or delete their personal information at any time by contacting the Information Officer. The Company will take all reasonable steps to verify the data subject's identity before making any changes. Corrections will be effected as promptly as reasonably practicable.

Note that the Company may decline to delete information that it is legally obliged to retain, or that is necessary for the defence of a right or legal claim.

19. Disclosure of Personal Information to Third Parties

The Company does not claim ownership of data subjects' personal information and will not share it with third parties except:

- With the explicit consent of the data subject.
- Where disclosure is necessary for the Company's legitimate operational purposes (e.g. to engaged service providers or operators acting under mandate).
- Where disclosure is required by applicable law, court order or regulator.

20. Awareness and Consent

The Company will ensure that data subjects are aware of the purpose for which their information is processed by:

- Making this Policy available for inspection at Block A, 4 Pieter Wenning Road, Sandton, during normal business hours.
- Publishing this Policy on the Company's website at www.ldvsouthafrica.co.za.
- Incorporating this Policy by reference into employment agreements, client contracts, standard terms and conditions, and other relevant agreements.

Where required, written consent will be obtained before processing personal information, and records of consents will be maintained by the Information Officer.

21. Use of Cookies

When a user visits the Company's websites, a cookie may be placed on their device (subject to cookie settings). Cookies assist in collecting anonymised site visitation statistics and tracking newsletter link preferences. Aggregated cookie data is not linked to personal information without prior consent. Users may configure their browsers to refuse cookies, though this may affect site functionality. Please refer to the Website Terms and Conditions for the full Cookie Policy.

22. Your Rights as a Data Subject

Under POPIA, data subjects have the following rights:

- The right to request confirmation that the Company holds personal information about them.
- The right to access that information (subject to a reasonable administrative fee).
- The right to request correction or deletion of personal information.
- The right to object to the processing of personal information.
- The right to opt out of direct marketing communications.
- The right to lodge a complaint with the Information Regulator.

All requests should be submitted in writing to the Information Officer at the contact details set out in clause 12.4.

23. Third-Party Websites

The Company's websites may contain links to third-party websites. LDV South Africa is not responsible for the privacy practices of such websites. We recommend that users review the privacy policy of any third-party website before interacting with it.

24. Status, Review and Amendments

This Policy has been adopted by the Company and applies to all operations of Africa Automotive Holdings (Pty) Ltd trading as LDV South Africa. It will be reviewed annually or as required by changes in applicable law or the Company's operations. Amendments will be communicated to employees, clients and other affected data subjects as appropriate and will be published on the Company's website.