

PRIVACY POLICY

1 INTRODUCTION

- 1.1 We are committed to protecting your privacy and to ensuring that personal information provided to us is collected and used properly, lawfully and transparently in line with the Protection of Personal Information Act 4 of 2013 ("**POPIA**").
- 1.2 This Privacy Policy ("**Policy**") governs the collection, processing and disclosure of personal information that Automatrix Proprietary Limited ("**Automatrix**") collects through the Automatrix website ("**website**") accessible at <https://www.automxconnect.com/Automatrix/>.
- 1.3 This Policy is not intended to reproduce laws or regulations but rather set out guidelines for our conduct in any operations which involve the processing of personal information.

2 APPLICATION

This Policy applies to –

- 2.1 all of our approved repairers and prospective repairers;
- 2.2 all our vehicle manufacturers and approved motor dealers that interact with us;
- 2.3 insurance companies that interact with us;
- 2.4 all of our suppliers and service providers (which includes potential suppliers and service providers); and
- 2.5 any other natural or juristic person who interacts with us through our website, over the phone, via email, website applications, social media or otherwise.

3 WHO ARE WE?

Automatrix is actively involved in the development, management and administration of vehicle manufacturer approval programs offering various specialist service to the auto body repair industry in South Africa with a focus on vehicle approval programmes for a number of leading manufacturers including, amongst others, –

Manufacturers	
BMW South Africa	Ford Motor Company Southern Africa
Great Wall Motors South Africa	Haval Motors South Africa
Honda Motor Southern Africa	Isuzu Motors South Africa (Including Light Commercial Vehicles, Commercial Vehicles and Body Builders)
Mitsubishi Motors South Africa	Renault South Africa
Subaru Southern Africa	Suzuki Auto South Africa
TATA South Africa	

4 WHAT IS PERSONAL INFORMATION?

- 4.1 The term "personal information" as used in this Policy is defined as "information which relates to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person. The person or juristic person i.e. entity to whom personal information relates is referred to as the "data subject" ("**data subject**", "**you**" and "**your**").
- 4.2 Examples of personal information include, but are not limited to, the information detailed in 5.2 below.

5 WHAT TYPE OF PERSONAL INFORMATION DOES AUTOMATRIX COLLECT?

- 5.1 Automatrix collects and processes personal information to provide data subjects with access to our service and products, to help us improve our offerings and for other purposes explained below.
- 5.2 Automatrix collects the following types of personal information relating to data subjects –

Type of data subjects	What personal information do we process
<p>Natural persons (Vehicle owners)</p>	<ul style="list-style-type: none"> • Name and surname • Date of birth • Contact details • Physical and postal address • Vehicle details (VIN and registration number) • Vehicle model and year of registration • Insurance company details • Description of repairs to vehicle • Replacement parts purchases, including description, supplier and cost • Vehicle write-off information • Website usage data
<p>Juristic persons (Approved repairers)</p>	<ul style="list-style-type: none"> • Company details (including registration number and documents, VAT number, TAX clearance certificate, BBBEE certificate, physical and postal address and contact details) • Job card/quotations/invoices (including all information contained on the job card/quotation such as customer details (as set out above), vehicle details, description of the works to be performed, materials required, duration and estimated costs) • Banking details • Employee details • Financial information • Details of directors • Floor plans • Type of repair equipment used • Customer details

Suppliers/Service providers	<ul style="list-style-type: none"> • Company details (e.g. registration number and documents, VAT number, Tax clearance certificate BBBEE certificate, physical address, contact details); • Quotes and invoices • Banking details • Financial information • List of directors and their details
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5.3 When personal information is collected, Automatrix will indicate the purpose for the collection and whether the information required is compulsory or voluntary.

5.4 **When manufacturers and/or approved body repairers provide us with personal information relating to their customers, such manufacturers and/or approved body repairers warrant that they have a lawful basis for doing so or have received permission to share their customers' information with us for use in line with the purposes set out in this Policy.**

6 HOW DO WE COLLECT PERSONAL INFORMATION?

Automatrix collects personal information from the following sources –

- 6.1 information provided on our website;
- 6.2 approved repairers;
- 6.3 vehicle manufacturers; and
- 6.4 insurance companies.

7 HOW DO WE USE YOUR PERSONAL INFORMATION?

Automatrix processes personal information for the following purposes –

- 7.1 contractual performance in terms of agreements concluded with manufacturers, approved repairers and insurers that includes, but is not limited to, –
 - 7.1.1 the development of approval programme criteria specific to each manufacturer's equipment;
 - 7.1.2 regular auditing of approved repairers to ensure the maintenance of manufacturer standards and processes;
 - 7.1.3 processing of insurance claims;
 - 7.1.4 providing all-inclusive administration services, including scheduling, invoicing, help desk queries and digital reporting; and
 - 7.1.5 data reporting and business analytics.

- 7.2 provision for offering our products and services;
- 7.3 detection of fraudulent claims, crime money laundering and other malpractice;
- 7.4 conducting customer satisfaction research or for statistical analysis;
- 7.5 in connection with legal proceedings, if applicable; and
- 7.6 comply with applicable laws, regulatory requirements or industry standards to which we subscribe or which apply to use.

8 DISCLOSURE OF PERSONAL INFORMATION TO THIRD PARTIES

- 8.1 We may disclose personal information provided to us to third parties who are (i) involved in delivery of products and service that we deliver and (ii) who assist us in giving effect to the above purposes at paragraph 7. These third parties include, amongst others –
 - 8.1.1 manufacturers;
 - 8.1.2 insurance companies; and
 - 8.1.3 suppliers, service providers, consultants, subcontractors and other vendors who need access to such information to carry out work on our behalf. Any such parties only have access to such information as is necessary to perform their functions and may not use it for any purpose other than to provide services to us;
- 8.2 Where we disclose your personal information to the above parties, they will be bound to use that personal information for the reasons and purposes it was provided to them and not for any other purpose.. To this end, we will enter into agreements with these third parties.
- 8.3 In addition to the above, we may be obliged to disclose your personal information where we have a duty to disclose in terms of law or where we believe it is necessary to protect our rights.

9 INFORMATION SECURITY

- 9.1 Automatrix will take reasonable and appropriate technical and organisational measures to ensure that your personal information is kept secure and is protected against unauthorised or unlawful processing, accidental loss, destruction or damage, alteration disclosure or access.
- 9.2 We have technology controls for our IS/IT systems such as firewalls user verification, data encryption and separation of roles, systems and data.
- 9.3 We will, on a regular basis, continue to review our security controls and related processes to ensure that your personal information is secure.

9.4 As stated above, when we contract with third parties, we conclude agreements with them in terms of which we impose appropriate security, privacy and confidentiality obligations on them to ensure that personal information is kept secure.

9.5 Whilst we will do all things reasonably necessary to protect your rights of privacy, we cannot guarantee or accept any liability whatsoever for unauthorised or unlawful disclosures of your personal information, whilst in our possession, made by third parties who are not subject to our control, unless such disclosure is as a result of our gross negligence.

9.6 **If you disclose your personal information to a third party, such as an entity that operates a website linked to our website or anyone other than Automatrix, WE SHALL NOT BE LIABLE FOR ANY LOSS OR DAMAGE, HOWSOEVER ARISING, SUFFERED BY YOU AS A RESULT OF THE DISCLOSURE OF SUCH INFORMATION TO THE THIRD PARTY. This is because we do not regulate or control how that third party uses your personal information. You should always ensure that you read the privacy policy of any third party.**

10 HOW TO ACCESS AND CORRECT YOUR PERSONAL INFORMATION

10.1 We undertake to provide you with access to your personal information and provide mechanisms that any personal information found to be inaccurate or incomplete could be corrected or amended as feasible subject to any requirement or rule for such personal information to be retained by law. For further information on how to exercise these rights, please refer to our procedure for data subject access to, objection to, correction or deletion of personal information processed by Automatrix as set out in the PAIA/POPIA Manual <https://www.automxconnect.com/Automatrix/docs/paia-popia-manual.pdf>.

10.2 Prior to the amendment, correction or removal of your personal information, we will require you to identify yourself and to identify the portion information requested to be amended, correct or removed. A request for the amendment, correction or removal of personal information may be declined if the process of the request is unlawful, unreasonably repetitive, require disproportionate technical effort, jeopardize the privacy of others or would be impractical.

10.3 Please note that any such access request and request to correct may be subject to a payment of a legally allowable fee and we will let you know what it is at the time of your request.

10.4 It is important that any information you provide directly to us is accurate and correct. Please let us know as soon as you can if any information we hold about you is no longer correct. Providing false or inaccurate information in order to obtain a product or service may also result in services being restricted or cancelled.

11 RETENTION OF PERSONAL INFORMATION

11.1 We will not retain your personal information longer than the period for which it was originally needed, unless we are required by law to do so, or you consent to us retaining such information for a longer period.

11.2 We may also retain your personal information to the extent and duration that we have a legitimate interest to process your personal information depending on, amongst others, the nature and lifespan our services or products provided to you.

11.3 We will upon your request, promptly return or destroy any and all of your personal information in our possession or control, save for what is set out above and for that which we are legally obliged to retain.

12 **CROSS BORDER PERSONAL INFORMATION TRANSFERS**

Automatrix currently does not have any planned cross border transfers of personal information outside South Africa. If cross border personal information transfers become applicable in the future, we will ensure that the provisions of section 72 of POPIA are complied with.

13 **COOKIES**

The website makes use of “cookies” to automatically collect information and data through the standard operation of the Internet servers. “**Cookies**” are small text files a website can use (and which we may use) to recognise repeat users, facilitate the user’s on-going access to and use of a website and allow a website to track usage behaviour and compile aggregate data that will allow the website operator to improve the functionality of the website and its content, and to display more focused advertising to a user by way of third party tools. The type of information collected by cookies is not used to personally identify you. If you do not want information collected through the use of cookies, there is a simple procedure in most browsers that allows you to deny or accept the cookie feature. Please note that cookies may be necessary to provide you with certain features available on our website, and thus if you disable the cookies on your browser you may not be able to use those features, and your access to our Website will therefore be limited.

14 **YOUR RIGHTS AS A DATA SUBJECT**

14.1 As a data subject, you have a number of data privacy rights. These rights include the right to request from Automatrix access to, correction or deletion of your personal data or restriction of processing concerning your data or to object to the processing of your personal information. For further information on how to exercise these rights, please refer to our procedure for data subject access to, objection to, correction or deletion of personal information processed by Automatrix as set out in the PAIA/POPIA Manual <https://www.automxconnect.com/Automatrix/docs/paia-popia-manual.pdf>.

14.2 All the rights of a data subject are contained in POPIA. The information on these rights can be found at the Information Regulator’s website at <https://www.justice.gov.za/inforeg/>, to whom you have the right to make a complaint, if we do not resolve your concern.

15 CONTACT US

If you have any questions about this Policy, our treatment of your personal information or wish to exercise any of your rights please contact our Information Officer whose details are as follows –

Name: Candice Symonds
Email: candice@automx.co.za
Telephone number: 011 792 7014

16 VERSION CONTROL

Last updated **June 2021**.