

PRIVACY STATEMENT – TORRE GROUP
WWW.ELEPHANTLIFTING.CO.ZA, WWW.LETABAPUMPS.CO.ZA, WWW.TAGS.CO.ZA

1. Who we are and the purpose of this statement

The Torre Group is committed to protecting your privacy and we will only use your personal information in accordance with this Statement and applicable data protection legislation.

We understand and confirm the importance of keeping Personal Information private and secure, in particular in terms of the compliance requirements set out in the Protection of Personal Information Act, 4 of 2013 (known as POPIA) and also any other laws, regulations, provisions or codes that are in force and which apply to Personal Information.

This statement sets out how your personal information will be used by the Torre Group and applies to any information, including personal and special personal information, you give to the Torre Group or which the Torre Group may collect from third parties as well as the Torre websites.

Any reference to “Torre”, “the Torre Group” or “we” refers to one or more of the entities, affiliates or subsidiaries of Torre Holdings Proprietary Limited group.

We have implemented reasonable technical and operational measures to keep your personal information secure however it is important that you take all necessary and appropriate steps to protect your personal information yourself as well (for example, by ensuring that all passwords and access codes are kept secure).

2. How we collect information

We collect personal information about you and any other person whose details you provide to us in accordance with the relevant laws, either:

- Directly from you when you complete a product or service application form, electronically, telephonically or by way of a hard copy;
- Indirectly from you when you interact with us electronically by way of our website, apps, or social media channels, which may include the collection of metadata (data about data);
- Where relevant, from third-party sources, such as other entities within the Torre Group, public databases, data aggregators, other financial institutions, appointed agent or regulator.

3. What information we collect

We may collect the following information about our stakeholders or users:

- your name, address, contact details, date of birth, place of birth, identity number, passport number, bank details, details about your employment, tax number and financial information;
- records of correspondence or enquiries from you or anyone acting on your behalf;
- details of transactions you carry out with us;
- details of contracts, sales or leases you carry out with us;
- sensitive or special categories of personal information, including biometric information, such as images, fingerprints and voiceprints.

Where you provide us with the personal information of third parties you should take steps to inform the third party that you need to disclose their details to us, identifying us. We will process their personal information in accordance with this statement.

You may refuse to provide us with your personal information in which case we may not be able to provide you with a relevant service or would have to terminate our business relationship. The supply of certain items of personal information, especially those collected to comply with regulation, is legally mandatory.

4. How we use your information

We may use, transfer and disclose your personal information for the purposes of:

- providing you with the products or offerings you have requested, or considering your application to provide services and products to us and notifying you about important changes to these services, products or offerings;
- managing your account or relationship and complying with your instructions or requests;
- detecting and preventing fraud and money laundering and/or in the interest of security and crime prevention;
- assessing and dealing with complaints and requests;
- operational, marketing, auditing, legal and record keeping requirements;
- verifying your identity or the identity of your beneficial owner;
- transferring or processing your personal information outside of the Republic of South Africa to such countries that may not offer the same level of data protection as the Republic of South Africa, including for cloud storage purposes and the use of any of our websites;
- complying with applicable laws, including lawful requests for information received from local or foreign law enforcement, government and tax collection agencies;
- conducting market research and providing you with information about the Torre Group products or services from time to time via email, telephone or other means (for example, events);
- where you have unsubscribed from certain direct marketing communications, ensuring that we do not send such direct marketing to you again;
- disclosing your personal information to third parties for reasons set out in this Statement or where it is not unlawful to do so;
- monitoring, keeping record of and having access to all forms of correspondence or communications received by or sent from the Torre Group or any of its employees, agents or contractors, including monitoring, recording and using as evidence all telephone communications between you and the Torre Group;
- improving or evaluating the effectiveness of the Torre Group business or products, services or offerings; and
- prevention and control of any disease.

We may from time to time (and at any time) contact you about services, products and offerings available from the Torre Group or specific affiliates which we believe may be of interest to you, by email, phone, text or other electronic means, unless you have unsubscribed from receiving such communications. You may object to receiving direct marketing from Torre at any time by emailing the Torre Group entity or sending a request to POPI@torreindustries.com.

Please note that the Torre Group will not be responsible for any loss, damage or injury that you may incur as a result of any unintentional disclosures of your personal information to unauthorised persons or the provision of incorrect or incomplete personal information to the Torre Group.

5. Sharing your information

Your personal information may be shared with the Torre Group affiliates, our agents and sub- contractors, and selected third parties who process the information on our behalf.

We may also disclose your personal information to third parties in the following circumstances:

- to any other of the Torre Group's affiliates, business partners or other third parties to –
 - assess and monitor any of your applications for Torre Group' products or services;
 - determine which products and services required by Torre Group may be of interest to you and/or to send you information about such products and services, unless you object or choose not to receive such communications;
 - have a better understanding of your circumstances and capability to provide and improve Torre Group' products and services;
 - to any relevant person and/or entity for purposes of prevention, detection and reporting of fraud and criminal activities, the identification of the proceeds of unlawful activities and the combatting of crime;
 - to any regulator or supervisory authority, including those in foreign jurisdictions, if Torre Group is required to do so in terms of applicable laws;
 - to a prospective buyer or seller of any of our businesses or assets;
- to any person if we are under a duty to disclose or share your personal information in order to

- comply with any applicable laws, or to protect the rights, property or safety of Torre Group, other clients or other third parties; and/or to your agent or any other person acting on your behalf, or an introducer.

We may transfer your information to another of Torre Group' affiliates, an agent, sub-contractor or third party who carries on business in another country, including one which may not have data privacy laws similar to those of South Africa. If this happens, we will ensure that anyone to whom we pass your information agrees to treat your information with the same level of protection as if we were dealing with it.

If you do not wish us to disclose this information to third parties, please contact us at the contact details set out below. We may, however, not be able to provide products or services to you if such disclosure is necessary.

We may retain your personal information indefinitely, unless you object, in which case we will only retain it if we are permitted or required to do so in terms of applicable laws. However, as a general rule, we will retain your information in accordance with retention periods set out in applicable laws, unless we need to retain it for longer for a lawful purpose. (For example, for the purposes of complaints handling, legal processes and proceedings.)

6. Access to, correction and deletion of your personal information

You may request details of personal information which we hold about you under the Promotion of Access to Information Act, 2000 ("PAIA"). Fees to obtain a copy or a description of personal information held about you are prescribed in terms of PAIA. Confirmation of whether or not we hold personal information about you may be requested free of charge. If you would like to obtain a copy of your personal information held by the Torre Group, please review our PAIA Manual located at www.tags.co.za, www.elephantlifting.co.za, www.letabapumps.co.za and/or contact us via email on POPI@torreindustries.com.

You may request the correction of personal information the Torre Group holds about you. Please ensure that the information we hold about you is complete, accurate and up to date. If you fail to keep your information updated, or if your information is incorrect, the Torre Group may limit the products and services offered to you or purchased from you or elect not to open the account. Please note that you are responsible for informing the Torre Group if your information changes.

You have a right in certain circumstances to request the destruction or deletion of and, where applicable, to obtain restriction on the processing of personal information held about you. If you wish to exercise this right, please contact us using the contact details set out above.

You have a right to object on reasonable grounds to the processing of your personal information where the processing is carried out in order to protect our legitimate interests or your legitimate interests, unless the law provides for such processing.

7. Complaints

Should you believe that the Torre Group has utilised your personal information contrary to applicable laws, we ask that you undertake to first attempt to resolve any concerns with the Torre Group.

8. Updates

This privacy statement was last updated on 28 June 2021. A notice will be posted on the Torre websites home pages whenever the Privacy Statement is materially changed. Please check the website regularly to ensure that you are aware of the latest version of this Privacy Statement.

9. Contact Us

If you have any comments, questions, complaints or require personal information to be updated please contact the Torre Group's information officer via email at POPI@torreindustries.com.

Our head office's registered address is 11 Avalon Road, Westlake View Ext 13, Modderfontein, Gauteng, 1609.

10. The Information Regulator

Whereas we would appreciate the opportunity to first address any complaints regarding our processing of your personal information, you have the right to complain to the Information Regulator, whose contact details are:

The Information Regulator (South Africa) 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: inforeg@justice.gov.za