

**IoTRACK– OFFERED AND POWERED BY GREYSTONE TECHNOLOGIES (PTY) LTD**  
**PRIVACY NOTICE**

**Who are we?**

IoTrack, which is powered by Greystone Technologies (Pty) Ltd, is an IoT (“Internet of Things”) solution specifically developed for personal and asset tracking (“**IoTrack**” or “**we**”). IoTrack operates in South Africa and we are, depending on the circumstances, either a “Responsible Party” or an “Operator” in terms of the Protection of Personal Information Act, 4 of 2013 (POPIA) with respect to your Personal Information and as such we want to take certain steps to make sure that you are fully aware of exactly who we are, the types of Personal Information we process, how we process it, who we may need to share it with, as well as what your rights are in relation to our processing of your personal information in terms of POPIA.

We process Personal Information of our clients, employees, service providers, suppliers, and various other stakeholders who make it possible for us to operate (“Business Contacts”) in order to enable us to do business with them or provide our services to them as required. We also, by virtue of our clients’ use of our products and services, process the location information of data subjects, which information may constitute personal information within the context of POPIA. In this notice, “**you**” means you as an individual, who we are dealing with and whose Personal Information/Data we may need to collect and process in order to provide the requested services, or the entity you represent. We may need to collect and process your Personal Information/Data for the purposes described below, which purposes are supplemented by the purposes set forth in our Privacy Policy which can be viewed on our website.

**What Personal Information/Data is collected?**

IoTrack collects and processes a wide range of Personal Information/Data as part of operating our business and complying with our obligations towards our customers and other data subjects. We therefore want to hereby expressly inform you that when dealing with IoTrack, whether it be for purposes of requesting a quote, enquiring about our service or products offerings, or generally enabling us to comply with our obligations towards you in terms of your contractual relationship with us (“**IoTrack Dealing**”) you may need to provide IoTrack with certain Personal Information/Data, including but not limited to:

- Full names;
- Surnames;
- Data of birth;
- Identity numbers;
- Registration numbers;
- Entity names;
- Information pertaining to the entity you represent;
- Financial information, including banking account information;
- Statutory information (if applicable);
- Physical and postal address particulars;

- Telephone numbers;
- Email addresses;
- Location data;
- Unique Identifiers.

The above Personal Information/ Data does not necessarily comprise of all the types of Personal Information/Data which we may require from you pursuant to your IoTrack Dealing and the type of Personal Information/Data we may need to process will depend on the exact nature of your IoTrack Dealing. The purposes for which the IoTrack will be processing any of your Personal Information/Data will also depend on the circumstances which necessitate or require such processing pursuant to the relevant IoTrack Dealing.

We collect and record all telephone calls, internet communications, all correspondence we have with you irrespective of the medium of communication, details of your engagements with us, including your visits to our website and mobile application, although not all this information is always personal information. Often, we process certain information simply to improve your use of our website and application interfaces.

### **What do we do with your Personal Information and why do we collect it?**

We take your privacy very seriously and we only collect and process Personal Information (and where applicable, special personal information) for specific purposes which are connected to our legitimate business purposes, and information which we generally need in order to comply with our obligations towards you and also to comply with obligations which are imposed upon us in terms of applicable laws regulating us.

The Personal Information you provide to IoTrack is typically processed for the following purposes:

- **To make contact with you**

When we make contact with you, your personal information would have entered IoTrack's environment, where it is made available to our trained customer care consultants. Our consultants have received appropriate information privacy training and will make sure that your information is securely entered into our system where it can be protected from a technical information security perspective. Those who have access to your information will then only contact you to find out what you need and how we can help you.

It may be that we have obtained your information from someone other than yourself (perhaps you have opted into a marketing campaign or been referred to us). Regardless of where we have gotten your information from, and in line with our Privacy Policy ("Privacy Policy"), if you do not want IoTrack to contact you, we want to honour that. Therefore, when we contact you after having obtained your contact information from someone other than yourself, we will tell you where it came from and also ask you whether you would like to proceed with the relevant engagement.

- **To give you a quote**

If you have asked us for a quote, whether it be via our website or any other interface, you know who we are and what we do. In order to give you a quote, we are going to need certain personal information from you and our sales consultants will tell you exactly what information we need, why we need it and where we could perhaps also get it from if you don't have it at hand. This information is essential in order for us to tailor your quote. Again, we will always be honest with you, so if you have any issues with providing the information we are requesting, please tell us so that we can take the opportunity to explain why it is important and make sure you are comfortable before we proceed.

Throughout this process when we collect your information, it is travelling from you, passing through the trained hands of our employees who are required to handle it and enter it into our system,

where it will form part of your very own unique profile. This profile is unique to you, and once it has been created, your personal information resides within loTrack's system infrastructure.

- **To deliver our products and services**

Once you have accepted our quote, concluded an agreement with us and your profile resides in loTrack's system, it can only be accessed by authorised employees and/or service providers, who have access to it only for the purpose of us performing in terms of our contract with you and making sure that you are satisfied with our service.

In order for us to deliver our products and services to you, and always make sure that you are satisfied, we might need to share your personal information with certain third parties (your selected contact persons, employees, brokers, service providers, suppliers, and business partners). When we do so, we do so in terms of specific agreements or mandates, which ensure that these selected third parties comply with POPIA. If we need to ask you for permission to share your personal information with anyone else and for some reason such sharing is not provided for in our Privacy Policy, this privacy notice or our contract with one another, we will always take reasonable steps to procure your permission.

- **To market to you**

If you are a client

If you are a client of ours, you form part of a select base and we would be honoured to give you the opportunity to partake in our future value offerings and POPIA is a wonderful opportunity for us to ensure that the products and services we market to you in future suit your specific profile.

If you are not a client

If you aren't a client, we want you to be and know that you will derive tremendous value from being part of the loTrack family. We want you to know more about how our products and service offerings are expanding, what we are doing and how we can help you, so please give us the opportunity to contact you. This is how we will contact you, unless you have a specific preference, which we would appreciate you informing us about:

- [INSERT PHONE INFOGRAPHIC] – One of our trained sales consultants will contact you to speak about what we can offer you and always ask you whether you would like to proceed. If you don't want to be contacted, tell us so that we can make sure it doesn't happen again. We might try and convince you otherwise and ask you to read this notice, but this is only because we care and want to make sure you are making an informed decision.
- [INSERT SOCIAL MEDIA INFOGRAPHIC] – We do make use of various social media platforms to market our products and services. We don't have the ability to target you specifically through these platforms, but if you see one of our ads and would like to know more about who we are and what we have to offer, feel free to click on the ad or fill in the form. You will be directed either to our website or a digital lead form which will allow you to make contact with loTrack. We will ask you to agree to certain terms and conditions and acknowledge that you have read this privacy notice. We won't hide anything in the fine print, we simply want you to give us permission to contact you and tell you about what we have to offer.
- [INSERT EMAIL INFOGRAPHIC] – Sometimes it might be more convenient for you to read an email than what is it is to take a call. We will send you an email from time to time, but we don't want you to feel that we are spamming you, so if you are interested in what we have to offer, please opt-in to further email communications.

Everytime we do contact you, regardless of how we do so, we will always ask you whether you would like to opt-out. We will always respect your decision and only ask that you consider it carefully before proceeding.

- **To comply with applicable laws**

We have to comply with many important laws and regulatory requirements. We take our compliance obligations seriously and as such, we are legally required to collect and process certain personal information for very specific purposes.

We also reserve the right to disclose your personal information in the interests of enforcing the terms and conditions of our commercial agreement with you. This notice applies to all data (including all Personal Information/Data) past, present or future submitted by you to Io Track or which we otherwise obtain pursuant to undertaking our normal business activities.

### **How is your Personal Information/Data collected?**

We may make use of both "Active Processing" and "Inactive Processing" means to collect and process Personal Information/Data. When Io Track makes use of "Active Processing" means to collect your Personal Information, it has directly been provided with your Personal Information pursuant to an enquiry in respect of our products or services, or when you provide Personal Information/Data to IoTrack pursuant to a specific IoTrack Dealing.

In instances where Io Track makes use of "Inactive Processing" means, this means that IoTrack has not actively been provided with your Personal Information/Data, such as when IoTrack deploys passive processing means and certain technologies to collect information from you, such as through the uses of cookies, web beacons, embedded scripts and/or device identifiers, which are deployed on the website which IoTrack makes use of, as well as the IoTrack Portal. These passive processing means allow IoTrack to process certain kinds of non-personally identifiable information which can perhaps not be linked to you directly. For more information on Io Track's use of "Inactive Processing" means, such as cookies, please see our Terms of Use for our website and the IoTrack Portal.

### **How to manage cookies?**

You can set your browser not to accept cookies, however, in the case of IoTrack's website, should you elect not to make use of cookies on our website, this may influence your ability to make use of certain features on our website and the IoTrack Portal.

### **Who do we share your Personal Information/Data with?**

IoTrack primarily holds information and data in South Africa. We may, however, from time to time, transfer Personal Information/Data to data centres in other countries, but only for the above-mentioned lawful purposes and subject always to IoTrack's Privacy Policy.

It may be necessary to share your Personal Information/Data with select business contacts on a need-to-know basis. We give you the assurance that we will consistently apply our Privacy Policy to our business contacts and establish a lawful justification, which may include consent, for the sharing of Personal Information/Data with any third party. We will conclude written agreements with them to ensure your Personal Information/Data remains secure, confidential and that it is only used for the agreed purpose.

### **Where do we store your Personal Information/Data?**

IoTrack has implemented reasonable technical and organisational information security measures to protect Personal Information/Data.

All your Personal Information is stored securely by Io Track through the use of a combination of cloud-based and on-site storage facilities. Consequently, in storing your Personal Information/Data, we may transmit or transfer Personal Information/Data outside South Africa to a

foreign country, as such, personal information may be stored on servers located outside of South Africa in foreign countries that have different data protection laws in place. IoTrack is comfortable that these foreign countries protect Personal Information/Data to an extent that compares to the way in which we do, which is acceptable to us.

Despite all our attempts to keep your Personal Information safe and secure, unauthorised access remains a possibility. IoTrack will not take responsibility for anyone outside of Io Track's control breaching its security measures. You must review the conditions of use and security of any third-party websites made available through hyperlinks on any of our websites, mobile applications or websites before use.

### **How long do we store your Personal Information/Data?**

IoTrack will store or retain your Personal Information/Data for the period required in accordance with IoTrack's legitimate interest to do so or for the period necessary to comply with our legal and regulatory obligations related to the storage of specific types of records and/or information.

### **What are your Rights?**

You have rights when it comes to your Personal Information/Data, but bear in mind that there may be various considerations in deciding how to deal with any requests you may have. Contact us at [compliance@greystonetec.co.za](mailto:compliance@greystonetec.co.za), so that our Information Officer is able to review and/or process the request and provide a response.

Your rights include:

- **Right of Access** - You can ask us for a copy of the Personal Information/Data we hold.
- **Right to Know** - You can ask us what Personal Information/Data is or was shared with any of our business contacts or any third party.
- **Right to Change** - You can ask us to update your Personal Information/Data or delete any Personal Information that is no longer accurate or relevant.
- **Right to Object** - You can object to our processing of your Personal Information/Data.
- **Right to Report** - You can lodge a complaint with the relevant authorities should you feel aggrieved by the manner in which we have processed your Personal Information/Data.

### **The contact details of the respective authorities are:**

The Information Regulator (South Africa)  
JD House 27 Stiemens Street Braamfontein Johannesburg, 2001  
PO Box 31533  
Braamfontein, Johannesburg, 2107  
E-mail: [inforeg@justice.gov.za](mailto:inforeg@justice.gov.za)

As you now know by now, we are serious about keeping your information secure and to only process it for purposes which you know about and which are legitimately linked to our business operations. As such, we implement reasonable security measures and protocols to protect the Personal Information/Data we are privileged to hold. These measures are to protect any personal information we hold from being disclosed without authorisation, from loss, damage, destruction or unauthorised access. As you will appreciate nothing is 100% secure in this day and age and therefore, we ask that if you suspect that either you, or we, have had an information security breach, please notify us immediately so that we can take action. You can do so by contacting our Information Officer whose information is set out below. If you need to speak with our Information Officer, feel free to contact them.

**How to contact us?**

Should you have any questions about IoTrack's Privacy Policy, the Personal Information/Data we hold about you, or you would like to exercise any of the rights which you may have, please feel free to contact our Information Officer:

**Email:**

[Compliance@greystonetec.co.za](mailto:Compliance@greystonetec.co.za)

**Tel:**

+27 010 593 0848

**Physical Address:**

Midridge Office Estate South – Block C International Business Gateway, Pioneer Avenue, Midrand South Africa, 1685