

L&J Tools and Engineering Works (PTY) LTD: PRIVACY POLICY

Scope of the Privacy Policy

1.1 Introduction and scope

1.1.1 L&J Tools and Engineering Works (PTY) LTD ("L&J" or "we" or "us" or "our") conducts its business as a automotive manufacturer with offices in Amanzimtoti: 45 Beechgate Crescent, Southgate business park, 4126 and 51 Beechgate crescent, Southgate Business park, 4126.

L&J is a responsible party in respect of your Personal Information (as defined in clause 3.1 below), and Special Personal Information (as defined in clause 4.1 below), which means that L&J determines the purpose of and means for processing your Personal Information.

1.1.2 L&J is committed to protecting and respecting your privacy. We strive to ensure that our use of your Personal Information is lawful, reasonable, and relevant to our business activities.

1.1.3 You may contact us at reception@ljtools.co.za to discuss this Privacy Policy or your rights under data protection legislation that is applicable to you.

1.1.4 This Privacy Policy describes how we will treat your Personal Information, whether provided by you to us, or collected by us through other means when you engage with us, in your ordinary use of our products and services, in providing us with your products and services, or in accessing our website (the "Website").

1.1.5 This Privacy Policy must, as is appropriate, be read together with L&J's Website Terms of Use (accessible on the L&J Website (the "Terms") and any other documents or agreements between L&J and you (the "Agreements") that describe the manner in which we, in specific circumstances, collect or process Personal Information about you. This will enable you to understand the manner in which L&J will process your Personal Information. This Privacy Policy supplements such Terms and Agreements, but does not supersede them and in the event of any conflict, ambiguity or inconsistency between this Privacy Policy, the Terms and/or the Agreements, such documents shall be construed in the following order of priority:

1.1.6 this Privacy Policy;

1.1.7 the Terms of use; and

1.1.8 the Agreements.

1.2 Your consent to the Processing of your Personal Information

1.2.1 We may collect, receive, record, organise, collate, store, update, change, retrieve, read, consult, use, share or erase your Personal Information in the ways set out in this Privacy Policy. When we do one or more of these actions with your Personal Information, we are "Processing" your Personal Information (and "process" has a corresponding meaning).

1.2.2 If you are concerned about any aspect of this Privacy Policy as it relates to your Personal Information, please do not continue to engage with us, use our Website or our products and services.

1.2.3 We may, where permitted or required to do so by applicable law, process your Personal Information without your knowledge or permission, if sufficient grounds of justification are present, and we will do so in accordance with the further provisions of this Privacy Policy.

2. What and who does this Privacy Policy apply to?

2.1 This Privacy Policy applies to the processing by us or on our behalf, and our successors-in-title, of the Personal Information relating to you, being a user who accesses and/or uses our Website or our products and services, or a provider of products and services to us, clients, suppliers, former employees, prospective employees and other data subjects that engage with us. This Privacy Policy applies regardless of the device which you use to access our Website or to engage with us, which device is capable of using, or enabled to use, the Website including, but not limited to, internet-connected mobile devices and tablets ("Access Device").

2.2 This Privacy Policy does not apply to the processing of Personal Information by other third parties relating to or by means of other parties' websites, products or services, such as websites linked to, from or advertised on the Website or through our products and services, or sites which link to or advertise the Website or our products and services.

3. What is Personal Information?

3.1 "Personal Information" refers to private information about an identifiable living natural person or, where applicable, an identifiable existing juristic person. Personal Information does not include information that does not identify you (including in instances where that information has been de-identified so that it does not identify a person). The Personal Information that we collect about you may differ on the basis of your engagement with us or the products and services that you receive from L&J or that you provide to L&J.

3.2 We may process various types of Personal Information about you, as follows:

3.2.1 Identity Information, which includes information concerning your name, username or similar identifier, marital status, title, occupation, interests, date of birth, gender, race and legal status, as well as copies of your identity documents, photographs, identity number, registration number and your qualifications;

3.2.2 Contact Information, which includes your billing addresses, delivery addresses, e-mail addresses and telephone numbers;

3.2.3 Financial Information, which includes bank account details; TAX status; Tax reference numbers; provident/pension information; and any other information required to fulfil daily requirements in our industry

3.2.4 Transaction Information, which includes details about payments made to or received from you, which may consist of financial activity;

3.2.5 Technical Information, which includes your internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access the Website or to use our products and services or engage with us;

3.2.6 Usage Information, which includes information as to your access to and use of the Website, products and services, such as what links you went to, what content you accessed, the amount of content viewed and the order of that content, as well as the

amount of time spent on the specific content and what products and services you access and use when engaging with L&J.

3.2.7 Location Information, which includes geographical information from your Access Device (which is usually based on the GPS or IP location); and

3.2.8 Marketing and Communications Information, which includes your preferences in respect of receiving marketing information from us and our third parties, and your communication preferences.

3.3 L&J may also process, collect, store and/or use aggregated data, which may include historical or statistical data ("Aggregated Data") for any purpose, including for know-how and research purposes. Aggregated Data may be derived from your Personal Information but is not always considered Personal Information, as this data does not directly or indirectly reveal your identity. However, if we combine or connect Aggregated Data with your Personal Information in a manner that has the result that it can directly or indirectly identify you, we will treat the combined data as Personal Information, which will be managed in accordance with this Privacy Policy.

4. Special Personal Information

4.1 We hereby notify you that, in certain circumstances, by engaging with L&J, we may collect certain Special Personal Information about you. "Special Personal Information" refers to details about your race or ethnic origin, trade union membership, health or biometric information or information about your criminal offences or convictions.

4.2 The processing of Special Personal Information requires higher levels of protection. We need to have further justifications for processing Special Personal Information. L&J has implemented appropriate policies and safeguards, which we are required by law to maintain, to process Special Personal Information.

5. When will we process your Special Personal Information?

5.1 We will generally not process Special Personal Information about you unless it is necessary for establishing, exercising or defending a right or obligation in law, or where we have obtained your consent to do so. The situations in which we may process your Special Personal Information include the following:

5.1.1 racial and ethnic information may be processed by L&J through CCTV cameras installed at L&J premises for safety and security reasons;

5.1.2 as part of the recruitment and hiring process, we may process information relating to your criminal behaviour;

5.1.3 when you access our premises, we may process information relating to your health as part of our screening processes in order to comply with any relevant regulations or protocols; and

5.1.4 we may process information which indicates your religious beliefs (for example, when you attend events organised by L&J, we may ask you for your dietary requirements, and this may indicate your religious beliefs).

6. How we collect your Personal Information

6.1 We collect your Personal Information in the following ways:

- 6.1.1 through direct or active interactions with you;
- 6.1.2 through automated or passive interactions with you;
- 6.1.3 from third parties and public sources; and
- 6.1.4 CCTV.

6.2 Direct or active collection from you

6.2.1 We may require that you submit certain information:

- 6.2.1.1 to enable you to access portions of the Website;
- 6.2.1.2 to subscribe to our publications;
- 6.2.1.3 to request sent to you;
- 6.2.1.4 to apply for job opportunities;
- 6.2.1.5 to make contact with our employees;
- 6.2.1.6 to grant you access to our premises;
- 6.2.1.7 to enable you to facilitate the conclusion of an agreement with us; and
- 6.2.1.8 that is necessary for our fulfilment of our statutory or regulatory obligations.

6.2.2 We also collect Personal Information directly from you when you communicate directly with us.

6.2.3 If you contact us, we reserve the right to retain a record of that correspondence in accordance with our Record Retention Policy and applicable data protection legislation, which may include Personal Information.

6.2.4 The Personal Information that we actively collect from you may include any of the Personal Information listed in clause 3.2 of this Privacy Policy and, in some instances, certain Special Personal Information listed in clause 5.1 of this Privacy Policy.

6.3 Passive collection from your Access Device when browsing our Website

6.3.1 We may passively collect certain of your Personal Information from the Access Device that you use to access and navigate the Website, by way of various technological applications, for instance, using server logs to collect and maintain log information.

6.3.2 We also use cookies and anonymous identifiers which enable our computer system to recognise you when you next visit the Website to distinguish you from other users and to improve our service to you, and which can be used to enhance the content of the Website and make it more user-friendly, as well as to give you a more personalised experience.

6.3.3 A cookie is a small piece of data (an alphanumeric identifier) which our computer system transfers to your Access Device through your web browser when you visit the Website and which is stored in your web browser. When you visit the Website again, the cookie allows the site to recognise your browser. Cookies may store user preferences and other information.

6.3.4 You may disable the use of cookies by configuring your browser to refuse all cookies or to indicate when a cookie is being sent. However, please note that some parts of the Website will not function properly if you refuse cookies and you may not be able to enjoy all of the features and functionality of the Website.

6.3.5 The Personal Information that we passively collect from your Access Device may include your Identity Information, your Contact Information, your Technical Information, your Profile Information, your Usage Information, your Location Information and your Marketing and Communications Information, or any other Personal Information which

you permit us, from time to time, to passively collect from your Access Device.

6.4 Collection from third parties and public sources

L&J receives Personal Information and Special Personal Information about you from various third parties including recruitment agencies, suppliers of background checks services and publicly available sources.

6.5 CCTV

L&J collects Personal Information and Special Personal Information about you through CCTV cameras installed at L&J premises for safety and security reasons.

7. Compulsory Personal Information and consequences of not sharing it with us

7.1 The following information is compulsory Personal Information:

7.1.1 your name and surname;

7.1.2 your contact details, such as your email address and/or your telephone number.

7.2 Depending on the nature of your engagement or relationship with us, other types of Personal Information may be necessary, including:

7.2.1 financial (including bank account details, tax information);

7.2.2 names and registration numbers as contained in documents issued by the Companies and Intellectual Property Commission and the South African Revenue Service; and

7.2.3 information which may be necessary to ensure our compliance with the Financial Intelligence Centre Act, 38 of 2001.

7.3 All other Personal Information is optional

8. Agree collection of Personal Information

You agree and accept that there is certain compulsory Personal Information you must provide us with if you want to engage with us fully, supply your products or services to us and/or enjoy all of the features and functionality on the Website. If you decide not to provide us with such compulsory Personal Information, you agree that we may limit our engagement with you, our procurement of your goods and services and certain features and functionality on the Website.

9. Sharing of your Personal Information

9.1 We will not intentionally disclose your Personal Information, whether for commercial gain or otherwise, other than with your permission, as permitted by applicable law or in the manner as set out in this Privacy Policy.

9.2 You agree and give permission for us to share your Personal Information under the following circumstances:

9.2.1 with our industry bargaining council, payroll related parties such to fulfil payroll obligations and suppliers that have agreed to be bound by applicable data protection legislation and this Privacy Policy or similar terms, which offer the same level of protection as this Privacy Policy;

9.2.2 with service providers approved by the company,

We will authorise any Personal Information processing done by a third party on our behalf, amongst other things by entering into written agreements with those third parties which will

govern our relationship with them. These agreements will include provisions such as confidentiality, non-disclosure and data protection. If they fail to meet their obligations

in terms of the agreements, these third parties may be disciplined, their contracts terminated, or other appropriate action taken;

9.2.3 to enable us to enforce or apply our Terms and/or any Agreement you have with us;

9.2.4 to enable us to monitor web traffic: web servers serving the website automatically collect information about pages you visit. This information is used for internal review, to tailor information to individual visitors and for traffic audits;

9.2.6 for statistics purposes: we may perform statistical analyses in order to measure interest in the various areas of the Website (for product development purposes);

9.2.7 to protect our rights, property or safety or that of our clients, employees, contractors, suppliers, agents and any other third party;

9.2.8 with governmental agencies and other regulatory or self-regulatory bodies, if required to do so by law or when we reasonably believe that such action is necessary to:

9.2.8.1 comply with the law or with any legal process;

9.2.8.2 protect and defend the rights, property or safety of L&J, or our clients, employees, contractors, suppliers, agents or any third party;

9.2.8.3 detect, prevent or manage actual or alleged fraud, security breaches, technical issues, or the abuse, misuse or unauthorised use of the Website and/or contraventions of this Privacy Policy; and/or

9.2.8.4 protect the rights, property or safety of members of the public (if you provide false or deceptive information or misrepresent yourself, we may proactively disclose such information to the appropriate regulatory bodies and/or commercial entities).

9.3 We will get your permission before disclosing your Personal Information to any third party for any other purpose, if we are required by law to do so.

10. Storage and transfer of your Personal Information

10.1 We store your Personal Information on:

10.1.1 our premises, in the form of hard copies;

10.1.2 the premises of third party service providers such as document storage service providers;

10.1.3 our servers; or

10.1.4 on the servers of our third party service providers, such as IT systems or hosting service providers.

10.2 In the event of the scenarios contemplated in clauses 10.1.2 and 10.1.4, we will ensure that we have entered into written agreements with those third party service