



PRIVACY NOTICE for Transnet Spotlight

Last updated December 2023

Thank you for choosing to be part of our community at Transnet (“Company”, “we”, “us”, or “our”). We are committed to protecting your personal information right to privacy. If you have any questions or concerns about this privacy notice or our practices with regard to your personal information, please contact us at spotlight@transnet.net

This privacy notice describes how we might use your information if you:

- Download and use our mobile application – Transnet Spotlight
- Engage with us in other related ways – including any sales, marketing, or events.
- In this privacy notice, if we refer to:
 - “App,” we are referring to any application of ours that references or links to this policy, including any listed above.
 - “Services,” we are referring to our App, and other related services, including any sales, marketing, or events.

The purpose of this privacy notice is to explain to you in the clearest way possible what information we collect, how we use it, and what rights you have in relation to it. If there are any terms in this privacy notice that you do not agree with, please discontinue use of our services immediately.

Please read this privacy notice carefully, as it will help you understand what we do with the information we collect.

1. WHAT INFORMATION DO WE COLLECT?

Personal information you disclose to us.

In short: We collect personal information that you provide to us.

We collect personal information that you voluntarily provide to us when you register on the App, express an interest in obtaining information about us or our products and services, when you participate in activities on the App or otherwise when you contact us.

The personal information that we collect depends on the context of your interactions with us and the App, the choices you make and the products and features you use. The personal information we collect include the following:

Personal Information Provided by You. We collect email addresses; usernames; passwords; and other similar information.



Payment Data. We may collect data necessary to process your payment if you make purchases, such as your payment instrument number (such as a credit card number), and the security code associated with your payment instrument. All payment data is stored by Google Pay.

Social Media Login Data. We may provide you with the option to register with us using your existing social media account details, like your Google, Apple, or other social media accounts. If you choose in this way, we collect the information described in the section called “HOW DO WE HANDLE YOUR SOCIAL LOGINS?” below.

All personal information that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such personal information.

Information collected through our App.

In short: We collect information regarding your mobile device when you use our App.

If you use our App, we also collect the following information:

- **Mobile Device Access.** We may request access or permission to certain features from your mobile device, including your mobile device’s camera, microphone, storage, scanner, and other features. If you wish to change our access or permissions, you may do so in your device settings.
- **Mobile Location Access.** We may request access or permission to the mobile device “location” function, the usage is in the background by using when the app is in use.

This App collects location data to enable “determining your current location”, “providing location addresses for your weather reports”, only when the app is in use. If the app is switched by you to run in the background, you will be automatically logged out after 30 seconds, ending the use of your device’s location features. The feature may be extended to **support advertising.**

This information is primarily needed to maintain the security and operation of our App, for troubleshooting and for our internal analytics and reporting purposes.

HOW DO WE USE YOUR INFORMATION?

In short: We process your information for purposes based on legitimate business interests, the fulfillment of our contract with you, compliance with our legal obligations, and/or your consent.

We use personal information collected via our App for a variety of business purposes described below. We process your personal information for these purposes in reliance on our legitimate business interests, in order to enter or perform a contract with you, with your consent, and/or for compliance with our legal obligations. We indicate the specific processing grounds we rely on next to each purpose listed below.

We use the information we collect or receive:



- **To facilitate account creation and logon process.** If you chose to link your account with us to a third-party account (such as you Google or Apple account), we use the information you allowed us to collect from those third parties to facilitate account creation and logon process for the performance of the contract. See the section below headed “HOW DO WE HANDLE YOUR SOCIAL LOGINS?” for further information.
- **To post testimonials.** We post testimonials on our App that may contain personal information. Prior to posting a testimonial, we will obtain your consent to use your name and the content of the testimonial. If you wish to update, or delete your testimonial, please contact us at spotlight@transnet.net and be sure to include your name, testimonial location, and contact information.
- **Request feedback.** We may use your information to request feedback and to contact you about your use of our App.
- **To enable user-to-user communications.** We may use your information in order to enable user-to-user communications with each user’s consent.
- **To manage user accounts.** We may use your information for the purposes of managing our account and keeping it in working order.
- **To send administrative information to you.** We may use your personal information to send you product, service, and new feature information and/or information about changes to our terms, conditions, and policies.
- **To protect our Services.** We may use your information as part of our efforts to keep our App safe and secure (for example, for fraud monitoring and prevention).
- **To enforce our terms, conditions, and policies for business purposes, to comply with legal and regulatory requirements or in connection with our contract.**
- **To respond to legal requests and prevent harm.** If we receive a subpoena or other legal requests, we may need to inspect the data we hold to determine how to respond.
- **Fulfil and manage your orders.** We may use your information to fulfil and manage your orders, payments, returns, and exchanges made through the App.
- **Administer prize draws and competitions.** We may use your information to administer prize draws and competitions when you elect to participate in our competitions.
- **To deliver and facilitate delivery of services to the user.** We may use your information to provide you with the requested service.
- **To respond to user inquiries/offer support to users.** We may use your information to respond to your inquiries and solve any potential issues you might have with the use of our Services.

WILL YOUR INFORMATION BE SHARED WITH ANYONE?

In short: We only share information with your consent, to comply with laws, to provide you with services, to protect your rights, or to fulfil business obligations.



We may process or share your data that we hold on to the following legal basis:

- **Consent:** We may process your data if you had given us specific purpose.
- **Legitimate interests:** We may process your data when it is reasonably necessary to achieve our legitimate business interests.
- **Performance of contract:** Where we have entered a contract with you, we may process your personal information to fulfil the terms of our contract.
- **Legal Obligations:** We may disclose your information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or subpoena (including in response to public authorities to meet national security or law enforcement requirements).
- **Vital Interests:** We may disclose your information where we believe it is necessary to investigate, prevent, or act regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.

More specifically, we may need to process your data or share your personal information in the following situations:

- **Business Transfers:** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our company to another company.

HOW DO WE HANDLE YOUR SOCIAL LOGINS?

In short: If you choose to register or log in to our services using a social media account, we may have access to certain information about you.

Our App offers you the ability to register and login using your third-party social media account details (like your Google or Apple logins). Where you choose to do this, we will receive certain profile information about you from your social media provider. The profile information we receive may vary depending on the social media provider concerned, but will often include your name, email address, friends list, profile picture as well as other information you choose to make public on such media platform.

We will use the information we receive only for the purposes that are described in this privacy notice or that are otherwise made clear to you on the relevant App. Please note that we do not control, and are not responsible for, other uses of your personal information by your third-party social media platform. We recommend that you review their privacy notice to understand how they collect, use, and share your personal information, and how you set your privacy preferences on their sites and apps.

WHAT IS OUR STANCE ON THIRD-PARTY WEBSITES?

In short: We are not responsible for the safety of any information that you share with third-party providers who advertise, but are affiliated and displayed on our App.



The App may contain advertisements from third parties that are not affiliated with us, and which may link to other websites, online services or mobile applications. We cannot guarantee the safety and privacy of data you provide to any third parties. Any data collected by third parties is not covered by this privacy notice. We are not responsible for the content or privacy and security practices and policies of any third parties, including other websites, services or applications that may be linked to or from our App. You should review the policies of such third parties and contact them directly to respond to your questions.

HOW LONG DO WE KEEP YOUR INFORMATION?

In short: We keep your information for as long as necessary to fulfil the purposes outlined in this privacy notice unless otherwise required by law.

We will only keep your personal information if it is necessary for the purposes set out in this privacy notice, unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements). No purpose in this notice will require us keeping your personal information for longer than the period of time in which users have an account with us.

When we have no ongoing legitimate business needs to process your personal information, we will either delete or anonymise such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

HOW DO WE KEEP YOUR INFORMATION SAFE?

In short: We aim to protect your personal information through a system of organizational and technical security measures.

We have implemented appropriate technical and organizational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cyber criminals, or other unauthorized third parties will not be able to defeat our security, and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our App is at your own risk. You should only access the App within a secure environment.

DO WE COLLECT INFORMATION FROM MINORS?

In short: We do not knowingly collect data from or market to children under 18 years of age.

We do not knowingly solicit data or market to children under 18 years of age. By using the App, you represent you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the App. If we learn that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data, we may have collected from children under the age of 18, please contact us at spotlight@transnet.net

WHAT ARE YOUR PRIVACY RIGHTS?

In short: In some regions, such as the European Economic Area (EEA) and United Kingdom (UK), you have rights that allow you to and control over your personal information. You may review, change, or terminate your account at any time.

In some regions (like the EEA and UK), you have certain rights under applicable data protection laws. These may include the right (1) to request access and obtain a copy of your personal information, (2) to request rectification or erasure (3) to restrict the processing of your personal information, (4) if applicable, to data portability. In certain circumstances, you may also have the right to object to the processing of your personal information. To make such requests, please use the contact details provided below. We will consider and act upon any request in accordance with applicable data protection laws.

If we are relying on your consent to process your personal information, you have the right to withdraw your consent at any time. Please note however that this will not affect the lawfulness of the processing before its withdrawal, nor will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

If you are a resident in the EEA and UK and you believe we are unlawfully processing your personal information, you have the right to complain to your local supervisory authority.

If you are a resident in Switzerland, the contact details for the data protection authorities can be searched online.

If you have questions or comments about your privacy rights, you may email us at spotlight@transnet.net

Account Information

If you would at any time like to review or change the information in your account or terminate your account, you can:

- Contact us using the contact information provided.

Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, we may retain some information in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our Terms of Use and/or comply with applicable legal requirements.

Opting out of email marketing: You can unsubscribe by mailing us at spotlight@transnet.net

CONTROLS FOR DO_NOT_TRACK (DNT) FEATURES

We do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online.



DO CALIFORNIA RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?

In short: Yes if you are granted specific rights regarding access to your personal information.

Refer to California Civil Code Section 1798.83, also known as the “Shine the Light” law for further information.

DO WE MAKE UPDATES TO THIS NOTICE?

In short: Yes, we will update this notice to stay compliant with relevant laws.

The updated version will be indicated by an updated “Revised” date and the updated version will be effective as soon as it is accessible.

HOW CAN YOU CONTACT US ABOUT THIS NOTICE?

If you have questions or comments about this notice, you may email us at spotlight@transnet.net

Post to:

Transnet Port Terminals

202 Stalwart Simelane Street, Durban, Kwazulu, South Africa, 4001