

## TRATIX PRIVACY NOTICE

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## **PRIVACY POLICY**

### **1. DEFINITIONS**

<b>“Tratix”</b>	means Tratix Intelligence Ltd, a company incorporated under the laws of Israel, with its principal place of business at Tel Aviv.
<b>“Data Subject”</b>	means the person to whom Personal Information relates.
<b>“Information Officer”</b>	means the chief executive officer, or equivalent officer, of Tratix, or the person who is acting as such whose information is set out below.
<b>“PAIA Manual”</b>	means the manual which sets out the process for accessing information as envisaged by sections 14 and 51 of the Promotion of Access to Information Act 2 of 2002 (PAIA) and which is available on Tratix's website.
<b>“Personal Information”</b>	means any information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person. It is information or pieces of information that could identify that natural or juristic person, either directly (e.g. by name) or indirectly (e.g. through pseudonymised data) and includes things like email/home addresses, usernames, profile pictures, user generated content, financial information, and geolocation.

### **2. INTRODUCTION AND PURPOSE OF THIS NOTICE**

- 2.1. Tratix recognises its Data Subjects' rights to privacy and is committed to protecting and controlling the use of the Personal Information that it collects, in accordance with the regulatory requirements of the jurisdictions in which it operates.
- 2.2. In accordance with the data privacy laws, and because our clients' privacy is important to us, please take note of this Privacy Notice, as it describes how we process Personal Information, including the receipt, collection, use, disclosure, sharing, retention and importantly the protection of Personal Information in

accordance with the provisions of POPIA.

### **3. WHO WE ARE**

Tratix is a technology company specialising in proactive cargo security. Our AI-powered platform analyses video and telematics data in real time to detect and prevent vehicle tailing and cargo theft before incidents occur.

The Company's advanced monitoring and prevention system provides customers with: Ongoing monitoring of fleet surroundings, Threat detection and identification of suspicious activity before it escalates, Live alerts to notify authorized personnel in real time, Automated prevention protocols that help drivers and control rooms respond quickly, Enhanced route visibility, GPS jammer detection, and even bogus police detection.

### **4. APPLICATION OF THE PRIVACY NOTICE**

This Privacy Notice applies to Tratix, as defined, including all employees, as well as third parties who provide services to Tratix and covers Personal Information collected and managed by Tratix. It also applies to a Data Subject when the Data Subject visits Tratix's websites, uses its electronic applications, or makes use of Tratix's services as a customer.

### **5. PRINCIPLES FOR THE COLLECTION AND PROCESSING OF PERSONAL INFORMATION**

#### **5.1. Collection, processing and purpose**

- 5.1.1. Tratix will only collect Personal Information when it is necessary to comply with legal obligations that apply, or when such processing is necessary for the performance of a contract or pre-contractual procedures.
- 5.1.2. Tratix may also process information if it has a legitimate interest, provided that in each case our interest is in accordance with applicable law and the rights of the Data Subject.
- 5.1.3. When none of the other lawful processing conditions support the data processing operation, Tratix will only process Personal Information if it has obtained the consent of the Data Subject to process said Personal

Information for specific, explicit and legitimate purposes.

5.1.4. Tratix will only use Personal Information for the fulfilment of the specific purposes for which it was obtained, or for other lawful processing.

#### **5.2. Accuracy**

Tratix will take all reasonable steps to ensure that Personal Information that it processes is accurate, complete and up to date.

#### **5.3. Openness**

5.3.1. Tratix is committed to openness regarding its policies and practices of handling of Personal Information.

5.3.2. Also refer to our Disclaimer on our website for the terms of using Tratix's website.

#### **5.4. Security**

Tratix will ensure that appropriate security safeguards are in place to protect Personal Information from loss, unauthorised access, destruction, use, modification or disclosure.

#### **5.5. Transfers and sharing**

5.5.1. Tratix may transfer Personal Information outside South Africa or the European Union to be processed by some of its service providers, companies associated with and/or belonging to the Tratix Group. In this case, Tratix ensures that this transfer takes place in accordance with the legislation in force and that an adequate level of protection of Personal Information is guaranteed based on standard data protection clauses adopted.

5.5.2. Tratix will only disclose Personal Information for the fulfilment of the specific purposes for which it was obtained, or for other lawful processing.

5.5.3. Under no circumstances does Tratix transfer or share Personal Information,

outside the conditions described above, or sell Personal Information to third parties.

#### **5.6. Retention**

Tratix will retain Personal Information for as long as is necessary for the purposes for which it was collected. In some cases, data retention may occur for longer periods, especially when applicable law so requires.

#### **5.7. Access**

The Data Subject may request a copy of their Personal Information from Tratix and, where required, instruct Tratix to effect changes to correct the data or to permanently delete their Personal Information, in accordance with local regulations.

### **6. INFORMATION ABOUT OTHERS**

If the Data Subject provides Tratix with Personal Information about someone else, the Data Subject is responsible for ensuring that it complies with any obligation and consent obligations under applicable data protection laws in relation to such disclosure. In so far as required by applicable data protection laws, the Data Subject must ensure that it has provided the required notices and has obtained the other person's consent to provide Tratix with his/her/its Personal Information and that the Data Subject explains to them how Tratix collects, uses, discloses and retains their Personal Information or direct them to read this Privacy Notice.

### **7. FURTHER PROCESSING AND MARKETING**

Tratix and/or its carefully selected third-party service providers will from time to time further process a Data Subject's Personal Information for the purpose of informing and providing the Data Subject with Tratix and third-party services, products and other beneficial optional products. Tratix may also share a Data Subject's information with Tratix's affiliates and subsidiary companies so that they may contact the Data Subject with information about their products or services which may be of benefit or interest to the Data Subject. Should the Data Subject not want to receive communications pertaining to these services or products provided by Tratix or by other third-party service providers, the Data Subject may opt out of this communication by emailing a completed

Form 1 under the Annexures to [info@trtix.com](mailto:info@trtix.com)

**8. CONSENT**

By providing Tratix with its Personal Information, the Data Subject consents to Tratix processing and further processing its Personal Information as and where required, provided that Tratix will always ensure that such processing is done in a lawful and legitimate manner and in line with this Privacy Notice and applicable legislation.

**9. RIGHTS OF THE DATA SUBJECT**

Whilst the provision of Personal Information is voluntary, withdrawing consent or choosing to delete some types of Personal Information may prevent Tratix from supplying certain services to a Data Subject, or responding to queries as a prospective employee or supplier. In order to better protect and safeguard Personal Information, Tratix takes steps to verify the identity of a Data Subject before granting access or making changes to Personal Information.

**10. INFORMATION OFFICER**

10.1. Data Subjects with queries regarding data protection policies or procedures may contact the information officers, Dana Shafiki, at [info@trtix.com](mailto:info@trtix.com).

10.2. Details of Tratix's Information Officer are also available in the Tratix's PAIA Manual.

**11. COMPLAINTS**

Data Subjects have the right to submit a complaint to the local supervisory authority if unsatisfied with Tratix's handling of the Data Subject's Personal Information, or about any complaint made to Tratix.

**Information Regulator in South Africa:**

JD House  
27 Stiemens Street  
Braamfontein

Johannesburg, 2001

P.O Box 31533  
Braamfontein  
Johannesburg, 2017  
Complaints email: [complaints.IR@justice.za](mailto:complaints.IR@justice.za)  
<https://www.justice.gov.za/inforeg/index.html>

**12. CHANGES TO THIS PRIVACY NOTICE**

Tratix may change this Privacy Notice from time to time without notice to the Data Subject, unless the amendment is material. The most updated version is always available on Tratix's website, and data subjects are encouraged to visit Tratix's website frequently in order to keep abreast with any changes.