GROUP PRIVACY POLICY

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GROUP PRIVACY POLICY			
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Effective Date	September 2026	**Email**	sgpopia@supergrp.com
Version	V3/2026	**Telephone**	(011) 523 4440

APPROVALS:							
Signatory	Peter Mountford	**Capacity**	Group CEO	**Date**		**Signature**	
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Signatory	Colin Brown	**Capacity**	Group CFO	**Date**		**Signature**	
Signatory	Graeme Barnard	**Capacity**	Group HR	**Date**		**Signature**	
Signatory	John Mackay	**Capacity**	Group Company Secretary	**Date**		**Signature**	

INTRODUCTION

Super Group respects the privacy rights of all data subjects and is committed to processing information in a lawful, reasonable, and responsible manner in accordance with the Protection of Personal Information Act No. 4 of 2013 ("**POPIA**").

This Privacy Policy serves as Super Group's external privacy notice and explains how personal information relating to customers, prospective customers, suppliers, service providers, dealers, operators, business partners, website users, and other stakeholders is collected, used, disclosed, retained and protected.

For purposes of this Policy, "the **Group**", "**We**", "**Us**", and "**Our**" refers to Super Group and its subsidiaries, divisions and business units operating in the supply chain, fleet management and dealership environments.

By accessing our websites, submitting information to us, purchasing products or services from us, or engaging with us, you acknowledge that personal information may be processed in accordance with this Privacy Policy.

PRIVACY POLICY

1. DEFINITIONS

In this Policy the following words bear the meanings ascribed to them hereunder and as defined in POPIA:

"**CPA**" means the Consumer Protection Act 68 of 2008;

"**Data Subject**" means the person to whom personal information relates;

"**ECTA**" means the Electronic Communications and Transactions Act 25 of 2002;

"**FAIS**" means the Financial Advisory and Intermediary Services Act 37 of 2002;

"**Group Document Retention Policy"** means the formal set of guidelines that determines which records are kept by Super Group, the period of time for which they must be kept in terms of applicable legislation, and other arrangements in this regard;

"**Information Regulator**" means the independent regulatory authority responsible for overseeing and enforcing compliance with POPIA and PAIA in South Africa;

"**NCA**" means the National Credit Act 34 of 2005;

"**Operator"** means a person who processes Personal Information for a Responsible Party in terms of a contract or mandate, without coming under the direct authority of that party;

"**PAIA**" means the Promotion of Access to Information Act 2 of 2000;

"**Personal Information**" (alternatively, "**Information**") means information relating to an identifiable, living natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to –

(a) Information relating to the race, gender, sex, pregnancy, marital status, national ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;
(b) Information relating to the education or the medical, financial, criminal, or employment history of the person;
(c) Any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier, or other particular assignment to the person;
(d) The biometric information of the person;
(e) Correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
(f) The views or opinions of another individual about the person; and
(g) The name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person.

"**POPIA**" means the Protection of Personal Information Act 4 of 2013;

"**Responsible Party**" means a public or private body or any other person which, alone or in conjunction with others, determines the purpose of and means for processing personal information. In this Policy, Super Group and its subsidiaries and affiliates;

"**Social Media**" means the digital platforms and technologies that enable people to interact with content and each other online;

"**You(r)**" means the person using or gaining access to this website.

2. OVERVIEW

Super Group operates across various sectors, including supply chain management, logistics and transportation services, motor vehicle and equipment dealerships, and related support and administrative services.

Depending on the nature of your interaction with us, the relevant Super Group company may act as the Responsible Party in relation to your personal information. In such instances, Super Group assumes all the duties and responsibilities of a Responsible Party in terms of POPIA where we determine both the purpose and means for processing personal information. This applies from the time that the Personal Information is obtained the first time until it is destroyed.

Where we do not determine the means or purpose for processing, we assume the role of an Operator. In such instances we may have reduced responsibility as agreed to with the relevant business partner.

3. INFORMATION SUPER GROUP COLLECTS

The categories of personal information we may collect includes (but is not necessarily limited thereto):

3.1 **Identification Information**

- Name and surname;
- Identity or passport number;
- Date of birth;
- Nationality.

3.2 **Contact Information**

- Address;
- Postal address;
- E-mail address;
- Telephone and mobile numbers.

3.3 **Employment Information**

Where relevant to recruitment, contractor management, or business engagements:

- Curriculum vitae;
- Qualifications;
- Employment history;
- Professional registrations or membership.

3.4 **Customer Information**

- Customer account details;
- Products and services purchased;
- Transaction history;
- Vehicle ownership information;
- Warranty and service records.

3.5 **Logistics and Supply Chain Information**

- Delivery details;
- Collection addresses;
- Consignee and consignor information;
- Driver details;
- Vehicle tracking information where applicable;
- Operational and shipment-related information.

3.6 **Website and Technology Information**

- Internet protocol address;
- Browser type;
- Device information;
- Cookies and similar technologies;
- Website usage information and analytics.

3.7 **Correspondence**

- Enquiries;
- Complaints;
- Requests submitted through our websites or customer service channels.

4. MANNER OF COLLECTION OF PERSONAL INFORMATION

Personal Information is collected directly from the Data Subject as far as possible, but may also be collected from the following sources:

- Through our websites and online platforms;
- During the creation of customer accounts;
- During sales, service, or support engagements;
- Through correspondence and communications;

- From publicly available sources;
- From third-party service providers;
- From business partners and operators acting on Super Group's behalf;
- Through cookies and website analytics tools;
- Government organisations and public bodies;
- The internet and media, including online and social media platforms;
- Credit or information bureaus (where applicable);
- Public resources;
- Other third parties where legally permitted.

5. PURPOSES FOR PROCESSING PERSONAL INFORMATION

Super Group processes personal information for legitimate business purposes to conduct day-to-day operations, including:

5.1 Customer and Client Management

- Providing products and services;
- Managing customer relationships;
- Processing transactions;
- Delivering products.

5.2 Dealership Operations

- Vehicle sales;
- Financing and insurance facilitation;
- Vehicle servicing and maintenance;
- Warranty administration;
- Customer support activities.

5.3 Logistics Operations

- Delivery and collection services;
- Shipment management;
- Fleet management;
- Route planning;
- Operational communications.

5.4 Supply Chain Operations

- Supplier onboarding;
- Procurement processes;
- Contract management;
- Inventory and supply management;
- Operational planning.

5.5 Legal and Regulatory Compliance

- Compliance with applicable legislation including POPIA, PAIA, CPA, FAIS, NCA, ECTA, and tax, labour and other regulatory obligations.

5.6 **Recruitment and Human Resources**

- Processing employment applications;
- Employee administration;
- Personnel management.

5.7 **Marketing and Communications**

Where permitted by law:

- Marketing products and services;
- Customer satisfaction surveys;
- Promotional campaigns;
- Event invitations.

5.8 **Security and Risk Management**

- Fraud and other crime prevention;
- Information security monitoring;
- Incident investigation;
- Business continuity activities.

5.9 **General**

- Rendering our services to you;
- To perform or conclude an agreement to which Super Group is a party;
- For any legitimate purposes related to the relationship with us and our employees;
- Processing credit applications;
- For internal business purposes, which including administrative and operational tasks;
- Monitoring our business performance, carrying out market and statistical research, and for business development;
- Any other purpose if the law allows or requires it.

6. LEGAL BASIS FOR PROCESSING

Super Group processes personal information where:

- Valid consent has been obtained;
- Processing is necessary to conclude or perform in terms of a contract;
- Processing is required by law;
- Processing protects a legitimate interest of the data subject;
- Processing is necessary for pursuing a legitimate interest of Super Group or a third party; or
- If processing is otherwise permitted under POPIA.

6.1 **Consent**

Where you have provided consent for Super Group to process your Personal Information, you may withdraw it at any time by advising us thereof in writing. Take note however that Personal Information may continue to be processed if legal justification exists for it, or where permitted or required by law.

In instances where consent is mandatory to process your Personal Information, refusal to grant it may result in Super Group not being able to maintain the relationship with you as a Data Subject, unless other legal grounds to lawfully process your Personal Information without consent exists and provided that it is necessary.

7. INFORMATION SHARING AND DISCLOSURE

Super Group may share Personal Information with:

- Other Group entities;
- Service providers and Operators;
- Professional advisors;
- Auditors;
- Regulatory authorities;
- Financial institutions;
- Insurers;
- Vehicle manufacturers and distributors;
- Logistics and transportation partners;
- Technology service providers;
- Law enforcement agencies where legally required.

Super Group will not use or disclose Personal Information to any third party for any purpose other than the purpose for which it was collected without obtaining the necessary consent to do so, or to the extent that legislation permits or requires.

Super Group requires Operators and service providers processing personal information on our behalf to implement appropriate safeguards to protect such information.

Super Group may also transfer information to third parties if it sells any portion of its business or assets.

8. CROSS-BORDER TRANSFER OF INFORMATION

Super Group may use cloud storage services, which may result in your information being transferred cross-border. We will only transfer Personal Information to third parties in countries with adequate data protection laws or do so in terms of a written agreement with the recipient which imposes data protection requirements on that party as required by POPIA.

9. INFORMATION SECURITY MEASURES

Super Group implements reasonable technical and organisational measures designed to ensure the security, integrity and confidentiality of Personal Information held by us. These measures are intended to protect Personal Information and prevent accidental or unlawful destruction, loss, alteration, disclosure, access, misuse, and other unlawful or unauthorised forms of processing.

Although every reasonable effort is made to protect Personal Information, no method of transmission or storage can be guaranteed to be completely secure.

Super Group cannot be held liable for any losses or damages that may occur as a result of security breaches unless directly attributed to the gross negligence or misconduct on the part of Super Group or any of its employees, contractors or service providers.

9.1 **Security Compromises and Breaches**

Super Group will notify affected Data Subjects and the applicable regulatory authorities of a security compromise or breach involving Personal Information in accordance with our policies and procedures.

If you want to report any concerns about our privacy practices or if you suspect any breach regarding your Personal Information, kindly notify us without delay by contacting us at the details provided below.

The internet is an open and often vulnerable system and the transfer of information via the internet is not completely secure. Although we implement all reasonable measures to protect Personal Information, we cannot guarantee the security of your Personal Information transferred to us when using the internet. Therefore, you acknowledge and agree that any transfer of Personal Information via the internet is at your own risk, and you are responsible for ensuring that any Personal Information that you send is sent securely.

10. RETENTION

Super Group takes reasonable steps to process Personal Information only for the minimum period necessary guided by the purpose for which it is collected.

We retain information in accordance with the retention periods required by law, for the duration of contractual obligations, to establish-, exercise-, or defend legal rights, and as determined by our Group Document Retention Policy.

Information that is no longer required for the purposes for which it was collected will be securely destroyed, deleted, anonymised, or de-identified where appropriate.

11. DATA SUBJECT RIGHTS

Subject to applicable law, you may have the right to:

- Request confirmation of whether we hold Personal Information about you;
- Request access to your Personal Information;
- Request correction or updating of your Personal Information;
- Object to processing;
- Withdraw your consent (where applicable);
- Request deletion of your information where legally permissible;
- Lodge a complaint with the Information Regulator;
- Submit a request for access to records under PAIA.

11.1 **Objection to Processing**

You may, on reasonable grounds, object to Super Group using your Personal Information. If you object, we will stop using your Personal Information and delete it, except if applicable laws allow its use or retention or where we have a lawful basis to continue doing so. Where the deletion of Personal Information is not possible, the Personal Information will be masked and/or de-personalised.

To exercise this right or to discuss it with us, please contact the Information Officer at the details provided below and complete Form 1 https://inforegulator.org.za/wp-content/uploads/2020/07/FORM-1-OBJECTION-TO-THE-PROCESSING-OF-PERSONAL-INFORMATION.pdf.

11.2 **Quality of Personal Information**

We want to ensure that your Personal Information is accurate and kept up to date. You may ask us to correct or remove any Personal Information that you think is inaccurate, by completing Form 2 at https://inforegulator.org.za/wp-content/uploads/2020/07/FORM-2-REQUEST-FOR-CORRECTION-OR-DELETION-OF-

PERSONAL-INFORMATION-OR.pdf and by contacting us at the details provided below. It is your responsibility to inform us if any of your Personal Information changes.

11.3 **Access to Personal Information**

You have the right to enquire whether Super Group holds Personal Information about you. To exercise this right, you may e-mail us at the contact details below.

This request may be subject to you verifying your identity and stating the rights that you wish to exercise, amongst other verification questions.

If you wish to lodge a formal request to obtain copies or transcripts of information, you may be required to pay administration fees and submit Form 2 as determined by PAIA. We will assess whether the formal request can be granted and inform you of the outcome within 30 (thirty) days of receipt of the request.

12. THIRD PARTY INFORMATION AND WEBSITES

Super Group is not responsible for- and gives no warranties, undertakings and makes no representations in respect of the privacy policies or practices of any websites linked to Super Group's website.

Your use of and reliance on these links is at your own risk.

13. CHILDREN'S PERSONAL INFORMATION

Super Group does not knowingly collect Personal Information from children unless such processing is permitted by applicable law or if appropriate consent has been obtained from a competent person.

14. SOCIAL MEDIA

If you communicate with us through a Social Media channel, we may use the same channel to communicate with you in return. This also applies to communications regarding a sales or service contract, for example sending documentation over WhatsApp. In such instances, the prevailing Privacy Policy or notice of the chosen social media channel may apply.

TAKE NOTE that social media channels may expose your information to security risks as we have very limited control thereover. By choosing to use these channels, you accept this risk.

15. MARKETING

This policy applies to all marketing and advertising initiatives and promotions undertaken by Super Group, whether online or otherwise.

Super Group takes steps to ensure that any marketing and advertising initiatives undertaken –

- Project Super Group's image, values and ethics satisfactorily;
- Are appropriate to the circumstances and the intended audience;
- Are non-discriminatory and respectful;
- Are mindful of an individual's right to privacy and their rights when receiving unsolicited communications;
- Are aligned with Super Group's strategic objectives;
- Are factually accurate and are compliant with all applicable legal and regulatory requirements and standards;
- Are in line with franchise/supplier agreements.

15.1 Opting Out of Marketing Activities

When marketing to customers and potential customers, Super Group offers an opt-out function to allow anyone who receives marketing material to opt out from future communications. Where consent is required, Super Group will only conduct marketing activities with the necessary consent.

When you opt-out of receiving marketing information, Super Group may still contact you when it is necessary for purposes of managing its relationship with you, for example, when it is part of performing in terms of our agreement, providing you with necessary information, or if required or allowed by law.

15.2 Use of Information for Marketing Purposes

Super Group will not sell any Data Subject's personal information to third parties for marketing or any other purpose.

Super Group may use your Personal Information to provide you with information regarding any of its other related products, services, or events from time-to-time. You may request that Super Group stops sending you such information at any time by using the functionality provided or by e-mailing us at the contact details provided below.

16. SUPPLIER PROCUREMENT

This policy applies in certain instances to the Personal Information processed during procurement and appointment of suppliers and/or outsourced service providers of products and/or services.

We endeavour to ensure that all suppliers of products and services are assessed and vetted to ensure that they comply with:

- All the required criteria to ensure that the products and services being provided offer value and are of the standard and quality expected by Super Group;
- All legislation relevant to the services and/or products that are to be supplied or provided;
- Manufacturer requirements so as not to invalidate any warranties or guarantees;
- All regulatory body requirements relevant to the service and/or products.

All suppliers to Super Group are required to enter into a service level agreement to regulate the way in which suppliers will use Personal Information accessed, used or acquired during the relationship. All suppliers are required to implement the security measures as prescribed by POPIA or as stipulated in the agreement.

17. CONTACT DETAILS

17.1 **Information Officer Details**

Information Officer:	Chané Williams
E-mail:	**sgpopia@supergrp.com**
Telephone:	+2711 523 4440

17.2 **Requests and Enquiries**

POPIA and PAIA requests, privacy enquiries, complaints and objections may be submitted to **sgpopia@supergrp.com**

17.3 **The Information Regulator**

Website:	**https://inforegulator.org.za/**
Address:	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191
Telephone:	010 023 5200
Toll Free Number:	0800 017 160
E-mail:	**enquiries@inforegulator.org.za**

If you want to raise any objection or have any queries about our privacy practices, you can contact our Information Officer on sgpopia@supergrp.com or at the telephone number provided.

If you believe that Super Group or any of its divisions, have infringed your rights or contravened the provisions of POPIA in any manner that has prejudiced you, you have the right to raise your complaint in the prescribed format with the Information Regulator.

Information on how to submit a complaint to the Information Regulator can be found on their website at this link: https://inforegulator.org.za/complaints/

POLICY UPDATES

Super Group reserves the right to update or amend this policy at any time. You are responsible for reviewing changes each time you access Super Group's website(s). Your continued use of the website constitutes your acceptance.

VERSION	CHANGES	DATE
1	Annual review.	November 2023
2	Updates to contact details, signatories, address of the Information Regulator, and links to the Information Regulator's portal. Updates following the publication of the April 2025 Regulations.	July 2025
3	Annual review. Updates to contact details.	September 2026