MICHELIN TYRE COMPANY SOUTH AFRICA (PTY) LTD. POPI MANUAL

MICHELIN TYRE COMPANY SOUTH AFRICA (PTY) LTD. is committed to the protection and security of Data and Personal Information ("PI") it gathers from any potential and confirmed clients, suppliers, vendors, contractors, students, employees or potential employees and persons (referred to as individuals / organizations here within), entering our online platforms. MICHELIN TYRE COMPANY SOUTH AFRICA (PTY) LTD. ("we", "us", "our", the "company") endeavors to have practices and structures embedded in our operations and technologies to ensure protection of any Personal Information provided to us, through any channel, be it online or directly to our staff or centralized points of entry - such as our sales and services departments, research, training and learnership programs, HR, and procurement departments.

This policy and notice are set out to inform the reader of what information is collected by MICHELIN TYRE COMPANY SOUTH AFRICA (PTY) LTD., as well as the purpose for which we collect PI, and to provide surety in the privacy commitments for storing and processing any Personal Information we gather.

1. What Personal Information We Collect and Why

We collect basic contact information from any parties enquiring on products and services, such as, full name / organization name, nature of enquiry and request and contact email / phone number.

For any vendors, contractors, clients, and 3rd Parties we collect additional information such as company registration numbers, VAT and Tax numbers, company / personal physical address, payment and financial details, identity / passport numbers and credit worthiness, as applicable.

Where inquiries or requests are made for employment or scholarships and learnership programs, further details are collected such as basic contact information, previous employment history, academic records, financial information (where applicable), and basic lifestyle and medical information, due to the risk of work levels in the environmental and engineering industry.

We can summarize our main purposes for collecting personal information as follows:

- To carry out our obligations arising from any contracts entered into between customers, clients, vendors, employees and students with us
- To carry out and manage business operations,
- To confirm and verify identity or to verify that the authorized individual / company is valid for contact, for security purposes,

- For the detection and prevention of fraud, crime, or other malpractice,
- For audit and record keeping purposes,
- In connection with legal proceedings,
- To capture opt-in and opt-out of marketing of our products,
- To send notifications about changes to our service
- For purposes of research and analytics,
- To assist with business development,
- To respond to queries or comments,
- To comply with legal and regulatory requirements or industry codes to which we subscribe, or which apply to us, or when it is otherwise allowed by law,
- For monitoring and auditing site usage,
- Administer benefits to any customers, clients, and employees,
- For vetting and verification, OHS administration, work management, business travel, corporate security, organizational charts, email archiving for disaster recovery, legal report obligations,
- And other legitimate business interests.

2. How We Protect Personal Information

In accordance with the Protection of Personal Information Act (POPI) 4 of 2013 (POPI Act), MICHELIN TYRE COMPANY SOUTH AFRICA (PTY) LTD. is committed to protecting all PI we process from loss, misuse and unauthorized access, disclosure, alteration, or destruction. We follow practices to ensure safeguards are in place for all information we collect, including electronic and physical Personal Information records. We install these structures through:

Fostering a culture of **accountability** within our organization to ensure all our privacy controls are implemented, appropriate staff training conducted, and due processes are followed by all employees, where holding non-compliant persons to account is enforced.

Always **specifying the purpose** for collecting Personal Information, and only collecting that which is necessary to fulfil that purpose. We adhere to a data retention and destruction record schedule to ensure we do not retain information for any longer than we need to.

We **limit the processing** of PI to only the reasons for which were specified at collection and will only allow **further processing** if it is compatible with the original purpose, or permission is collected before we process PI for other purposes, and record is kept of consent received.

We ensure **quality of PI** by providing the means of updating PI to individuals and organizations whenever required, and in order to keep the records up to date.

MICHELIN TYRE COMPANY SOUTH AFRICA (PTY) LTD. complies with the sections of Promotion of Access to Information Act 2 of 2000 (PAIA) that provides for **openness** and transparency in maintaining a Records Manual and allowing for access to information; as well as ensuring individuals and organizations are made aware of the channels used to collect their information and may follow any of the prescriptions of PAIA to update, have access to correct information and lodge a complaint regarding their PI.

Measures are in place to minimize the threat to privacy should something happen to the PI we possess, including Response Plans, providing updates on any breaches that may affect PI and how we can minimize impacts, to the individuals and organizations affected.

We have appropriate **Security safeguards** such as infrastructure and operations security measures (firewalls), identity and access management, security awareness and policies / procedures (vulnerability management, Business Continuity planning and data recovery) for data privacy, restrictions on information and use of pseudonymization or redaction of Personal Information in place in order to protect the PI we process.

Gathering **prior authorization** from the Regulator for cases falling in Section 57, Chapter 6 of the POPI Act, in order to process Special Personal Information, such as children and health information, for scholarship and learnership opportunities and medical checks for fitness of work, while ensuring that sufficient controls are in place to provide specialized care to such SPI.

3. How We Collect It and Where We Share It

3.1 Collecting

MICHELIN TYRE COMPANY SOUTH AFRICA (PTY) LTD., will primarily collect information directly from the individual / organization through an authorized representative, using specific channels or directed to an individual in our organization or additionally provided through online channels and portals, and external 3rd Parties where the consent has been collected to do so.

This can be done by filling in forms or by corresponding with us by post, phone, e-mail or on our website, contractually working with us and a 3rd Party on projects and sharing information amongst others.

We collect information from 3rd Parties regarding individuals and organization only with permission, for example the credit bureau, logging-in sign books when entering the premise, CCTV footage on the premises as well as any products and services of MICHELIN TYRE COMPANY SOUTH AFRICA (PTY) LTD. that are used.

Further information from our site usage is collected and analyzed, where the disclaimer on our site can be referred to for further details.

3.2 Sharing

Where appropriate, before disclosing Personal Information to a 3rd Party, we contractually require the 3rd Party to have adequate precautions and security controls in place to protect that PI and data with the same level of protection as prescribed by the law.

Information may also be shared to other countries, like our associated companies outside of South Africa, in which case we will fully comply with applicable Data Protection Legislation. This may happen if our servers or suppliers and service providers are based outside of South Africa, or if our services hosted in systems or servers or backups are stored outside of South Africa. We ensure equal Data Privacy across all our branches and subsidiaries, while we make sure that PI is protected, and enter into appropriate agreements to achieve this.

3.3 Marketing

Individuals / Organizations have the right to choose whether to receive marketing material or not. When accepting to use our products and services or joining the organization, marketing consent will be collected for related services, products, and offerings. If consent to opt-in / opt-out requires change, the individual / organization will always be able to contact us to have this amended.

We do comply with the direct marketing provisions of the Consumer Protection Act No 68 of 2008 ("CPA") and the regulations.

4 Rights of the Data Subjects

Where the individual / organization is concerned, certain rights are provided regarding Personal Information MICHELIN TYRE COMPANY SOUTH AFRICA (PTY) LTD. holds, and these rights can be exercised as required. These rights are:

4.1 Right to lodge a complaint

If an individual or organization has any concerns in our practices when using their PI, a complaint may be lodged with the following contact point of our company: michelinsa.privacy@michelin.com

Our Physical and Postal Address:
102 Western Service Road
Gallo Manor, Ext 6
Woodmead, 2191

PO Box 803
Isando,1600

4.2 Right to request for access

Individuals / organizations may request access to their information, upon following our PAIA Manual processes.

4.3 Right to object or request restrictions

Individuals / organizations have the right to object to their information being processed or withdraw permission to process their information by either MICHELIN TYRE COMPANY SOUTH AFRICA (PTY) LTD. or any 3rd Party involved in the operations for fulfilling services and contractual agreements with us; however, it must be noted that where certain transactional processing is objected to and they are mandatory to the fulling of services or operations of MICHELIN TYRE COMPANY SOUTH AFRICA (PTY) LTD., then we have the right to decline agreements with the individual / organization. Example, if we are in an agreement with a supplier and they object to providing their financial details, which we need to use to pay for our supplies, then we cannot fulfil the agreement and may reject the transaction.

4.4 Right to correct

Where an individual / organizations' information has changed, is inaccurate or incomplete, they have the right to have it amended by us.

4.5 Right to request the erasure

A request to erase an individual / organizations' Personal Information, where the personal information is no longer necessary for the purpose of which it was collected, will be allowed, provided it is in line with our data retention and destruction guidelines.

5 Our Sites

Our website can be accessed by any external or internal parties without providing any Personal Information and where an individual / organization provides Personal Information through the online platform it would only gather the necessary information to resolve any request or enquiry and identify the individual / organization - with information such as name, email address, phone number, or organization and details around the query.

Internal staff, contractors, and vendors may access the internal portals, tools and systems provided to maintain the contractual agreements held with them as well as maintain personal and corporate records for the purpose of executing work deliverables and providing benefits to them.

All information provided from our public and restricted platforms are secured by appropriate infrastructure, system and physical security controls, policies and best practices embedded in our departments and in line with the legal requirements of the POPI Act and other security standards, to ensure that all our information and that of others we collect is protected.

This policy and notice, is kept under regular review and will be available on our web page and at any building of MICHELIN TYRE COMPANY SOUTH AFRICA (PTY) LTD. office upon request. This notice was last updated on the 15th of July, 2022.