



## PRIVACY POLICY NOTICE

This Notice explains how we, as PRASA Group, may obtain, use and disclose your personal information in accordance with the requirements of the Protection of Personal Information Act ["POPI Act"].

### About PRASA

PRASA is the Passenger Rail Agency of South Africa, a public entity constituted under the Legal Succession to The South African Transport Services Act, with a dual mandate, the primary mandate being to provide commuter train services and long distance passenger bus and train service and the secondary mandate being to generate income from its asset base

PRASA has 2 subsidiaries, namely Intersite Assets Investment SOC Limited ["Intersite"] and Autopax SOC Limited ["Autopax"]

Intersite business is framed to achieve PRASA secondary mandate and includes property developments, commercialization. As a result, Intersite engages with and interacts in ordinary course of business with third parties. Autopax, provides long distance passenger bus services including cross border services.

### Terms

You, refers to you as the Data Subject and Data Subject refers to you, whose Personal Information we may process;

PRASA, we, our, us – refers to PRASA;

Process - includes use, handle, receive, store, keep, destroy, etc.;

Personal Information - includes information relating to you as Data Subject, including but not limited to (i) views or opinions of another individual about the Data Subject; and (ii) information relating to such Data Subject's –

- 1.1 race, sex, gender, sexual orientation, pregnancy, marital status, nationality, ethnic or social origin, colour, age, physical or mental health, well-being, disability, religion, conscience, belief, cultural affiliation, language and birth;
- 1.2 education, medical, financial, criminal or employment history;
- 1.3 names, identity number and/or any other personal identifier, including any number(s), which may uniquely identify a Data Subject, account or client number, password, pin code, numeric, alpha, or alpha-numeric design or configuration of any nature, symbol, email address, domain name or IP address, physical address, cellular phone number, telephone number or other particular assignment;
- 1.4 blood type, fingerprint or any other biometric information;
- 1.5 personal opinions, views or preferences;



- 1.6 correspondence that is implicitly or expressly of a personal, private or confidential nature (or further correspondence that would reveal the contents of the original correspondence); and
- 1.7 information relating to corporate structure, composition and business operations (in circumstances where the Data Subject is a juristic person).

In short, any information we know about you will be regarded as personal information.

### **Our Services**

The PRASA Group provides amongst others the following products and services:

- Daily commuting Metrorail services
- Long distance bus and train passenger services; includes:
  - On-board Concierge services
- Customer Services including
  - Ticket sales
  - Pre-booking of services
  - Complaints management
  - Customer Surveys
  - Customer liaison and contact centres
  - Electronic Communication with commuters via Text or whatsapp service for train services alerts
- Research
- Supply chain management i.e. tenders
- Security services including the protection of PRASA assets, commuters, passengers and customers
- Information, communication and Technology [ICT] services, including use of personal computers, ICT security

### **Collection of Information**

We collect information in connection with the products and services which we offer and provide. This includes information collected through:

- our customer liaison lines;
- our websites;
- social network
- branded pages on third-party platforms and applications accessed or used through such websites; or
- Third-Party platforms which are operated by or on behalf of PRASA.

We also obtain your personal information through engagement with service providers via supply chain management either directly through our tender system or through third parties such as Central Supplier Database operated by Government, CIDB, etc



This notice does not apply to the information practices of third-party companies (including, without limitation, their websites, platforms and/or applications) which we do not own or control; or individuals that PRASA does not manage or employ. These Third-Party sites may have their own privacy policies and terms and conditions and Data Subjects are encouraged to read them before using those Third-Party sites.

### **When will we Process your Personal Information?**

PRASA will always strive to collect Personal Information in a fair, lawful, and reasonable manner to ensure that it protects your privacy as Data Subject and will Process the Personal Information based on lawful grounds in a manner that does not adversely affect the Data Subject in question.

We will endeavour to obtain the consent from you as the Data Subject in order to Process the Personal Information of such Data Subjects. PRASA may also rely on other lawful grounds for its Processing of Personal Information including to carry out actions in relation to the conclusion or performance of a contract to which the Data Subject is a party; to comply with a public law duty or to carry out an obligation imposed on PRASA in terms of applicable law.

We will seek to obtain your or, if you are a child or a person who lacks the capacity in law, or the guardian or competent person consent before we process the Personal Information of such person. We will not require children to furnish us with their personal information other than for a reason which is necessary to provide them a service or product. If we determine that the Data Subject is a child, we will not use or maintain this information unless:

- we obtain the guardian consent;
- it is for the benefit of the child or person who lacks capacity in law, for e.g. to assist them to process a claim/benefit.

### **Disclosure of Information**

We may disclose your information to our service providers, including data storage and processing providers, may from time to time also have access to a Data Subject's Personal Information in connection with purposes for which the Personal Information was initially collected to be Processed. We will ensure that such third-party service providers will process the Personal Information for the purposes specified by us and such parties employ the appropriate security to protect the Personal Information.

We may disclose your information:

- as a result of our reporting obligations under the law, including to Parliament of the Republic of South Africa, to our external auditors, the Public Protector;
- where we are obliged by law [to the Government departments and entities such as Department of Trade and Industry/BEE Commission/ the CIDB, South African Revenue Services, Unemployment Insurance Fund, the industry Regulators, Industry Ombudsmen, etc.] or industry codes authorized by the various Regulator to do so;
- where we believe it is necessary to protect our rights
- on our website in connection with the supply chain management process



- to the financial service providers or advisors for e.g. for pension fund, etc.
- to the Employee health to our service providers;
- to the payment processing service providers such as banks to assist with payment instructions;
- to law enforcement and Government Agencies for the purposes of fraud prevention;
- for security screening and checks to verify your personal information;
- to obtain tax clearance certificates;
- to our brokers/insurers;
- to service providers providing information and communication services.

## **Security**

The information that we collect from you, as the Data Subject is stored in a secure environment and is not available to any person outside, except as we indicate in this Notice. We will employ at least the same level of security that we use to protect our own information.

Your personal information that we Process electronically, i.e. through our website, emails, etc may be stored in data centres controlled by our services providers.

## **Confidentiality**

We will maintain confidentiality of your personal information

## **Processing of Information about persons related to Juristic persons**

If you are a juristic person, we may collect your personal information including that of related to persons for e.g. directors, officers, employees, shareholders, bankers, banking accounts, guarantors, etc. If you furnish us with information of related person, you warrant that the related person has granted you the required consent and they are aware that you will provide us with such information. As such reference to you, will include reference to such related persons.

## **Direct Marketing**

We will market our products and services if you have given us permission to do so

## **Your Rights**

You have the right to:

- Access to you information
- Withdraw the Consent
- Object to further processing of your information
- Correction of your Information
- Lodge a complaint with the Information Regulator

## **Cookies**



You can access our Information Manual and Data Privacy Protection Policy on our website, [www.prasa.com](http://www.prasa.com).

Where you access our website, you agree that we may send you “cookies” from our website to your computer. We use the term “cookies” to refer to information which is sent from our website to your computer hard drive and where it is saved and may contain information to personalise your experience on our website. To end, the next time you visit our website, we can identify you.