

The Responsible Party (Controller) as per the Protection of Personal Information Act No 4 of 2013 is Sandown Motor Holdings (Pty) Ltd ("We")

The Braes Office Park

193 Bryanston Drive
Bryanston, Sandton, 2191, South Africa

Email: smhdataprotection@daimler.com

Information Officer:

Mr. Roy McAllister

Email: smhdataprotection@daimler.com

Deputy Information Officer:

Mr. Ismail Abduragmaan

Email: smhdataprotection@daimler.com

Sandown Motor Holdings (Pty) Ltd and its affiliates (see [Legal Notice](#) for definition) appreciates your interest in its products and your visit to our website. Privacy is important to us and we want you to feel comfortable visiting our site. The protection of your privacy in the processing of your personal information, information relating to a living natural and/or existing juristic person, is an important concern to which we pay special attention during our business processes. Personal information collected during visits to our website will be processed by us according to Protection of Personal Information Act no.4 of 2013 (POPIA).

Our Privacy Statement on the use of our website does not apply to your activities on the websites of social networks or other providers that can be accessed using the links on our website. Please read the data protection provisions on the websites of those providers.

1. Collection and processing of personal information.

1.1 What Personal information are we collecting:

We collect information that is reasonably necessary for the purpose that it is required for such as;

- name; gender; age and birth date; contact details; residential and/or business address, registration and driver's license details; other forms of identification used to confirm your identity; credit card and bank account details; other financial information; current and past vehicle information and details;
- cookies and website tracking (for information about what cookies are and how we use them, please refer to our [Cookie policy on our website](#))
- location through anti-theft vehicle tracking technology in loan and demonstrator vehicles;
- voice when we record inbound and outbound calls for quality, training and record purposes; and

- image by videos and photos at events, during market research or through security cameras;
- personal interests; and personal preferences (such as your preferred vehicle specifications)

1.2 Where do we collect your Personal Information?

- when you contact or correspond with us and require support
- when you attend one of our events;
- when you visit our authorized Agents to test drive or purchase a vehicle and/or parts, have your vehicle serviced or repaired.
- if you order a product or service from us;
- if you apply to be a dealer or an agent or through dealer/agent communications;
- from third party roadside assistance service providers;
- via our websites (including our microsites) including:
 - if you choose to supply the information to us by entering your information into the interactive sections on our websites (for example, enquiry forms, message boards, chat, profile pages, blogs, social networking features and the like). Please be aware that any information you post or disclose on these websites may be available to other site visitors and the general public (depending on the privacy settings you have in place);
 - if you choose to create a new login or use your existing login or otherwise provide information through our websites and microsites; when you attend a (product) focus group, review a product or complete a survey
 - if you select any web links or visit any websites where cookies and website tracking is enabled;
- via our Apps or the Apps of other related or Daimler Group companies
- via social media;

2. Purpose of Use

Primarily we collect personal information so we can provide you with the best possible products and services that we and our authorized Agents have to offer, to create a more personalised experience for you.

- We will use your personal information for the purpose of technical administration of the website, customer administration, product surveys and marketing, only to the extent necessary in each specific case.
- If you share Personal information by filling out a registration form, contact form, chat, survey, contest entry or to execute a contract with you – we will use that information for the designated purposes, purposes of customer management and for purposes of processing and billing and business transactions within the required scope in each instance.
- For other purposes (e.g. display of personalized content or advertising based on your usage behaviour), we and, if applicable, selected third parties, use your personal information if and to the extent you give your consent through our consent management system. You will find further information and decision-making options here: [[Click here to go to settings](#)]

3. Access to Information

Upon written request, we or our representatives will inform you in writing within reasonable time what personal information is stored by us as defined by applicable law. Should such information be incorrect, we will at your request correct that information for you.

4. Transfer of personal information to third parties; Social Plug-ins; Use of Service Providers

- Our websites may also contain offers of third parties. If you click on such an offer, we transfer information to the respective provider to the required extent.
- We use social plug-ins on our websites from social networks such as Facebook, Twitter and Google+, we integrate them as follows:

When you visit our websites these buttons are deactivated by default, i.e. without your intervention they will not send any information to third parties. Before you are able to use these buttons, you must activate them by clicking on them. They then remain active until you deactivate them again or delete your cookies (please refer to “Cookies”). After their activation, a direct link to the server of the respective social network is established. The contents of the button are then transmitted from the social network directly to your browser and incorporated in the website.

Please note that we have no influence on the extent of the data retrieved by the social networks with their buttons. For information on purpose and extent of the data retrieval by the social network concerned, and about the rights and settings possibilities for the protection of your private sphere, please refer to the data protection information provided by the social network in question.

After activation of a button, the social network can retrieve data, independently of whether you interact with the button or not. If you are logged on to a social network, the network can assign the visit to the website to your user account. A social network cannot assign a visit to other Sandown Motor Holdings (Pty) Ltd websites unless and until you activate the respective button as well.

If you are a member of a social network and do not wish it to combine data retrieved from your visit to our websites with your membership data, you must log out from the social network concerned before activating the buttons

- We also use qualified service providers (IT service providers, marketing agencies) to operate, optimize and secure our websites. We only pass on personal information to the latter insofar as this is necessary for the provision and use of the website and its functionalities, for the pursuit of legitimate interests or insofar as you have consented there to. You will find more information regarding recipients of personal information in our consent management system:[\[Click here to go to settings\]](#)
- We will only disclose your information to government authorities in cases where it is required by law. Our employees, agencies, and retailers are obliged by us to respect confidentiality.

5. Analysis of usage information and use of analytics tools

We would like to tailor the content of our websites as precisely as possible to your interests and in this way improve our offer for you. You can find information on the cookies we use and their functions in our settings [Click here to go to settings.](#)

6. User-based information (targeting and retargeting).

We use so-called targeting and retargeting technologies in order to tailor our online marketing (e.g. banner ads) more specifically to your needs and interests. This involves using cookies to store information about your interest in our products and services. When you visit either our websites (targeting) or other websites (retargeting) that work together with our retargeting partners, those cookies are read and used to provide you with information that is customized and most closely related to your interests. A so-called cookie-ID pseudonym is stored in the cookies. That means you cannot be easily identified through the process. During the retargeting process, we may also collect information about your interest in the products and services of our retargeting partners.

If you do not wish us (and our targeting/retargeting partners) to process information about your visit or to tailor banner advertisements to your interests, you may permanently object to the practice (opt out) at any time.

We will comply with your rejection by placing an opt-out cookie in your browser. This cookie will only indicate that you have opted out. Please note that, for technical reasons, an opt-out cookie affects only the browser in which it has been installed.

If you delete the cookie or use a different browser or device, you will need to opt out again. Below you will find information about the targeting and retargeting technologies we use and their providers as well as the respective opt-out procedures:

Salesforce Data Management Platform (DMP) from Salesforce.com EMEA Limited ([targeting/retargeting]), London, United Kingdom of Great Britain and Northern Ireland

When this technology is used, data is transferred to servers in the US. The parent company of Salesforce.com is based in the United States and certified under the EU-U.S. Privacy Shield Framework.

If you wish to file an objection, please click on the following link:

<https://www.salesforce.com/products/marketing-cloud/sfmc/salesforce-dmp-consumer-choice/>

As an alternative, you can manage the use of third-party cookies and activate or deactivate them using the options provided on the following website:

<http://www.youronlinechoices.com/uk/your-ad-choices>

7. Pixels

We use Pixels to record and track the preferences of visitors, to be able to optimise the design of our website. Pixels retrieve data about the page request and send this information to our analytics server. Pixels ease navigation and increase the user-friendliness of a website. Pixels also help us to identify the most popular sections of our website.

This enables us to provide content that is more accurately suited to your needs, and in so doing improve our service to you as an individual. Your unique customer ID can be transmitted via pixels, provided that you have consented to this. By continuing to use the links in this email, you agree to us retrieving your behavioural data for the purpose of data analytics, which will be linked to you as an individual and your personal information which may be capable of being transmitted in real time.

8. Cookies/ Settings

We use cookies to optimize the design of this website and make continuous improvements. By continuing your visit the website, you consent to the use of cookies. You can find information on the cookies we use and their functions in our settings [[Click here to go to settings](#)]

9. Transfer of information across border

During our daily business activities, your personal information, under conditions of confidentiality, may be transferred, accessed, processed and/or stored in various countries for the purpose of service delivery.

We will not transfer personal information to a third party in another country unless:

- The recipient of the personal information is subject to a law, binding corporate rules or a binding agreement which:-
 - Upholds principles for reasonable processing of the information that are substantially similar to the conditions contained in POPIA and
 - Includes provisions that are substantially similar to those contained in POPIA relating to the further transfer of personal information from the recipient to third parties who are in another country
- You consent to the transfer;
- The transfer is necessary for the performance of a contract between yourself and us or for the implementation of pre-contractual measures taken in response to your request;
- The transfer is necessary for the conclusion or performance of a contract concluded in the interest of yourself between us and a third party,

10. Information Security

Sandown Motor Holdings (Pty) Ltd uses technical and organizational security measures in order to protect the information we have under our control against accidental or intentional manipulation, loss,

destruction and against access by unauthorized persons. Our security procedures are continually enhanced as new technology becomes available.

11. Legal basis of processing

We process personal information under the following circumstances:

- Conclusion or performance of a contract;
- Necessary for compliance with legislation;
- Protecting a legitimate (vital) interest of the data subject;
- Protecting a legitimate (vital) interest of our organisation; and
- When we have your consent.

12. Direct marketing

Direct marketing involves us communicating directly with you to promote the sale of our goods and services. This can be achieved by an array of methods including for example, by mail, telephone, e-mail or SMS/IM/MMS and potentially by third parties on our behalf. We will obtain your consent prior to using or disclosing your personal information for direct marketing purposes. You have an option to opt out from direct marketing at any time.

13. Rights of the Data Subject

As a data subject, you have the following rights when it comes to your personal information:

- Right to have your personal information processed in accordance with the conditions for the lawful processing of personal information
- Right to be notified on why your personal information is collected.
- Right to object to the processing of personal information.
- Right to institute civil proceedings regarding the alleged interference with the protection of your personal information.
- Right to submit a complaint to the Information Regulator regarding the alleged interference with the protection of the personal information of any data subject.
- Right to request the information we have on you.

14. Deletion of your personal information

We delete your personal information as soon as the purpose for which we have collected and processed the data ceases to apply. Beyond this time period, data storage only takes place to the extent made necessary by the legislation, regulations or other legal provisions to which we are subject to.

15. Daimler AG's Central Registration Service

With the Central Registration Service offered by Daimler AG, you can sign up for every website and application belonging to the Daimler Group and its brands that are connected to the service. The applicable terms of use contain specific data protection provisions. Those terms of use can be found on the registration pages of affiliated websites and applications.

16. Complaints and enquiries

If you are not happy with the way we have handled your personal information please contact us and we will try our best to resolve the matter with you. For security reasons, we request that complaints, requests for access to or correction of personal information or any enquiries or questions concerning privacy matters be put in writing and e-mailed to:

Sandown Motor Holdings (Pty) Ltd Limited

The Braes Office Park

193 Bryanston Drive

Bryanston, Sandton, 2191, South Africa

Email: smhdataprotection@daimler.com

If your concern is not resolved to your satisfaction you can contact the Information Regulator:

The Information Regulator (South Africa)

JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

P.O Box 31533, Braamfontein, Johannesburg, 2017

Complaints email: complaints.IR@justice.gov.za

Last updated: 23 June 2021

