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## Privacy Statement of Nebula Logistics Africa (Pty) Ltd

1. This is the Privacy Statement of **Nebula Logistics Africa (Pty) Ltd**, (hereinafter “we”, “us”, “our”). It applies to the personal information of:
  - 1) visitors to our website, available at <https://www.nebulagroup.biz>;
  - 2) customers (including corporate customers and individuals);
  - 3) prospective customers (including corporate entities and individuals);
  - 4) prospective employees;
  - 5) current and prospective third-party service providers/joint venture partners/vendors/second-level dealers/ authorised agents;
  - 6) all of our investors and potential investors who engage with us in any manner. Your relationship with us as an investor is subject to any separate terms between us;
  - 7) and collectively any or all of the above as “you”.

Use of the Website is also subject to our terms and conditions and website disclaimer, available at <https://www.nebulagroup.biz>.

We may need to change or update this Privacy Statement from time to time. Any updated versions will be posted on our website and will be effective from the date of posting. Where practical, we may notify you of the changes.

### 2. What personal information do we collect?

- 2.1 We respect your privacy rights and comply with all applicable laws in handling personal information. When used in this Privacy Statement, the term “personal information” has the meaning given to it in the *Protection of Personal Information Act, 2013 (POPIA)*, applicable in the Republic of South Africa. Generally speaking, personal information is any information that can be used to personally identify a natural or juristic person. If any information that we collect personally identifies you, or you are reasonably identifiable from it, we will treat it as personal information.
- 2.2 We may collect your personal information in a number of ways including when you:
  - 1) visit our website, we may collect usage information which may include your IP address, geographical location, browser type and version, operating system, referral source, duration of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. This information may be processed for the purposes of analysing the use of the website and improving usability;
  - 2) provide personal information when purchasing our products and/or services. The information is processed for use and/or administration of the product/service you require and may include your company name, first name, surname, credit card information, city and email address. This information is processed for the purpose of supplying our products and/or services to you and communicating with you;
  - 3) provide personal information in the course of a submission of an enquiry, including an enquiry pertaining to available vendor and/or service provider opportunities, on our website “contact us” page. The personal information is processed for the purpose of responding to your enquiry and may include your company name, first name, surname, city and/or email address;

#### **Nebula Logistics Africa (Pty) Ltd**

**Directors** B Botha J Whittle M Matome M Tlale N Dikgale PK Christou  
Reg No 1905/000694/07 VAT No 4290109844  
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- 4) provide personal information for a vendor or service provider opportunity in the form of Request for Proposal (RFP), Request for Quotation (RFP) and/or Request for Information (RFI). The information is processed for the purpose of carrying out a proper tender process. Such information may include information about the incorporation or registered name of your business, tax information, broad-based black economic empowerment (B-BBEE) information, company address, and company contact person's first name, surname and/or email address;
- 5) provide personal information in the course of a submission for a job opportunity advertised on our website's careers page. The personal information may include your first name, surname, city and/or email address;
- 6) you provide to us for the purpose of subscribing to our email notifications and/or newsletters for the purposes of sending you the relevant notifications and/or newsletters. You may choose to opt out of receiving these communications at any given time by notifying us or by unsubscribing from the mailing list; and/or
- 7) you provide personal information on a voluntary basis to us when you fill out an enquiry form in the question section of our "contact us" page, or contact us via social media, or when you email us, or when you provide personal information to support a request logged by you to us for the above collection means.

2.3 In addition to the above, we may collect your personal information from third parties in the event that:

- 1) you are participating in a tender, we may collect additional personal information about any lawsuits relating to your business, business ownership and share structure, directors' personal information and the business's financial information required for purposes of a tender evaluation process pertaining to vendors and/or service providers. We may process this information as part of our standard due diligence practices which form part of our internal governance requirements;
- 2) you are applying for a job, we may collect personal information about your criminal record, qualification history and employment history checks from third parties in the course of our candidate selection and evaluation process which form part of our recruitment processes; and/or
- 3) we merge with, or acquire, another business.

2.4 The website advertises on third-party websites through Google AdWords, and Google may use cookies\* to serve advertisements based on your visit to this site. We also may use this information to gain insights into how our visitors use the website and optimize the experience and the presentation of information. \*Cookies are small text files stored on your device when you visit most websites. These files hold small amounts of data and allow the server to recognise you when you revisit a website.

2.5 We may also use cookies on the website as set out in our cookies policy (refer <https://www.nebulagroup.biz>).

2.6 If you provide us with personal information of third parties, please make sure that you are authorised to do so.

### 3. Why do we collect personal information?

3.1 We collect personal information and handle it for the following purposes:

- 1) to establish and maintain a business/professional relationship with you;
- 2) to conduct relevant due diligence when entering into contracts/transactions with you;
- 3) to conduct background checks and relevant due diligence as part of the standard recruitment processes applicable to prospective employees;
- 4) to respond to general enquiries submitted through our "contact us" page;
- 5) to authenticate your identity in order to provide you with access to certain information belonging to us or third parties, which may be required for purposes of giving effect to a contract or transaction with you;

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- 6) to gain insight into how our visitors use the website and to improve our website service;
- 7) to contribute to research and analytics studies, including the use of artificial intelligence and machine learning;
- 8) to communicate relevant information to stakeholders;
- 9) to comply with applicable laws;
- 10) to enforce our terms of use;
- 11) to recognise, prevent and investigate cybercriminal attacks of our website; and
- 12) for any other purposes that you consent to when you agree to provide it to us, by email or other means of written communication.

We may handle anonymised information for research or analytics purposes or including it in our publications and share this information with third parties. You will not be identifiable from this information.

#### **4. What happens if you don't provide the personal information we require?**

4.1 If you do not provide us with mandatory information:

- 1) we may not be able to supply the products and/or services you require from us;
- 2) we may not be able to respond to your enquiry as submitted to us through the "contact us" page;
- 3) we may not be able to authenticate your identity in order to provide you with access to certain information belonging to us, or third parties, which may be required for purposes of giving effect to a contract or transaction with you; and/or
- 4) we may become non-compliant with applicable laws as it pertains to our business operations and dealings.

Voluntary personal information is collected to improve our interactions with you and improve stakeholder experience.

#### **5. Do we disclose personal information to third parties?**

5.1 We may disclose your personal information to third parties where required or permitted by law, where it is necessary to give effect to a contract with you, or where we have a legitimate interest in doing so. These are some of the instances where we may share your personal information with third parties, who may include:

- 1) other group companies or divisions within our holding company, *Nebula Group Africa*;
- 2) our employees, contractors and/or third party service providers/vendors (such as our website hosting partners, our service email marketing partners in connection with the Website);
- 3) researchers and analytics provider(s), to the extent relevant to **Nebula Group Africa and its subsidiaries**;
- 4) our insurers, underwriters and professional advisors, including our accountants, lawyers, business advisors and consultants;
- 5) employees and/or the managers of any entities through which they operate if we merge, combine or divest a part of our business;
- 6) law enforcement or regulatory bodies as required by law;
- 7) purchasers or potential purchasers of our business or parts thereof; and
- 8) any other juristic or natural person for any authorised purpose with your express consent.

5.2 We will never sell your personal information.

## 6. Do we send personal information outside of South Africa?

We may from time to time send personal information outside the borders of South Africa, including to countries which may not have data protection laws which are similar to those in force in South Africa, for storage purposes and the like, in accordance with POPIA and any other applicable laws.

## 7. Direct Marketing, Advertising and Related Communication

- 7.1 We may, if permitted to do so in terms of applicable laws, use your contact details to send you details of our products and/or services, or any other special offerings through sales campaigns which may interest you. This may also include requests to provide customer experience feedback. These communications may be sent to you in various forms (including by email) in accordance with applicable marketing laws and practices. If you indicate a preference for a method of communication, we will endeavour to use that method as indicated.
- 7.2 All of these communications will set out how to unsubscribe from (or opt-out of) receiving future marketing communications if you no longer wish to receive such. You can also unsubscribe from receiving such communications by clicking on the unsubscribe link in the specific communication, contact us on [Privacy@nebulagroup.biz](mailto:Privacy@nebulagroup.biz).

## 8. Security

- 8.1 As the Website is accessible via the internet, and the internet is inherently insecure, we cannot guarantee the security of information you send to us online (including that it will not be intercepted). You send information to us online at your own risk.
- 8.2 We may keep your personal information in either electronic or hard copy form. In both cases, we take reasonable and appropriate steps to ensure that the personal information is protected from misuse and loss and from unauthorised access, modification or disclosure.
- 8.3 Personal information is usually destroyed or de-identified when no longer needed or when we are no longer required by law to retain it (whichever is the later).

## 9. How can you access and correct your personal information?

- 9.1 You have the right to contact us at any time requesting:
- 1) confirmation that we have your personal information;
  - 2) access to the records containing your personal information or a description of the personal information that we hold about you; and
  - 3) the identity or categories of third parties who have had, or currently have, access to your personal information.
- 9.2 Details on how to make a request are available on our PAIA Manual. When making a request, we will require adequate proof of your identity. We will try to provide you with suitable means of accessing information, where you are legally entitled to it, by for example, posting or emailing it to you.
- 9.3 There may be instances where we cannot grant access to your personal information. For example, if access would interfere with the privacy or fundamental rights of others, or would result in a breach of confidentiality, we may need to refuse access. If we refuse access, we will give written reasons for the refusal.
- 9.4 If you believe that any personal information that we hold about you is inaccurate, irrelevant, outdated, incomplete or misleading, you may ask us to correct it. If you believe that any personal information that we hold about you is excessive or has been unlawfully obtained or that we are no longer authorised to retain it, you may ask us to destroy or delete it. If we do not agree that there are grounds for action, you may ask us to add a note to the personal information stating that you disagree with it.
- 9.5 We may charge a reasonable fee to cover our administrative and other costs in providing information to you. We will not charge for making a request or for making any corrections to personal information.

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## **10. Complaints**

- 10.1 If you believe that your personal information has been unlawfully used, accessed or acquired, you may lodge a formal complaint on [privacy@nebulagroup.biz](mailto:privacy@nebulagroup.biz) accompanied by details of the incident so that we can investigate it.
- 10.2 We will treat your complaints confidentially (unless otherwise required by law), investigate those complaints and aim to ensure that they are resolved within a reasonable time, in order to provide you with feedback.
- 10.3 You also have the right to contact the Information Regulator at <https://www.justice.gov.za/infoereg/contact.html>

## **11. Changes to your personal information/data subject rights request**

If your personal information changes please let us know and provide us with all changes as soon as reasonably possible to enable us to update it. Any other data subject rights requests must be e-mailed to [privacy@nebulagroup.biz](mailto:privacy@nebulagroup.biz).

## **12. Third-party websites**

- 12.1 This Privacy Statement does not apply to any third-party websites which may be accessible through links on the Website. We do not make any representations or warranties about the privacy practices of any third party and do not accept any responsibility for them. Third-party website providers are responsible for informing users about their own privacy practices and we suggest that you review the privacy policies of any third-party providers whose sites you access.

## **13. Contact information**

- 13.1 If users have any questions about this Privacy Statement or any other general concerns regarding the processing of your personal information you can contact us on [privacy@nebulagroup.biz](mailto:privacy@nebulagroup.biz).