EXTERNAL PRIVACY NOTICE

1 What is the purpose of this notice?

1.1 Astron Energy Proprietary Limited ("**we**", "**us**" or "**our**") is a supplier of petroleum products in Southern Africa. As a company registered and operating in South Africa, we are a "**responsible party**" in terms of the Protection of Personal Information Act No 4 of 2013 ("**POPIA**"). We are required to comply with POPIA and any other laws which apply to our relationship with you.

1.2 This privacy notice (this "**notice**") notifies you as an external party about how we collect, store, retain, transfer, share, delete, and otherwise "**process**" your personal information.

1.3 Please read this notice carefully to understand how we process your personal information. This notice is structured as a layered notice, with more detailed and further information relating to the processing of your personal information appearing in the annexures.

2 Who does this notice apply to?

2.1 This notice applies to you if you are a -

2.1.1 customer - wholesale (also referred to as 'end-user') or retail;

2.1.2 franchisee, retailer, operator or dealer of an Astron Energy branded service station (including the owners, directors, shareholders, members, site managers and other representatives of any such party), or branded marketer;

2.1.3 supplier or service provider;

2.1.4 job applicant;

2.1.5 visitor to our premises;

2.1.6 website user;

2.1.7 member of, or participant in, any loyalty, rewards or partnership programme in which we participate together with a programme partner (a "**loyalty programme**");

2.1.8 entrant in, or winner of, any promotional competition, promotion or prize draw conducted by us or on our behalf (a "**competition**"); or

2.1.9 person to whom we market goods and services.

Confidential

2.2 Any reference to "**you**", "**your**" or "**yours**" should be interpreted to refer to any party in 22.1 adapted for the context in which the term appears. This notice does not however confer any additional status on you.

2.3 This notice applies to you irrespective of whether you are an individual or a corporate like a company, close corporation, trust, partnership, or joint venture. This is because POPIA applies to - and protects - both natural and juristic persons.

2.4 This notice does not apply to you if you are our current (or former) employee (temporary or permanent and irrespective of contract type), partner, worker, intern, agency worker, consultant, individual contractor and / or director. We have a separate internal privacy notice which applies to those parties.

3 What is personal information?

3.1 "**Personal information**" is defined broadly in POPIA and includes any information which identifies you (tells someone who you are), from which you are identifiable (from which someone can work out who you are), or otherwise relates to you.

3.2 Personal information can range from basic information about you, like your name and contact details, to sensitive information like your financial and tax records and what is defined in POPIA as "**special personal information**", like information about your health and sexual orientation. We discuss the special personal information that we may process about you at 77.

3.3 At Annexure A, we list the categories, types and sources of personal information we process about you.

3.4 Keep in mind that given the type of relationship we have with you, we may process a large amount of your personal information, which may also include various types of personal information. The personal information we may be required to process about you may not be specifically listed or mentioned in this notice. If you are concerned about what personal information we process about you, you can contact our Information Officer at the details at 200.

4 What other documents are applicable to the processing of your personal information?

4.1 This notice should be read along with -

4.1.1 our agreement with you, whether that is a branded marketer, customer, franchisee, service level, or other type of agreement;

4.1.2 our Promotion of Access to Information Act No 2 of 2000 ("**PAIA**") manual, which, in relation to POPIA, provides for terms of processing, request forms, and requester fees. Our PAIA manual is available at the following link: Astron Energy PAIA Manual; and

Confidential

4.1.3 where applicable, the rules and terms and conditions of any loyalty programme in which you participate, and the terms and conditions of any competition you enter, which may contain additional, programme- or competition-specific information about the processing of your personal information.

4.2 Additionally, if you are our supplier, service provider, branded marketer or franchisee, our other policies, notices, processes, manuals, and any other document which governs or otherwise relates to the processing of personal information, such documents may apply to you and should be read with this notice. This includes -

4.2.1 any information technology ("**IT**"), anti-bribery and corruption, money laundering, procurement, transformation and whistleblowing policies; and

4.2.2 group wide policies which may apply to you.

4.3 Lastly, if you are a website user, our cookies policy will apply to you. You can access our cookies policy at the following link: Astron Energy – Cookies Notice.

4.4 It may be the case that any of the documents referred to in this 44 provide for additional terms which should be read as supplementing this notice, for example, specific consent to processing of personal information, or other bespoke terms. The aforementioned documents still constitute notice for purposes of POPIA.

5 Do you have to provide your personal information to us?

5.1 Yes, given our relationship with you, if you are not willing to provide your personal information, we may not be able to contract with you and / or enter into or continue our relationship with you.

5.2 If you refuse to provide specific personal information to us, we may be required to put you on notice in terms of our agreement with you, cancel our agreement with you, or refuse to provide you with further goods, services and / or website usage.

6 Why do we process your personal information?

6.1 POPIA requires that we have what is known as a "**lawful basis**" for each processing activity that we undertake. The lawful bases which we rely on for processing your personal information, as a third party, are -

6.1.1 the processing is necessary for the conclusion or performance of our contract with you e.g. providing our products or services to you or receiving the supply of your goods and services;

6.1.2 we have a "**legitimate interest**" to do so: this means we have a legitimate business reason to use your personal information and that we use your information in a way that does not infringe on your rights and freedoms e.g. monitoring our IT systems to keep them safe and secure;

Confidential

6.1.3 you have a legitimate interest for us to process this personal information e.g. for us to market to you or research your use of products and services to improve our offering; and / or

6.1.4 where we have a legal obligation to do so e.g. processing your PAIA requests for records.

6.2 Lastly, we may request that you "**consent**" to our use of your personal information. We do not usually rely on consent, although it may be used in specific circumstances. We will always clearly ask you for consent in writing where we use it as a lawful basis. Any consent given by telephonic means will be electronically recorded. To the extent that you have consented to the processing of your personal information, where we have another lawful basis/bases to process your personal information, including those set out in this document, that other lawful basis/bases will prevail, which means we will be able to continue processing your personal information.

6.3 We list the reasons why we process your personal information and the related lawful basis/bases at Annexure B.

7 Do we process your 'special personal information' and the personal information of children?

7.1 We do not generally process any special personal information of third parties. This includes information relating to: health or sex life; ethnic or racial origin; religious or philosophical beliefs; trade union membership; or political affiliation. By providing us with personal information, you agree that you will not provide us with your or any other person's special personal information.

7.2 We may - where we are required to do so for the establishment, exercise, or defence of a right or obligation in law - process specific special personal information; for example, regarding the alleged commission of a criminal offence by you, any criminal proceedings against you, and biometric information. An example of this is if you are our service provider and we initiate a forensic investigation into alleged improper payments, and report any suspected crime to the South African Police Service ("**SAPS**").

7.3 Where you are a job applicant, we may process your health, race / ethnicity and criminal information. Where we do so, we ask for your consent in accordance with POPIA.

7.4 Where you are our supplier, we may process your special personal information and that of your employees and beneficial owners. This will include the processing of race information and health information which may be processed at the onboarding phase and throughout our engagement with you. This is for the purpose of verifying your Broad-Based Black Economic Empowerment ("**B-BBEE**") status; determining the effect of your B-BBEE status on our own B-BBEE rating; and to otherwise comply with B-BBEE or other laws. POPIA permits this processing in accordance with the Broad-Based Black Economic Empowerment Act No 53 of 2003 ("**BEE Act**") which sets out measures to advance the participation of black people in the economy. We do not require your further consent for this processing.

Confidential

7.5 We do not generally process the personal information of a child (a person under the age of 18 years). By providing us with personal information, you agree that you will not provide us with any personal information of a child.

7.6 Where we are otherwise required to process your special personal information, we will ask for your explicit consent to do so.

8 Where do we collect your personal information from?

8.1 We may collect your personal information from another source where -

8.1.1 collection from another source would not prejudice your legitimate interests;

8.1.2 collection from you is not reasonably practicable; or

8.1.3 you have consented to such collection.

8.2 When we start our relationship with you, the initial personal information that we process is likely to come from you, for example: your full names, contact details and bank details (this is unless such information has been made public by you). In the course of our relationship, you may be required to provide us with information for other purposes such as purchase orders, details of delivery sites and dates, representatives etc.

8.3 We may also receive your personal information from -

8.3.1 a third party who has identified you as someone who is interested in our products and services;

8.3.2 if you are a job applicant, from a recruitment agency where you have used one;

8.3.3 a third party service provider in relation to IT, security and other services that we may use;

8.3.4 if you are a loyalty programme member, from the relevant programme partner, from our PSP (as defined in 111.2.1.2), and from the payment terminals at participating service stations;

8.3.5 if you are a retailer or operator of an Astron Energy branded service station, from the branded marketer that supplies you, from our PSP and from the point-of-sale and forecourt systems at your site; and

8.3.6 if you enter a competition, from the relevant service station, our appointed competition agency or notifier, and the platform through which you enter.

8.4 We also produce personal information about you in the course of our relationship with you, like when you correspond with us, make payments, visit our premises, buy goods and services from us, and use our IT services and infrastructure.

Confidential

8.5 The sources of the personal information which we process are set out in Annexure B.

9 How and where is your personal information stored?

9.1 Your personal information is stored electronically on servers located in South Africa and outside South Africa. Your personal information may be stored on any Glencore group company's servers. We also make use of systems hosted overseas.

9.2 Where your personal information is stored outside South Africa, we ensure that it is afforded the same protection as it would be in South Africa by contractual and other measures.

9.3 We may also have physical records at our head office, any of our branches, or the refinery.

10 How do we keep your personal information safe and secure?

10.1 We use administrative, technological and physical controls to protect your personal information against unauthorised loss, damage, modification, disclosure, or access. Such controls include policies, monitoring, access control, password protection, firewalls, anti-virus and encryption where possible.

10.2 Even though we take reasonable measures to protect your personal information, transmitting information over electronic platforms, like email or WhatsApp, creates certain risks which we cannot prevent. We will not be held responsible for any loss incurred in the transmission of electronic messages.

10.3 We have agreements in place with our service providers to ensure the confidentiality and security of your personal information, including operator agreements / provisions in place with service providers who process personal information solely on our behalf.

11 Who do we share your personal information with?

11.1 We are part of the international Glencore group of companies (the "**Glencore Group**" and each a "**Group Company**"). As such, we may disclose your personal information to any Group Company, including, without limitation, in order to run global processes, carry out group wide reporting, or take decisions about hiring or promotion.

11.2 It may also be necessary from time to time for us to disclose personal information to third parties -

11.2.1 to carry out specific services (including by individuals or companies employed by us), functions or consultancy work including -

11.2.1.1 external reference agencies or recruiters;

Confidential

11.2.1.2 financial institutions and payment services providers, including any designated payment and loyalty engine provider that operates the platform for a loyalty programme on our behalf ("**PSP**");

11.2.1.3 IT services and applications service providers or systems which we utilise;

11.2.1.4 B-BBEE verification and compliance;

11.2.1.5 delivery, courier, postal and / or logistics services or companies;

11.2.1.6 loyalty programme and alliance partners;

11.2.1.7 marketing, promotional and competition agencies, winner notifiers, independent auditors of competitions, and prize suppliers and fulfilment partners;

11.2.2 to protect, defend or enforce our rights or interests, for example: legal representatives, auditors, accountants and other professional advisors;

11.2.3 to comply with legal, regulatory or administrative obligations or requests, including from the Information Regulator, the South African Revenue Service ("**SARS**"), the SAPS, the National Prosecuting Authority ("**NPA**"), the Unemployment Insurance Fund ("**UIF**") and the Financial Intelligence Centre, insofar as it is applicable;

11.2.4 in relation to any potential acquisition, amalgamation or merger of our business;

11.2.5 where required or requested for regulatory, licensing, price-setting, margin-setting, monitoring, investigative, statistical or policy purposes by government departments, regulators and other public bodies, including the Department of Mineral and Petroleum Resources ("**DMPR**"), the Information Regulator, the National Energy Regulator of South Africa, the Department of Trade, Industry and Competition, National Consumer Commission, the Competition Commission and the Competition Tribunal, the South African Reserve Bank, and any economists, consultants, accountants, auditors or other experts appointed by, or acting on behalf of, any such body, as well as industry bodies through which such information is required to be submitted; and

11.2.6 where required to be provided to other support service providers necessary to assist us with any of the aforementioned activities.

11.3 **Franchisees, retailers and branded marketers:** If you are our franchisee, retailer, site operator or branded marketer, we may be required to disclose personal information about you and your owners, directors and representatives (including your retail network and regulatory information described in Annexure A) to third parties including the DMPR, other regulators and the experts referred to above.

Confidential

11.4 **Loyalty programmes**: If you are a loyalty programme member, the relevant programme partner acts as an independent responsible party, our PSP processes your personal information on our behalf as our operator, and retailers at participating service stations process transaction information when you earn or redeem rewards at their sites.

11.5 **Competitions**: If you enter a competition, we may also share your personal information with the service station involved where necessary to verify your entry or hand over a prize.

12 Do we transfer your personal information overseas?

12.1 Due to the global nature of our business, your personal information may be disclosed to any Group Company situated outside of South Africa, including the United Kingdom, Switzerland and the United States of America. Your personal information may also be processed by personnel operating outside South Africa who work for us, a Group Company, or one of our third party service providers who act on our behalf. If you are a loyalty programme member or a participating retailer, your personal information may be hosted and processed on cloud infrastructure located in the United Kingdom and the Republic of Ireland by us, our PSP and their hosting providers.

12.2 Where we transfer your personal information overseas, we will ensure suitable safeguards are in place to protect its confidentiality and integrity. We will ensure that the third party recipient of the personal information is subject to laws or an agreement with us which provides the same level of protection to personal information as POPIA does. You can obtain information and a copy of documentation pertaining to the safeguards to which your personal information is subject from the Information Officer indicated at 200.

12.3 In relation to intra-group transfers, we have agreements in place which govern how personal information is shared across the Glencore Group and how it should be protected.

13 How long do we keep your personal information for?

13.1 Personal information will be stored for as long as required to satisfy the purpose for which the personal information was collected and used, unless a longer period is required by law, or for the exercise or defence of legal claims. Usually, we retain your personal information for the duration of our agreement with you and an additional three years.

13.2 If you are a job applicant and you are successful, your personal information will be retained and governed by our internal privacy notice. If you are unsuccessful, we will delete your personal information in accordance with our retention policy.

13.3 We note however that certain records may be subject to specific statutory retention periods, for example, tax records. Further information on specific statutory retention periods can be obtained from our Information Officer.

Confidential

14 **Are there any specific laws authorising our processing of your personal information?**

We may be required to process your personal information in terms of a variety of South African laws, including laws relating to the petroleum industry, tax, competition, B-BBEE, consumer protection and data protection. A list of these laws is available in our PAIA manual referred to in 4.1.2.

15 **What happens if my personal information is accessed by an unauthorised person?**

15.1 If your personal information is accessed or acquired by an unauthorised person (i.e. a security compromise or data breach), we will notify you and the Information Regulator in accordance with our obligations in POPIA.

15.2 If you suspect that your personal information which we process may have been acquired or accessed by an unauthorised person, please contact our Information Officer immediately.

16 **What are your obligations regarding other persons' personal information?**

In the event that we enter into a contractual relationship with you, you are required to treat other persons' personal information confidentially and securely in accordance with the law and our policies. If you are our contractor or service provider, please ensure you comply with all our policies which apply to you.

17 **Do we process your personal information by way of automated decision making?**

17.1 POPIA requires that we do not process your personal information by way of automated decision making in a manner which results in legal consequences or seriously affects you, without human intervention. This is unless specific conditions are met.

17.2 We make use of third party service providers who use AI and / or machine learning to process data we provide them, including in relation to expense payments. Where this automated processing has legal consequences for you or seriously affects you, we ensure that a human checks it.

17.3 If you are a loyalty programme member, our PSP operates an automated fraud engine on our behalf which analyses transaction patterns and assigns risk statuses to loyalty transactions. Where a risk status may lead to a decision that has legal consequences for you or seriously affects you, for example suspending your participation in the loyalty programme or withholding rewards, that decision is reviewed by a person and you may make representations to us about it.

18 **Do we conduct direct marketing?**

18.1 We may use your personal information to market our products and / or services to you. You will receive marketing communications from us if you have consented to receiving such communications, or if you have previously purchased products or services from us provided that you have not opted out of receiving such marketing.

Confidential

18.2 When collecting information that might be used to market to you, we give you the opportunity to opt-out from receiving such communications. Moreover, each marketing communication we send you includes an unsubscribe link. If we contact you by telephone line, either with a human speaking to you or by an automated calling machine, you are still permitted to refuse further marketing by indicating so over the phone. You are entitled to request copies of any electronic recording of your refusal of further marketing in accordance with 19.1.1.

18.3 If you are a loyalty programme member and you opt in, through the programme partner, to receive marketing from us, the programme partner will transfer your name, contact details and consent record to us for inclusion in our own marketing database, and we may use your contact details for targeted marketing of our fuel and related products and customer experience programmes, including marketing tailored to your fuel purchases. We are the responsible party for that marketing database. You may withdraw your consent or unsubscribe at any time by using the unsubscribe mechanism in our communications or by contacting our Information Officer, and doing so will not affect your membership of the loyalty programme.

19 What are my rights?

19.1 You have the rights afforded to you in terms of POPIA to the extent applicable, including the right -

19.1.1 to request access to a copy of your personal information;

19.1.2 to request that we rectify your personal information if it is inaccurate, incomplete or obtained unlawfully;

19.1.3 to request that we delete / erase your personal information in one of the circumstances referred to in 19.1.2 or if we are no longer permitted to retain your personal information;

19.1.4 to be notified of action taken as a result of a request referred to in 19.1.2 or 19.1.3;

19.1.5 to object to the processing of your personal information where our lawful basis for processing is in your, our or the legitimate interests of any other person;

19.1.6 not to be subject to automated decision making, including profiling which has legal or similar significant effects;

19.1.7 to request that we restrict the processing of your personal information if you want us to establish the accuracy of certain information; for proof without deleting it; where you say that the processing is unlawful but you do not want us to delete it; or you want us to transfer the information to another system; and

19.1.8 to withdraw consent, where consent is the basis upon which we process the personal information at any time, without affecting the lawfulness of

Confidential

processing based on consent before its withdrawal, or processing for which we rely on another lawful basis/bases.

19.2 We may request proof of identification to verify your request. We may refuse your request, alternatively, be required to refuse your request, for example, if one of the mandatory grounds of refusal are triggered in relation to a request for access.

19.3 Please refer to our PAIA manual (referred to in 4.1.2) for further information on how to lodge any of the requests indicated at 19.1. Should you require assistance lodging any request in any particular manner (like by phone, WhatsApp or post), please contact our Information Officer, who will assist.

19.4 We would appreciate if you could give us the opportunity to resolve any data protection related issue you may have by contacting our Information Officer. If we are unable to do so, you may lodge a complaint with the Information Regulator at the following details:

Email:	POPIAComplaints@inforegulator.org.za
Telephone No.:	010 023 5200
Physical and Postal Address:	Woodmead North Office Park 54 Maxwell Drive, Woodmead, Johannesburg, 2191
Website:	www.inforegulator.org.za

20 Who should I contact if I have an issue?

If you have any complaint, concern, query, or question about this notice or our processing of your personal information, please contact the Information Officer at the following details:

Information Officer:	Thabiet Booley
Deputy Information Officer:	Lizel Oberholzer
Email:	privacy@astronenergy.co.za
Telephone No.:	+27 21 403 7911
Physical and Postal Address:	5 Century Boulevard, Century City, Cape Town, 7441

21 Will this notice change?

This notice is subject to change, at least annually, if not more if there is anything we need to provide for.

Depending on our relationship with you, you may not be notified by us if this notice changes; we will however upload an updated version of this notice on our website. It is your responsibility to ensure you are familiar with this notice and that you check the website to make sure you are referring to the latest version.

ANNEXURE A - CATEGORIES, TYPES AND SOURCES OF PERSONAL INFORMATION

Category of information	Types of information	Source of information
Contact information	We process contact information to enable us to know who you are so that we can do business with you and contact you if we need to. We need this information both to provide and receive goods / services. The contact information that we process includes - • if you are an individual, your full names and surname, and job title; • if you are a corporate, your company name and registration number; • cellular telephone number; • landline number; • WhatsApp line number; • email address. If you are an individual (an employee, director, individual contractor etc) representing a corporate, we process the above information about you as a representative of that corporate. We also process contact information where you enter into competitions or surveys with us. We process contact information for direct marketing purposes.	You or your representative are the source of this information
Financial and tax information	If in terms of our relationship with you, we pay you, or are required to pay you, we process your financial information, including your - • bank account details, including number, type of account, branch code and account name; • tax related information, including your value added tax ("**VAT**") number and tax clearance certificate	• You or your representative are the source of this information; or • Us, where we have produced the information ourselves
Transaction information	Whether we are paying you or getting paid by you in terms of our relationship with you, we process transaction information, including your - • goods or services purchased; • date, time and location of purchase; • bank account details; • payment card details; • date of payment;	• Your or our bank or PSP • You or your representative • Us, where we have produced the information ourselves

Confidential

Category of information	Types of information	Source of information
	• payment channel (EFT, debit card, credit card etc); • bank; • invoices, bills and statements; and • payment confirmation. We also process personal information about your enquiries for products and services, as well as information that assists us in identifying the best products and services for you. We process transaction information regarding our retailers' customers, including transaction and card details, volume, and loyalty card details (including name and number)	
Location information	Where we deliver products or services to you, alternatively, you have provided us with an address for legal notices, we process your information relating to your physical address, location and representative.	You or your representative are the source of this information
Legal and compliance information	We process legal information about you, including - • our contract / agreement with you, including original copy and signatories, or any contract which relates or has a bearing on our relationship with you, including any agreement we have with a branded marketer; • any information processed about you to comply with our internal or external legal and compliance obligations, procedures and / or requirements. For example, board meeting minutes and agendas, data protection or other compliance audits; • your B-BBEE status, certificate, shareholders and ultimate beneficial owners as well as other relevant B-BBEE information; • records of any disputes with you, including any legal demands, discovery, court, arbitration, mediation, ombud, or expert determination related documents; • any records we are required to keep or maintain in terms of applicable laws, including any laws relating to petroleum products, its sale, and supply; • any complaints or queries that you raise with us; • PAIA or POPIA requests by you or a third party which relate to you; • documents relating to an investigation or enforcement process against you, or us which also relates to you, including a regulator's correspondence, subpoenas, enforcement and information notices;	• You or your representative • Court or other dispute resolution forum • Your legal representative • A regulator or public body • Us, where we have produced the information ourselves

Confidential

Category of information	Types of information	Source of information
	• information about your directors, shareholders, beneficial owners, and any other information required to comply with our internal anti-bribery and corruption policies, anti-money laundering policies, or any applicable laws and requirements.	
Website usage information	We may process information about your use of our website and services. This information may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use.	The source of the usage information is our analytics tracking system
Communication information	We may process information contained in or relating to any communication that you send to us or that we send to you. The communication information may include the communication content and metadata associated with the communication. This information relates to both corporates and their individual representatives. Communication information may include - • written correspondence, like emails or WhatsApp messages; • website forms or messages; • video recordings and transcripts of any videoconferencing, including Microsoft Teams and Zoom; • instant messenger messages on any application; • call logs. We may record voice calls for monitoring or legal compliance purposes.	• You or your representative are the source of this information • Us, where we have produced the information ourselves
Employment application information	We are an employer and hire new employees or independent contractors for a variety of positions. To do so, we consider various job applicants, who either approach us directly or are referred to us through a recruitment agency. We process a host of personal information of job applicants, including - • their contact information; • passport, visa, work permit, and related information; • CV and resume; • qualifications; • education; • work history; • references and contract details; • race and / or ethnicity; • health information, like disabilities; • sexual orientation if disclosed;	• You • Your recruitment agency

Confidential

Category of information	Types of information	Source of information
	• gender; • criminal record. We are required to comply with various laws in hiring employees, as well as our own internal policies surrounding equal opportunity employment, and hiring persons from protected categories relating to race, ethnicity, gender, sexual orientation, and disability. Where we collect this special personal information directly from an applicant, we will obtain their consent. Where we are provided this special personal information from a recruitment agency, the agency should have received the necessary consent from you, and warrants to us that it has done so and that we are permitted to process your personal information, including your special personal information.	
Access and security information	We process information about you when you use our IT infrastructure or visit our premises. For this purpose, we process personal information like your - • download and print records, • records of email and internet usage in accordance with our policies relating to email and internet policy; • CCTV images captured through the legitimate use of CCTV; and • physical and / or electronic access log ins, including contact information.	• You, where you have provided the personal information to us • Us, where we have produced the information ourselves • A third party IT service provider or application that we use • Security companies who we utilise to protect and monitor our premises • Our landlords where we rent premises from them
Retail network and regulatory information	If you are our franchisee, retailer, site operator or branded marketer, we process information about you and your business, including: • identity, ownership, shareholding and directors' details; • site and retail licence details; • fuel volumes, sales and turnover; margins, operating costs, rental and fees;	• You or your representative; • your branded marketer;

Confidential

Category of information	Types of information	Source of information
	• financial statements and management accounts; tank dip, meter and stock reconciliation records; • card and loyalty programme transaction, contribution and settlement information; and • any other information required to comply with, or respond to requests under, laws regulating the petroleum industry, including information requested by the DMPR or experts appointed by it.	• Our PSP and site point-of-sale systems; • a regulator or public body; • us, where we have produced the information ourselves
Loyalty programme information	If you are a loyalty programme member, we process: • your membership identifier and membership category; • transaction ID, date, time and site of purchase; • product, litres and amount; • method of payment and masked card number; • rewards earned, redeemed and expired; fraud risk status; and • where you have opted in to our marketing, your name, mobile number, email address and consent record.	• The programme partner; • Our PSP; the payment terminal at the participating service station; • us, where we have produced the information ourselves
Competition information	If you enter a competition, we process: • your name, surname, identity number (for winner validation), cell phone number and email address; • proof of qualifying purchase (such as your receipt, the site and the date and time of purchase); • entry channel; and • if you win, prize acceptance and handover records, including photographs or recordings where you agree.	• You; • the service station; • our appointed competition agency or notifier; • the platform through which you enter

Confidential

ANNEXURE B - PURPOSE AND LAWFUL BASES OF PROCESSING

No	Purpose	Lawful bases	Categories of personal information
1	**Operations** Where you are our branded marketer, franchisee, customer (wholesale or retail), website user, or we market our goods or services to you, we may process your personal information for the purposes of - • procuring and onboarding customers; • operating our website; • the processing and fulfilment of orders; • supplying our goods and services; • generating invoices, bills and other payment-related documentation; • receiving and monitoring payments; • credit control. Where we are your customer, we may process your personal information for the purposes of - • receiving goods and services; • making and monitoring payments; • credit control; • expense monitoring and analytics; • verifying your B-BBEE status and related supporting documentation.	The lawful bases for these forms of processing are because the processing is - • necessary to perform in terms of our contract with you; • necessary for our compliance with B-BBEE related laws; • in our legitimate interests, namely the proper administration of our website, services, and the procurement of goods and services from entities with favourable B-BBEE ratings; • if you are our customer, it is in your legitimate interests to use our website and purchase our products; or • if we are your customer, it is in your legitimate interests to sell and provide the goods and services to us.	• Contact information • Financial and tax information • Transaction information • Location information • Legal and compliance information • Website usage information • Communication information
2	**Relationships and communications** We may process personal information for the purposes of - • managing our relationships; • providing support services; • complaint handling; • receiving products or services; and • communicating with you (excluding communicating for the purposes of direct marketing) by email, WhatsApp, instant messenger, videoconferencing, SMS, post, and/or telephone.	The lawful basis for this processing is that we are required to process this information to perform in terms of our agreement with you. It is also in our legitimate interests, namely communicating with our - • website visitors; • service users; • branded marketers; • franchisees; • customers (wholesale and retail); • service providers; and	• Contact information • Transaction information • Location information • Communication information

Confidential

No	Purpose	Lawful bases	Categories of personal information
		• personnel / representatives of any of these parties. It is further for the maintenance of relationships, and the proper administration of our website, services and business.	
3	**Direct marketing** We may process personal information for the purposes of creating, targeting and sending direct marketing communications by - • email; • SMS; • post; and • telephone calls	The lawful basis for this processing is consent.	• Contact information • Transaction information • Legal and compliance information
4	**Research and analysis** We may process usage data and/or transaction data for the purposes of researching and analysing (and improving where required) the use of our - • website, services; • sales; • expenses; • as well as researching and analysing other interactions with our business.	The lawful basis for this processing is our legitimate interests, namely monitoring, supporting, improving and securing our - • website; • services; • products; • expense processing; and • business generally.	• Contact information • Financial and tax information • Transaction information • Website usage information
5	**Record keeping** We may process your personal information for the purposes of creating and maintaining our data bases, back-up copies of our data bases and our business records generally.	The lawful basis for this processing is our legitimate interests, namely ensuring that we have access to all the information we need to properly and efficiently run our business in accordance with this notice.	• Contact information • Financial and tax information • Transaction information • Location information • Legal and compliance information • Website usage information • Communication information
6	**Security and access to our premises**	The lawful basis of this processing is our legitimate interests, namely the protection of our website,	• Contact information • Financial and tax information

Confidential

No	Purpose	Lawful bases	Categories of personal information
	We may process your personal information for the purposes of security and the prevention of fraud, and other criminal activity.	services and business, and the protection of others.	• Transaction information • Communication information
7	**Insurance and risk management** We may process your personal information where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks and/or obtaining professional advice.	The lawful basis for this processing is our legitimate interests, namely the proper protection of our business against risks.	• Contact information • Financial and tax information • Transaction information • Legal and compliance information • Communication information
8	**Legal claims** We may process your personal information where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure (including mediation, arbitration and any expert or referee determination process).	The lawful basis for this processing is where we have a legal obligation to process this personal information, for example, as required by the rules of Court. It is also in our legitimate interests to process this personal information, for the protection and assertion of our legal rights, your legal rights, and the legal rights of others.	• Contact information • Financial and tax information • Transaction information • Legal and compliance information • Communication information
9	**Legal compliance and vital interests** We may also process your personal information where such processing is necessary for compliance with a legal obligation to which we are subject or in order to protect your vital interests or the vital interests of another natural person.	The lawful basis for this processing is where we have a legal obligation to process this personal information, for example, where we suspect that you have committed fraud over R100,000. The lawful basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others The lawful basis may also be in your legitimate interests, for example, if we need to assist you in getting medical assistance or the like.	• Contact information • Financial and tax information • Transaction information • Legal and compliance information • Communication information
10	**Considering and hiring employees** We process personal information for recruitment and hiring purposes.	We process this personal information because it is in our interests to consider persons for job positions and to hire them if successful.	• Contact information • Employment application information

Confidential

No	Purpose	Lawful bases	Categories of personal information
		It is further in your legitimate interests to be considered for a job position. Where your special personal information is processed, your consent is obtained for such processing.	
11	**Premises, IT, access and monitoring** If you visit any of our premises, we need to process your personal information to grant you access to our technical and IT infrastructure. We also need to process your personal information to provide you with access to our premises, including our plants, refinery and offices.	• This processing is necessary for our contract with you • It is in our legitimate interests to provide you with access to our systems and premises and to monitor that access • It is also in our legitimate interests to ensure that such systems and premises are used in accordance with our policies, in a lawful manner that does not introduce unnecessary risk to us or others • It is in your legitimate interests to visit our premises and make use of our IT infrastructure	• Access and security information
12	**Regulatory reporting** Where you are our franchisee, retailer, site operator or branded marketer, we may process and disclose your personal information to the DMPR, other regulators and public bodies, and experts appointed by them, for regulatory, price-setting, margin-setting and monitoring purposes.	• Compliance with an obligation imposed by law; • the proper performance of a public law duty by a public body; and • our legitimate interests in participating in the regulatory processes that govern our business and retail network.	• Contact information; • Financial and tax information; • Transaction information; • Legal and compliance information; • Retail network and regulatory information
13	**Loyalty programmes** To operate loyalty programmes with programme partners, including verifying membership, calculating, allocating and settling rewards, processing redemptions, reconciliations and contributions, detecting and preventing fraud, handling queries and complaints, and analysing programme performance.	• Performance of the programme terms to which you are party; • our legitimate interests in operating, securing and improving the programme; and • consent, where you opt in to our marketing database.	• Contact information; • Transaction information; • Loyalty programme information; • Retail network and regulatory information (participating retailers)
14	**Competitions** To administer competitions, verify eligibility and qualifying purchases, conduct draws, contact and	• Performance of the competition terms you accept on entry; • compliance with the Consumer Protection Act; and	• Contact information; • Competition information; • Transaction information

Confidential

No	Purpose	Lawful bases	Categories of personal information
	validate winners, deliver prizes, publish winners' details and comply with competition laws.	• consent for any publicity or marketing beyond what is legally required.	

Confidential