

TRACKER CONNECT (PROPRIETARY) LIMITED

Registration Number (2011/003946/07)

("Tracker")

MANUAL PREPARED IN ACCORDANCE WITH SECTION 51 OF THE PROMOTION OF ACCESS TO
INFORMATION ACT, NO 2 OF 2000

COMPLETED: 10 MAY 2021

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1. INTRODUCTION

This Manual is published in terms of Section 14 of the Promotion of Access to Information Act, 2000 (Act No. 2 of 2000).

2. PURPOSE OF THE MANUAL

The purpose of the Manual is to help you access Tracker information and any other information that we may hold and which you may be entitled to. PAIA requires us to make it available to you so that:

- you know what types of information we have; and
- you can request it, if you are entitled to access it.

3. CONTACT DETAILS (Section 51(1)(a))

The Chief Executive Officer has duly authorised the Information Officer to deal with all matters in connection with requests for information in terms of PAIA.

Executive Directors: W de Nobrega (CEO); C Appana (CFO);

Information Officer: A Stamp

Postal Address: P.O. Box 2492, Cresta, 211

Street Address: Stonemill Office Park, 340 Republic Road, Darrenwood, 2194

Telephone Number: 011 380 0300

Email Address: paia@tracker.co.za

4. THE PAIA MANUAL (Section 51(1)(b))

This Manual has been compiled in accordance with Section 10 of PAIA by the South African Human Rights Commission.

The Manual is available from the South African Human Rights Commission. Please direct any queries to:

The South African Human Rights Commission:
PAIA Unit, the Research and Documentation Department
Telephone Number: +27 11 484-8300
Website: www.sahrc.org.za
E-mail: paia@sahrc.org.za
Postal Address: Private Bag X2700, Houghton, 2041

5. NOTICES (Section 51(1)(c))

Notice(s) in terms of PAIA:

At this stage, no notice(s) has/have been published by the Minister on the categories of information available without a person having to request access in terms of PAIA. However, certain records / information is freely available on our website.

6. RECORDS WE HOLD

Categories of information collected about you as a customer include:

- General identification and contact information.
- Your name, address, e-mail address, telephone number, gender, marital status (Tracker employees only), date of birth, passwords and activity records (such as driving behaviour and location of your vehicle).
- Identification numbers issued by government bodies or agencies.
- Identity and passport number
- VIN number and registration number of your vehicle.
- Vehicle make and model.
- Financial information and bank account details.
- Credit history and credit score and other financial information.
- Medical condition and health status (Tracker employees only).
- Other sensitive information (Tracker employees only).
- We may obtain information about your criminal record or civil litigation history in the process of preventing, detecting and investigating fraud or in the employment process. We may also obtain sensitive information if you voluntarily provide it to us (for example, if you express preferences regarding medical treatment based on your religious beliefs) (Tracker employees only).
- Telephone recordings.
- Recordings of telephone calls to and from our representatives and call centres.
- Information to investigate crime, including fraud and money laundering (for example, we will share information with insurers who are investigating an insurance claim or with the SAPS who are investigating a criminal matter).
- Information enabling us to provide products and services.
- Location and identification of your vehicle (for example, vehicle coordinates and vehicle license plate or VIN number).
- Medical condition and health status (if applicable).

7. RECORDS AVAILABLE IN TERMS OF LEGISLATION (Section 51(1)(d))

Records available in terms of any other legislation applicable to our business, inter alia:

Broad Based Black Economic Empowerment Act 53 of 2003(as amended)
Basic Conditions of Employment Act 75 of 1997(as amended)
Companies Act, 71 of 2008
Competition Act 89 of 1998 (as amended)
Criminal Procedure Act No 51 of 1977(as amended)
Consumer Protection Act, 68 of 2008
Constitution of RSA Act 108 of 1996 (as amended)
Copyright Act, 98 of 1978
Cross-border Road Transport Agency Act 4 1998 (as amended)

Customs and Excise Act 32 of 2014
Designs Act 195 of 1993
Dangerous Weapons Act 15 of 2013 (as amended)
Electronic Communications and Transactions Act 25 of 2002
Financial Advisory and Intermediary Services Act, 37 of 2002
Financial Intelligence Centre Act 38 of 2001 (FICA) (as amended)
Firearms Control Act 60 of 2000 (as amended)
Independent Communications Authority of SA Act 13 of 2000 (ICASA)(as amended)
Income Tax Act, 58 of 1962
Intellectual Property Laws Amendment Act 28 of 2013
Intellectual Property Rights from Publicly Financed Research & Development Act 51 of 2008
Interception & Monitoring Prohibition Act No 127 of 1992 (as amended)
National Qualifications Framework Act 67 of 2008 (as amended)
Occupational Health and Safety Act, 85 of 1993
Patents Act 57 of 1978 (as amended)
Prescribed Rate of Interest Amendment Act 7 of 1997
Prevention of Organised Crime Act, 121 of 1998
Prevention and Combatting of Corrupt Activities, Act 12 of 2004
Private Security Industry Regulating Act No 56 of 2001
Private Security Industry Levies Act 23 of 2002
Promotion of Equality and Prevention of Unfair Discrimination Act, 4 of 2000
Protected Disclosures Act 26 of 2000
Protection of Personal Information Act, 4 of 2014
Regulation of Interception of Communications and Provision of Communication-Related Information Act 70 of 2002 (RICA)
Short Term Insurance Act of 1998(as amended)
South African Revenue Services Act, 34 of 1997
Skills Development Levies Act, 97 of 1998
Tax Administration Act 16 of 2016
Trademarks Act, 94 of 1993
Value Added Tax Act, 89 of 1991

8. RECORDS HELD BY THE COMPANY

In terms of records that may be requested, the mere fact that the information of the company is listed in the Manual does not mean that the information will be made available. The company in terms of Chapter 4 of PAIA, has the right to refuse a request for information should any of the grounds of refusal as set out in Chapter 4 of the Act, exist.

For instance, we may have to refuse you access to certain records in terms of PAIA to protect:

- privacy of a third party or someone who is a natural person, including a deceased individual;
- someone else's or another company's personal, commercial or confidential information;
- the safety of individuals and protection of property;
- Tracker's confidential and/or proprietary information;
- information that by agreement between Tracker and a third party, is confidential (for example the content of a confidential agreement);
- records privileged from production in legal proceedings;
- research information; or

- commercial activities of Tracker, which may include trade secrets, intellectual property, proprietary information, financial information, commercial information or technical information which disclosure would likely cause harm to the business interests of Tracker.

We will notify you in writing whether your request has been approved or denied within 30 (thirty) calendar days after we have received a completed Request for Access form. If we cannot find any requested record or it does not exist, then we will notify you that it is not possible to give access to that particular record.

Web Page

The Web Page (www.tracker.co.za) is accessible to anyone who has access to the Internet. The web page has the following categories:

- About Tracker
- If your vehicle is stolen
- Products
- How to get a Tracker
- Fitment Centres
- Tracker Offices
- Tracker Insight Overview
- Why Tracker
- Our Partners
- Corporate and Social Investment
- Our Brand
- Frequently asked questions
- Contact Tracker
- Tracker Vacancies
- Consumer Support
- Consumer App
- Disclaimer
- Copyrights
- Information Manual
- Privacy Policy
- Terms of use
- My Tracker Self Service Centre
- Legal and Governance
- Plans and Pricing
- Media Gallery
- Brochure downloads
- Rate our Service
- Terms and Conditions
- Features and Benefits
- New Products
- News Room

9. OTHER INFORMATION WE KEEP

Company Secretarial and Legal

- Agreements
- Company Secretarial Records
- Trademarks and Patents

Finance

- Financial Statements
- Management Accounts
- Budgets
- Management Plans
- Asset Registers
- Company Policies
- Banking Records
- Purchasing Records
- Audit Reports

Security

- Records
- Biometric Access Details

Human Capital

- Policies
- Benefits
- Provident Fund
- Staff Records
- Employment Equity Reports
- Skills Development Reports
- Training and Development Records
- Industrial Relations Records
- Payroll Records
- Medical Aid Information

Operational

- Database
- Computer Software
- Health and Safety Records
- Maintenance Records

10. REQUEST PROCEDURE

Should you request information in terms of PAIA, please complete the prescribed form.

The request form can be accessed on www.justice.gov.za or a copy of the form can be downloaded from our website www.tracker.co.za

Remember to indicate the following on the form:

- Form of access required;
- Identify the right you want to exercise or protect and give an explanation why the record is needed for that purpose;
- Specify a postal address in South Africa, or an e-mail address;
- Proof of the capacity in which you are acting, if requesting access on behalf of a third party.

The completed form, together with the necessary supporting information can be delivered to Tracker as follows:

- In person at Tracker Connect: Stonemill Office Park, 340 Republic Rd, Darrenwood, Johannesburg, 2194 - marked attention of Mr T. Stamp, Information Officer
- By email to Paia@tracker.co.za

11. INFORMATION SECURITY

We secure our data by maintaining reasonable measures to protect personal information from loss or misuse and unauthorized access, disclosure, alteration and destruction. We also take reasonable steps to keep personal information accurate, current, complete and reliable for its intended use.

12. UPDATES TO THIS MANUAL (Section 51(4))

This Manual will be updated and amended from time to time.

13. LEGISLATIVE AND REGULATORY FRAMEWORK

This Manual should be read in conjunction with the following legislative framework:

- Promotion of Access to Information Act 2 of 2000;
- Protection of Personal Information Act 4 of 2014.

14. AVAILABILITY OF THE MANUAL

In accordance with the Regulations to the Act, the Manual has been made available to the South African Human Rights Commission (SAHRC). It can be accessed on their website (www.sahrc.org.za) and will be published in the Government Gazette. The Manual is also published on Tracker's website at www.tracker.co.za, together with the prescribed form and the fees applicable.


15. FEES IN RESPECT OF PRIVATE BODIES


You must pay the requested fee as required by law when submitting a request for access to information. The prescribed fees are set out in the Fee Schedule which is available from SAHRC, alternatively access the following link:

<https://www.sahrc.org.za/home/21/files/PAIA%20Notice%20on%20fees.pdf>

You must pay the fees before Tracker hands over the requested information. You have to pay a further access fee if we grant the request for any time that has exceeded the prescribed hours to search and prepare the records for disclosure.

Signatures:

Quality Document drafted for Review::	In the creation of this document I commit that I adhered to the guidelines that are in place as far as possible.	
Name:	Lee Ann Koen TRACKER\lakoen <i>Lee Ann Koen</i>	Title: Quality Compliance Officer
<hr/>		2025-06-13 15:06:09 (UTC+02:00)
Electronically Signed		Timestamp

Controlled Quality Document Authorized for Release:	I authorize this controlled quality document, and its associated supporting documents if present, for release	
Name:	Lizette Le Roux TRACKER\lroux <i>Lizette Le Roux</i>	Title:
<hr/>		2025-06-13 16:06:57 (UTC+02:00)
Electronically Signed		Timestamp

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