



PRIVACY NOTICE

Fidelity Services Group (Pty) Ltd and its subsidiary companies (“Fidelity”) takes data privacy seriously. We understand that when sharing personal information with us, we are placed in a position of trust and we are therefore committed to safeguard the information that we collect from our websites and/or from our clients to whom we provide services and/or from our business partners with whom we do business with.

This privacy notices describes how we collect and use your personal information by explaining the following:

- Who we are and what we do;
- What personal information we collect;
- Where do we obtain the personal information from;
- How we use your personal information;
- With whom do we share your personal information;
- Transferring of personal information to other countries;
- Measures we take to protect your personal information;
- How long we retain your personal information;
- Your rights in relation to your personal information;
- The use of cookies and similar technology;
- Automated Decision Making;
- How you can make contract with us;
- Updating this Privacy Notice `

When providing your personal information to us, via one or our website, email, in person, over the phone, via a call center, or in any other manner not specifically mentioned here, this privacy notice will apply.

There may be circumstances where you receive marketing material on third party websites that generally have their own privacy notices and related terms and conditions and we encourage you to read same before making use of the website.

WHO WE ARE AND WHAT WE DO

Fidelity is Southern Africa’s largest integrated security solutions provider and the industry leader in protection innovation. Excellence in service delivery and implementation are fundamental to our impressive record of accomplishments.



By keeping abreast of the latest trends and technological developments globally, and continuously evolving and innovating, the Group remains a front-runner in the security solutions market. Through a bouquet of services and related products, the Group can tailor make a solution for any requirements.

WHAT PERSONAL INFORMATION WE COLLECT ABOUT YOU

Personal information means any information that can be used directly or indirectly to identify a specific individual or business.

You are not required to provide us with any personal information when requested but should you refuse we may not be able to render our services to you or otherwise have a business relationship with you.

We collect and process different types of personal information in the course of operating our business and providing our services to you. These includes:

- Basic personal information such as your name and surname;
- Contract information such as your telephone number, email address and postal address and in some instances your fax number;
- Demographic information such as your address, province you reside in and the interest in our service offerings;
- Financial information such as payment related information and bank account details;
- Credit related information from third party Credit Bureaus;
- Personal information provided to or generated by us in the course of providing our security service which in some instance will include “special personal” information;
- Recruitment related information that will also include your employment history, references, scholastic and other educational related information, professional memberships, race, gender and if necessary the information regarding your criminal history, if any;
- In the course of employment with us we collect information regarding your dependants, health and safety related information, ongoing criminal verification checks, tax related information, and if required other information relating to your suitability for a particular role;
- Data provided to us in the course of attending events or meetings at any one or our premises;
- Information relating to race and gender as far as it relates to equal employment opportunities and Black Economic Empowerment;
- Website usage and technical data such as the details of your visits to our website and making use of our “contact me” form;



WHERE DO WE OBTAIN THE PERSONAL INFORMATION FROM

We collect and receive personal information in a number of different ways including:

- Collecting personal information directly from you by means of email, telephone, call centers, face to face interaction with our business representatives;
- When monitoring the use or interaction with our websites;
- Information collected during marketing campaigns and other means of direct marketing
- Collection from third parties;
- We also collect information from public sources such as LinkedIn, Facebook ect.

HOW WE USE YOUR PERSONAL INFORMATION

We will only use your personal information when the law allows us to use the information.

Most commonly we use your personal information in the following circumstances:

- **Consent:** Where you have given us your consent to use the information
- **Contract Performance:** When the information is necessary to enter into a contract with you and during the subsistence of the contractual relationship with you
- **Legal Obligation:** Where it is necessary for us to use your personal information to comply with a legal obligation
- **Legitimate interest:** Where we, as a Responsible Party, has established a legitimate interest to process the information and our reasons for using the information outweighs the prejudice to your rights as a data subject
- **Legal Claim:** Where your information is necessary to prosecute, defend or make a claim against you or another third party.
- **Your Interest:** In the instances where it becomes necessary to use your personal information to protect your or someone else's interest
- **Public Interest:** Where its in the public interest to use your personal information

MORE SPECIFICALLY WE USE YOUR PERSONAL INFORMATION:

- To provide our **services** to you – we use your information to perform our agreed services to you including to carry out any obligation that arises from any agreement that we have entered into.
- For **marketing and business development** purpose – as we aim to grow our customer base, innovate and grow our service offerings we use your personal information to provide you with information regarding our services as well as new products and developments. We will provide you with the option to unsubscribe or opt-out from receiving any further



communication, electronic or otherwise, sent to you should you no longer wish to receive marketing information to you.

- For **research and development purposes** – to better understand our clients and their needs as well as marketing preferences in order to remain at the forefront of the industry and engaging in a meaningful way with our clients and potential clients.
- For **recruitment** purposes – to enable us to review your CV, process your application for employment, assess your suitability for a particular position, to appoint you in the event that you are successful and to retain your details for a period of time should we have another suitable job opportunity that you may be interested in.
- **Legal and Regulatory Obligations** – from time to time we are required to use personal information to ensure that we, as a responsible corporate citizen and the provider of innovative security related services, comply with the statutory obligations placed on us
- To facilitate the use of our **websites** – to respond to requests for information and enquiries from website visitors and to ensure that our website operates effectively whilst being used by you.
- To **enforce** our agreement with you – to recover any payments due to us, including the recovery of such monies through the engagement with debt collection agencies and legal practitioners including the institution of legal proceedings for such recovery. The personal information may also be used to institute and defend any legal proceedings, by you or another third party, relating to the agreement.
- To **inform** you of changes – to notify you of any changes to our services, our terms of engagement or this privacy notice.
- When we make **changes to our business** – when we re-organize our business, either through a restructure, merger, acquisition or divestment, we may need to share and/or transfer some or all of your personal information with the relevant third parties as part of any due diligence process.

WITH WHO DO WE SHARE YOUR PERSONAL INFORMATION

Fidelity Services Group (Pty) Ltd comprise of various businesses and we share and process your information within our group of companies.

We also share your information, to the extent necessary, with the following third parties:

- Our professional service advisors including legal, financial, risk managers, bankers, auditors and other advisors used in the ordinary course of our business
- Our insurers and insurance brokers
- Other external service providers and or advisers including marketing and Information Technology service providers.



- Regulators and law enforcement agencies to the extent required by any law and/or regulation

TRANSFERRING OF YOUR PERSONAL INFORMATION TO OTHER COUNTRIES

Personal information we hold about you may in certain circumstance be transmitted transborder to other counties as some of the technology solutions we use are hosted outside of South Africa. We endeavor to only transfer personal information to countries that have adequate data protection law and if not ensure that all reasonable efforts are made by these service providers, as processors, to secure the confidentiality and integrity of the data.

MEASURES WE TAKE TO PROTECT YOUR PERSONAL INFORMATION

As a service provider that aims to secure your assets we will also take all reasonable physical, technical and managerial measures to protect your personal information for unlawful access, use, disclosure or destruction.

Our measures include but is not limited to implementing appropriate access controls, investing in our information security capabilities, and keeping into consideration best industry practices.

To this end Fidelity is in the process of implementing ISO270001 standards and obtaining certification.

Access to your personal data is only permitted amongst our employees and agents on a need-to-know basis and subject to contractual confidentiality obligations. Our staff receive regular communications relating to POPIA and the role that they play when processing personal information. Staff receive various face to face training as well as training via a e-learning platform on a ongoing basis.

HOW LONG DO WE RETAIN YOUR DATA

We will retain your personal data in line with prescribed legislation, if any, and if not the data shall be retained for as long as it is necessary to fulfil the purpose for which the information was collected for, and if applicable for any other purpose that is linked to the initial reason for collection.



We base our data retention periods on the needs of our business but will at all relevant times take into consideration the applicable legislative prescripts as well as best practice.

YOUR RIGHTS IN RELATION TO YOUR PERSONAL DATA

As a data subject you have a right:

- To be notified what personal information is being processed
- To be informed with whom your personal information has been shared
- To request us to provide you with an extract of the personal information we hold about you
- To request the correction of the personal information we hold about you. This will enable you to correct any incomplete or inaccurate information we may have about you
- To request the deletion of your information or more commonly referred to as the right to be forgotten. This right may be exercised if we have no lawful basis to have or retain personal information about you.
- To object to the processing of your personal information in the prescribed manner and on reasonable grounds. In particular you have the right to object against the use of your information for direct marketing purposes
- If our processing activity is based on your consent you have the right to withdraw your consent at any time
- To request the restriction of processing of your personal information. This right enables you to request that we suspend processing on certain grounds
- To request that we transfer your personal information to another party
- The right not to be subject to a decision based solely on automated processing and which has a legal or other significant impact on you. In particular you have the right to obtain human intervention, to express your point of view, to obtain an explanation of the decision reached and to challenge the decision

Whilst we respect your rights as set out above, you should be aware that in certain circumstances your rights may be subject to certain exemptions or restrictions for example if the processing of your personal information is necessary to safeguard the public interest (e.g. to prevent crime or pursue a criminal case against you) or where we are required or permitted by law to continue to process the information.

You will not be required to pay a fee to access your personal information or to exercise any of your other rights relating to your personal information. We do however have the right in terms of the law to charge a reasonable fee if your request is unfounded or excessive. In the alternative to a fee, we may refuse to comply with an unfounded or excessive request.



When exercising any of your rights as a data subject we may have to require specific information from you to confirm your identity and to establish your right to access the personal information. This requirement is being put in place to ensure that we do not disclose your personal information to a requester that does not have a right to receive it. We will respond to your request to exercise any of your rights within a reasonable time.

We are, in terms of the law, required to take reasonable steps to ensure that the information we hold about you is accurate. Please keep us informed of any changes to your personal information.

Please note that you have the right to make a compliance to the **Information Regulator**, the supervisory authority for data protection issues.

Their details are as follows:

THE INFORMATION REGULATOR OF SOUTH AFRICA

JD HOUSE, 27 SIEMENS STREET

BRAAMFONTEIN

JOHANNESBURG

P.O Box 31511, BRAAMFONTEIN, JOHANNESBURG, 2017

EMAIL: inforeg@justice.gov.za / complaints.IR@justice.gov.za

THE USE OF COOKIES AND SIMILAR TECHNOLOGY

Cookies are small text files that websites use to collect information whilst you are browsing the internet. Cookies are processed and stored by your web browser. Different cookies can be used ranging from necessary functional cookies to enable a website to function to cookies that collect and store a wealth of data about you in order to identify you and track your online activity.

Fidelity only uses cookies that are necessary – these cookies are essential for you to browse our websites and use its features effectively.



AUTOMATED DECISION MAKING

Automated decision making takes place when an electronic system uses personal information to make a decision about you without any human intervention. We are allowed to use automated decision making under the following circumstances:

- Where we have notified you of the decision and we give you a reasonable time to object against the decision
- Where it is necessary to perform our duty as a security service and related service provider and there are appropriate safeguards in place to protect your rights
- In limited circumstances, with your consent and where appropriate safeguards are in place to protect your rights

If we do make an automated decision about you on the basis of particularly sensitive personal information, we must either have your explicit written consent or it must be justified in the public interest. We must at all times put in place appropriate safeguards in place to protect your rights.

HOW YOU CAN MAKE CONTACT WITH US

We have appointed the following deputy information officers to oversee compliance to this privacy notice. If you have any questions about this privacy notice or how we use your personal information please contact:

- Fidelity Services Group: MarindaM@fidelity-services.com
- Fidelity Security Services: IanL@fidelity-service.com
- Fidelity Cash Solutions: FrankM@fidelity-services.com
- Fidelity Cash Master: FrankM@fidelity-services.com
- Fidelity ADT: JonathanB@fidelity-services.com

UPDATING THIS PRIVACY NOTICE

We reserve the right to update this privacy notice from time to time. We will at all times have available the last version of this policy on our website and we therefore encourage you to review the policy when visiting our website in order to stay informed as to how we use your information.

Reference: PN
Annexure: N/A
Revision No.: 01
Date: 31/05/2021
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Quality Management System

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