

CUSTOMER PRIVACY POLICY

PARTFINDERS

Table of Contents

1	Introduction and Scope of Application	3
2	Responsible Party Details	3
3	Personal Information Collected from Users.....	3
4	Purpose of Processing Personal Information.....	4
5	Direct Marketing and Communications.....	5
6	Cookies and Tracking Technologies	5
7	Storage and Security of Information	6
8	Retention of Personal Information.....	7
9	Disclosure to Third-Party Service Providers	7
10	Rights of the Data Subject.....	8
11	Information Officer	9
12	The Information Regulator (South Africa)	9
13	Amendments to this Policy.....	9

1 Introduction and Scope of Application

- 1.1 This Customer Privacy Policy ("**Policy**") governs the processing of personal information by The Part Supplier (Pty) Ltd (Registration Number: 2025/778881/07) ("**we**", "**us**", or "**our**") through the Partfinders platform ("**Platform**") accessible at www.partfinders.co.za.
- 1.2 This Policy applies exclusively to users and buyers who interact with our Platform. It does not extend to independent vendors listed on the Platform, whose data processing activities are governed separately.
- 1.3 The Platform operates as an online listing service that facilitates connections between users and independent vehicle parts vendors. We expressly disclaim any role in:
 - 1.3.1 processing payments for vehicle part transactions;
 - 1.3.2 acting as an agent in sales transactions between users and vendors; and
 - 1.3.3 controlling information exchanged directly between buyers and vendors outside the Platform.
- 1.4 By using the Platform, you acknowledge that your personal information will be processed in accordance with this Policy and applicable South African data protection laws, including the Protection of Personal Information Act 4 of 2013 ("**POPIA**"). You further consent to the processing activities described herein, where such consent is required by law.
- 1.5 You acknowledge that any engagement with independent vendors, including any personal information you share with them, may be subject to their own separate privacy policies and terms, which are outside of our control.

2 Responsible Party Details

- 2.1 We are the "**Responsible Party**" as defined in the POPIA for all personal information processed through the Partfinders platform (www.partfinders.co.za).
- 2.2 Our registered office is in the Republic of South Africa and we have appointed an Information Officer in compliance with POPIA.
- 2.3 For any privacy-related enquiries or requests, including the exercise of your rights under POPIA, you may contact our Information Officer at: queries@partfinders.co.za.

3 Personal Information Collected from Users

- 3.1 When you use our Platform, we may collect and process the following categories of personal information:

3.1.1 Contact Information

Your name, email address, and telephone number when voluntarily provided via our contact forms or WhatsApp enquiries.

3.1.2 Technical Data

Your IP address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system, and platform.

3.1.3 Usage Data

Information about how you interact with our Platform, including pages visited, search queries, and session duration.

3.2 Our Platform uses cookies and similar tracking technologies to collect certain technical and usage data to enhance functionality and analyse performance. For detailed information, please refer to Clause 6 (Cookies and Tracking Technologies).

3.3 We do not control, process, or assume responsibility for any personal information you share directly with independent vendors outside of the Platform (e.g., via direct calls, emails, or external messaging platforms). Such interactions are governed by the vendor's own privacy policy and fall outside the scope of this Policy.

4 Purpose of Processing Personal Information

4.1 We process your personal information solely for the following specific, explicitly defined and lawful purposes:

4.1.1 To respond to and process your enquiries submitted through our Platform;

4.1.2 To facilitate connections between you and independent vendors listed on our Platform by transmitting your enquiry details to relevant vendors;

4.1.3 To maintain and improve the technical functionality, security, and performance of our Platform, including for troubleshooting, data analysis, and system testing;

4.1.4 To conduct internal analytics for service enhancement and user experience optimisation, including monitoring usage patterns and Platform performance; and

4.1.5 To comply with our legal obligations under South African law, including applicable record-keeping requirements.

4.2 We do not use automated decision-making or profiling that produces legal effects or similarly significant consequences for users of the Platform. Certain technical tools used on the Platform, such as analytics software, may automatically process anonymised or aggregated data to help us understand usage patterns and improve the performance and functionality of the Platform. Any such automated processing does not involve decisions

being made about individual users and does not materially affect your rights, interests, or access to services on the Platform.

- 4.3 All processing is conducted in strict accordance with the POPIA and is limited to what is necessary for the purposes listed above. We will not process your personal information for any purpose that is incompatible with these stated purposes, unless required or permitted to do so by law.
- 4.4 In accordance with section 11 of the POPIA, we process personal information only where there is a lawful basis to do so. This includes processing that is necessary for responding to user enquiries, facilitating connections between users and vendors, complying with legal obligations, protecting our legitimate business interests, or where you have provided your consent.

5 Direct Marketing and Communications

- 5.1 We will only send you direct marketing communications (including newsletters and promotional material) if you have expressly consented to receive such communications or where permitted by applicable South African law.
- 5.2 All marketing communications will include a clear and functional "unsubscribe" mechanism, allowing you to opt out of future communications at any time.
- 5.3 You may withdraw your consent or opt out of receiving marketing communications at any time by:
 - 5.3.1 Clicking the unsubscribe link provided in any marketing email; or
 - 5.3.2 Contacting us at queries@partfinders.co.za with your request.
- 5.4 Please note that withdrawing your consent or opting out will not affect the lawfulness of processing based on consent before its withdrawal, nor will it affect the processing of your personal information for non-marketing purposes, such as communications regarding your account or transactions.

6 Cookies and Tracking Technologies

- 6.1 Our Platform uses cookies and similar tracking technologies to enhance functionality, analyse usage patterns, and improve your user experience. These technologies help us distinguish you from other users and remember your preferences.
- 6.2 We utilise the following categories of cookies:

6.2.1 Essential Cookies

These are necessary for the core functionality of our Platform, such as page navigation and access to secure areas. The Platform cannot function properly without these cookies, and they cannot be disabled without affecting its operation.

6.2.2 Analytics Cookies

These collect anonymised data about how you interact with our Platform (e.g., pages visited, session duration) to help us understand usage patterns and improve performance.

- 6.3 You can manage your cookie preferences through your browser settings, which allow you to block or delete cookies. Please note that disabling or deleting cookies, particularly essential ones, may impair the Platform's functionality and your user experience.
- 6.4 Upon your first visit to our Platform, a cookie banner will appear, notifying you of our use of cookies. It will provide you with the opportunity to accept our cookie practices or customise your preferences for non-essential cookies.
- 6.5 We do not use tracking technologies to profile users for third-party advertising purposes.

7 Storage and Security of Information

- 7.1 We store your personal information on secure servers located within the Republic of South Africa. We are committed to protecting the security of your personal information and implement appropriate, reasonable technical and organisational measures to protect it against unauthorised access, alteration, disclosure, or destruction.
- 7.2 These measures are in accordance with industry standards and South African data protection laws, and include, but are not limited to:
 - 7.2.1 Secure network infrastructure, including firewalls and encryption protocols;
 - 7.2.2 Restricted access to personal information on a need-to-know basis for our employees and authorised service providers; and
 - 7.2.3 Regular security assessments and updates to our systems.
- 7.3 While we take all reasonable steps to secure your information, no method of transmission over the Internet or method of electronic storage is 100% secure. We cannot guarantee its absolute security. However, in the event of a suspected data breach, we will investigate the incident and notify you and the Information Regulator in accordance with our legal obligations.
- 7.4 We do not intentionally transfer your personal information to countries outside of South Africa. Should it become necessary to do so for a legitimate business purpose, we will ensure that the recipient of the information is subject to a law, binding corporate rules, or

binding agreement which provides an adequate level of protection that is substantially similar to the conditions for lawful processing under South African law.

8 Retention of Personal Information

- 8.1 We will retain your personal information only for as long as is necessary to fulfil the purposes for which it was collected, including for the purposes of:
 - 8.1.1 Providing our services to you, resolving your enquiries, and facilitating connections with vendors;
 - 8.1.2 Maintaining the security and integrity of our Platform;
 - 8.1.3 Complying with our legal obligations and any statutory retention periods required by South African law; and
 - 8.1.4 The establishment, exercise, or defence of legal claims, or to resolve disputes and enforce our agreements.
- 8.2 Once your personal information is no longer required for these purposes, or where you have exercised a valid right to deletion and we have no overriding legal obligation to retain it, we will securely destroy or permanently de-identify the information in accordance with our data protection policies and applicable law.
- 8.3 Please note that different retention periods may apply to different categories of personal information based on the specific purpose for which it was collected and any applicable legal or operational requirements.

9 Disclosure to Third-Party Service Providers

- 9.1 We may disclose your personal information to trusted third-party service providers ("**Operators**") who assist us in operating our Platform and delivering services to you. These Operators are contractually bound to process your information only on our instructions, for specified purposes, and in compliance with this Policy and applicable data protection laws.
- 9.2 Categories of Operators we may share your information with include:
 - 9.2.1 Hosting and infrastructure providers that securely store and maintain our Platform data;
 - 9.2.2 IT and software development service providers who support, maintain, and enhance Platform functionality;
 - 9.2.3 Analytics providers that assist us in understanding Platform usage to improve our services; and

9.2.4 Communication and email marketing service providers (only where you have provided your consent for such communications).

9.3 We ensure that all Operators implement appropriate technical and organisational measures to protect your personal information. Any disclosure is limited to the minimum information necessary for the performance of their services, and we prohibit them from using your information for any purpose other than providing the contracted services to us.

9.4 We remain accountable for the protection of your personal information under the POPIA, even when it is processed by our Operators on our behalf.

9.5 For clarity, this clause does not apply to independent vendors listed on the Platform. These vendors are not service providers to us, and any personal information you choose to share with them directly falls outside the scope of this Policy.

10 Rights of the Data Subject

10.1 In accordance with the POPIA, you have the following rights regarding your personal information processed by us:

10.1.1 Right to Access

You may request confirmation of whether we hold your personal information and obtain a copy of such information, subject to lawful limitations.

10.1.2 Right to Correction

You may request the correction, updating, or deletion of personal information that is inaccurate, incomplete, misleading, or outdated.

10.1.3 Right to Object

You may object, on reasonable grounds, to the processing of your personal information, including for direct marketing purposes. We will cease processing upon your objection, except where such processing is required by law or necessary for the conclusion or performance of a contract.

10.1.4 Right to Withdraw Consent

Where our processing of your personal information is based on your consent, you may withdraw that consent at any time. This will not affect the lawfulness of processing that occurred before your withdrawal.

10.1.5 Right to Lodge a Complaint

You may submit a complaint to the Information Regulator of South Africa if you believe that your rights under POPIA have been infringed.

- 10.2 To exercise any of these rights, please submit a written request to our Information Officer at queries@partfinders.co.za. We may require proof of your identity and sufficient details to locate your information to process your request.
- 10.3 We will respond to your request within a reasonable timeframe, as prescribed by law. Please note that your rights are subject to the limitations and exceptions set forth in POPIA and other applicable South African laws.

11 Information Officer

- 11.1 The Part Supplier (Pty) Ltd has appointed an Information Officer in compliance with the POPIA, who is responsible for overseeing compliance with data protection laws and this Privacy Policy.
- 11.2 The Information Officer may be contacted at queries@partfinders.co.za for any matters relating to the processing of personal information, including the exercise of rights under POPIA or the lodging of complaints.

12 The Information Regulator (South Africa)

- 12.1 Should you believe that we have processed your personal information in a manner that infringes upon your rights under the POPIA, you have the right to lodge a complaint with the Information Regulator of South Africa, the supervisory authority responsible for enforcing data protection laws in South Africa.
- 12.2 The contact details for the Information Regulator are as follows:
 - 12.2.1 Physical Address: JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
 - 12.2.2 Postal Address: P.O Box 31533, Braamfontein, Johannesburg, 2017
 - 12.2.3 Email: POPIAComplaints@inforegulator.org.za
 - 12.2.4 Website: <https://inforegulator.org.za/>
- 12.3 We encourage you to first contact our Information Officer at queries@partfinders.co.za to allow us an opportunity to resolve any concerns you may have before you approach the Information Regulator.

13 Amendments to this Policy

- 13.1 We reserve the right to amend this Policy at any time to reflect changes in our practices, legal requirements, or operational needs. The amended Policy will be effective immediately upon its publication on our Platform, which will be indicated by a revised "**Last Updated**" date.

- 13.2 For any material changes to this Policy, we will take reasonable steps to notify you in advance. This may include posting a prominent notice on our Platform or sending a direct communication to you where appropriate.
- 13.3 Where required by applicable law, such as the POPIA, we will seek your explicit consent for any material changes that substantially affect the way we process your Personal Information.
- 13.4 Your continued use of our Platform following the notification of amendments constitutes your acceptance of the revised Policy. We encourage you to review this Policy periodically to stay informed.