



Privacy Statement

Introduction and Purpose

TRM SECURITY SERVICES (PTY) LTD (TRM) takes the protection of personal data very seriously. The purpose of this policy statement is to expand upon our Privacy Policy and to describe the way in which we collect, store, use, and protect data that is associated with any Data Subject (natural/juristic person) and/or could be used to identify the Data Subject.

This statement applies to you if you are:

- A past, current or prospective client.
- A Data Subject who has interacted with one of our TRM Security Services personnel at Head Office or via any of our clients.
- If you have applied to TRM Security Services for employment, if you are a past employee, or may currently be in the employment of TRM Security Services.
- If you have applied, have been or currently are trainee at our Training Centre.
- If you have accessed any of our social media platforms, or are seeking marketing assistance.

Definitions

Under the Act, TRM is defined as the Operator, together with any other relevant party (if applicable), and our client is defined as the Responsible Party:

- Responsible Party means a public or private body or any other person which, alone or in conjunction with others determines the purpose of and means for processing personal information. Called Controllers in other jurisdictions (GDPR)
- Operator means a person who processes personal information on behalf of the responsible party. Called processors in other jurisdictions (GDPR)
- Data Subject is any person, natural or juristic, who can be identified, directly or indirectly, via an identifier such as a name; an ID number; location data; or via factors specific to the person's physical, physiological, genetic, mental, economic, cultural or social identity.
- Processing means any operation or activity, whether or not by automatic means, concerning personal information, including:
 - The collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use of data
 - Dissemination by means of transmission, distribution or making available in any other form
 - Merging, linking, restriction, degradation, erasure or destruction of information.



- Record means any recorded information
 - Regardless of form or medium, including any of the following:
 - Writing of any material
 - Information produced, recorded or stored by means of any tape-recorder, computer equipment, whether hardware or software or both, or other devices, and any material subsequently derived from information so produced, recorded or stored
 - Label, marking or other writing that identifies or describes anything of which it forms part, or to which it is attached by any means
 - Book, map, plan, graph or drawing
 - Photograph, film, negative, tape or other devices in which one or more visual images are embodied so as to be capable, with or without the aid of some other equipment, of being reproduced; in the possession or under the control of a responsible party
 - Whether or not it was created by a responsible party and regardless of when it came into existence.

- Personal Information means information relating to an identifiable, living, natural person, and where it is applicable and identifiable, existing juristic person, including, but not limited to
 - Information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, wellbeing, disability, religion, conscience, belief, culture, language and birth of the person.
 - Information relating to the education or the medical, financial, criminal or employment history of the person
 - Any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignments to the person
 - The biometric information of the person
 - The personal opinions, views or preferences of the person
 - Correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence
 - The views or opinions of another individual about the person
 - The name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person

Expanded Definition of Personal Information

- Personal Information that TRM Collects:
 - Certain information that we collect for the purposes of a contractual nature, which may be basic personal information, demographic information, financial information, credit related information from a 3rd party; 3rd party credential verification, recruitment information, pre-employment information
 - Certain information that we collect for access control, whether on site or at Head Office to load users onto specific access systems
 - Certain information that we collect when you present your ID/Driver's License and Vehicle License Disc for scanning.
 - Certain information pertaining to incident recording, investigations and backing evidence in the form of reports, statements, CCTV and photographic evidence.
 - Certain information collected by your automatic or manual entries into a register or onto a device or at a site, whether 3rd party or directly.
 - Certain information relating to electronic systems and databases for our clients/ Responsible Parties.

- Certain information pertaining to our training facility, with regards to training, recruitment and pre-employment.
 - Certain information pertaining to marketing information, which may be provided to us directly during the course of prospective client meetings, or via our website, telephonic calls directed to TRM, social media pages or email, whereby proposals or marketing information is requested.
 - Certain information relating to statutory legislated requirements such as B-BEEE, Employment Equity, WSP and other similar requirements.
 - Certain information pertaining to the health and safety of prospective and current personnel, in that it affects their ability to perform their duties, or as may be required for statutory reporting.
 - Certain information pertaining to digital platforms, such as social media and websites, training facilities, online meeting platforms and the likes.
 - Certain information pertaining to Trade Unions, Bargaining Councils, Provident, Medical Funds and the likes.
 - We collect and process your personal information mainly to contact you for the purposes of understanding your requirements, and delivering services accordingly. For this purpose, we will collect contact details including your name and organisation.
 - We collect information directly from you where you provide us with your personal details. Where possible, we will inform you what information you are required to provide to us and what information is optional.
- Personal Information Excludes:
 - Permanently de-identified information that does not relate to, or cannot be traced back to, you specifically
 - Non-personal statistical information collected and compiled by us
 - Examples
 - Identifying Information – such as your name, date of birth, or identification number of any kind;
 - Contact Information – such as your phone number or email address (if provided by you)

Information Collection

- TRM collects information from the consumer at sites owned/rented/managed/secured by our clients. Our client, as the defined Responsible Party is the sole owner of the information collected via TRM and will have their own Privacy Policies in place to safeguard this information.
- As Operator, under POPIA, TRM will not sell, share, or rent this information to others in any way. Our objective remains to facilitate the collection of information on behalf of a contractually stipulated third party, our client.
- Consent to collect information can be express (e.g., signing an agreement) or implied (by providing guards with access to identification documents), or via documentation handed in, or supplied to TRM via electronic means.
- Information is also obtained for pre-employment and employment means, as well as to safeguard clients.

Acceptance and Consent

We will obtain your consent to collect personal data in accordance with POPIA, which states that information may be collected in pursuance of the Responsible Party's reasonable interests.

It is within your rights to refuse to submit information, however by doing so it may limit the extent of the services, which we may provide, or may restrict access to certain facilities, functionality or to be considered for specific opportunities.

Purpose, Processing and Retention

TRM devices capture information including, but not limited to, that which is contained on a driver's license, Identification documents, legal agreements, as well as the associated vehicle license disc as per the purposes set out by the responsible party.

- Information is collected for the purpose of:
 - Safety and Security
 - Customer Service
 - Site Management
 - Employment
- Information is subject to no further processing by TRM: analysis; evaluation; sharing.
- TRM will retain your personal data for as long as it is necessary to fulfil the purposes explicitly set out in this policy, unless:
 - retention of the record is required or authorised by law
 - The data subject has consented to the retention of the record.

Disclosure of Information

- In compliance with POPIA and GDPR, TRM will not share consumer data with any third-party external to our client contracts and agreements. This includes, but is not limited to: marketing agencies and their affiliates; other clients; employees; the general public
- However, POPIA does require that we share your data with:
 - Our clients (Reseller and Site) pursuant to the SLA we have in place with them, but only in accordance with the principles of the Act and upon confirmation of their own Data Protection Policies.
 - Information Regulators: we may disclose your personal data as required by law or governmental audit
 - Law enforcement: We may disclose personal data if required:
 - by a subpoena or court order;
 - to comply with any law;
 - to protect the safety of any individual or the general public

Security

As a security service provider, we take the security of personal information very seriously and always do our best to comply with applicable data protection laws.

We may need to disclose personal information to our personnel to do their jobs, but will not do so unnecessarily. We may also need to supply information to 3rd party suppliers, in order to provide you with the best service possible, pertaining to client's security.

Data Retention

Data is retained in line with legislated requirements and for the prescribed periods. In some instances, it may be prudent to our business operation and our client's safety and security, that certain records are maintained past the prescribed dates, this information will not be utilised for processing, but rather for reference purposes.

Data Breaches

In the event of a breach, we will take all reasonable measures to notify all responsible parties, as well as the relevant supervisory authorities and affected data subjects, as soon as we become aware of such a breach, providing information such as:

- When the breach occurred
- If available, how the breach occurred
- Which information has been breached
- Who may be affected by such breach
- The measures we intend to take to rectify the breach

Correction of Personal Information

You have the right to ask us to update, correct or delete your personal information. We will take all reasonable steps to confirm your identity before making changes to Personal Information, we may hold about you. We would appreciate it if you would take the necessary steps to keep your Personal Information accurate and up to date by notifying us of any changes, we need to be aware of.

Definition of Personal Information

According to the POPI Act "Personal Information" means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person. The POPI Act, which has more specific examples if you need them, can be found at the following link:

www.gov.za/documents/download.php?f=204368

Right to object in terms of the POPI Act (POPIA) section 18. (h) (iv) you have the right to object to the processing of personal information as referred to in section 11(3) of the POPIA.

Right to Lodge a Complaint

Right to lodge a complaint in terms of the POPI Act (POPIA) section 18. (h) (v) you have the right to lodge a complaint to the Information Regulator (South Africa) (IRSA).

The IRSA contact details are:

<https://www.justice.gov.za/infoereg/contact.html>

33 Hoofd Street Forum III, 3rd Floor Braampark P.O Box 31533 Braamfontein, Johannesburg, 2017

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Email infoereg@justice.gov.za

Changes to this notice

Please note, that we may amend this privacy notice from time to time. Please check our website periodically to inform yourself of any changes.

Enquiries

If you have any questions or concerns arising from this privacy policy, please contact us on the contact information as registered on our website: www.trmsecurity.com

Please note, that we are not responsible for anyone else's privacy policies or practices and will need to consult their respective websites or companies for their privacy statements.

Below is a link for forms, which you may find useful:

<https://www.justice.gov.za/infoereg/docs.html>

Cookies

We may make use of "Cookies", which are small text files a website can use to recognise repeat users, facilitate the user's ongoing access to and use of the website and allow a website to track usage behaviour and compile aggregate data, that will allow content improvements and targeted advertising. Cookies are not programs that come onto your system and damage files. Generally, cookies work by assigning a unique number to you that has no meaning outside the assigning site. If you do not want information collected through the use of cookies, there is a simple procedure in most browsers that allows you to deny or accept the cookie feature; however, you should note that cookies may be necessary to provide you with certain features (e.g., customized delivery of information) available on our website or social media platforms. We have no access to or control over any cookies that any 3rd parties or partners use on our website and they should have their own privacy policies that govern them.

For more information about "Cookies", please refer to <https://www.allaboutcookies.org/>