

Metro-i Privacy Notice





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1. Introduction

This MetroEye Proprietary Limited t/a Metro-I (“**Metro-I**”) Privacy Notice (“**Notice**” or “**Privacy Notice**”) explains how your personal information (“**Personal Information**”), is collected, used and disclosed by Metro-I itself or through the relevant Metro-I entities, affiliates or operators. It also explains how you can access and update your Personal Information.

Personal Information means information relating to any identifiable, living, natural person, and where it is applicable, an 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, well-being, 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 assignment 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; and
- 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

This Notice covers both our online and offline data collection activities, including Personal Information that we collect through our various channels such as websites, electronic applications, CCTV cameras, third-party social networks, consumer engagement service, and events. Please note that we might aggregate Personal Information from different sources (website, offline event) and across different devices. As part of this, we combine Personal Information that were originally collected from different Metro-I platforms or Metro-I partners.

It is important to note that if you do not provide the required or necessary Personal Information to us, we may not be able to provide you with our goods and/or services.

We may change this Privacy Notice from time to time by posting the updated version of the Privacy Notice on our website. Please visit our website frequently to view this Privacy Notice to stay informed about how we use your Personal Information.

2. Purpose of This Notice

In order to comply with POPIA, a person processing another’s Personal Information must provide the owner of the Personal Information with a number of details pertaining to the processing of his/her/its Personal Information, before such information is processed; as well



as get permission or consent from the owner of such Personal Information, to process his/her/its Personal Information, unless such processing:

- is necessary to carry out actions for the conclusion or performance of a contract to which the owner of the Personal Information is a party;
- is required in order to comply with an obligation imposed by law;
- is for a legitimate purpose or is necessary to protect the legitimate interests and/or for pursuing the legitimate interests of: i) the owner of the Personal Information; ii) the person processing the Personal Information; or iii) that of a third-party to whom the Personal Information is supplied; or
- is necessary for the proper performance of a public law duty by a public body or on behalf of a public body.

Where any person uses our websites, electronic applications, email or electronic services, or our services in general, we will have to process such person's Personal Information. This includes processing of biometric information, licence plate details, licence disk details, drivers license as well as mobile phone verification (MAC address) of residents and visitors to locations (residential estate/complex, shopping mall, business park) where Metro-I is contracted to provide services that require processing of such Personal Information.

This Privacy Notice also asks that you provide us with your consent to process your Personal Information, where this is required, which consent will be deemed to have been given by yourself, when you provide us with your Personal Information for processing.

3. Application of The Privacy Notice

This Privacy Notice applies to:

- the Metro-I website, electronic applications, or electronic services and/or to the Metro-I e-services ("**Websites**") and any services in general, offered by Metro-I; and
- to all users or providers of services and any user of the Metro-I Website.

4. Collection of Personal Information

Depending on how you interact with us (online, offline, over the phone, in person etc.), we may collect various types of information from you, as described below:

- **Personal contact information:** This includes any information you provide to us that would allow us or our service providers to contact you, such as your name, postal address, e-mail address, social network details, phone number, or name of employer.
- **Account login information:** Any information that is required to give you access to your specific account profile. Examples include your login ID/email address, screen name, password in unrecoverable form, and/or security question and answer.
- **Demographic information & interests:** Any information that describes your demographic or behavioural characteristics. Examples include your date of birth, and geographic location (e.g. postal code/zip code).
- **Information from electronic devices:** Any information about the computer system or other technological device that you use to access the Websites such as the Internet protocol (IP) address used to connect your computer or device to the Internet, operating system type, and web browser type and version. If you access our Websites via a mobile device such as a smartphone, the collected information will also include, where permitted, your phone's unique device ID, advertising ID, geo-



location, and other similar mobile device data, device identification number and type and location information, device and browser information, such as network and connection information (including Internet Service Provider (ISP) and Internet Protocol (IP) addresses), device and browser identifiers and information (including device, application, or browser type, version, plug-in type and version, operating system, user agent, language and time zone settings, and other technical information), advertising identifiers, cookie identifiers and information, and similar data, usage information and browsing history, such as usage metrics (including usage rates, occurrences of technical errors, diagnostic reports, settings preferences, backup information, API calls, and other logs), content interactions (including searches, views, downloads, prints, shares, streams, and display or playback details), and user journey history (including clickstreams and page navigation, URLs, timestamps, content viewed or searched for, page response times, page interaction information (such as scrolling, clicks, and mouse-overs), and download errors), advertising interactions (including when and how you interact with marketing and advertising materials, click rates, purchases or next steps you may make after seeing an advertisement, and marketing preferences), and similar data.

- **Location data:** The location of your mobile device, your household, and similar location data.
- **Customer relations:** Communications between you and our Customer Support Agents can be recorded or listened into, in accordance with applicable laws, for local operational needs. Where required by law, you will be informed about such recording at the beginning of your call.
- **Special Personal Information:** We may seek to collect or otherwise process special Personal Information in order to provide you with our services, but which processing will always be done in accordance with applicable laws.
- **Personal Information of Children:** We may process the Personal Information of children *via* CCTV footage, captured by our various Metro-I cameras. We may also process videos, voice and other similar data via the Metro-I CCTV footage system, but which processing will always be done in accordance with POPIA.
- **Security access:** Vehicle details, drivers license, facial recognition and serial numbers of devices where access to our services ,Websites or a certain access controlled areas, that is monitored using the Metro-I services, is required.
- **Your image:** CCTV footage captured by our various Metro-I cameras. Video, voice, and other similar data when making use of our Metro-I services or when you pass through access controlled areas that is monitored using the Metro-I services.
- **Social media and online content:** Information, opinions, preferences placed or posted in social media and online profiles, online posts, and similar data.
- **Websites/communication usage information:** As you navigate through and interact with our Websites or newsletters, we use automatic data collection technologies to collect certain information about your actions. This includes information such as which links you click on, which pages or content you view and for how long, and other similar information and statistics about your interactions, such as content response times, download errors and length of visits to certain pages. This information is captured using automated technologies such as cookies and web beacons and is also collected through the use of third-party tracking for analytics and advertising purposes.
- **Market research & consumer feedback:** Any opinions, preferences or information that you voluntarily share with us about your experience of using our products and services.
- **Consumer-generated content:** Any content that you create and then share with us on third-party social networks or by uploading it to one of the Websites, including the use of third-party social network apps such as Facebook. Examples include photos,




videos, personal stories, or other similar media or content. Where permitted, we collect and publish consumer-generated content in connection with a variety of activities, website community features, consumer engagement, and third-party social networking.

- **Third-party social network information:** Any information that you share publicly on a third-party social network or information that is part of your profile on a third-party social network (such as Facebook) and that you allow the third-party social network to share with us. Examples include your basic account information (e.g. name, email address, gender, birthday, current city, profile picture, user ID, list of friends, etc.) and any other additional information or activities that you permit the third-party social network to share. We receive your third-party social network profile information (or parts of it) every time you download or interact with a Metro-I web application on a third-party social network such as Facebook, every time you use a social networking feature that is integrated within a Metro-I site (such as Facebook Connect) or every time you interact with us through a third-party social network. To learn more about how your information from a third-party social network is obtained by us or to opt-out of sharing such social network information, please visit the website of the relevant third-party social network.
- **Fingerprints:** We may store fingerprint information of persons registered to have frequent access to certain access controlled areas, that is monitored using the Metro-I services, as part of the access control services we provide to our customers.
- **Criminal Information:** This includes facial recognition and license plate scanning, which would be referenced against internal, 3rd party and SAPS databases relating to such information. Metro-I will also actively store any data collected of vehicles and persons where that data is tied to a criminal event. Part of Metro-I's service offering is to identify vehicles and persons that have been previously tied to criminal activities when entering access controlled areas, that is monitored using the Metro-I services.
- If you provide us with any Personal Information relating to a third-party, you warrant that you have obtained the consent of the third-party to provide Metro-I with the third-party's Personal Information or alternatively that you have a lawful basis to provide Metro-I with the third-party's Personal Information.

5. Sources We Collect From

Personal Information is collected about you by us from the following sources:

- **Camera Surveillance:** Various Metro-I cameras that monitor public spaces and access controlled areas, that is monitored using the Metro-I services such as estates, complexes and business parks.
- **Access Control Devices:** Customer access control devices or electronic applications operated by Metro-I at private property gates of customers.
- **The Websites:** Including sites that Metro-I operates under its own domains/URLs and mini-sites that we run on third-party social networks such as Facebook.
- **Mobile sites/apps:** Consumer-directed mobile sites or applications operated by or for Metro-I, such as the Metro-I App and other smartphone apps.
- **E-mail, text, WhatsApp and instant messaging platforms and other electronic messages:** Interactions with electronic communications between you and Metro-I.
- **Advertising interactions:** Interactions with our advertisements (e.g. if you interact with one of our ads on a third-party website, we may receive information about that interaction).
- **Data we create:** In the course of our interactions with you, we may create Personal Information about you (e.g. records of your interactions with us).

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- **Data from other sources:** Third-party social networks (e.g. such as Facebook, Google), market research (if feedback not provided on an anonymous basis), third-party data aggregators, service providers, promotional partners, public sources.

In addition, we collect the Personal Information detailed in clause 4 above, about you and any other party whose details you provide to us, when you use and access the Websites, including any access to such Websites for the following purposes:

- to make enquiries about Metro-I or the Metro-I services, its affiliates, service providers or business partners, via our Websites;
- to complete online forms, including call back requests;
- to look for, locate, read and / or download information or publications;
- to request or sign up for marketing material;
- for the performance of contractual terms, or for the enforcement of contractual rights;
- to provide you with details of our terms, conditions, policies and procedures and to enforce and apply same;
- to participate in any interactive areas that appear on our Websites;
- to interact with us, our affiliates, service providers, business partners or others;
- to provide us with your contact details or when you update those details;
- to send us an email; and
- to click on a link in an email or advertisement or communication received from us.

We also collect your Personal Information from your own devices including mobile devices and or the devices which you use in order to access our Websites, which is collected using cookies or similar technologies. Cookies are files with small amounts of data, which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Tracking technologies also used are beacons, tags and scripts to collect and track information and to improve and analyse our website experience.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our services.

Examples of Cookies we use:

- **Session Cookies:** We use Session Cookies to operate our services.
- **Preference Cookies:** We use Preference Cookies to remember your preferences and various settings.
- **Security Cookies:** We use Security Cookies for security purposes.

Metro-I also uses third-party vendors for licence plate recognition, re-marketing tracking cookies, including the Google AdWords tracking cookie. This means we will continue to show ads to you across the internet, specifically on the Google Content Network. Metro-I respects your privacy and is not collecting any identifiable information with Google's or any other third-party remarketing system. Third-party vendor cookies may collect your Personal Information and such Personal Information is subject to the terms and conditions and privacy policies of those third-party vendors.



Our third-party vendor, Google whose services we use will place cookies on web browsers in order to serve ads based on past visits to our website. Third-party vendors use cookies to serve ads based on a user's prior visits to our website. This allows us to make special offers and continue to market our services to those who have shown interest in our services.

We may enhance Personal Information we collect from you with information we obtain from third parties that are entitled to share that information; for example, information from credit agencies, search information providers or public sources (e.g. for due diligence purposes), but in each case as permitted by applicable laws.

6. Use of Personal Information

The Personal Information detailed under clause 4 above is used for the following purposes:

WHAT WE USE YOUR PERSONAL INFORMATION FOR	LAWFUL REASON FOR PROCESSING
<p>Operational and services provision We use your Personal Information:</p> <ul style="list-style-type: none"> to provide services to you, including responding to your enquiries. This typically requires the use of certain personal contact information and information regarding the reason for your inquiry (e.g. consultation or order status, technical issue, product question/complaint, general question, etc.) and to manage and administer the Metro-I services you have asked us to provide you with; to manage our relationship with you (for example, customer services and support activities); to provide you with any information that we are required to send to you in order to comply with our contractual, service, regulatory or legal obligations; to provide you with details of our terms, conditions, policies and procedures and to enforce and apply same; to deliver joint content and services with third parties with whom you have a separate relationship; to attend to queries and to provide any information to you that you have requested; to analyse your needs, requirements, preferences and habits; to anticipate your needs based on our analysis of your profile; to provide you with targeted services, goods and products or advertising and content; order fulfilment; general business purposes; maintaining your account, maintain and keeping records of your requirements; for the management and operation of our communications. 	<p>Legitimate business purposes Fulfilling contractual obligations Legal obligations Our legitimate interests</p>
<p>Security We use your Personal Information:</p>	<p>Fulfilling contractual obligations Legal obligations</p>



<ul style="list-style-type: none"> to detect, prevent, investigate or remediate, crime, illegal or prohibited activities or to otherwise protect our legal rights (including liaison with regulators and law enforcement agencies for these purposes); and for the management and operation of our IT and security systems. <p>We may monitor and record any communications which we hold with you when using the Websites, for quality assurance purposes, for evidential purposes and in order to meet our legal and regulatory obligations generally.</p>	<p>Legitimate interests</p>
<p>Third-party social networks</p> <p>We use your Personal Information when you interact with third-party social networking features, such as “Like” functions, to serve you with advertisements and engage with you on third-party social networks.</p>	<p>With your consent (where required)</p>
<p>Internal or market research, analytics</p> <p>We use your Personal Information to conduct internal or market research and measuring the effectiveness of advertising campaigns.</p>	<p>Fulfilling contractual obligations</p> <p>With your consent (where required)</p> <p>Legal obligations</p> <p>Legitimate interests</p>
<p>Legal reasons</p> <p>We use your Personal Information to comply with laws and regulations, including disclosing your Personal Information to third parties (i) when required by applicable law; (ii) in response to legal proceedings; (iii) in response to a request from a competent law enforcement agency; (iv) to report on crimes or criminal activities to the SAPS or any relevant authority; (v) to protect our rights, privacy, safety or property, or the public; or (vi) to enforce the terms of any agreement or the terms of our Website.</p>	<p>Legal obligations</p> <p>Legitimate interests</p> <p>Fulfilling contractual obligations</p>
<p>Quality control</p> <p>We use your Personal Information:</p> <ul style="list-style-type: none"> to provide, maintain, protect and improve our Websites, Metro-I services and products; to contact you to see if you would like to take part in our customer research (for example, feedback on your use of our Websites, products and services); to monitor, measure, improve and protect our content, Websites, services and provide an enhanced, personal, user experience for you; 	<p>Legitimate business purposes</p> <p>Fulfilling contractual obligations</p> <p>Legal obligations</p> <p>Legitimate interests</p>



<ul style="list-style-type: none"> • to compare information for accuracy and to verify it with third parties; • manage and administer your use of our Websites, products and services; • undertake internal testing of our Websites, and services to test and improve their security, provision and performance, in which case, we would pseudonymise any information used for such purposes, and ensure is it only displayed at an aggregated level which will not be linked back to you or any living individual; • to carry out statistical analysis and benchmarking, provided that in such circumstances the analysis and benchmarking is done at an aggregated level which will not be linked back to you or any living individual; • data analytics and benchmarking, in order to carry out research and development to improve our Metro-I services, products and Websites; and to develop and provide new and existing functionality and services (including statistical analysis, benchmarking and forecasting services). 	
<p>Legal reasons or merger/acquisition</p> <p>We use your Personal Information in the event that Metro-I or its assets are acquired by, or merged with, another company including through bankruptcy, we will share your Personal Information with any of our legal successors.</p>	<p>Legal obligations Our legitimate interests Fulfilling contractual obligations</p>

7. Disclosure of Personal Information

We share your Personal Information with the following parties:

- any Metro-I employee, subsidiary, holding company or affiliate company, Body Corporates, Home Owners Associations, Managing Agents, Third Party Security Service Providers, for the purposes set out in this Privacy Notice, (e.g. global information and customer relationship management; software and service compatibility and improvements; or to provide you with any information, applications, products or services that you have requested);
- our service providers and agents (including their sub-contractors) or third parties which process information on our behalf (e.g. affiliates, internet service and platform providers, payment processing providers and those service providers or organisations who we engage to help us provide you with the Metro-I services or to send communications to you);
- partners, including system implementers, independent software vendors and developers that may help us to provide you with the Websites, products, services and information you have requested or which we believe is of interest to you;
- third parties used to facilitate payment transactions, for financial institutions and transaction beneficiaries;
- third parties where you have a relationship with that third-party and you have consented to us sending information to such party;
- third parties for marketing purposes (e.g. our partners and other third parties with whom we work and whose products or services we think will interest you in the operation of your business activities);
- Regulators, in order to meet legal and regulatory obligations;

- law enforcement agencies so that they may detect or prevent crime or prosecute offenders;
- any third-party in the context of actual or threatened legal proceedings, provided we can do so lawfully (for example in response to a court order);
- any third-party in order to meet our legal and regulatory obligations, including statutory or regulatory reporting or the detection or prevention of unlawful acts;
- our own professional advisors, including attorneys and auditors for the purpose of seeking professional advice or to meet our audit or legal responsibilities;
- another organisation if we sell or buy (or negotiate to sell or buy) any business or assets; another organisation to whom we may transfer our agreement with you;
- third party information technology service providers and/or cloud-based solutions providers in another country; and
- Government departments where reporting is mandatory under applicable law.

We may share non-personally identifiable information about the use of the Websites, products or services publicly or with third-parties but this will not include information that can be used to identify you.

Where we share or disclose your Personal Information as described above, such sharing and or disclosure will always be subject to an agreement which will be concluded as between ourselves and the party to whom we are disclosing your Personal Information to, which contractually obliges the recipient of your Personal Information to comply with strict confidentiality and data security conditions.

8. Storage and/or Transfer of Your Personal Data

We use appropriate measures (described below) to keep your Personal Information confidential and secure. Please note, however, that these protections do not apply to information you choose to share in public areas such as third-party social networks.

We store your Personal Information in operating environments that use reasonable security measures to prevent unauthorised access.

We follow reasonable standards to protect Personal Information. The transmission of information via the Internet is, unfortunately, not completely secure and although we will do our best to protect your Personal Information, we cannot guarantee the security of the data during transmission through the Websites.

It is important that you also play a role in keeping your Personal Information safe and secure. When signing up for an online account, please be sure to choose an account password that would be difficult for others to guess and never reveal your password to anyone else. You are responsible for keeping this password confidential and for any use of your account. If you use a shared or public computer, never choose to have your login ID/email address or password remembered and make sure to log out of your account every time you leave the computer. You should also make use of any privacy settings or controls we provide you in the Websites. The storage as well as the processing of your Personal Information as described above, by Metro- I, may require that your Personal Information is ultimately transferred/transmitted to and/or stored at a destination outside of the Republic of South Africa (including to countries



which have different information protection standards to those which apply in South Africa). We have put in place standard contractual clauses to protect your Personal Information in these situations.

Once your Personal Information is no longer required due to the fact that the purpose for which the Personal Information is held has come to an end, such Personal Information will be retained in accordance with Metro-I's Records Retention Schedules in our Records Management Policy, which varies depending on the type of processing, the purpose for such processing, the business function, record classes, and record types. We retain Personal Information for the periods that the Personal Information is needed to: (a) fulfil the purposes described in this Privacy Notice, (b) meet the timelines determined or recommended by regulators, professional bodies, or associations, the relevant Body Corporate, Home Owners Association, or Managing Agents, (c) comply with applicable laws, legal holds, and other legal obligations (including contractual obligations), and (d) comply with your requests.

9. When You Provide Us With Information About Others

If you provide us with any Personal Information about someone else, you are responsible for ensuring that you comply with any obligation and consent obligations under POPIA in relation to such disclosure. In so far as required by applicable POPIA, you must ensure that you have provided the required notices and have obtained the individual's consent to provide us with this/her/its Personal Information and that you explain to them how we collect, use, disclose and retain their Personal Information or direct them to read the Privacy Notice.

10. Other Sites and Social Media

If you follow a link from our Websites to another site or service, this Privacy Notice will no longer apply. We are not responsible for the information handling practices of third-party sites or services and we encourage you to read the privacy notices appearing on those sites or services.

The Websites may enable you to share information with social media sites or use social media sites to create your account or to connect your social media account. Those social media sites may automatically provide us with access to certain Personal Information retained by them about you (for example any content you have viewed). You should be able to manage your privacy settings from within your own third-party social media account(s) to manage what Personal Information you enable us to access from that account.

11. How Can You Access and Correct Your Personal Information

You have the right to contact us at any time requesting:

- confirmation that we have your Personal Information;
- access to the records containing your Personal Information or a description of the Personal Information that we hold about you;
- the identity or categories of third parties who have had, or currently have, access to your Personal Information; and/or

- request that we update incorrect Personal Information or delete your Personal Information.

Details on how to make a request is documented in our PAIA manual available on our website at www.metrofibre.co.za. When making a request, we will require adequate proof of your identity. We will try to provide you with suitable means of accessing information, where you are entitled to it, by for example, posting or emailing it to you. We reserve the right to charge a fee. There may be instances where we cannot grant access to your Personal Information. For example, if access would interfere with the privacy of others or would result in a breach of confidentiality, we may need to refuse access. If we refuse access, we will give written reasons for the refusal. If you believe that any Personal Information that we hold about you is inaccurate, irrelevant, outdated, incomplete or misleading, you may ask us to correct it.

If you believe that any Personal Information that we hold about you is excessive or has been unlawfully obtained or that we are no longer authorised to retain it, you may ask us to destroy or delete it. If we do not agree that there are grounds for action, you may ask us to add a note to the Personal Information stating that you disagree with it. We may charge a reasonable fee to cover our administrative and other costs in providing information to you. You will not be charged for simply making a request. You have the right to request the deletion of Personal Information held, which will be implemented subject to applicable laws.

Personal Information is destroyed or de-identified in accordance with our Records Management Policy when it is no longer needed or when we are no longer required by law to retain it (whichever is the later).

Any comments, questions or suggestions about this Privacy Notice or our handling of your Personal Information should be emailed to **infoOfficer@metrofibre.co.za**. Alternatively, you can contact us at **087 151 4000**. Our telephone switchboard is open 08:00 am – 5:00 pm, Monday to Friday. Our switchboard team will take a message and ensure the appropriate person responds as soon as possible. Physical Address: 298 Witch-hazel Avenue, Highveld Ext. 71, Centurion, 0157.

Should you believe that Metro-I has utilised your Personal Information contrary to the directives of POPIA, you undertake to first attempt to resolve any concerns with Metro-I by addressing a complaint in writing to the Metro-I Information Officer's email address provided above. If you are not satisfied with the outcome of such process, you have the right to lodge a complaint with the Information Regulator at **complaints.IR@justice.gov.za** as established in terms of the POPIA.

If your Personal Information changes, please let us know and provide us with all changes as soon as reasonably possible to enable us to update it.