

PRIVACY POLICY

Planet42 means (“**Kinnectus (Pty) Ltd, Inclusion South Africa (Pty) Ltd and Inclusive Mobility Management (Pty) Ltd**”) adheres to the highest standards of protecting your personal information when we process it by virtue of your use of our services, your use of our website <https://planet42.com> or any of its related applications, or platforms (collectively, “the Website”), or by providing us with your personal information in any other way. We have therefore created this Privacy Policy (“Policy”) for you to read and understand how we safeguard your personal information and respect your privacy.

Please note that Planet42 is a private limited liability company duly registered and operating in accordance with the laws of South Africa.

Not all terms are necessarily defined in order or may be defined in our Terms and Conditions of Use (“Terms”).

Please ensure that you read all the provisions below, and any other Planet42 rules and policies which may apply from time to time.

1. Important Information and Who We Are

1.1. Purpose of this Policy

1.1.1. This Policy aims to give you information on how Planet42 collects and processes your personal data through any form of your engagement with Planet42 such as your engagement with us when corresponding with us, when using our services, accessing or using our Website, or providing us with your personal data in any other way.

1.1.2. This Policy complies with and facilitates the obligations required by the South African *Protection of Personal Information Act, No. 4 of 2013* (“**POPI**”), as amended.

1.1.3. It is important that you read this Policy together with any other privacy policy or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your personal data. This Policy supplements the other notices and is not intended to override them.

1.2. Responsible Party and Operator

1.2.1. Planet42 is the “Responsible Party” and is responsible for your personal data in instances where we decide the processing operations concerning your personal data. Sometimes, but very rarely, we may also operate as an “Operator” of personal data on behalf of a third-party Responsible Party, where that Responsible Party’s privacy terms will apply, but we will draw your attention to them, when applicable.

1.2.2. We have appointed an Information Officer at Planet42 who is responsible for overseeing questions in relation to this Policy. If you have any questions about this Policy, including any requests to exercise your legal rights, please contact the Information Officer using the details set out below.

1.3. Our Contact Details

1.3.1. Our full details are:

Full name of legal entity:	Planet42
Name of Information Officer:	Dineo Mogaila
Email address:	dineom@planet42.com

Full name of legal entity:	Planet42
Name of Deputy Information Officer:	Cherise Fasson
Email address:	cherise@planet42.com

- 1.3.2. You have the right to make a complaint at any time to the South African regulator's office (Information Regulator's Office of South Africa). We would, however, appreciate the chance to deal with your concerns before you approach any such regulator, so please contact us in the first instance.

1.4. **Changes to the Policy and Your Duty to Inform us of Changes**

- 1.4.1. This Policy version was updated on 06 March 2026.
- 1.4.2. It is important that the personal data we hold about you is accurate and current. Please update your personal data yourself using the relevant prompts in your Profile or keep us informed if your personal data changes during your relationship with us.
- 1.4.3. This Policy is subject to change without notice and is updated or amended from time to time and will be effective once we upload the amended version to the platform. Your continued access or use of our services constitutes your acceptance of this Policy, as amended. It is your responsibility to read this document periodically to ensure you are aware of any changes.

1.5. **Third-Party Links on Website**

- 1.5.1. The Website may include links to third-party websites, plug-ins, and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements or terms. When you leave our Website or engage with such third parties, we encourage you to read the distinct Policy of every third party you engage with.

2. **The Data We Collect About You**

- 2.1. Personal data, or personally identifiable information, means any information about an individual, both natural and juristic entities (i.e. people and companies), from which that entity can be identified. It does not include data where the identity has been removed ("**Aggregated Data**" – see below).
- 2.2. We may collect, use, store, and transfer ("**process**") different kinds of personal data about you which we have grouped as follows:
- 2.3. Information relating to your identity, including your full name, identity or passport number, date of birth, and company registration details (where applicable).
- 2.4. Information relating to your contact details, including your residential, postal or business address, email address, and telephone number.
- 2.5. Information relating to your financial position and employment, including income details, banking information, payslips, bank statements, and other information required to assess affordability or perform a contract with you.
- 2.6. Information obtained from credit bureaux or other lawful sources relating to your credit profile, repayment history, financial obligations, and creditworthiness.
- 2.7. Information relating to agreements entered into with us or our authorised partners, including vehicle information, payment records, fees, charges, and related contractual documentation.
- 2.8. Information required for compliance with applicable laws and regulations, including the Financial Intelligence Centre Act 38 of 2001 and other applicable financial services legislation. This may include identity verification information, sanctions screening results, and politically exposed person (PEP) screening status.
- 2.9. Information collected when you access or use our Website or systems, including internet protocol (IP) address, device information, browser type, login data, usage data, and cookie information.

- 2.10. Information contained in communications between you and us, including emails, messaging platform interactions, customer support records and audio recordings of telephone calls with our customer support or service teams, which may be recorded for training, quality assurance, and compliance purpose.
- 2.11. Information relating to vehicle usage and telematics data where applicable, including vehicle location data, driving behaviour information, and driver performance data collected through telematics or vehicle tracking systems used to support the services.
- 2.12. We also collect, use, and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific Website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Policy.
- 2.13. Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services or allow you to provide us with your services). In this case, we may have to cancel Website-access or Services you have with us, but we will notify you if this is the case at the time.

3. How Is Your Personal Data Collected?

- 3.1. We use different methods to collect data from and about you, including through:
 - 3.1.1. **Direct interactions:** You may give us your personal information by corresponding with us through the website, by phone, email or otherwise. This includes personal data you provide when you:
 - 3.1.1.1. use our Services;
 - 3.1.1.2. use our Website;
 - 3.1.1.3. contract with us;
 - 3.1.1.4. complete online information;
 - 3.1.1.5. provide any services to us as a Service Provider;
 - 3.1.1.6. contract with us and our dealership partners;
 - 3.1.1.7. request information to be sent to you; or
 - 3.1.1.8. give us some feedback.
 - 3.1.2. **Automated technologies or interactions:** As you interact with our Website, we may automatically collect **Technical Data, Profile** and **Usage Data** about your equipment, browsing actions and patterns. We may collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies.
 - 3.1.3. **Third parties or publicly available sources:** We may receive personal data about you from various third parties and public sources as set out below:
 - 3.1.3.1. Dealer partners and their platforms;
 - 3.1.3.2. Analytics providers;
 - 3.1.3.3. Social media platforms;
 - 3.1.3.4. Survey data providers;
 - 3.1.3.5. Marketing platforms;

- 3.1.3.6. Search information providers;
- 3.1.3.7. Providers of technical and/or payment services; and
- 3.1.3.8. Publicly available sources being credit bureaus or agencies based in South Africa.
- 3.1.3.9. Cloud hosting providers

4. How We Use Your Personal Data

- 4.1. We will only use your personal data when the law allows us to and for legitimate reasons, which you hereby expressly understand and consent to. Most commonly, we will use your personal data in the following circumstances:
 - 4.1.1. where we have your consent to do so;
 - 4.1.2. where we need to consult with you or perform on the Services contract we are about to enter into or have entered into with you;
 - 4.1.3. where it is necessary for our legitimate business interests (or those of a third party) and your interests and fundamental rights do not override those interests; and/or
 - 4.1.4. where we need to comply with a legal or regulatory obligation.
- 4.2. Purposes for which we will use your personal data:
 - 4.2.1. We have set out below, in a table format, a description of:
 - 4.2.1.1 The purpose for which we will process your personal information,
 - 4.2.1.2 The type of data we process; and
 - 4.2.1.3 The lawful basis of processing
- 4.3. Note that we may process your personal information for more than one lawful ground depending on the specific purpose for which we are using your personal information.
 - 4.3.1. **Marketing**
 - 4.3.1.1. We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. To manifest your rights attached to any marketing sent to you as an existing client, please use the in-built prompts provided on those communications, or contact us.
 - 4.3.1.2. You will receive marketing communications from us if you are using our Services, have requested information from us, or provided us with your details in any other circumstance and, in each case, you have not opted-out of receiving that marketing.
 - 4.3.2. **Third-Party Marketing**
 - 4.3.2.1. Whilst we may use your personal data within Planet42, we will get your express opt-in consent before we share your personal data publicly with any entity outside of the Planet42 group for public purposes.
 - 4.3.3. **Change of Purpose**
 - 4.3.3.1. We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

- 4.3.3.2. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.
- 4.3.3.3. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.
- 4.3.3.4. We may share personal information with authorised third-party service providers who assist in providing services, including credit assessment providers, identity verification services, payment processors, hosting providers, analytics, services, repair workshops when their vehicles are undergoing repairs, dealerships for the purpose of providing you with vehicle options, insurance and service providers procured for the purposes of delivering an excellent service to our clients .

5. Disclosures of Your Personal Data

- 5.1. We may have to share your personal data with the parties set out below for the purposes set out in the table above.
 - 5.1.1. Internal Third Parties as set out in the Glossary;
 - 5.1.2. External Third Parties as set out in the Glossary;
 - 5.1.3. Specific third parties listed in the table above; and/or
 - 5.1.4. Third parties to whom we may choose to sell, transfer, or merge parts of our organisation or our assets. Alternatively, we may seek to acquire other organisations or merge with them. If a change happens to our organisation, then the new owners may use your personal data in the same way as set out in this Policy.
- 5.2. We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions and standards.

6. Cookies

- 6.1. We use both essential cookies (which are necessary for the functioning of the Website) and non-essential cookies (such as analytics and marketing cookies).
- 6.2. Non-essential cookies will only be activated where you have provided your consent through our cookie banner or preference management tool.
- 6.3. You may withdraw or modify your cookie preferences at any time through your browser settings or via the cookie settings available on our Website. Please note that disabling certain cookies may limit your ability to use certain Website features.

7. International Transfers

- 7.1. We share your personal data within the Planet42 group.
- 7.2. In accordance with section 72 of POPIA, where we transfer your personal information outside of South Africa, we ensure that:
 - 7.2.1. the recipient is subject to a law, binding corporate rules or agreement that provides an adequate level of protection;
 - 7.2.2. we have entered into a written agreement with the recipient requiring them to safeguard the personal information in a manner consistent with POPIA; or

7.2.3. the transfer is otherwise permitted under POPIA.

7.3. Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of South Africa.

8. Data Security

8.1. We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed by using reputable IT Security systems and software's as well as a cloud storage solution. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a legitimate need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

8.2. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

9. Data Retention

9.1. We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including the purpose of satisfying any legal, accounting, or reporting requirements.

9.2. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data, any other South African applicable law requiring us to retain the data and whether we can achieve those purposes through other means, and the applicable legal requirements.

9.3. Details of retention periods for different aspects of your personal data are available from us by contacting us. In some circumstances you can ask us to delete your data; see below for further information.

9.4. In some circumstances, we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9.5. Without limiting the generality of the above:

9.5.1. records required under FICA are retained for a minimum of 5 (five) years as required by law;

9.5.2. credit-related information is retained in accordance with the National Credit Act and related regulations;

9.5.3. contractual records are retained for as long as necessary to enforce or defend legal rights; and

9.5.4. marketing information is retained until you withdraw your consent or opt out.

9.6. Once the retention period for your personal data has expired, or we are no longer authorised to retain it, we will ensure that the data is destroyed, deleted, or de-identified as soon as reasonably practicable. In accordance with South African law, any destruction or deletion will be carried out in a manner that prevents its reconstruction in an intelligible form (e.g., through secure shredding of physical records or permanent electronic erasure).

- 9.7. Notwithstanding the above, we may retain personal data for longer periods if it is required for ongoing or requested litigation, or as part of a formal investigation by the Information Regulator or other legal authority.

10. Your Legal Rights

- 10.1. Under certain circumstances, you have rights under data protection laws in relation to your personal data where we are the relevant “Responsible Party” over such personal data. Please contact us to find out more about, or manifest, these rights:
 - 10.1.1. request access to your personal data;
 - 10.1.2. request correction of your personal data;
 - 10.1.3. request erasure of your personal data;
 - 10.1.4. object to the processing of your personal data;
 - 10.1.5. request a restriction on processing your personal data;
 - 10.1.6. request transfer of your personal data; and/or
 - 10.1.7. right to withdraw consent.
- 10.2. You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive. Alternatively, we may refuse to comply with your request in these circumstances.
- 10.3. We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.
- 10.4. We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.
- 10.5. Planet42 processes personal information primarily in accordance with South African law, including POPIA. If you access our services from outside South Africa and believe additional data protection rights apply to you, you may contact us and we will assess such request in accordance with applicable law.

11. Glossary

11.1. Lawful Basis

- 11.1.1. **Legitimate Interest** means the interest of our company in conducting and managing the company to enable us to give you the best service and the most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

- 11.1.2. **Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
- 11.1.3. **Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.
- 11.1.4. **Consent** means the confirmed consent you have provided to our processing of your personal data by actively accepting this Policy.

11.2. Third Parties

- 11.2.1. **Internal Third Parties** means other entities or parties of Planet42 acting as joint responsible parties or operators and who are based internationally within jurisdictions where a Planet42 group company is based such as the European Union and North America.
- 11.2.2. **External Third Parties** means:
 - 11.2.2.1. Authorised third-party Service Providers under contract with Planet42 who need your personal information in order to contact and transact with you pursuant to your use of the Services;
 - 11.2.2.2. service providers acting as operators
 - 11.2.2.3. South African or other national governments and/or their respective authorities pursuant to our adherence with anti-corruption and crime-fighting legislation; and/or
 - 11.2.2.4. professional advisers acting as operators or joint responsible parties including lawyers, bankers, auditors and insurers based in South Africa who provide consultancy, banking, legal, insurance and accounting services as required.

11.3. Your legal rights

You have the right to:

- 11.3.1. **Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- 11.3.2. **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- 11.3.3. **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no valid reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. **Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be communicated to you, if applicable, at the time of your request.**
- 11.3.4. **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

- 11.3.5. **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
- 11.3.5.1. if you want us to establish the data's accuracy;
 - 11.3.5.2. where our use of the data is unlawful but you do not want us to erase it; or
 - 11.3.5.3. where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.

Users also understand that we may suspend the processing of your personal data in situations where you have objected to our use of your data, but we nevertheless need to verify whether we have overriding legitimate grounds to use it.

- 11.3.6. **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform on a contract with you.
- 11.3.7. **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain Website access or Services to you. We will advise you if this is the case at the time you withdraw your consent. **Please take note that regardless of your right to withdraw consent under POPI, other South African legislation applies and may require that we continue to process your data in order to comply with anti-corruption, crime-fighting and/or other national legislation, which you expressly understand and agree to.**