

CLIENT PRIVACY NOTICE

Important information and who we are

Purpose of this Privacy Notice

We at Kenings Car Van and Truck Hire (Pty) Ltd (“**Kenings**”) are committed to protecting our renters’ privacy and ensuring that their Personal Information is collected and used appropriately, lawfully and transparently.

This **Privacy Notice** sets out briefly how we collect and process your Personal Information as a renter or prospective renter in accordance with the [Protection of Personal Information Act](#) (“**POPI**”). “**Personal Information**” has the meaning given to it in [POPI](#), generally including any personal information that identifies a person.

This **Privacy Notice** also relates to third parties who are not our renters, but whose Personal Information is processed by us in connection with the provision of our services to our renters, for example additional drivers.

If you provide Personal Information to us about another person, you must inform that person about this **Privacy Notice** and get their permission (where possible) for sharing their Personal Information with us.

It is important that you read this **Privacy Notice** so that you are fully aware of how and why we are using your information.

Responsible party

Kenings is a “responsible party” under [POPI](#) and, as such, is responsible for the Personal Information we have about you and registered with the [South African Information Regulator](#).

We have appointed an [Information Officer](#) who is responsible for overseeing Kenings’ compliance with [POPI](#). If you have any questions about this **Privacy Notice** or any of Kenings’ privacy practices, please contact our [Information Officer](#) using the details set out below.

Contact details of Information Officer

Name: Brian Holloway Hartmann

Email address: brian@kenings.co.za

Landline: (021) 5559561

Cell number: 0784577109

Changes to the Privacy Notice and your duty to inform us of changes

This version was last updated on 30 June 2021.

This **Privacy Notice** does not form part of any contract to provide our services to our renters. We may update this notice at any time.

It is important that the Personal Information we hold about you is accurate and current. Please keep us informed if your Personal Information changes during your relationship with us.

Grounds for using your Personal Information

To provide our services and run our business, we collect, use, store and transfer your Personal Information. Where we do this, we will either rely on your consent or on other lawful grounds set out in [POPI](#), for example:

- preparing to enter into or performing a contract with you;
- complying with obligations placed on us by law;
- protecting your legitimate interests;
- having a legitimate interest to require your Personal Information.

What Personal Information we collect

The exact Personal Information we collect from you depends on what you have asked us to do or what we are contracted to do for you. This may include:

- **identity information** such as your name, identity/registration number, marital status, job title, date of birth, gender and information that is necessary to verify your identity (such as identity documents and driver's licenses), including if you are an additional driver for the specific rental;
- **contact information** such as addresses, email addresses and telephone numbers;
- **financial information** such as bank account, payment details (such as your debit or credit card details) and credit information;

- **employment information** such as your employer's details and business address;
- **Renter information** such as information you provide to us or which we require relevant to the service which we are providing you with, for example geographical data (such as pick up and delivering points for the vehicle), travelling/tourism data, insurance data and tracking data;
- **company or business details** such as your business' name, registration number, business address and VAT number;
- **location information**, unless you have opted out;
- **compliance information** such as details we require to comply with the law;
- **technical data** such as geolocation data, information from other on-board devices and video footage from our security footage;
- **vehicle information** such as consumption, mileage, accident, incident/damages and usage information, information from built-in services, infotainment and connection car data and information about traffic offences;
- **marketing and communications information** such as your preferences in receiving marketing from us and your communication preferences.

We may collect **special** (sensitive) categories of Personal Information about you. This may include your race or ethnicity, information about your health and genetic and biometric data and any criminal convictions and offences. *Please note we do not generally collect special Personal Information unless you have voluntarily provided it to us, it is relevant to the service we are providing to you (for example if you inform us you have a medical disability that requires an adapted vehicle) or is otherwise permitted or required by law.*

Third-party links and vehicle data

Our website may include links to and from third-party websites, plug-ins and applications (like our affiliates and business partners). Clicking on those links or enabling those connections may allow third parties to collect or share information about you. We do not control these third-party websites and are not responsible for their privacy notices, so we encourage you to read the privacy notice of every website you visit.

Depending on the technology used in your rental vehicle, vehicle manufacturers and build-in services, such as Apple CarPlay and Android Auto, may also collect Connected

Car Data from our vehicles in accordance with their privacy notices and share the Connected Car Data with us.

If you choose to sync your information or a device to the car, data from you or your device may be accessed and stored on the car's systems, such as the infotainment system. Please always unpair your device and ensure that you take the necessary steps to remove your information from the system when you return the car at the end of your rental period to reduce the risk of unauthorized access. We are not responsible for any data that is left in the vehicle as a result of your use.

Where we may get Personal Information from

We use different methods to collect Personal Information from and about you including through:

- **Direct interactions.** You may give us your Personal Information as part of an initial enquiry about our services or once you have become a renter of ours by filling in forms or by corresponding with us by post, phone, e-mail, in person or otherwise.
- **Third parties.** We may receive Personal Information about you from various third parties such as travel agents or third-party booking services, airlines, hotels, insurers, your employers or other parties we have contractual relationships with.
- **Publicly available sources or governmental agencies,** such as credit bureaux, law enforcement agencies, law enforcement and regulatory authorities.
- **Automated technologies or interactions.** As you interact with our website or in-vehicle technology, including apps and tracking devices, we may automatically collect technical data about you. Please note that the rental vehicles you operate may collect Personal Information about you. We are not responsible for these activities, and such collection (and use) is subject to the vehicle manufacturer's policies and notices.

Sometimes, we will combine the Personal Information we receive from you with other information we received from other sources so we can provide you a more customised and hassle-free experience.

We will only collect your Personal Information from you or from third parties where you

have given your consent or it is otherwise permitted under the law.

Cookies

We collect certain information automatically by using cookies when you visit our website, including your device data, advertisements, destination data or other areas of the website you clicked on and your location.

We use this information to improve the way our website functions and our service.

You can manage cookies through your web browser.

Automated decision making

Sometimes, as part of our business operations, decisions may be taken about you or recommendations made to you using automated computer software and systems. These decisions do not involve human input. We will only use such automation where appropriate and, when we do, ensure your privacy and data protection rights are respected and upheld.

How we use your Personal Information

We will only collect and use your Personal Information for specific and lawful purposes, for example to:

- register you as a new renter or a prospective new renter;
- rent a vehicle or provide our other services such as chauffeur or fleet management services;
- provide you with additional services or functionalities (for example mobile wifi and GPS services or providing you with vehicle information);
- carry out transactions you have requested;
- maintain our relationship with you and communicate with you, for example for transactional and service related purposes;
- administer your rental, manage your rental records and to calculate your fees;
- diagnose problems, analyse trends, assess our performances and improve our services;
- maintain our fleet;

- to enable third party vehicle applications and services;
- recover lost, stolen or towed rental vehicles;
- confirm and verify your identity for security purposes;
- comply with our legal, regulatory and compliance obligations including with regard to record keeping and traffic laws;
- process fees, payments, collect and recover money owed to us;
- detect, investigate and prevent crime, including fraud and money laundering;
- market our services, if you have agreed;
- deal with any other issues which may arise as necessary during the course of our providing services to you.

We will only use your Personal Information 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.

Who we may share Personal Information with

To facilitate the uses of Personal Information identified in this **Privacy Notice**, we may share your Personal Information with a variety of third parties, including our service partners and business partners.

We use third party service providers who provide certain services on our behalf and may share your Personal Information with them, for example our IT service providers and marketing agents. In the event any of your Personal Information is shared with our service providers, we ensure that they comply, strictly and confidentially, with our instructions and they do not use your Personal Information for their own purposes unless you have explicitly consented to them doing so or they are permitted by law to do so.

If you are renting with a corporate, membership or other similar commercial entity account, we may share Personal Information with the organization that manages the account for their own purposes. We recommend you review their privacy notices to learn more about their privacy practices.

We may also have to share your Personal Information with entities such as regulatory bodies and government, law enforcement and fraud prevention agencies.

We also share information with third parties for other legitimate purposes, for example service providers you use on conjunction or connection with our services (such as your travel agents) or to resolve traffic violations, process claims and provide customer services such as roadside assistance.

We may share your Personal Information with third parties where you have consented to us doing so or it is otherwise permitted by law.

Our services and offerings

We also process your Personal Information for specific business purposes to enable us to give you the best services. For example, we would like to use your Personal Information to keep you informed about other services Kenings and our business partners offer which may be of particular interest to you.

You may opt out at any time if you don't want to receive any communications of this nature by contacting us at booking@kenings.co.za.

Retention of your Personal Information

We keep your Personal Information, usually in computer or manual files, only for as long as necessary to fulfill the purposes for which the information was collected or to fulfill our legitimate business interests (including for legal, archival, accounting and/or audit purposes) or required by law. Your Personal Information will be retained in accordance with Kenning's retention and destruction policies and will be securely disposed of when it is no longer required.

Security of Personal Information

We use appropriate technical and physical security measures to keep your Personal Information safe and secure. When we provide your Personal Information to a third party or engage a third party to collect Personal Information on our behalf, the third party will be selected carefully and required to use appropriate security measures to protect the confidentiality and security of your Personal Information.

Your rights

You have a number of rights under [POPI](#) in connection with our use of your Personal

Information. These rights include:

- a right to access your Personal Information;
- a right to correct inaccurate Personal Information;
- a right to erase or suspend our use of your Personal Information;
- a right to object to our use of your Personal Information;
- a right to withdraw consent; and
- a right to complain to the [Information Regulator](#).

Please bear in mind that if you erase or suspend our use of your Personal Information or if you object or withdraw consent, this may affect our ability to carry out the tasks mentioned above for your benefit.

If you would like to exercise any of your rights set out above, please contact our [Information Officer](#) at the contact details provided above.

Contact details of the [Information Regulator](#):

Physical address:	JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
Postal address:	P.O Box 31533, Braamfontein, Johannesburg, 2017
Complaints email:	complaints.IR@justice.gov.za
General enquiries email:	inforeg@justice.gov.za