



Email: [info@vhirel.com](mailto:info@vhirel.com) | [support@vhirel.com](mailto:support@vhirel.com)

Telephone: 0861 VHIREL | 072 527 7681

Website: <https://www.vhirel.com>

## VHIREL (Pty) Ltd PRIVACY POLICY

Effective Date: 1 November 2025

### Who we are and scope

*VHIREL (Pty) Ltd (Registration No. 2016/427017/07; VAT 4300295732) operates an online equipment sharing platform that connects equipment suppliers with renters and facilitates rental transactions, payments, and logistics.*

*This Privacy Policy explains how we collect, use, disclose, store, and protect personal information when you visit our website/app, create an account, list or rent equipment, or otherwise interact with us.*

*We act as the “responsible party” for personal information we determine the purposes and means of processing for. We may act as an “operator” when we process personal information strictly on a supplier’s or corporate client’s documented instructions.*

### 1. CONTACT DETAILS AND INFORMATION OFFICER

- 1.1 Legal entity: **VHIREL (Pty) Ltd.**
- 1.2 Registered address: Office 6, PHG Group Office Suites, 101 On Olympus Drive, Helicon Heights, Bloemfontein, 9300, South Africa.
- 1.3 General contact: [info@vhirel.com](mailto:info@vhirel.com) | [support@vhirel.com](mailto:support@vhirel.com) | 0861 **VHIREL** | 072 527 7681.
- 1.4 Information Officer: Mauritz Jacques Calitz; Email: [privacy@vhirel.com](mailto:privacy@vhirel.com); Address: as above.

### 2. PERSONAL INFORMATION WE COLLECT

- 2.1 Identification and verification: full names; SA ID/passport numbers; company registration and VAT numbers; proof of identity or incorporation documents.
- 2.2 Contact details: email addresses; phone numbers; physical and postal addresses.
- 2.3 Business roles and site contacts: job titles; authorised representatives; site supervisors; delivery and collection contacts; safety or security desk details necessary for access.
- 2.4 Account credentials and settings: usernames; hashed passwords; multi-factor tokens; communication and notification preferences.
- 2.5 Payment, payout, and credit: bank account details for supplier remittances; masked card details handled by payment processors; billing addresses; credit references and results where applicable; chargeback and collections data.
- 2.6 Transactional and rental lifecycle: booking requests and acceptances; **VHIREL** Official Orders; rental periods and rates; delivery/collection details; invoices; deposits; refunds; usage confirmations; disputes and outcomes.
- 2.7 Equipment condition and evidence: equipment identifiers (make, model, serial numbers); condition reports; handover/return checklists; time-stamped photos or video of equipment and site conditions.
- 2.8 Telematics, usage, and location: engine hours; odometer readings; operational status; GPS location if equipment is fitted with telematics or where logistics require location coordination for delivery, safety, or recovery.
- 2.9 Communications and support: emails; messages; call notes; helpdesk tickets; feedback and reviews submitted via the platform.
- 2.10 Device, log, and analytics: IP address; device/browser type; operating system; access times; activity logs; cookies and similar technologies subject to consent where required.
- 2.11 Office visitors and CCTV: visitor logs and CCTV footage at our premises for safety and security.

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2.12 Special and children's personal information: we do not intentionally process special personal information (for example, health or biometrics) or children's information in the ordinary course. If a specific lawful need arises, we will obtain required authorisations/consents and apply additional safeguards.

### **3. HOW WE COLLECT PERSONAL INFORMATION**

3.1 We collect information directly from you during onboarding, when you list or rent equipment, complete handover/return processes, or contact support.

3.2 We collect information automatically from your device and our systems through cookies, logs, telematics integrations, and security monitoring.

3.3 We collect information from third parties such as payment processors, telematics providers, identity verification vendors, credit bureaux where lawful and appropriate, and public registers.

### **4. WHY WE PROCESS PERSONAL INFORMATION AND LAWFUL PROCESS**

4.1 Platform provision and administration: to create and manage accounts; facilitate bookings, Official Orders, digital agreements, handovers, and returns; and provide support (necessary to enter into or perform a contract).

4.2 Payments and finance: to process deposits, rental payments, refunds, supplier payouts, and reconciliations; to manage credit terms; and to prevent and address chargebacks (contract; legal obligation; legitimate interests).

4.3 Verification and risk management: to verify identities, complete due diligence, and prevent fraud or misuse of equipment (legal obligation where applicable; legitimate interests).

4.4 Security and integrity: to secure accounts and the platform; to protect users, funds, and equipment; and to monitor and investigate incidents (legal obligation; legitimate interests).

4.5 Legal and regulatory compliance: to comply with POPIA, PAIA, tax, company, safety, and other laws; to respond to lawful requests; and to exercise or defend legal claims (legal obligation; legitimate interests).

4.6 Analytics and improvement: to analyse usage, enhance performance, and develop features (legitimate interests; consent for non-essential cookies).

4.7 Direct marketing: to send service updates and relevant offers relating to equipment supply and rental (consent for new prospects; soft opt-in for existing customers; opt-out available at any time).

### **5. COOKIES AND SIMILAR TECHNOLOGIES**

5.1 We use essential cookies for functionality and security. With your consent, we also use analytics and, where applicable, advertising cookies to understand usage and improve services.

5.2 You can manage cookie preferences via our banner and browser settings. Blocking some cookies may affect site functionality.

### **6. SHARING AND DISCLOSURES**

6.1 Users and counterparties: we share necessary information between suppliers, renters, and their authorised site contacts to fulfil bookings, handovers, returns, and dispute resolution.

6.2 Service providers (operators): we engage vetted providers under written operator agreements for hosting/cloud, payments, KYC and verification, telematics and GPS, analytics, communications, cybersecurity, document management, storage/backup, and customer support. These providers must follow our instructions, implement appropriate safeguards, and keep information confidential.

- 6.3 Insurers, assessors, and advisors: we share information with insurers, loss adjusters, independent assessors, auditors, professional advisors, and collections partners to manage claims, recover losses, and enforce agreements.
- 6.4 Corporate transactions: if we undertake a merger, acquisition, or reorganisation, we may share information subject to confidentiality and appropriate safeguards.
- 6.5 Legal and regulatory: we disclose information to regulators, law enforcement, courts, or other public bodies when required by law or to protect our rights, users, the public, or equipment assets.
- 6.6 We do not sell personal information.

## 7. CROSS-BORDER TRANSFERS

- 7.1 Some operators or infrastructure may be located outside South Africa. We will only transfer personal information cross-border where the recipient is subject to a law, binding corporate rules, or binding agreement that provides an adequate level of protection, or where another POPIA justification applies (for example, your consent or necessity for contract performance).

## 8. SECURITY SAFEGUARDS

- 8.1 We implement appropriate, reasonable technical and organisational measures to protect personal information against loss, unauthorised access, and unlawful processing, including encryption in transit, role-based access controls, logging and monitoring, secure software development and change control, vulnerability management, and staff confidentiality and training.
- 8.2 We require operators to implement appropriate safeguards, process only on documented instructions, and notify us promptly of any suspected or actual data breach.

## 9. DATA BREACHES

If we have reasonable grounds to believe that your personal information has been accessed or acquired by any unauthorised person, we will notify the Information Regulator and affected data subjects as soon as reasonably possible with details of the breach, likely consequences, measures taken, and advice on protective steps.

## 10. RETENTION

We retain personal information only for as long as necessary for the purposes set out in this Policy and as required by law (for example, tax and company records are typically kept for 5–7 years). Where information is no longer needed, we securely delete, de-identify, or archive it in line with POPIA and our retention schedule.

## 11. YOUR POPIA RIGHTS

- 11.1 You have the right to be informed about the collection and use of your personal information, to request access to your personal information, to request correction or deletion, to object to certain processing (including direct marketing), and to withdraw consent where processing relies on consent (without affecting prior lawful processing).
- 11.2 You may exercise your rights by emailing our Information Officer at [privacy@vhirel.com](mailto:privacy@vhirel.com). We may require verification and sufficient detail to locate the records.

## 12. PAIA ACCESS TO INFORMATION

12.1 Our PAIA section 51 Manual describes the categories of records we hold and how to request access. It is available on request from the Information Officer.

12.2 You can submit a PAIA request by completing the prescribed form and sending it to the Information Officer at our registered address or [privacy@vhirel.com](mailto:privacy@vhirel.com). Prescribed fees may apply, and we will respond within statutory timelines, granting or refusing access with reasons as required by law.

## 13. DIRECT MARKETING PREFERENCES

We will obtain consent for electronic direct marketing to new prospects. Existing customers may receive communications about similar services, subject to an easy opt-out in each message and maintenance of suppression lists.

## 14. AUTOMATED DECISION-MAKING AND PROFILING

We do not make legally or similarly significant decisions based solely on automated processing. We may use risk indicators, credit data, fraud scores, or telematics analytics to support manual decisions, and you may request human review of any decision that materially affects you.

## 15. CHILDREN'S INFORMATION

Our platform is intended for adults. We do not knowingly process children's personal information without the required legal consents/authorisations. If you believe a child's information has been provided to us contrary to law, please contact the Information Officer.

## 16. CHANGES TO THIS POLICY

We may update this Policy from time to time. Material changes will be communicated on our website/app or by email. Continued use after the effective date constitutes acceptance of the updated Policy.

## 17. CONTACTS AND COMPLAINTS

For questions, requests, or complaints, contact the Information Officer at [privacy@vhirel.com](mailto:privacy@vhirel.com), or write to our registered address above.

You may also contact the Information Regulator (South Africa):

Woodmead North Office Park, 54 Maxwell Drive Woodmead, Johannesburg, 2191

Website: <https://inforegulator.org.za>;

Email: [PAIAComplaints@inforegulator.org.za](mailto:PAIAComplaints@inforegulator.org.za); [POPIAComplaints@inforegulator.org.za](mailto:POPIAComplaints@inforegulator.org.za);  
[enquiries@inforegulator.org.za](mailto:enquiries@inforegulator.org.za)