

ATSC Global Limited (“**ATSC Global**”, “**we**”, “**us**”, “**our**”) is committed to safeguarding the privacy and protection of Personal Data processed through the **Hire24 platform** (“**Hire24**” or the “**Platform**”).

This Privacy Policy explains how we collect, use, disclose, transfer, store, and protect the Personal Data of Data Subjects (“**Users**”, “**you**”, “**your**”) who access or use the Platform as Lessors or Lessees of construction equipment.

It applies to Users in the European Union (“**EU**”) under the GDPR and Users in the Republic of South Africa (“**RSA**”) under POPIA.

**PLEASE READ THIS PRIVACY POLICY CAREFULLY.**

**BY ACCESSING OR USING HIRE24 OR SUBMITTING PERSONAL DATA TO US, YOU ACKNOWLEDGE THAT YOU HAVE READ, UNDERSTOOD, AND AGREED TO THE TERMS OF THIS PRIVACY POLICY.**

Hire24 is not intended for Children, and we do not knowingly process Children’s Personal Data.

**1. WHO WE ARE & OUR ROLE IN DATA PROCESSING**

**Controller / Responsible Party**

For all Processing operations relating to Hire24, ATSC Global Limited acts as the:

- Data Controller (under GDPR); and
- Responsible Party (under POPIA).

This means we determine the purpose and means of Processing your Personal Data.

**Processor/ Operator**

In limited circumstances, we may act as a:

- Processor (under GDPR);
- Operator (under POPIA),

Where we Process Personal Data strictly on behalf of an under the instructions of a third party, for example in the following circumstances:

- When Lessors use Hire24’s messaging or booking tools and we merely store or transmit information on their behalf;
- When we send booking confirmations or notifications to Lessees for Lessors;
- When we collect identification documents at a Lessor’s request and share them with that Lessor;
- Any other Processing where we follow the Lessor’s instructions and do not determine the purpose of Processing.

**2. PERSONAL DATA WE COLLECT**

Personal Data means any information that identifies or can reasonably be linked to you.

We collect the following categories of data through the Hire24 Platform:

Type of Data	Details
<b>Identity Data</b>	<ul style="list-style-type: none"> <li>• First name, last name</li> <li>• Identification numbers (where required for verification)</li> <li>• Company details (if applicable)</li> <li>• Age (to confirm eligibility)</li> </ul>
<b>Contact Data</b>	<ul style="list-style-type: none"> <li>• Email address</li> <li>• Mobile number</li> <li>• Physical address or business location</li> </ul>
<b>Transaction Data &amp; Booking Data</b>	<ul style="list-style-type: none"> <li>• Equipment listings</li> <li>• Rental requests, confirmations, cancellations</li> <li>• Payment instructions, invoices, billing history</li> <li>• Records of transactions between lessors and lessees</li> </ul> <p><i>(Note: We do <b>not</b> store card or bank details. Payments are securely processed by third-party payment providers.)</i></p>

<p><b>Account &amp; Profile Data</b></p>	<ul style="list-style-type: none"> <li>• Username, password, login credentials</li> <li>• Role/type of account (lessor or lessee)</li> <li>• Profile information you voluntarily add</li> <li>• Reviews and ratings you submit or receive</li> </ul>
<p><b>Usage Data</b></p>	<ul style="list-style-type: none"> <li>• Interactions with features and functions</li> <li>• Search queries</li> <li>• Pages viewed and navigation patterns</li> <li>• Clickstream data</li> </ul>
<p><b>Marketing and Communications Data</b></p>	<ul style="list-style-type: none"> <li>• Messages exchanged between Users on the Platform</li> <li>• Support requests and correspondence</li> <li>• Call logs or chat interactions (if applicable)</li> </ul> <p>Marketing preferences in receiving marketing from ATSC Global and third parties, your communication preferences (communications related to the Services).</p>
<p><b>Technical &amp; Device Data</b></p>	<p>Collected automatically when you access the Platform:</p> <ul style="list-style-type: none"> <li>• IP address</li> <li>• Device type, operating system, browser type</li> <li>• Unique device identifiers</li> <li>• Log files, system event information</li> <li>• Access times and dates</li> </ul>
<p><b>Aggregate Data and Pattern Data (“Pattern Data”)</b></p>	<p>Statistical, demographical or transactional information derived from Personal Data but is not considered Personal Data in law as this data will not directly or indirectly reveal the identity of the Data Subject. For example, we may aggregate the Usage Data of a Data Subject to calculate the percentage of users accessing a specific website or specific Service feature or executing a specific transaction type. However, if we combine or connect Pattern Data with your Personal Data so that it can directly or indirectly identify you, we will treat the combined data as Personal Data which will be used in accordance with this Privacy Policy.</p>
<p><b>Additional Personal Data</b></p>	<p>You may choose to provide additional Personal Data to us. When you do so, you agree to provide accurate and current information, and to not impersonate or misrepresent any person or entity or falsely state your affiliation with anyone or anything.</p>
<p><b>Location Data</b></p>	<p>Where necessary to provide the service:</p> <ul style="list-style-type: none"> <li>• Approximate or general location</li> <li>• Location of equipment or service area</li> </ul>
<p><b>Special Category Data/Special Personal Information and Children Information</b></p>	<p>We do not collect any Special Category Data/Special Personal Information or Children Information directly from Data Subjects.</p>

You may opt to provide us with additional Personal Data, in which case you agree to supply accurate and up-to-date information, and you must not impersonate or misrepresent any individual or entity, nor falsely claim or misrepresent your association with anyone or anything.

We do not collect any Special Category Data about you, except when providing our Services, which will be collected with your consent.

**Submission of Personal Data on behalf of another:** If you submit information on behalf of someone else, it is your responsibility to obtain the necessary consent from that person/User before sharing their Personal Data with us. Upon receiving such Personal Data, we will assume that the required consent has been obtained and will process the data according to your instructions. By submitting Personal Data on behalf of another person/User, you indemnify us against any claims from third parties related to Personal Data processed without the necessary consent or other legal exceptions.

**If you fail to provide Personal Data:** If we are required by law or under the terms of a contract with you to collect Personal Data and you do not provide that data upon request, we may be unable to fulfill our contractual obligations (for example, providing you with Services, including complimentary Services). In such cases, we may need to cancel a Service you have with us, but we will inform you if this becomes necessary at that time.

### 3. HOW WE COLLECT PERSONAL DATA

We collect personal data in the following ways:

Directly from You	Automatically	From Third Parties
<ul style="list-style-type: none"> <li>• Register an account</li> <li>• Create or manage listings</li> <li>• Make rental bookings</li> <li>• Interact with other Users</li> <li>• Contact support</li> <li>• Submit reviews or feedback</li> <li>• Request our marketing material from Us.</li> <li>• Contact us via our “Contact Us” form, or WhatsApp or other social media sites’ messaging platforms.</li> </ul>	<ul style="list-style-type: none"> <li>• As you interact with our Services or website, we will automatically collect Technical Data about your equipment, browsing actions, patterns, and device(s). This Personal Data is collected by using cookies, server logs and other similar technologies.</li> <li>• We may also receive Technical Data about you if you visit other websites employing our cookies.</li> </ul>	<ul style="list-style-type: none"> <li>• Analytics providers such as Google.</li> <li>• Advertising networks.</li> <li>• Search information providers.</li> <li>• Third Party service providers that provide a service or product to you, subject to your consent to us to collect the information.</li> <li>• Payment providers</li> <li>• Fraud prevention or security service providers.</li> <li>• Public records or online databases (where legally permitted)</li> <li>• Contact, Financial and Transaction Data from providers of technical, payment and delivery services.</li> </ul>

### 4. COOKIES

For detailed information on how we use cookies and similar tracking technologies on our website/platform, please review our Cookies Policy. By continuing to use our Services you consent to our use of cookies as described in that policy.

### 5. HOW WE USE PERSONAL DATA (PURPOSES OF PROCESSING)

We process your Personal Information for the following purposes:

- **To Provide Services:** To create and manage your account, process transactions, and provide customer support.
- **To Improve Our Services:** To analyse usage patterns and improve our website and Services.
- **Marketing Communications:** To send you promotional materials and updates if you have opted in to receive such communications.
- **Legal Compliance:** To comply with applicable laws and regulations.

Note that we may process Personal Data for more than one lawful ground depending on the specific purpose for which we are using the data. Please contact us if you need details about the specific legal ground, we are relying on to process your Personal Data where more than one ground has been set out in the table below.

Purpose of Activity	Type of Data	Lawful basis for processing including basis of legitimate interest
To register you as a User of our Services and create an account with us.	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Marketing and Communications</li> </ul>	<ul style="list-style-type: none"> <li>• Consent (where required)</li> <li>• Performance of a contract with you</li> </ul>
To facilitate Listings, Bookings and Transactions: <ul style="list-style-type: none"> <li>• Match lessors and lessees</li> <li>• Manage bookings and communications</li> <li>• Process payments and refunds</li> <li>• Send confirmations and notifications</li> </ul>	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Financial</li> <li>• Transaction</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> <li>• Legitimate interests</li> <li>• Compliance with legal obligations</li> </ul>
To provide and improve the Hire24 Platform: <ul style="list-style-type: none"> <li>• Operate the Platform</li> <li>• Enhance functionality, user experience, and security</li> <li>• Monitor usage and system performance</li> </ul>	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Transaction</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate interests</li> </ul>
Manage payments, fees and charges; Collect and recover money owed to ATSC Global	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Financial</li> <li>• Transaction</li> <li>• Marketing and Communications</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> <li>• Necessary for our legitimate interests (to recover debts due to us)</li> </ul> <p><b>[TAKE NOTE: we do not store Financial Information - card details. We use third party service provider(s) to execute transactions where you use your card. You should read their privacy policy]</b></p>
To manage our relationship with you which will include: <ul style="list-style-type: none"> <li>• Notifying you about changes to our Terms of Services or this Privacy Policy where required</li> <li>• Asking you to leave a review</li> <li>• General Service communications.</li> </ul>	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Profile</li> <li>• Marketing and Communications</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> <li>• Necessary to comply with a legal obligation</li> <li>• Necessary for our legitimate interests (to keep our records updated and to study how clients use our services)</li> </ul>
To administer and protect our business, website and other electronic platforms (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Technical</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganization or group restructuring exercise)</li> <li>• Necessary to comply with a legal obligation</li> </ul>
To deliver relevant website and Service content and information about similar services and/or products to you and measure or understand the effectiveness of the advertising we serve to you	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Profile</li> <li>• Usage</li> <li>• Marketing and Communications</li> <li>• Technical</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary for our legitimate interests (to study how clients use our services, to develop them, to grow our business and to inform our marketing strategy)</li> </ul>
To use data analytics to improve our website, Services, marketing, client relationships and experiences	<ul style="list-style-type: none"> <li>• Technical</li> <li>• Usage</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary for our legitimate interests (to define types of clients for our services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</li> </ul>
To make suggestions and recommendations to you about Services that may be of interest to you	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Profile</li> <li>• Usage</li> <li>• Marketing and Communications</li> <li>• Technical</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary for our legitimate interests (to develop our services and grow our business)</li> </ul>

## 6. Legal Basis for Processing

Under the **GDPR & POPIA**, we process your Personal Data only on the basis of one or more of the following grounds:

- **Consent:** Where you have provided consent for us to process your data for specific purposes.
- **Contractual Necessity:** Where processing is necessary for the performance of a contract with you.
- **Legal Obligation:** Where we are required to comply with a legal obligation.
- **Legitimate Interests:** Where processing is necessary for our legitimate interests or those of a third party, provided that your interests do not override those interests.

We ensure that, in every instance, your Personal Data is processed in a fair, lawful, and transparent manner.

## 7. AI, AUTOMATED PROCESSING & PROFILING

Hire24 does not:

- Use artificial intelligence to make decisions about Users;
- Conduct automated decision-making that produces legal or significant effects; and
- Perform behavioural profiling using AI systems.

We may use basic analytics and system-level automation (not AI) to:

- Monitor Platform performance;
- Detect spam or abusive behaviour; and
- Compile statistical insights

These functions do not involve predictions, behavioural modelling, or automated decisions that meaningfully affect your rights. If AI-based features are introduced in the future, this Privacy Policy will be updated, and Users will be notified where required by law.

## 8. DISCLOSURE OF PERSONAL INFORMATION

We may share your Personal Data with:

### 8.1. Internal Parties

- ATSC Global group companies; and
- Employees or authorised personnel with a need to know.

### 8.2. External Third Parties

- Payment processors;
- Identity verification or security providers;
- Hosting and IT infrastructure providers;
- Professional advisers (legal, tax, accounting); and
- Regulatory or governmental authorities where required by law.

### 8.3. Other Hire24 Users

Certain information may be visible to other Users, including:

- Your profile information;
- Your ratings or reviews; and
- Contact information necessary to complete a rental.

We only disclose what is necessary to facilitate a transaction.

### 8.4. Business Transfers

If Hire24 or ATSC Global undergoes a reorganisation, merger, acquisition, or sale, personal data may be transferred as part of the transaction.

## 9. INTERNATIONAL DATA TRANSFERS

As ATSC Global is located in Ireland and processes the data of Users in South Africa, your Personal Data may be transferred across borders.

Whenever we transfer your Personal Data out of your country, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your Personal Data to countries that have appropriate data protection and privacy legislation to protect your Personal Data.
- Where we use certain service providers, we conclude an agreement with them to confirm that your Personal Data is confidential, they can only process on our instructions and that they should establish and maintain appropriate technological and organisational measurements to protect your Personal Data.

By submitting your Personal Data to us you consent to the transfer of your Personal Data outside the borders of your country (when required).

## 10. DATA SECURITY

We implement appropriate technical and organizational measures to protect your Personal Data against unauthorised access, loss, destruction, or alteration. However, no method of transmission over the internet or method of electronic storage is a hundred percent secure.

## 11. USER RIGHTS

### European Union Users (GDPR Rights)

You have the following rights under GDPR:

- **Right to Access:** You can request access to your Personal Information. There may be a fee associated with this request – see below.
- **Right to Rectification:** You can request correction of inaccurate or incomplete data.
- **Right to Erasure:** You can request deletion of your personal data under certain conditions.
- **Right to Restrict Processing:** You can request that we limit the processing of your data.
- **Right to Data Portability:** You can request a copy of your data in a structured format.
- **Right to Object:** You can object to processing based on legitimate interests or direct marketing.

### South African Users (POPIA Rights)

You have the following rights under POPIA:

- **Right to Access:** You can request access to your Personal Information held by us.
- **Right to Correction:** You can request correction of inaccurate or incomplete data.
- **Right to Deletion:** You can request deletion of your Personal Information under certain conditions.
- **Right to Object:** You can object to processing based on legitimate interests or direct marketing.
- **Right to Withdraw Consent:** You can withdraw your consent for the processing of your Personal Information.
- **Right to Lodge a complaint:** You have the right to lodge a complaint with the Information Regulator.

To exercise these rights, please contact us using the contact details provided below.

**Fee required:** Apart from any prescribed fees under any applicable data protection legislation, 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 could refuse to comply with your request in these circumstances.

**Time limit to respond:** We try to respond to all legitimate requests within 30 (thirty) days. Occasionally it could take us longer than 30 (thirty) days 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.

## 12. DATA RETENTION

We will retain your Personal Information only for as long as necessary to fulfill the purposes outlined in this policy or as required by law.

### How long will we use your Personal Data for?

- We will only retain your Personal Data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your Personal Data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect of our relationship with you.
- 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 and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.
- By law we have to keep basic information about our clients (including Contact, Identity and Transaction Data) for five years after they cease being clients for tax purposes.
- In some circumstances you can ask us to delete your data: see your legal rights below for further information.
- In some circumstances we will 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.

## 13. CHANGES TO THIS PRIVACY POLICY

We may update this Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on our website. Your continued use of our services after any changes indicates your acceptance of the revised policy.

## 14. IMPORTANT INFORMATION AND WHO WE ARE

To get in touch with us:

**Full name of legal entity:** ATSC Global Limited

**Contact details:** Website ([click here](#) to communicate via our website)

**Email:** [legal@atsc.global](mailto:legal@atsc.global)

**Registered address:** 1<sup>st</sup> Floor, Penrose 2, Penrose Dock, Cork City, Ireland, T23 YY09

## 15. DEFINITIONS

- **ATSC Global Limited** means a private company duly incorporated and registered in accordance with the laws of the Republic of Ireland under registration number 745470 with its registered address at **1st Floor, Penrose 2, Penrose Dock, Cork City, Ireland, T23 YY09**, and includes its successors-in-title and permitted assigns.
- **Children** means natural persons under the age of 18 years.
- **Data Controller (EU) / Responsible Party (RSA)** 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 Data.
- **Data Processor/ Operator** means an entity that handles Personal Data as instructed by a Data Controller (our Clients).
- **Data Protection Legislation** means the General Data Protection Regulation (EU) 2016/679 (“GDPR”) applicable to users in the European Union (“EU”) and the Protection of Personal Information Act (“POPIA”) applicable to users in South Africa (“SA”).
- **Data Subject** means the person to whom Personal Data relates and, in this document, refers to you as the party providing Personal Data that will be processed by ATSC Global or a relevant third-party.

- **Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best Service and the best and 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.
- **Lessee** means a User of the Platform who registers to obtain access to and rent construction equipment from one or more Lessors through the Platform. The Lessee is responsible for entering into lease agreements with the Lessor(s) for the use of the equipment under agreed terms and conditions. As a Lessee, the User may be required to provide personal, financial, and identification information which the Platform collects and processes to facilitate rental transactions, verify identity, and ensure compliance with applicable laws.
- **Lessor** means a User of the Platform who registers to list, offer, and rent out construction equipment to one or more Lessees. The Lessor retains ownership of the equipment and undertakes responsibility for managing its availability, condition, and compliance with all relevant laws governing its rental. The Lessor consents to provide necessary business, identification, and equipment details during registration and transaction processes, which the platform collects and processes to enable secure and efficient rental interactions.
- **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.
- **Personal Data** includes the definition contained in the GDPR as well as the definition of “Personal Information” in the POPI Act.
- **Process or Processing** as defined under the POPI Act and GDPR.
- **Services** has the same meaning as per our Terms of Use.
- **Special Category Data** as defined by the GDPR or **Special Personal Information** as defined by the POPI ACT.
- **THIRD-PARTIES**
  - i. **Internal Third-Parties:** Partners, affiliates, employees, shareholders, directors and/ or agents of ATSC Global (if applicable), acting as joint responsible parties or operators and who may also provide IT and system administration services and undertake leadership reporting.
  - ii. **External Third-Parties:**
    - (1) Service providers acting as operators who provide IT and system administration services.
    - (2) Professional advisers acting as operators or joint Responsible Parties, including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
    - (3) The Revenue Services, regulators and other authorities acting as operators or joint Responsible Parties who require reporting of processing activities in certain circumstances.
    - (4) Courts of law or any other authorities where we have an obligation under law to share your Personal Data.
    - (5) In the event that we sell or buy any business or assets, in which case we may disclose your Personal Data to the prospective seller or buyer of such business or assets.

**END OF POLICY**