



First Floor, South Wing, Block B
Regent Hill Office Park
Cnr Leslie and Turley Roads
Lonehill, 2191
Gauteng, South Africa

Corr-Serve (Pty) Ltd.

POPIA POLICY

Policy	POPIA POLICY
Applicable to	All employees
Person responsible	Information Officer
Document No.	APX0014

1. Introduction:

The POPI Act, 4 of 2013, ensures that the right to privacy is taken seriously and includes a data subject's right to be protected against any unlawful collection, retention, dissemination and use of their personal information.

The Company is required to receive consent from a data subject before they can obtain, retain and process personal information for communication or any other purpose.

The POPI Act, highlights the need for a greater understanding of the manner in which personal information is stored and processed. This means that the systems, processes and how logical and physical access is maintained and managed for the systems and areas housing personal information all need to be considered.

Protection of Personal Information requires extra vigilance in all aspects of physical and information security. The basis of the POPI Act is to protect personal information and prevent information from being exposed to unauthorised persons. As a result, this implies an obligation to protect information relating to individuals and juristic entities from any damage, including financial fraud, identity theft, misuse and the abuse of personal information.

The POPI Act requires that a set of streamlined processes and systems must be established that can easily identify where personal information is stored, understand how this information is processed physically and electronically, who has access to this information, as well as for what purpose it is required.

Any organisation or person who keeps personal information must take steps to prevent the loss, damage, and unauthorized destruction of the personal information. In terms of Section 19, of the Act, they are also required to prevent unlawful access to, or unlawful processing of this personal information.

2. The Company:

The Company operates in the IT industry and interacts with various data subjects in the processing of data, as defined by the Act.

3. The type of personal information the Company collects:

The Company currently collects and process the following personal information (PI):

- i) Staff, service providers and statutory entities;

ii) Special Personal Data: staff and service providers.

4. How personal information is collected and what it is used for:

4.1 Most of the personal information processed is provided directly by the Data Subject, for one of the following reasons:

- 4.1.1 Management of the employment relationship;
- 4.1.2 Management of the operational/production process;
- 4.1.3 Management of service levels and contractual requirements;
- 4.1.4 Management of the statutory requirement processes.

4.2 This information may be shared with:

- 4.2.1 Data Subject.

5. Processing Personal Information:

Processing of Personal Information is conducted in terms of the Protection of Personal Information Act (POPIA), and consists of the following:

- 5.1 The data subject or a competent person where the data subject is a child, may consent to the processing.
- 5.2 A data subject has the right to withdraw his/her consent;
- 5.3 The processing is necessary to carry out actions for business;
- 5.4 The processing complies with an obligation imposed by law on the business;
- 5.5 The processing protects a legitimate interest of the data subject;
- 5.6 The processing is necessary for pursuing the legitimate interests of the business or of a third party to whom the information is supplied.

Any person processing personal information on behalf of an employer must have the necessary authorization from the employer to do so. They must also treat the personal information as confidential and not share this information without the following the required processes. (section 20). The person must have a written contract with the Company in which they are specifically obliged to maintain the integrity and confidentiality of the personal information and to implement the established safeguards against identified risks.

Employment contracts, of administrative staff, data capturers and for any employee who deals with personal information, in order to ensure that these requirements are met, will be updated.

6. Personal information is stored:

Information is securely stored as follows:

- 6.1 All risks must be identified and then safeguards must be established and maintained against these risks. Regular verification that the safeguards are being effectively implemented is required. Safeguards are to be updated in response to any new risks or identified deficiencies in existing safeguards.
- 6.2 In terms of Section 21(2), the employee also has an obligation to notify the Company immediately if they believe that there has been a data breach.
- 6.3 In the event of a breach and personal information has been accessed or acquired by any unauthorized party the responsible party (Information Officer) is required to notify the Information Regulator, and the data subject needs to receive formal notification off this fact. The notification to the data subject must be provided with extreme haste and



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with sufficient information to allow the subject to protect themselves against the possible consequences of the personal information falling into the wrong hands.

6.4 Information is kept for the periods as indicated in the Retention Policy.

6.5 Information is disposed of by the Information Officer in accordance with the Data Destruction Policy.

7. Data protection rights:

7.1 A data subject is entitled to access personal data by sending a written request to the Information Officer.

7.2 A fee may be charged for this service as set out in terms of the Popi Act.

7.3 On request personal data may be corrected or supplemented.

7.4 Requests for the destruction of personal data will be considered in light of any other laws or regulations prohibiting the destruction of that data.

7.5 The Company has one month to respond to any request.

7.6 Everyone has the right to enquire as to whether somebody or an entity has their personal information on record. The enquiring party must provide proof of identity and the requested information must be provided to the data subject free of charge. To establish what this information consists of and whether this information has been disseminated to any third parties, payment may be required. Access to this information is also subject to the Promotion of Access to Information Act.

7.7 Everyone has the right to have their personal information corrected or deleted if it is inaccurate, irrelevant, excessive, dated or misleading, or if it has been obtained unlawfully, or if the responsible party is no longer authorized to retain the information.

1. Special Personal Information

Section 26 of the POPI Act creates a special category of personal information called "special personal information". This relates to religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life or biometric information. Also included in this category is information relating to the alleged commission of any offence or any proceedings in respect of any offence allegedly committed and the outcome of such proceedings.

Failure to obtain consent makes processing this special personal information strictly prohibited, unless

- 1.1. it is necessary by law;
- 1.2. or is done for historical, statistical or research purposes;
- 1.3. or the information has been deliberately made public by the subject.

There are limited exceptions to the prohibition against the processing of "special personal information". Details of such exceptions are set out in the Act.

Special rules apply to the processing of personal information of children. (section 35)
These rules are set out in the Act.

The Information Regulator has the power to grant exemptions to allow people to process personal information without complying with the Act if the public interest outweighs the subject's rights of privacy or where there is a clear benefit to the subject. Such exemptions



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may be granted if specific conditions have been met. Details of such exceptions are set out in the Act.

2. Contact details: (Whom will attend to requests and administer the requests, include their details here – Person needs to ensure that they understand the POPI Act and what is the procedures of the company)

Name: Ms Rachel Best

Address: Regent Hill Office Park, Cnr Leslie and Turley Roads, Lonehill, Gauteng, 2191

Phone Number: (012) 661-0690

E-mail: rachel.best@corr-serve.co.za

10. Complaints:

- a. If a data subject has any concerns about the use of their personal information, they can file a complaint with the Information Officer. Refer to clause 8 for details.
- b. A data subject can also complain to the Information Regulator if they are unhappy with how Personal Information is processed.

The contact details are as follows:

The Information Regulator (SA)
33 Hoofd Street
Forum III
3rd Floor
Braampark

PO Box 31533
Braamfontein, 2017.

Complaints email: complaints.IR@justice.gov.za