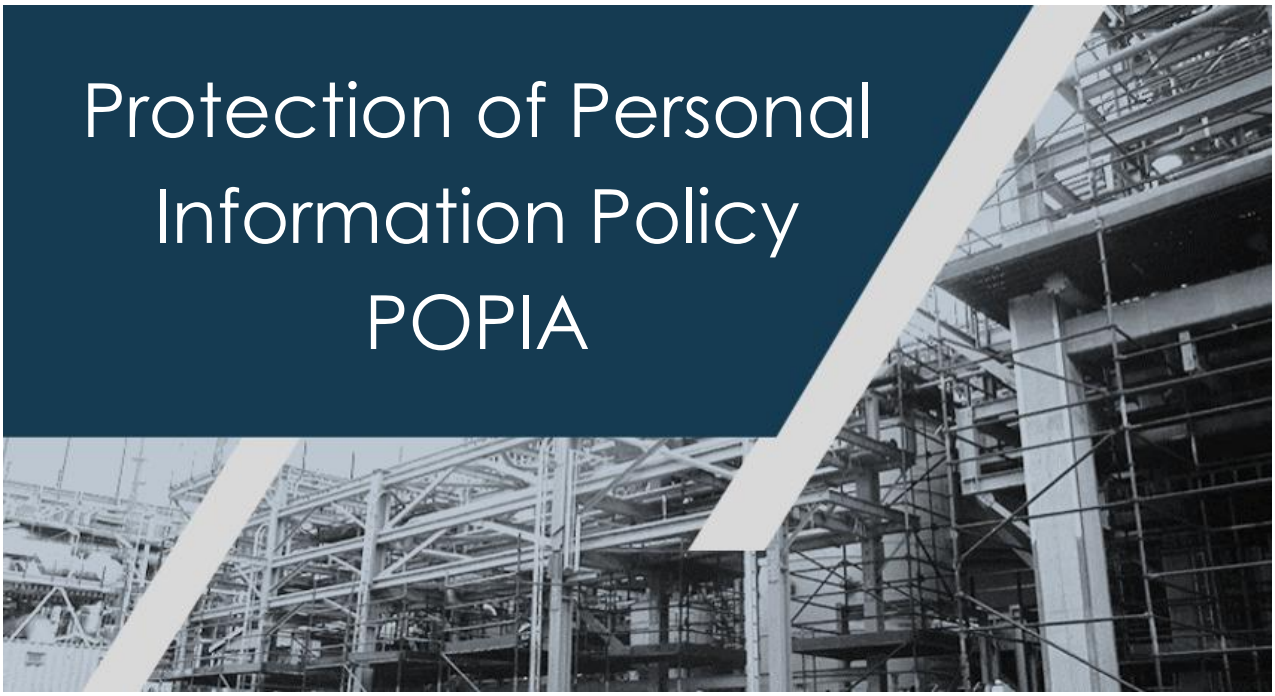
Protection of Personal Information Policy POPIA



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Content Contributor:	Reviewers:	Approver:	Approval
Sian Angus	Trevor Govender	Trevor Govender	SharePoint Workflow

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Reference and Support Documents	
Document No.	Document Name
PPS_GRC_MAN_0002	PAIA Manual
PPS_GRC_FRM_0002	Personal Information Request Form
PPS_GRC_FRM_0002	POPIA Complaint Form
Act, 4 of 2013	Protection of Personal Information Act, 4 of 2013

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1. Definitions/Abbreviations

Terms / Abbreviations	Definition
Company	Pangea Professional Services (Pty) Ltd.
Data Subject	The person to whom Personal Information and/or Special Personal Information relates.
Deputy Information Officer	The legal and compliance officer of the Company, duly appointed in accordance with the requirements of POPIA and PAIA.
Information Officer	The managing director of the Company, duly appointed in accordance with the requirements of POPIA and PAIA.
Regulator	The information regulator established in terms of POPIA.
Operator	A third party who processes personal information on behalf of the Company subject to an agreement or mandate.
PAIA	Promotion of Access to Information Act, 20 of 2000.
PAIA Manual	The PAIA manual of the Company.
Personal Information	Information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to – (a) race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth; (b) education, medical, financial, criminal or employment history; (c) any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person; (d) biometric information; (e) personal opinions, views or preferences; (f) correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence; (g) views or opinions of another individual about the person; and (h) the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal

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	information about the person.
POPIA	Protection of Personal Information Act, 4 of 2013.
POPIA Procedure	The POPIA Procedure of the Company.
Process/Processed/ Processing	Any operation performed on personal information, including collection, storage, use, dissemination, and destruction.
Special Personal Information	Information relating to – (a) the religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life or biometric information of a Data Subject; or (b) the criminal behaviour of a Data Subject to the extent that such information relates to— (i) the alleged commission of any offence; or (ii) any proceedings in respect of any offence allegedly committed by a Data Subject or the disposal of such proceedings.

2. Purpose

2.1. This Policy outlines the manner in which the Company collects, processes, stores, and protects Personal Information and/or Special Personal Information in accordance with POPIA requirements.

2.2. This Policy must be read together with the Company's PAIA Manual, which sets out the process for Data Subjects requesting access to information held by the Company in terms of PAIA.

3. Scope

3.1. This Policy applies to all Data Subjects whose Personal Information and/or Special Personal Information is Processed by the Company, from time to time.

3.2. For purposes of this Policy, any reference to "information" shall refer to either Personal Information or Special Personal Information, as the context requires.

4. Data Subject Rights

Data Subjects have the right to:

4.1. Be informed of the Processing of their information.

4.2. Be informed if their information has been accessed or acquired by an unauthorised person.

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4.3. Establish whether the Company is in possession of their information.

4.4. Request access to their information.

4.5. Request the correction, destruction or deletion of their information to the extent that such information is inaccurate, irrelevant, excessive, outdated, incomplete, misleading or unlawfully obtained.

4.6. Reasonably object to the Processing of their information, if such information has not been processed in accordance with section 11(1) of POPIA.

4.7. Object to the Processing of their information for purposes of direct marketing.

4.8. Not have their information Processed for purposes of direct marketing by means of unsolicited electronic communications.

4.9. Not be subject to automated decision which results in legal consequences or substantially affects the Data Subject, and which decision is based solely on the automated Processing of their information.

4.10. Lodge a complaint with the Regulator where their information has been interfered with.

4.11. Institute civil proceedings emanating from a breach of the protection of their information.

5. Principles for Processing Personal Information and Special Personal Information

Personal Information and Special Personal Information is processed by the Company in accordance with the following principles, as outlined in POPIA:

5.1. Accountability

The Company will ensure that all Processing takes place in accordance with the provisions of POPIA.

5.2. Processing Limitation

The Company will –

5.2.1. Process information in a lawful and reasonable manner.

5.2.2. Only Process information for purposes which are adequate, relevant and not excessive.

5.2.3. Only Process information with the consent of the Data Subject.

5.2.4. Collect information directly from the Data Subject, unless otherwise required or permitted by law.

5.3. Purpose Specification

The Company will only Process information for a specific, explicitly defined and lawful purpose relating to the activities carried out by the Company. Records of information

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collected by the Company will be retained only for such period as is necessary to fulfil the purpose of collection.

5.4. Further Processing Limitation

5.4.1. Further Processing of information will only take place if it is required in accordance with the purpose for which the information was collected.

5.4.2. The following factors will be taken into consideration to determine if further Processing is in accordance with the purpose of collection:

5.4.2.1. the relationship between the purpose of the intended further Processing and the purpose for which the information has been collected.

5.4.2.2. the nature of the information concerned.

5.4.2.3. the consequences of the intended further processing for the Data Subject;

5.4.2.4. the manner in which the information has been collected; and

5.4.2.5. any contractual rights and obligations between the parties.

5.5. Information Quality

The Company will, having regard to the purpose of Processing, ensure the completeness, relevance and accuracy of information.

5.6. Transparency

The Company will maintain all information in accordance with its PAIA Manual and will implement measures to ensure that Data Subjects are notified that their information is being collected, including the purpose for which it is being collected and processed.

5.7. Security Safeguards

5.7.1. The Company has implemented security measures to ensure the integrity and confidentiality of all information Processed.

5.7.2. Any security breaches will be notified to the Regulator, and the Company will implement measures to mitigate the breach, to the extent applicable, internally.

5.8. Data Subject Participation

Data Subjects may request access to, amendments to or deletion of their information from the Company. The Company, in accordance with its POPIA Procedure, has established mechanisms for Data Subjects to exercise these rights.

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6. Personal Information and Special Personal Information Collected

6.1. Processing of Personal Information

Personal Information is Processed by the Company for purposes of human resource management, financial management, employment contract and relationships with third-party service providers.

6.2. Processing of Special Personal Information

Special Personal Information is only Processed by the Company where:

6.2.1. The Data Subject has consented to Processing.

6.2.2. Processing is necessary to ensure compliance with a legal obligation.

6.2.3. Processing is for historical, research or statistical purposes to the extent that:

6.2.3.1. the purpose is in the public interest, and Processing is necessary for such purpose concerned; or

6.2.3.2. it would be impossible or result in a disproportionate effort to obtain the Data Subject's consent.

6.2.4. The information has deliberately been made publicly available by the Data Subject.

7. Information Officers

7.1. The Company has designated its Managing Director as the Information Officer, as well as its Legal and Compliance Officer as Deputy Information Officer to discharge all of the Company's obligations in terms of POPIA. The Information Officer and Deputy Information Officer have both been duly registered with the Information Regulator.

7.2. Where the Information Officer is unavailable or unable to perform his duties, the Deputy Information Officer will assume the role of the Information Officer.

7.3. The details of the Information Officer and Deputy Information Officer will be communicated to Data Subjects in an appropriate format.

8. Operators

8.1. Non-disclosure agreements must be concluded with all Operators prior to the disclosure of information by the Company. All non-disclosure agreements must be prepared and retained by the Legal and Compliance Officer of the Company.

8.2. Operators must implement adequate security safeguards to ensure the confidentiality of information.

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9. Request for Access to Personal Information

9.1. Data Subjects may request access to their information by completing the Personal Information Request Form and emailing the completed form to the Information Officer.

9.2. Upon receipt of the completed form, the Information Officer will process the request in accordance with the Company's PAIA Manual.

9.3. All requests will be processed within a reasonable time.

10. POPIA Complaints

10.1. Data Subjects may raise a complaint where any of their rights under POPIA have been infringed by completing the POPIA Complaint Form and emailing the completed form to the Information Officer.

10.2. The Information Officer will consider any complaints raised and endeavour to address the complaint amicably and within a reasonable time.

10.3. The Information Officer may propose any of the following remedies to the complainant –

10.3.1. A suggested remedy for the complaint.

10.3.2. A dismissal of the complaint, together with substantiating reasons.

10.3.3. Where a breach has occurred and the implementation of mitigation measures to prevent any further breaches.

11. Policy Review

This Policy shall be reviewed annually and revised if necessitated by a change in legislation, regulation or operational requirements.

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