

TRIPLE ADVANCED INVESTMENTS 51 (PTY) LTD

2010/018513/07

INFORMATION PRIVACY POLICY

1. DOCUMENT VERSION CONTROL

Version 1 – 17 June 2021

2. BACKGROUND

The Protection of Personal Information Act (the Act) has been enacted by the President during November 2013 and comes fully into operation on 1 July 2021

3. POLICY STATEMENT

The Act confirms that every person has rights with regard to how their personal information is obtained, processed, retained and protected.

The Organisation is committed to complying with its obligations in this regard in respect of all personal information it receives, processes and retains.

4. DEFINITIONS

Data Subject includes all living, identifiable natural or juristic persons about whom the organisation holds personal information or special personal information.

Operator means a person who processes personal information for a responsible part in terms of a contract or mandate, without coming under direct authority of that party.

Personal Information means information relating to an identifiable, living, natural or juristic person. Personal information can be factual (ID/Passport numbers, name, addresses, phone numbers, email addresses, etc.) or it can be an opinion (such as a performance appraisal.)

Processing means any operation or activity, whether or not by automatic means, concerning personal information, including:

- the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;

- dissemination by means of transmission, distribution or making available in any other form; or merging, linking, as well as restriction, degradation, erasure or destruction of information.

Responsible Party 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 information.

Special Personal Information means information about an individual that pertains to racial or ethnic origins, political, religious or philosophical beliefs, health or sexual life, trade union membership or political persuasion, biometric information or criminal behaviour (to the extent that such criminal behaviour relates to the alleged commission by a data subject of an offence or any proceedings in respect of any offence allegedly committed by a data subject. Special Personal Information can only be processed under strict conditions and will usually require the express written consent of the person concerned.

5. INFORMATION PROCESSING PRINCIPLES

The Act prescribes eight Information Processing Principles which are summarised below. The Organisation is committed to comply with these principles.

5.1 Accountability – a responsible party must ensure that the Information Processing Principles are complied with.

It will be the responsibility of each employee to ensure that the Organisation complies with the provisions of the Act. The Organisation is required to appoint an Information officer who shall, in addition to other obligations, oversee the Act's implementation and continually monitor compliance with the Act throughout the organisation.

5.2 Process Limitation – personal information must be processed lawfully and in a reasonable manner.

The Organisation shall ensure that personal information shall only be processed for lawful purposes and shall develop and implement Policies, Procedures and Controls to ensure compliance.

5.3 Purpose Specification – personal information shall only be obtained and processed for specific lawful purposes.

The Organisation shall ensure that personal information shall only be obtained and processed in accordance with the intended purpose it was obtained and provided and shall develop and implement Policies, Procedures and Controls to ensure compliance.

5.4 Further Processing Limitation - personal information shall be retained and processed for no longer than is necessary for the purpose/s for which it was collected.

The Organisation shall ensure that personal information shall only be retained and processed for such a period as may be necessary for the purpose for which it was acquired (unless further retention and processing is required by other Legislation and shall develop and implement Policies, Procedures and Controls to ensure compliance.

5.5 Information Quality - personal information must be complete, accurate, not misleading and kept up to date.

5.6 Openness – personal information may only be processed by a responsible party who has taken reasonable steps to notify the data subject.

5.7 Security Safeguards – personal information must be kept secure.

5.8 Data Subject Participation – a data subject has the right to request the responsible part to confirm, free of charge, whether or not the responsible party holds personal information about him as well as the description of the personal information held by responsible party.

6. IMPLEMENTATION OF INFORMATION PROCESSING PRINCIPLES

The Organisation shall:

6.1 Ensure that it has developed and implemented Policies, Procedures and Controls to ensure compliance with the Processing Principles. Such Policies, Procedures and Controls shall include (but not be limited to):

- Information Handling Policies
- Information Processing Policies
- Information Retention Policies
- Information and IT/Cyber Security Policies
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6.2 Appoint an Information Officer

6.3 Ensure that all employees are trained on the provisions of POPIA and complies with the Policies, Procedures and Controls it has implemented.

6.4 Take all reasonable steps to ensure that suppliers, contractors and clients complies with the Information Processing Principles which shall include the revision of (and where required, amending) agreements with such parties to ensure their compliance.

6.5 Review their Data and Systems Security and identify any technology or data protection weaknesses and address such weaknesses on a regular basis.



G.L. Esterhuizen
Information Officer