

PROTECTION OF PERSONAL INFORMATION (POPI)

POLICY MANUAL

OF

INTO SA SOUTH AFRICA (PTY) LTD.

CIPC Registration No. 2019/464036/07

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1. DEFINITIONS

"Company"	means Into SA South Africa (Pty) Ltd., a private company incorporated under the laws of South Africa and registered with the CIPC under registration Number 2019/464036/07 and having its registered address at 88 Upper Mill Street, Vredehoek, Cape Town 8001. The Company falls under the Industry Sector as defined in this chapter.
"Data Subjects"	means all individuals, corporate entities and organisations on which Personal Information is collected and / or stored, for the Company it is limited to employees, clients and suppliers.
"Deputy Information Officer"	means the employee appointed in chapter 3.1 in terms of s56 POPIA and standing in for the Information Officer fulfilling the duties of the Deputy Information Officer as per chapter 3.2.
"Industry Sector"	The Company activity is "Corporate advice for foreigners and foreign-owned companies, products and brands entering South Africa"
"Information Officer"	means the employee appointed in chapter 3.1 in terms of s1 POPIA and fulfilling the duties of the Information Officer as per chapter 3.2;
"Information Regulator"	means the body as constituted in accordance with s41 POPIA;
"Personal Information"	means all information pertaining to an individual or a corporate entity or organisation as laid out in chapter 2.1;
"Policy Manual"	means this document containing all provisions of the policies and procedures pertaining to the implementation of the Protection of Personal Information Act by the Company;
"POPIA"	means the Protection of Personal Information Act, Act No. 4 of 2013, as amended;
"Special Information"	means all personal information pertaining to an individual or a corporate entity or organisation as laid out in chapter 2.2.

2. PROTECTED INFORMATION

As the Company keeps personal information of customers, clients and suppliers it is adopting this policy and it is putting procedures in place as set out in this Policy Manual in order to prevent the loss, damage and/or unauthorised destruction of said information as well as to prevent the unlawful access to or unlawful processing of any Personal or Special Personal Information collected and stored.

As this Policy Manual has been drafted and is being implemented only in terms of the POPIA, it attributes its rules and regulations only to information protected specifically under the POPIA.

In terms of POPIA the following information is protected:

2.1 Personal Information

Personal Information includes but is not necessarily limited to the Company's employee's, client's, customer's or supplier's:¹

- Identity or passport number²;
- Date of birth and / or age;
- Phone numbers³;
- Email addresses;
- Online or instant messaging handles and identifiers;
- Physical address;
- Gender;
- Photos and video footage⁴
- Marital relationship status and family relations;
- Private correspondence;
- Employment history and salary information;
- Financial information;
- Education information; and / or
- Physical and mental health information⁵.

¹ Personal Information not collected and stored is marked in red

² South African or foreign

³ Including cellular network / mobile network phone numbers

⁴ Including CCTV footage and voice recordings

⁵ including medical history and blood type

2.2 Special Personal Information

Special Personal Information collected / stored by the Company in terms of s26 POPIA includes:⁶

- ☑ religious or philosophical beliefs;
- ☑ race or ethnic origin;
- ☑ trade union membership;
- ☑ political persuasion;
- ☑ criminal and disciplinary proceedings that the individual may be involved in;
- ☑ health ^; and /or
- ☑ biometric information.

The recording and storage of Special Personal Information is subject to increased limitations of its use and storage and will only be kept if:

- ☑ with consent of the individuals concerned; AND
- ☑ necessary in law; AND
- ☑ collected and conducted for historical, statistical or research purposes; AND
- ☑ if the information has been deliberately made public by the subject.

2.3 Information about Minors

The Company does record and store information about minors accompanying clients for immigration purposes and does so with the prior consent of the minor's parents and by adhering to the special rules as stipulated in s35 POPIA.

3. INFORMATION OFFICERS

The Head of the Company, being the Board of Directors generally assumes the position of the Information Officer in terms of the POPI Act but may appoint any officer or responsible employee, who is resident in South Africa.

3.1 Appointments

Notwithstanding the obligations of the Information Officer in terms of s1 POPIA remaining ultimately with the Board of Directors of the Company ("Board"), the Board has – for the time

⁶ Special Personal Information not collected and stored is marked in red

being – appointed the following resident employees as Information Officer (IO) and Deputy Information Officer (DIO) in terms of the POPIA:-

	IO:	DIO:
Title:	Mr.	Mrs.
Name:	Ralph Michael	Sherizaan
Surname:	Ertner	Ertner
Designation:	Director	Director
Date of Birth:	11 August 1965	12 July 1990
ID / Passport:	ID 6508115130185	ID 9007120221086
Nationality:	German	South African
Business Address:	1024 Cisticola Avenue Zambezi Country Estate Montana 0151	1024 Cisticola Avenue Zambezi Country Estate Montana 0151
Work Phone:	+27 (21) 1802603	+27 (21) 1802603
Mobile Phone:	+27 (83) 4447044	+27 (71) 1018839
Email Address:	ralph.ertner@into-sa.com	sherizaan.ertner@into-sa.com

3.2 Duties

The Information Officer, is responsible for:

- ☑ All assessments of personal data storage, access and security;
- ☑ The implementation and supervision of this Policy Manual and its compliance with the POPIA;
- ☑ Providing updated documentation to support this Policy Manual;
- ☑ Ensuring this policy and subsequent updates are communicated to relevant managers, representatives, staff and associates, where applicable.

In case of the Information Officer not being able to attend to any of his or her responsibilities, the responsibility falls upon the Deputy Information Officer, who is the acting on behalf of the Information Officer until such time where the Information Officer is able to resume his or her duties. Any delegation of duties in this regard is being registered with the Information Regulator via its Online Portal.

The details and credentials of both, IO and DIO, are registered with the Information Regulator via its Online Portal.

4. COMMITMENT TO POPIA

The Company is committed to the compliance with The Protection of Personal Information Act ("POPIA") which requires the Company to:-

- a. Sufficiently inform employees, clients, customers and suppliers ("Data Subjects") about the purpose for which we will process their personal information;
- b. Protect all Personal and Special Personal Information from threats, whether internal or external, deliberate or accidental, to ensure information safety, prevent business damage through information leaks and irretrievably erase all information not needed for the business anymore.

This Policy Manual defines all measures and standards for the protection and lawful processing of Personal and Special Personal Information within our Company and provides principles regarding the right all Data Subjects to privacy and reasonable safeguarding of their information.

All officers, employees, subsidiaries, business units, departments and individuals directly associated with us are responsible for adhering to this Policy Manual and are committed to report any security breaches or incidents to the Information Officer.

Any Service Provider that provides Information Technology services including data storage facilities to our Company must have implemented POPIA and has to adhere to the requirements of POPIA to ensure adequate protection of any Personal or Special Information obtained, processed or stored by them on our behalf. In case of any rising doubts about their compliance or adherence as set out above the Information Officer will obtain written confirmation to this effect from service provider in question.

5. POLICY PRINCIPLES

The following principles are a reiteration of the content and aims of POPIA and shall apply across the entire scope of application of POPIA for the Company:-

Principle 1: Data Storage Limitation

The Company will take all reasonable steps to ensure that Personal Information obtained from suppliers, clients, customers and employees is stored safely and securely, which includes

employment applicants with regard to their CV's, Resumes, References, Qualifications, Integrity Checks and any other Personal Information that may be obtained for the purpose of hiring a prospective employment candidate.

As it is necessitated in the course of the ordinary business of the Company some Special Personal Information is collected or stored.

Principle 2: Data Protection

All Personal Information collected is being reduced to necessary information only and stored on a secured server, protected from unauthorised access of any third party or employee not entitled to the type of information. No Personal Information will be released unless consent by the Data Subject has been obtained prior to its release or the Company becomes legally obliged to disclose certain information. In this case the Data Subject protected will be informed prior to the release of the Personal Information to enable same to object and rescind the Company's duty to disclose said Personal Information.

Principle 3: Data Collection Purpose

The Company collects Personal Information either for purposes of maintaining professional relationship with clients, customers and suppliers or for hiring procedures and employment only.

Principle 4: Limitations on Data Processing and Storage

Personal information will not be processed further in a way that is incompatible with the purpose for which the information was initially collected. Personal Information will further be destroyed and erased from all storage media;⁷ when it is **requested by the Data Subject / not required anymore / becoming obsolete** or is protected from third-party storage by law or court order.

Principle 5: Data Accuracy

The Company undertakes to its best abilities and knowledge to verify and keep up-to-date all Personal Information collected within the scope of this Policy Manual. All Data Subjects are also entitled to correct any Personal Information stored by the Company.

Principle 6: Data Source Transparency

Where Personal Information does not originate from the Data Subjects themselves the Data Subject has to be informed about the fact that the Company:-

⁷ Reasons not chosen by the Company are crossed out, reasons chosen are highlighted in bold

- ☑ Obtained Personal Information from an external source; and
- ☑ Collects and stores their Personal Information; and
- ☑ Has a valid reason for obtaining and storing this Personal Information.

Principle 7: Data Integrity Safeguards

The Company will – at all times – ensure that all reasonably available technical and organisational measures will be taken to secure the integrity of all Personal Information obtained and stored, and that the Company will further guard such Personal Information against the risk of loss, damage or destruction.

Personal information will – at all times – also be safeguarded and protected against any unauthorised or unlawful access or processing and will further only be used internally for legitimate purposes within the sphere of the ordinary business of the Company and only by the Information Officer or authorised officers or employees of the Company.

Principle 8: Participation of Data Subjects

All Data Subjects are entitled to know particulars of their Personal Information collected and stored by the Company as well as the identity and contact details of the Information Officer and any other authorised employees.

6. OPERATIONAL CONSIDERATIONS

All operational considerations contained in this Policy Manual are a direct consequence of the provisions above.

Monitoring

The Management and Information Officer are responsible for administering and overseeing the implementation of this Policy Manual and, as far as applicable, supporting guidelines, standard operating procedures, notices, consents and appropriate related documents and processes.

All employees, subsidiaries, business units, departments and individuals directly associated with the Company are to be trained, according to their functions, in the regulatory requirements, policies and guidelines that govern the sourcing, storage and protection of all Personal Information.

The Company will conduct regular reviews and audits, where appropriate, to ensure compliance with POPIA and this Policy Manual, while the POPIA shall supersede this Policy.

Operating Controls

The Company will establish appropriate standard operating procedures that are consistent with this Policy Manual and its regulatory requirements. This will include:

- ☑ Management of access to Personal information;
- ☑ Incident reporting and management;
- ☑ User addition or removal;
- ☑ Information security training and education; and
- ☑ Secured (encrypted) data backup on all internal, external and cloud-based data-storage facilities..

Policy Compliance / Consequences

Any breach/es of any provision of this Policy Manual may result in disciplinary action and possible termination of employment of the employee committing, facilitating or assisting any breach.

Further, any breach/es of any provision of this Policy Manual will – without any undue delay - be reported by the Information Officer to the affected Data Subject.

This Policy Manual has been drafted by the Company and is subject to regular reviews and amendments.

RATIFIED AND ADOPTED THIS 30TH DAY OF JUNE 2021 AT CAPE TOWN



**Information Officer for
INTO SA SOUTH AFRICA (PTY) LTD.**