



	Reference number	Date implemented
	Version 1	22 June 2021
Document Name	<b>PERSONAL DATA PROTECTION POLICY</b>	

## 1. GENERAL

- 1.1. The purpose of this policy is to set procedures for how personal information that the Company processes is dealt with.
- 1.2. This policy sets the standards for security measures for personal information, whether it is stored physically and/or electronically.

## 2. SCOPE

- 2.1. This code applies equally to any director, consultant, employee and any other person representing the Company and compliance is mandatory;
- 2.2. If any employee is in doubt about the application of the code, clarification can be sought from management.

## 3. USE OF PERSONAL DATA

3.1. In the course of day-to-day business operations, authorized individuals within the Company may from time-to-time process (collect, utilize, store, delete and/or archive) Personal information.

3.1.1. Specifically, Personal Information may be used as follows:

- 3.1.1.1. To identify a Data Subject personally;
- 3.1.1.2. To communicate with a Data Subject;
- 3.1.1.3. To comply with human resource requirements;

- 3.1.1.4. To comply with government regulations;
- 3.1.1.5. To provide associate benefits;
- 3.1.1.6. To manage the business;
- 3.1.1.7. In line with the Company's policies.

#### **4. INTEGRITY OF PERSONAL DATA**

- 4.1. The Company will take reasonable steps to ensure that Personal Information is:
  - 4.1.1. Obtained, where possible, directly from the Data Subject to whom the Personal Information relates;
  - 4.1.2. Obtained and processed fairly and lawfully by the Company for the specified purposes it is collected;
  - 4.1.3. Relevant to and no more revealing than is necessary for the specified purposes; and
  - 4.1.4. Kept up to date to maintain data accuracy, while Personal Information is under the control of the Company and kept only for so long as is reasonably necessary.

#### **5. NOTICE**

- 5.1. The Company will inform Data Subjects about the purposes for which Personal Information is collected and used. In certain situations, Personal Data may be rendered anonymous so that the names of the Data Subjects are not known by Processors. In these cases, Data Subjects do not need to be notified.

#### **6. ACCESS TO PERSONAL DATA**

- 6.1. The Company will take steps to make sure that the Personal Information it uses is correct. The Company will allow Data Subjects reasonable access to Personal Information about themselves during normal working hours and upon reasonable request and will be allowed to update and/or correct any inaccurate information.

## **7. PROCEDURE FOR ACCESSING PERSONAL DATA**

- 7.1. Questions about Personal Information and/or authorization to access such Personal Information are to be directed to a Director. Unauthorized access may be grounds for disciplinary actions, including termination.

## **8. SECURITY OF PERSONAL DATA**

- 8.1. The Company will take reasonable precautions to protect Personal Information from loss, misuse, unauthorized access, disclosure, alteration and destruction.

## **9. CHOICE**

- 9.1. Any Data Subject whose Personal Information is to be transferred to Third Parties as described in this Policy may choose not to have their Personal Information transferred. A Data Subject must communicate their desire to object to the transfer as outlined below. Data Subjects who exercise their right to object are to be informed of the impact such objection will have on their employment/association with the Company (e.g., inability to process benefits or payroll data in a timely or appropriate fashion). A Data Subject may not object of transfer of Personal Information which is transferred by the Company to a Third Party for the following purposes:

- 9.1.1. Meeting applicable legal requirements;
- 9.1.2. Permitting the legitimate interests of the Company in making promotions, appointments, preparing succession planning and other employment decisions.

## **10. ACCOUNTABILITY**

- 10.1. The Company expects its associates, independent contractors, subcontractors, and partners to maintain the trust placed in the Company by those Data Subjects who provide personal information to the Company. The Company may periodically audit privacy compliance, and where necessary, will extend by contract its privacy policies and data protection practices to the Company's supplier and partner relationships.

## **11. PROCEDURE FOR INQUIRIES, COMPLAINTS AND OBJECTIONS**

- 11.1. A Data Subject may approach a Director with inquiries or complaints regarding the Company's processing of Personal Information or to object to the transfer of Personal Data.

## **12. COLLECTION OF PERSONAL DATA**

- 12.1. The Company will collect Personal Information with the consent of the Data Subject, unless the Company is permitted by law to collect the data without the Data Subject's consent.

## **13. STORAGE OF PERSONAL INFORMATION**

- 13.1. Personal Information will be securely stored whether electronically and/or physically. The Company has various policies in place to ensure the safety of the personal information, as far as is possible.
- 13.2. All electronically stored Personal Information will be stored and accessed in line with the Company's policies.
- 13.3. Where physical records of the Personal Information exist, such records will be stored in a secure area that can be 'locked-away', with limited access thereto as to avoid a breach of the personal information.
- 13.4. Such physical data records will be 'locked-away' and secured when not in use.
- 13.5. The Personal Information whether stored physically and/or electronically will only be accessed by individuals authorized to do so.
- 13.6. Members will also take note of the clean desk policy which is to be used as a protective measure of physical data records.

## **14. DELETION AND ARCHIVING OF PERSONAL INFORMATION**

- 14.1. The Company will not keep Personal Information that it no longer needs or is not required to keep by law.

- 14.2. All personal Information that is no longer necessary to the Company or that the Company is not required to keep by law shall be destroyed.
- 14.3. The data will be destroyed in such a way that it cannot be recreated.
- 14.4. Utmost care will be taken by the Company to ensure the successful deletion and/or destruction of the information.

## **15. TRANSBORDER INFORMATION FLOW AND INFORMATION SHARING**

- 15.1. The Company will inform Data Subjects that by submitting personal information to the Company, the Company may share information a third party in a foreign country. If information sharing results in cross border flow of the personal information, the Company will inform the Data Subject of the level of protection that the personal information will enjoy in the foreign country.