

Approval Date	Protection of Personal Information Policy	Document No:
21.06.2023		2.1.7
Effective Date		Rev No:
21.06.2023		000
		Page 1 of 2

Introduction

Technopol SA (Pty) Ltd. is obligated to comply with The Protection of Personal Information Act 4 of 2013. POPI requires Technopol SA to inform their clients and personnel as to the way their personal information is used, disclosed, and destroyed. Technopol SA guarantees its commitment to protecting its client's privacy and ensuring that their personal information is used appropriately, transparently, securely and in accordance with applicable laws. The Policy sets out the way Technopol SA deals with their clients and Employees personal information and stipulates the purpose for which said information is used. The Policy is made available on the Technopol SA website and by requesting it from the business.

Personal Information Collected

Section 9 of POPI states that "Personal Information may only be processed if, given the purpose for which it is processed, is adequate, relevant and not excessive." Technopol SA collects and processes client's personal information pertaining to the client's needs. The type of information will depend on the need for which it is collected and will be processed for that purpose only. Whenever possible, Technopol SA will inform the client as to the information required and the information deemed optional. Examples of personal information we collect include, but is not limited to:

- The Client's Identity number, name, surname, address, postal code
- Description of the client's residence, business, assets; financial information, banking details, etc.-.

Technopol SA also collects and processes the client's personal information for marketing purposes to ensure that our products and services remain relevant to our clients and potential clients.

The Usage of Personal Information

The Client's Personal Information will only be used for the purpose for which it was collected and as agreed.

This may include:

- Providing products or services to clients and to carry out the transactions requested
- Conducting credit reference searches or- verification
- Conducting market or customer satisfaction research
- Providing Technopol SA to clients, to render the services requested and to maintain and constantly improve the relationship.
- Providing communication in respect of Technopol SA and regulatory matters that may affect clients.
- In connection with and to comply with legal and regulatory requirements or when it is otherwise allowed by law.

According to section 10 of POPI, personal information may only be processed if certain conditions, listed below, are met along with supporting information for Technopol SA processing of Personal Information:

- The client's consents to the processing: - consent is obtained from clients during the first interaction and needs analysis stage of the relationship
- The necessity of processing to conduct an accurate analysis of the client's needs.

Disclosure of Personal Information

Technopol SA may disclose a client's personal information to any group companies or subsidiaries, joint venture companies and or approved product- or third-party service providers whose services or products clients elect to use. Technopol SA has agreements in place to ensure that compliance with confidentiality and privacy conditions. Technopol SA may also disclose a client's information where it has a duty or a right to disclose in terms of applicable legislation, the law, or where it may be deemed necessary to protect Technopol SA rights.

Safeguarding Client and Employee Information

It is a requirement of POPI to adequately protect personal information. Technopol SA will continuously review its security controls and processes to ensure that personal information is secure.

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21.06.2023		000
		Page 2 of 2

The following procedures are in place to protect personal information:

- Technopol SA has appointed an information officer as per the act.
- Each new employee will be required to sign an Employment Contract, containing relevant consent clauses for the use and storage of employee information, or any other action so required, in terms of POPI.
- Every employee currently employed within Technopol SA will be required to sign a new Employment Contract containing relevant consent clauses for the use and storage of employee information, or any other action so required, in terms of POPI.
- Technopol SA archived client information is stored on site, which is also governed by POPI, access is limited to these areas to authorized personal.
- Technopol SA product suppliers and other third-party service providers will be required to submit their commitment to the Protection of Personal Information; this is however an ongoing process that will be evaluated as needed.
- Consent to process client information is obtained from clients (or a person who has been given authorisation from the client to provide the client's personal information) during the introductory, appointment and needs analysis stage of the relationship.

Access and Correction of Personal Information

Clients and Employees have the right to access the personal information Technopol SA hold about them. They also have the right to ask Technopol SA to update, correct or delete their personal information on reasonable grounds. Once a person objects to the processing of their personal information, Technopol SA may no longer process said personal information. Technopol SA will take all reasonable steps to confirm the person's identity before providing details of their personal information or making changes to their personal information.

Amendments to This Policy

Amendments to, or a review of this Policy, will take place on an ad hoc basis or at least once a year. Clients are advised to access Technopol SA website periodically to keep abreast of any changes. Where material changes take place, clients will be notified directly, or changes will be stipulated on the Technopol SA website.

The Information Officer has the following responsibilities:

Developing, publishing, and maintaining a POPI Policy which addresses all relevant provisions of the POPI Act, including but not limited to the following:

- Reviewing the POPI Act and periodic updates as published
- Ensuring that POPI Act induction training takes place for all staff
- Ensuring that periodic communication awareness on POPI Act responsibilities takes place
- Ensuring that Privacy Notices for internal and external purposes are developed and published
- Approving unusual or controversial disclosures of personal data
- Ensuring that appropriate policies and controls are in place for ensuring the Information Quality of personal information
- Ensuring that appropriate Security Safeguards in line with the POPI Act for personal information are in place
- Handling all aspects of relationship with the Regulator as foreseen in the POPI Act
- Provide direction to any Deputy Information Officer when appointed

<p><u>Lammie De Beer</u> Managing Director</p>	Signature:
	Date: 7 August 2024