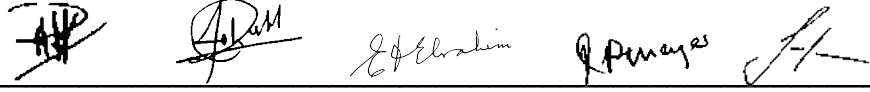


Protection of Personal Information Act Policy document


<p>Patience Hwenha, Mohammed Bhabha, Roelf Meyer, Ivor Jenkins, Ebrahim Ebrahim Directors</p>
<p>Date: 1 July 2021</p>

This Notice explains how we obtain, use and disclose your personal information, in accordance with the requirements of the Protection of Personal Information Act (“POPIA”).

At In Transformation Initiative we are committed to protecting your privacy and to ensure that your personal information is collected and used properly, lawfully and transparently.

Index

1. Definitions	2
2. Background.....	2
3. Scope of Policy	2
4. The Personal Information we collect.....	3
5. Information systems containing Personal Information kept by the Company	3
6. How we use Personal Information	4
7. Disclosure of Information	4
8. Information Security	4
9. Access to Personal Information held by the Company	4
10. Correction of Personal Information	5

11. Ivor Jenkins Information Officer	5
12. Revision details.....	5

1. Definitions

In the interpretation of this policy, unless the context indicates otherwise –

- (a) **“Availability”** means that data and information is available whenever expected and required by authorized users.
- (b) **“Confidentiality”** means ensuring that data is accessible only to those authorised to have access.
- (c) **“Integrity”** means safeguarding the accuracy and completeness of data and information.
- (d) **“Information security”** means the protection of information and its authenticity, integrity and confidentiality.
- (e) **“Information system”** means the structures of data, processes, and information technology for business.
- (f) **“Personal Information”** means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person. Further to the POPI Act, In Transformation Initiative also considers the following items as personal information:
 - a. All addresses including residential, postal and email and web addresses.
 - b. Change of name or particulars – for which we require copies of the relevant authorizing documents.
- (g) **“Privacy”** means the right of an individual to be secure from unauthorised disclosure of data.
- (h) **“Risk”** means the likelihood of occurrence of a particular event and potential consequences.

2. Background

In terms of the Protection of Personal Information (POPI) Act 2013 as amended, the company keeps personal information about its customers, employees, and service providers and suppliers and are required to comply with the Act. The Company has prepared the following POPI policy in compliance with the aforesaid Act.

3. Scope of Policy

This policy covers the security of Personal Information in any of the following information system environments:

- **Network Services** such as internet access, web access, email, social media and instant messaging;
- **Computing hardware, covering both fixed and portable** such as PCs, servers, printers, scanners, keyboards, monitors, disc drives, cell phones;
- **Software and Databases** such as applications, information systems, software tools and information services; and
- **Data** that is created, amended, enhanced, stored or transmitted, regardless of its sensitivity.

This policy applies to the Company and its employees, including any appointed consultants /agents. The processing/operating environment is considered to be, collectively, all systems and networks and databases that the Company operates or are operated on its behalf by its employees or agents.

With the exception of information intended for the general public, use of Personal Information will be restricted to the authorised users, processes and information systems controlled by the Company and its employees and service providers.

4. The Personal information we collect

We collect and process your personal information mainly to contact you for the purposes of understanding your requirements, and/or delivering services accordingly. For this purpose we will collect contact details including your name and organisation.

We collect information directly from you where you provide us with your personal details. Where possible, we will inform you what information you are required to provide to us and what information is optional.

Website usage information may be collected using “cookies” which allows us to collect standard internet visitor usage information.

5. Information systems containing Personal Information kept

The Company has the following systems which contain Personal Information and matters in general.

1. The financial and business administrative systems used for the regulating invoicing.
2. Electronic information pertaining to records of authorities, regulatory institutions, suppliers, service providers, employees, agents and consulting activities in general.
3. The Company makes use of information held by and obtained from other suppliers, service providers’ journals or websites and other sources to the benefit of the Company and its customers, suppliers and service providers and employees.
4. We make use of a business system management program which controls and stores all and any personal information in our Company.

6. How we use Personal Information

We will use your personal information only for the purposes for which it was collected and agreed with you. In addition, where necessary your information may be retained for legal or research purposes.

For example:

- To gather contact information;
- To confirm and verify your identity or to verify that you are an authorised user for security purposes;
- For the detection and prevention of fraud, crime, money laundering or other malpractices ;
- To conduct market or customer satisfaction research or for statistical analysis;
- For audit and record keeping purposes;
- In connection with legal proceedings.

7. Disclosure of Information

We may disclose your personal information to our service providers who are involved in the delivery of products or services to you. We have agreements in place to ensure that they

comply with the privacy requirements as required by the Protection of Personal Information Act.

We may also disclose your information:

- Where we have a duty or a right to disclose in terms of law or industry codes;
- Where we believe it is necessary to protect our rights.

8. Information security

We are legally obliged to provide adequate protection for the personal information we hold and to stop unauthorized access and use of personal information. We will, on an on-going basis, continue to review our security controls and related processes to ensure that your personal information remains secure.

Our security policies and procedures cover:

- Physical security;
- Computer and network security;
- Access to personal information;
- Secure communications;
- Security in contracting out activities or functions;
- Retention and disposal of information;
- Acceptable usage of personal information;
- Governance and regulatory issues;
- Monitoring access and usage of private information;
- Investigating and reacting to security incidents.

When we contract with third parties, we impose appropriate security, privacy and confidentiality obligations on them to ensure that personal information that we remain responsible for, is kept secure.

We will ensure that anyone to whom we pass your personal information agrees to treat your information with the same level of protection as we are obliged to.

9. Access to Personal Information held by the Company

You have the right to request a copy of the personal information we hold about you. To do this, simply contact the Information Officer at the addresses as provided in this document below and specify what information you require. We may need a copy of your ID-document to confirm your identity before providing details of your Personal Information.

Please note that any such access request for your Personal Information may be subject to a payment of a reasonable fee to cover the costs of the extraction and preparation of the information into a suitable format for dissemination to you.

10. Correction of Personal Information

You have the right to ask us to update, correct or delete your personal information. We will require a copy of your ID document to confirm your identity before making changes to personal information we may hold about you. It is your responsibility to keep your personal information accurate.

11. Information Officer

Ivor Jenkins will hold the responsibility of portfolio of Information Officer. The Information Officer's physical address and contact details are as follows:

Physical Address: The Information Officer
26 Duiker Crescent, Silver Lakes, 0054

E-mail address: **Enquiries:**
ivor@intransformation.org.za

12. Revision details

Date	Description
1 July 2021	First issue