

THE PROTECTION OF PERSONAL INFORMATION (POPI)

1. Introduction

The right to privacy is an integral human right recognised and protected in the South African Constitution as further regulated by the Protection of Personal Information Act 4 of 2013 ("POPIA").

POPIA aims to promote the protection of privacy through providing guiding principles that are intended to be applied to the processing and further processing of information in a context-sensitive manner within the employment relationship.

Through the provision of manufacturing & supply, Wipe-It (Pty) Ltd is inevitably involved in the collection, retention, dissemination and use of certain aspects of personal information of employees and clients.

Wipe-Its' POPI policy is aimed at effectively managing personal information as envisaged by POPIA in accordance with the eight (8) conditions for the lawful processing of personal information and special information.

2. Definitions

Personal information is any information that can be used to reveal a person's identity. Personal information relates to identifiable, living, natural person and where applicable an identifiable juristic person, including but not limited to information concerning:

- Race, gender, sex, pregnancy, marital status, national or ethnic origin, colour, sexual orientation, age, physical or mental health, disability, religion, conscience belief, culture, language and birth.
- Information relating to the education or the medical, financial, criminal or employment history of the person.
- Any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other assignment to the person.
- The personal opinions, views or preferences of the person.
- Correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence.
- The views or opinions of another individual about the person.
- The name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person.



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3. Data Subject

This refers to the natural or juristic person to whom personal information relates, such as an individual client, employee, contractor or service provider.

4. Responsible Party

The responsible party is the entity that requires the personal information for a particular reason and determines the purpose of and means for processing the personal information. In this case Wipe-It will be the responsible party.

6. Processing or Further Processing

The act of processing information includes any activity or any set of operations, whether or not by automatic means, concerning personal information and includes:

- The collection, receipt, recording, decentralise, collation, storage, updating or modification, retrieval, alteration, consultation or use.
- Dissemination by means of transmission, distribution or making available in any other form.
- Merging, linking, as well as any restrictions, degradation, erasure or destruction of information.

7. Record

Means any recorded information, regardless of form or medium, including:

- Any written material
- Information produced, recorded or stored by means of tape recorder, computer, whether hardware or software or both, or other devices, and any material subsequently derived from information so produced, recorded or stored.
- Photograph, film, tape or other device in which one or more visual images are embodied and to be capable of being reproduced.

8. Filing System

Means any structured set of personal information, whether centralised, decentralised or dispersed on a functional or geographical basis which is accessible according to specific criteria.

9. Unique Identifier

Means any identifier that is assigned to a data subject and is used by a responsible party for the purposes of the operations of that responsible party and that uniquely identifies that data subject in relation to that responsible party.

10. De-Identify

This means to delete any information that identifies a data subject, or which can be used by a reasonably foreseeable method to identify, or when linked to together information, that identifies the data subject.

11. Consent

Means any voluntarily, specific and informed expression of will in terms of which permission is given for the processing of personal information.

12. Biometrics

Means a technique of personal identification that is based on physical, physiological or behavioural characterisation including blood typing, fingerprinting, DNA analysis, retinal scanning and voice recognition.

13. Re-Identify

Means in relation to personal information of a data subject, to resurrect any information that has been de-identified that identifies the data subject.

Private body: Means a natural person who carries on any trade, business or profession but only in such capacity.

14. Purpose

Purpose of this policy is to protect data subjects from potential security breaches, theft and discrimination. The policy in conjunction with existing company policies is aimed at protecting Wipe-It against the potential compliance risks associated with the protection of personal information which includes:

- Breaches of confidentiality where the personal information of data subjects has been shared or disclosed inappropriately.
- All data subjects should be free to choose how and for what purpose the company uses information relating to them.

- Reputational damage.

This policy confirms Wipe-Its' commitment to protecting the privacy and rights of data subjects in the following manner:

- By encouraging desired behaviour in support of compliance with the provisions of POPIA.
- By maintaining our culture and values in support of the right to privacy as a human right.
- By developing, implementing and maintaining internal control mechanisms for purposes of managing potential compliance risks associated with the protection of personal information.
- By assigning specific duties and responsibilities to those identified and appointed for purposes of control, including the appointment of an Information Officer and where necessary a Deputy Information Officer.
- By continuously raising awareness through training and guidance to individuals who process personal information.

15. Scope of Policy

- Wipe-It Directors
- Wipe-It Management
- All employees
- All contractors, suppliers and persons acting on behalf of Wipe-It.

The guiding principles as contained in this policy must be read in conjunction with POPIA for purposes of intended compliance requirements in addition to any existing Company policy aimed at the protection of a data subject's right to privacy as contained in the Constitution of the Republic of South Africa.

15.1 The legal duty to comply with the provisions of POPIA comes to life in any situation where there is a:

- processing of
- personal information
- entered into a record
- by a responsible person
- who is domiciled in South-Africa.

15.2. The application of the provisions of POPIA is specifically excluded:

- In the course of purely personal household activities
- Information that has been de-identified to the extent that it cannot be identified again
- By or on behalf of a public body which involves inter alia, national security, defiance, or public safety
- For purposes of identifying those involved in money laundering
- Terrorism
- Journalistic, literary, or artistic purposes.

16. Rights of Data Subjects

Processing and further processing of personal information is only lawful if it complies with the eight (8) conditions as contained in POPIA. A data subject has the right to have his / her personal information processed in accordance with the eight (8) conditions.

An employee in addition has the right to access his or her personal information and to request the correction, destruction, or deletion of his or her personal information. The employee may also on specific grounds object to the processing or further processing of personal information. Provisions of POPIA generally does not apply to the processing of personal information in the workplace where that personal information has been de-identified or relates to the function of a Court.

17. The Right to Object to Direct Marketing

The data subject has the right to object to the processing of his / her personal information for purposes of direct marketing by means of unsolicited electronic communication.

18. The Right to Complain to the Information Regulator

The data subject has the right to submit a complaint to the Information Regulator regarding an alleged infringement of any of the rights protected under POPIA and to institute civil proceedings regarding alleged non-compliance with the protection of his / her personal information. Example of POPIA complaint form is attached to this policy as “**Annexure A**”.

19. The Right to be Informed

The data subject has the right to be notified that his / her personal information is being collected by Wipe-It. The data subject also has the right to be notified in any situation where Company has reasonable grounds to believe that the personal information of the data subject has been accessed or acquired by an unauthorised person.

20. Eight guiding principles

All employees and persons acting on behalf of Wipe-It will at all times be subject to and act in accordance with the following principles:

21. Accountability

Wipe-It hereby appoints Sybrand Gerhardus van Niekerk (Chief Executive Officer) as the Information Officer. Luyken van Niekerk (Chief Operations Officer) and Leolene van Niekerk (General Manager) is appointed as deputy Information Officer/s.

All individuals, whether employees or contractors who collect, processes or use personal information shall be accountable for such information to the Information Officer.

This policy shall be made available via the Company intranet and contained in the Company policies procedures manual, or a hard copy provided upon request.

Any personal information transferred to a third party for processing shall be subject to this policy. The Information Officer shall use contractual or other appropriate means to protect personal information at a level comparable to this policy while a third party is processing information.

Personal information to be collected, retained or used by Wipe-It shall be done so only after the Information Officer has given written approval. This information shall be secured according to the Information Officer's instruction.

Any person who believes the Company uses personal information collected, retained or used for purposes other than those explicitly approved may contact the Information Officer to register a complaint or to make related inquiry as contained in this policy.

The Information Officer shall communicate and explain this policy and give training regarding the contents to all employees/data subjects and contractors who might be in a position to collect, retain, process, further process and use personal information or duly delegate such duty to a competent person/s.

The Information Officer shall prepare and disseminate information to the public which explains the Company's' protection of personal information policies and procedures where necessary.

With reference to accountability as Wipe-It value the protection of personal information is everybody's responsibility. Wipe-It by means of provided structures will by all means try and ensure that the provisions of POPIA and the guiding principles as outlined in this policy are complied with through the encouragement of desired behaviour. Wipe-It will take appropriate action, including disciplinary action against those individuals who through their intentional or negligent actions and or omissions failed to comply with the principles outlined in this policy.

The duly appointed Information Officer will also be tasked with performing an impact assessment to ensure the Company has adequate measures and protocols in place to comply with the conditions of lawful processing of personal information.

22. Processing Limitations

Wipe-It will ensure that all personal information under its control will be processed in a lawful and reasonable manner that does not infringe the privacy of the data subject. Personal information will be obtained directly from applicants, unless such information can be derived from a public record. Processing of personal information will be subject to:

- Fair, reasonable, lawful and non-excessive manner.
- Only with informed consent of data subject where appropriate and
- Only for a specific defined purpose in direct relation to the business purpose.

Wipe-It will inform the data subject as to the reason for collection of personal information and obtain written consent prior to such collection where appropriate.

Where appropriate, the Company may maintain voice recordings for purposes of collecting personal information where services or transactions are concluded telephonically followed by the data subject's consent. Wipe-It undertakes to under no circumstances share personal information not directly involved with facilitating the purposes for which the information was originally collected.

Where applicable, the data subject will be informed of the possibility that their personal information will be shared within Wipe-It with reasons of doing so to be provided.

23. Purpose Specification

Wipe-It is committed to the principle of personal information being for a specific explicitly defined and lawful purpose related to a function or activity within the context of employment. Data subjects and applicants will at all times be informed of such purpose. It is specifically contained in this policy that personal information collected that pertains to a data subjects for purposes of medical incapacity, said personal information cannot be used for any other purpose except for what it was collected for.

Wipe-It commits to the principle of the retention of records in the absence of consent only for periods it is deemed to be necessary to achieve specific purpose for which personal information was collected. Wipe-It however acknowledges statutory provisions prescribing retention periods.

24. Further Processing Limitations

Personal information will not be processed for a secondary purpose unless that processing is compatible with the original purpose. Where Wipe-It seeks to process personal information, it holds for a purpose other than the original purpose for which it was originally collected, and where this secondary purpose is not compatible with the original purpose, Wipe-It will obtain additional consent from the data subject.

25. Information Quality

Wipe-It will take the necessary precaution to ensure that all personal information collected from data subjects is complete, accurate, not misleading and updated where necessary. Due cognizance will be applied with regards to the purpose for which personal information was collected with special care to be applied when personal information is collected from a source other than the data subject. Personal information obtained from data subjects at all times will be required to be verified with regards to supporting documentation which to be collected with the consent of the data subject in question.

26. Openness

26.1 All personal information collected will be subject to the data subject being:

- Aware of personal information collected
- Source of the information
- Name and address of responsible party
- Purpose for which personal information is collected
- Whether data subject is obliged to supply information
- Applicable legislation prescribing the disclosure of personal information to Wipe-It.

All data subjects are entitled to be informed regarding the personal information to be processed and to whom if any disclosure is required. The data subject furthermore has a right to have access to collected personal information, to correct such information if appropriate and to submit a complaint to the Information Regulator.

26.2 Wipe-It will ensure that data subjects have access to a dedicated POPIA e-mail address POPIAcomplaints@wipe-it.co.za for purposes of:

- To enquire whether Wipe-It holds relevant personal information.
- Request access to relevant information.
- Request Wipe-It to update or correct personal information being held.
- Submit a complaint to the Information Regulator concerning the alleged irregular processing of personal information.

27. Security Safeguards

Wipe-It will manage the security of its filing systems in order to ensure that personal information is adequately protected. Security controls will be implemented in order to prevent and or minimise the risk of loss, unauthorised access, disclosure, interference, modification, loss or destruction. Wipe-It will on a continuous basis review its security protocols with regards to a POPIA Gap Analysis and risk impact assessments to be conducted by Information Technology Department.

Access to all paper and electronic personal information will be strictly limited to authorised individuals only with all personal information to be securely stored.

All new employees will be required to follow standard pre-employment and on-boarding protocols. Current contracts of employment will be audited for purposes of confidentiality to reduce the risk of unauthorised disclosure of personal information.

In the event of required contractual amendments for purposes of existing employment contracts, employees will be consulted for purposes of a contractual addendum.

For purposes of confidentiality, Wipe-It through appropriate channels will engage with third party service providers in order to introduce service level agreements with both parties to pledge their unconditional commitment to POPIA and the guiding principles contained in this policy. An example of appropriate clause for purposes of a service level agreement for third party service providers attached as **“Annexure B”**.

28. Data Subject Participation

Wipe-It will appoint an Information Officer and a Deputy Information Officer. The duly appointed Information Officer will be responsible to ensure compliance with POPIA and the guiding principles of this policy.

In addition to the appointment of an Information Officer, all heads of departments will be required to assume the role similar to that of an Information Officer for purposes of compliance as contemplated by this policy. Information Officer and Deputy Information Officer will hold office for a period of twelve (12) months.

Once appointed the Information Officer will be registered with the Information Regulator established under POPIA. Appointment letter of information Officer attached hereto as **“Annexure C”**.

The prescribed duties of an Information Officer as contained in POPIA are as follows:

- The development, implementation, monitoring and maintenance of a compliance framework.
- To conduct a personal information impact assessment.
- A manual is developed, monitored, maintained and made available as prescribed by sections 14 and 15 of POPIA.
- The development of internal systems together with adequate systems to process requests for information or access thereto.
- Internal awareness sessions are conducted regarding POPIA, codes of conduct and information received from the Regulator.

29. POPI Framework

It is contemplated that the effect of POPIA with effect from 31 June 2021 will be within the framework of the employment life cycle of the data subject. Within the employment life cycle, it is contemplated as a guideline that the following personal information will be required to be processed by the employer during a data subject's life span:

29.1 Phase 1:

Engagement process which includes advertisement, recruitment, and selection. Typical personal information during the engagement process will be but not limited to:

- Curriculum vitae
- Identity document
- Educational qualifications and transcripts
- Interview forms
- Psychometric test results
- E-mail addresses
- Cell phone numbers
- Criminal and background checks, including medical for purposes of competency

During the engagement process personal information needs to be obtained from data subject directly unless obtained from a public platform. In the event of a recruitment agency being contracted for purposes of engagement, the data subject needs to give consent in order for Wipe-It to obtain such personal information from the recruitment agency.

Personal information from unsuccessful applicants must be destroyed once a decision has been taken not to employ the applicant as the purpose for which the personal information was collected ceases to exist, unless the applicant requests Company to retain the collected personal information for future reference.

29.2 Phase 2:

Employee onboarding and induction as per Wipe-It protocols:

- Contract of employment
- Residential address
- Next of kin contact details
- Medical aid details
- Biometrics
- E-mail addresses
- Cell phone number
- Bank account details
- Pay slips
- SARS and tax records

The Company onboarding process is comprehensive and therefore various documents and information required with reference to the data subject's next of kin's personal information, including inter alia their identity document, contact details and physical address. The nature of the information required pertaining to the data subject's next of kin constitutes personal information in terms of POPIA. The provisions of POPIA must therefore be adhered to. Accordingly, the Company must notify the next of kin that their personal information is being processed and only process personal information pertaining to a next of kin with their consent. The onus of consent being having been obtained lies with Wipe-It.

29.3 Phase 3:

Day to day employee management and engagement with unions

- Screening records in the context of COVID19
- Employee personnel file
- Disciplinary record
- Leave applications
- Medical notes
- Drug and alcohol results
- Performance reviews
- Psychometric results
- Processing of information related to union membership

With reference to the day-to-day management of data subjects, the following actions are recommended in order to ensure compliance with POPIA:

- Ongoing analysis of personal information collected to verify the quality, accuracy and completeness of information.
- Conduct risk assessments to determine where the Company falls short of its obligations to comply with POPIA.
- Revise HR policies to ensure compliance with POPIA.
- Revise and update contractual arrangements to ensure compliance with POPIA.
- Procedures must be put in place for data subjects to access personal information.

29.4 Phase 4:

Termination of employment

- Contract of employment to be retained for three (3) years
- Arbitration awards to be retained for three (3) years
- Employee SARS records to be retained for five (5) years
- OHS records to be retained for three (3) years
- Employee disciplinary records (indefinite)

Save for the personal information the company is obliged to retain; the Company must undertake the disposal of personal information in line termination of employment. Latter disposal to take place as soon as reasonably practicable. All on-line stores information must be deleted from hard drives and servers with all hard copies to be destroyed in an appropriate manner beyond reconstruction.

30. Consequences of Non-Compliance

POPIA creates various criminal offences for non-compliance, infringements or breach of confidentiality. The information Regulator may impose an administrative fine not exceeding R10 million. Some offences attract imprisonment not exceeding 10 years with or without a fine.

31. Specific Duties and Responsibilities

Wipe-It governing body cannot delegate its accountability and is ultimately accountable for ensuring that the Company meets its legal obligations as per the provisions of POPIA. The Company governing body may however to a degree, delegate certain responsibilities to individuals that are deemed to be capable. Wipe-It governing body is responsible to ensure that:

- To appoint an Information Officer and where necessary a deputy Information Officer
- All employees responsible for the processing of information on behalf of Wipe-It:
 1. Are trained and supervised to act in accordance with POPIA provisions
 2. Understand the high degree of confidentiality and contractual obligation to safeguard such personal information they are required to deal with from time to time.
 3. To be aware that any wilful and negligent breach of this policy may result in appropriate disciplinary action being instituted.
 4. Data subjects who wish to enquire about their personal information to be aware of procedure to be followed should they wish to do so.
 5. To schedule timeous POPIA audits for purposes of establishing standard of Company compliance and necessary corrective action with regards to POPIA provisions as imposed upon Wipe-It.

32. Consent

The Information Officer shall ensure that the individual from whom personal information is collected consents to this and to it being used and disclosed.

The Information Officer shall ensure that the individual can reasonably understand why and how information will be used when consent is given.

The Information Officer shall ensure that no condition is attached to supplying benefits because of the Company's activities requiring the individual to give consent for the collection, use or disclosure of information beyond that required to fulfil the explicitly specified and legitimate purposes.

The Information Officer shall ensure that express consent is obtained wherever possible and appropriate. In circumstances where, in the Information Compliance Officer's opinion, having regard to the information's sensitivity and the policy's purpose and intent, implied consent might be accepted.

In obtaining consent, the Information Officer shall ensure that the individual/data subject's reasonable expectations are respected.

The Information Officer shall ensure that the express consent obtained from an individual/data subject is clear and in an appropriately verifiable form.

The Information Officer shall ensure that the individual / data subject may withdraw consent at any time subject to legal or contractual restrictions and reasonable notice. The individual / data subject shall promptly be informed of the withdrawal implications.

33. Information Officer

- Wipe-Its' duly appointed Information Officer will be required to take all reasonable steps to ensure compliance with the provisions of POPIA.
- To ensure statutory conformance with reference to required information to the Information Regulator relating to any breach of security and appropriate corrective and preventative measures.
- To encourage unconditional compliance with the prescribed requirements for the lawful and reasonable processing of personal information.
- Ensuring contracts entered into with third party providers are inclusive of the provisions of POPIA in the interest of Company and to prevent and or minimise any non-compliance risk to the Company through third party providers. Latter being inclusive of the duty to oversee any contractual amendments in the Company's quest for compliance.
- To ensure the dedicated e-mail address and processing of requests by data subjects for purposes of complaints and or requests to access information is being managed and maintained pursuant to POPIA.
- To continuously assess and evaluate the Company's privacy regulations to ensure alignment with Company policies.
- To continuously act within the spirit of sensitizing all those acting on behalf of Wipe-It to be fully conversant with the risks associated with the processing of personal information and to remain conversant with all security protocols.
- To address all POPIA related questions, complaints and concerns
- Working hand in hand with the Information Regulator on any alleged non-compliance and or breach of confidentiality.

The Deputy Information Officer will assist the Information Officer in the performance of prescribed duties and to fulfil the role of Information Officer when called upon to do so by the Information Officer for reasons rendering the Information Officer unable to perform prescribed duties.

34. Employees and other parties acting on behalf of Wipe-It

- It is accepted and contemplated that employee and any other parties acting on behalf of Wipe-It will come into contact with personal information pertaining to employees and clients. All such employees and parties are required to treat such information as confidential business as contained in the contract of employment under confidentiality.
- Employees and other such parties that may come into contact with personal information in the execution of their respective duties are prohibited from directly or indirectly utilizing, disclosing or make public to any person not privileged to such information. Any wilful act or omission resulting in a breach of confidentiality as contemplated by the provisions of POPIA will be subject to appropriate discipline with reference to the Company's disciplinary code and procedure.
- Employees and other individuals acting on behalf of Wipe-It who at any time is unsure regarding appropriate action with regards to the collecting, retention and dissemination of personal information are required to obtain clarity and or assistance from their respective line managers or information Officer.
- Employees and other individuals acting on behalf of Wipe-It will only be allowed to process personal information under the following conditions:
 1. Where the data subject has consented to the processing of personal information.
 2. The processing of personal information is necessary in pursuing the legitimate interest of Company or of a third party to whom the information is supplied.
 3. The processing of personal information is with due cognizance of obligations as imposed by law.
 4. The processing of personal information at all times has the protection of the data subject in mind.
 5. The processing is regarded necessary to carry out specific actions in conclusion or performance of a contract to which the data subject is party.

34.1 Personal information may furthermore only be processed where the data subject:

- Clearly understands why the personal information had been collected and for what purpose.
- Explicit permission had been granted by the data subject for Wipe-It to collect relevant personal information.

Consent can be obtained in written form which includes any appropriate electronic medium that is accurate. For purposes of telephonic consent, voice recording of such consent can be made.

34.2 Employees and other persons acting on behalf of Wipe-It will under no circumstances:

- Process or have access to personal information where such processing or access is not a requirement to perform respective work-related tasks or duties.
- Save copies of personal information directly to their own private computers, laptops or other mobile devices. All personal information must be accessed and updated from the Company's centralised data base or server.
- Share personal information on an informal basis. Personal information not to be communicated via e-mail as this mode of communication is not secure. Where access to personal information is required, this may be requested from the relevant line manager of Information Officer.

34.3 Employees and persons acting on behalf of Wipe-It are responsible for:

- Keeping all personal information in a secure manner by taking reasonable precautions and conformance to guidelines as set out in this policy.
- To ensure that personal information is kept on a centralised basis.
- Ensuring that personal information is encrypted prior to sending information electronically.
- All computers, laptops and electronic devices to be password protected.
- Ensuring all computer screens and devices are switched off or locked when not in use.
- Any external devices for purposes of storing personal information to be securely stowed.
- Personal information stored on paper format to be securely stored.
- All printed personal information not to be left unattended.
- To take reasonable steps to ensure all personal information is accurately kept and up to date.
- Personal information only to be stored for as long as necessary. Permission to be obtained to dispose of personal information no longer to be kept on record.
- To undergo ongoing POPIA awareness training to ensure compliance as contemplated by the provisions of POPIA.
- Any employee or person becoming aware of any potential breach, unauthorised usage, modification, destruction or unsanctioned disclosure of personal information must immediately report such actions or suspicion to the Information Officer or Deputy Information Officer.

35. POPIA Audit Process

The duly appointed Wipe-It Information Officer will be responsible to schedule periodic POPIA audits in order to ensure compliance as contemplated. The POPIA audit will be aimed at:

- Identify processes currently in use for purposes of collection, retention, dissemination and destruction of personal information.
- To determine and evaluate the flow of personal information throughout the Company.
- Continuously strive to improve, secure and streamline the process of gathering, processing and storing of personal information.
- Ensure that data subjects are continuously made aware of the processing of their personal information.
- To verify the quality and security of personal information.
- To continuously monitor the Company's POPIA compliance status with appropriate corrective measures to be implemented.
- To continuously monitor and evaluate the Company's internal control measures for purposes of efficiency.

The Information Officer for purposes of POPIA audits will liaise with line managers and heads of departments in order to identify potential vulnerable areas that might give rise to the unlawful processing of personal information.

36. Data Subject Request to Access Personal Information

All data subjects have the right to:

- To be informed how to keep their personal information dated.
- To request clarity on the nature of personal information being held by Wipe-It.
- Right to access private information as held by Wipe-It.

Data subjects can request access to personal information via e-mail directed to the Information Officer. The Information Officer will provide the data subject upon such a request a "Personal Information Request Document" as **"Annexure D"**. Once the said document has been duly completed and received by the Information Officer, the Information Officer will verify the identity of the data subject and information requested prior to making available any such personal information. The Information Officer will process any such request for personal information against the provisions of POPIA, the Company POPI policy and any relevant Company policy regulating employee privacy. Any validated request received by the Information Officer will be processed within a reasonable time from such request having been received.

37. POPIA Complaint Procedure

Data subjects have the right to submit a complaint where it is alleged that any of their rights as contained under POPIA has allegedly been infringed upon. Wipe-It will consider and process all alleged infringements with the necessary urgency in line with the Company POPIA policy with due cognizance of the following procedure:

- All alleged POPIA complaints must be submitted in writing. Where applicable and if so required, the Information Officer will provide the data subject with a "POPIA Complaint Form", **"Annexure A"**.
- In the event of an alleged complaint having been received by any other person than the Information Officer, the person must ensure that the alleged complainant, accompanied with all the necessary detail to be submitted to the Information Officer as a matter of urgency.
- The Information Officer upon receipt of the alleged complaint will confirm receipt of said complaint in writing within 2 working days.
- The Information Officer will be required to objectively investigate and evaluate the alleged complaint with an aim to amicably resolve alleged complaint within a reasonable period of time. In considering the alleged complaint, the Information Officer will endeavour to resolve said dispute in a fair and objective manner as contemplated by the POPIA policy.
- The Information Officer will be required to determine the nature of the alleged complaint and whether it relates to a breach of confidentiality and the potential risk it imposes upon Wipe-Its' data subjects.
- Where it is reasonable to believe that the personal information of a data subject has been accessed or acquired by an unauthorised person, the Information Officer will be required to consult Wipe-Its' governing body whereafter the data subject/s and Information Regulator will be informed of said breach.
- The Information Officer will engage the data subject/s with regards to a proposed solution, and should the data subject/s not be satisfied with said solution, the data subject/s will have the option to escalate the alleged complaint to Wipe-Its' governing body within 7 days of the alleged complaint having been reported. Wipe-It will

at all times be transparent and provide reasons for any decisions taken. Wipe-It will provide reasons for any unforeseen delay with regards to feedback in view of any specified timelines.

- The feedback from the Information Officer to the data subject / s will be along the following lines:
 1. Suggested remedy for the complaint.
 2. Rejection of the complaint and the reasons for the rejection.
 3. An apology where necessary with confirmation of corrective action having been taken.
 4. Appropriate disciplinary that has been taken against any employee involved in an unauthorised breach of POPIA provisions.
 5. The Information Officer will be required from time to time to review the Company POPI complaints procedure to ensure the ongoing effectiveness of said procedure. Complaints will be analysed, and the source thereof utilised for purposes of preventative measures.

38. Challenging Compliance

The Information Compliance Officer is authorised to address a challenge concerning compliance with the above principles.

The Information Compliance Officer shall develop procedures to receive and respond to complaints or inquiries about the policies and practices regarding the handling of personal information. The compliance procedures shall be readily accessible and simple to use.

The Information Compliance Officer shall inform individuals / data subjects inquiring about lodging complaints that relevant complaint procedures exist as per this policy.

The Information Compliance Officer shall investigate all complaints as per this policy. If a complaint is found to be justified, the Information Officer shall take appropriate measures, including if necessary, amending this policy and general policies and practices pertaining to personal information as contained in this policy.

39. Disciplinary Action Process

Following the conclusion of a POPIA complaint, Wipe-It may recommend any appropriate administrative, legal and or disciplinary action to be instituted against any employee that is suspected of being implicated in any act of non-compliance as envisaged by this policy.

Wipe-It commits to a culture of ongoing training and awareness for purposes of POPIA compliance.

The Company's disciplinary code and procedure will be amended to incorporate gross negligence and wilful and deliberate mismanagement of data subject personal information as serious misconduct which may warrant summarily

dismissal. Any contemplated disciplinary action associated with POPIA will be under the auspice of the Company's disciplinary code and procedure.

Wipe-It reserves the right, subsequent to a formal disciplinary process to:

- Make recommendation to proceed with disciplinary action.
- Refer said breach to appropriate forum for criminal investigation.
- Any action deemed to be appropriate under the circumstances

40. Legislative framework

Wipe-Its' POPI policy will be managed within the defined regulatory and legislative framework as envisaged by the Audit and Risk Management Framework.

This policy is subject to the approval of the Wipe-It Board and to be reviewed from time to time. The following people may be contacted in relation to this policy:

Sybrand Gerhardus van Niekerk
Chief Executive Officer
sales@wipe-it.co.za

Luyken van Niekerk
Chief Operations Officer
operations@wipe-it.co.za

Leolene van Niekerk
General Manager
admin@wipe-it.co.za

“ANNEXURE A”**POPIA COMPLAINT FORM**

Wipe-It is committed to the safeguarding of your personal information in line with the provisions of POPIA.

Please submit your complaint to the Information Compliance Officer

Sybrand Gerhardus van Niekerk

Chief Executive Officer

sales@wipe-it.co.za

Please be informed that should we not be able to resolve your complaint to your satisfaction you have the right to refer you unresolved complaint to:

The Information Regulator of South Africa JD House

27 Stiemens Street Braamfontein Johannesburg 2001

P.O. Box 31533 Braamfontein Johannesburg 2017

General enquiries: infoereg@justice.gov.za

Complaints: IR@justice.gov.za

Particulars of Complaint

Name & Surname:		Contact Number:	
Identity Number:		E-mail Address:	
Postal Address:			

Details of Complaint:

Desired Outcome:

Signature: _____

Date: _____

“ANNEXURE B”

(To be included in SLAs)

SERVICE LEVEL AGREEMENT CONFIDENTIALITY

- The personal information shall mean race, gender, sex, pregnancy, marital status, national or ethnic origin, colour, sexual orientation, age, physical or mental health, disability, religion, conscience belief, culture, language, birth of a person, education and medical information, financial, criminal, employment history, any identifying number or symbol, e-mail address, physical address, telephone number, location information, online identifier, biometric information, personal opinions, views of preferences and correspondence send that is implicitly or explicitly of a private and confidential nature.
- The parties acknowledge that for the purpose of this agreement that the parties may come into contact with or have access to personal information and other information that may be classified or deemed to be private and confidential and for which the other party is responsible. Such personal information may also be deemed to be private and confidential as it relates to a third party who may be directly or indirectly associated with this agreement. Furthermore, it is acknowledged and agreed by the parties that they have the necessary consent to share or disclose the personal information and that the information may have value.
- The parties agree that they will at all times comply with the provisions of the POPIA and Codes of Conduct and that it shall only collect and use and process personal information it comes in contact with pursuant to this agreement in a lawful manner and only to the extend required to execute the services, or to provide goods and to perform their respective obligations in terms of this agreement.
- The parties agree that it shall put in place and at all times maintain appropriate physical, technological and contractual security measures to ensure the protection and confidentiality of personal information that it or its employees, contractors or other authorised individuals come into contact with pursuant to this agreement.
- Unless so required by law, the parties agree that it shall not disclose any personal information as defined by POPIA to any third party without the prior written consent of the other party and notwithstanding anything to the contrary contained herein, shall any party in no manner whatsoever transfer any personal information out of the Republic of South Africa.

GP: 012-653-0372
WC: 021-300-6259info@wipe-it.co.za
www.wipe-it.co.za53 Sterling Road, Samrand
Business Park, CenturionP.O. Box 53707,
Wierda Park. 0149

“ANNEXURE C”**APPOINTMENT OF INFORMATION COMPLIANCE OFFICER**

You are hereby, with immediate effect appointed as Wipe-Its' Information and Compliance Officer as required by the Protection of Information Act (Act 4 of 2013) also referred to as POPIA. This appointment may at any time be withdrawn or amended in writing and will be valid for a period of twelve (12) months.

You are entrusted with the following responsibilities:

- Taking all necessary steps to ensure the Company's reasonable compliance with the provisions of POPIA.
 - Keeping Wipe-Its' governing body up to date about the Company's information protection responsibilities under POPIA. In the event of a security breach to inform the governing body of the Company and advise accordingly on obligations in pursuant to POPIA.
 - To continuously analyse privacy regulations and to align them with the Company's personal information processing procedures. Latter to include reviewing the Company's information protection procedure and associated policies and procedures.
 - To ensure POPI audits are scheduled and conducted on a regular basis.
 - To ensure that all data subjects have convenient access for purposes of updating personal information or submit POPI related complaints with reference to the dedicated e-mail address for such purposes.
 - To approve any contract entered into with service providers, employees and other third parties which may have an impact on the personal information held by the Company. Latter includes the overseeing of amendments of the Company's contracts of employment and service level agreements.
 - Continuously encourage compliance with the conditions required for the lawful processing of personal information.
 - Ensuring that employees and other persons acting on behalf of Wipe-It are fully aware of the risks associated with the processing of personal information and that they remain informed about all relevant Company security control mechanisms.
-
- Organising and overseeing the awareness training of employees and other individuals involved in the processing of personal information on behalf of the Company.
 - To address employee related POPIA questions and or concerns.
 - To assess all POPIA related requests and complaints made by the Company's data subjects within the framework of the Company POPI policy.

- Working with the Information Regulator of South Africa in relation to any ongoing investigation. The Information Compliance Officer will therefore act as the contact point for the information Regulating authority on any issue relating to the processing of personal information and will consult with the Information/regulator of South Africa where appropriate with regards to any other matter.

I hereby unconditionally accept my appointment as the Wipe-It Information Compliance Officer.

Name and Surname: _____

Signature: _____

Date: _____

“ANNEXURE D”**PERSONAL INFORMATION REQUEST FORM
WIPE-IT POPIA POLICY AUDIT & RISK**

Completed Information Request Form to be submitted to the Information Compliance Officer

Name: _____

Contact Number: _____

E-mail Address: _____

Please be informed that in order to properly address your submitted request, you may be required to provide proof of identification prior to your request being processed. Depending on the nature of information required, a reasonable charge may be levied for providing copies of requested information as per Section 51 (1) (f) of the Promotion to Access of Information Act.

Particulars of Data Subject

Name & Surname: _____

Identity Number: _____

Postal Address: _____

Contact Number: _____

E-mail Address: _____

Request: I request Wipe-It to: Indicate with an X

Inform me whether it hold any of my personal information? ☐

Provide me with a record or description of my personal information ☐

Correct or update my personal information ☐

Destroy or delete a record of my personal information ☐

Instructions ☐

Signage: _____

Signature: _____

Date: _____

“ANNEXURE E”**POPIA NOTICE AND CONSENT FORM**

Wipe-It understands that your personal information is important to you and that you might have a degree of concern in disclosing such to the Company. Your privacy and the Company's compliance with the POPIA is just as important to us and we are therefore committed to the safeguarding and processing of your information in a lawful and prescribed manner.

Wipe-It also wants to ensure that you are duly informed and aware regarding the reasons and how your personal information will be processed. Should you however be of the opinion that your information is not accurate and or being processed in an incorrect manner or that your personal information as collected is not being used for what it was originally intended, you can contact the Wipe-It Information Compliance Officer. You are furthermore entitled to request access to the information the company holds about you at any time and should you believe your information is not correct and or complete, please request us to update or correct your information accordingly.

The contact details of Wipe-Its' Information Compliance Officer is:

Sybrand Gerhardus van Niekerk
Chief Executive Officer
sales@wipe-it.co.za

Purpose for processing your personal information:

Wipe-It collects, store, use and disclose your personal information for purposes of employment, provision of benefits and statutory compliance.

We will therefore only process and or further process your personal information for purposes you would reasonably expect with reference to your employment and the Company's statutory duties, including but not limited to:

- | | |
|------------------------------|---------------------------|
| - Curriculum Vitae | - Physical address |
| - Educational qualifications | - Criminal and ITC checks |
| - Identity document | - Background checks |
| - Psychometric results | - Contract of employment |
| - E-mail addresses | - Next of kin details |
| - Cell phone numbers | - Medical aid details |

- Biometric details
- Bank account number
- Pay slips
- SARS tax records
- Screening record for COVID19 purposes
- Employee personal file
- Disciplinary record
- Medical Doctor notes
- Drug and alcohol test results
- Performance reviews
- Trade union membership related information
- Advertising, recruitment and selection related information
- Arbitration awards / Court orders / rulings
- OHSA related incidents
- Personal information related to: job title, birth date, gender, race, occupation, past employment and any relevant disclosure required as per your conditions of employment.

Consent to disclose and share your information:

Wipe-It may be required when appropriate to share your information for purposes of specific services, products or advice that you have requested.

Where we share your personal information, we will take all necessary precautions to ensure that third party providers will treat your personal information with the same level of protection as required by Wipe-It. Your personal information may be hosted on servers managed by third-party providers which may be located off any of the Company's premises.

I hereby authorise and consent to Wipe-It to collect, retain and process my personal information as well as sharing my personal information with the following persons:

Name & Surname:			
Signature:		Date:	

“ANNEXURE F”

Objection to the processing of personal information in terms of section 11(3) of the Protection of Personal Information Act, 2013

1. Affidavits or other documentary evidence as applicable in support of the objection may be attached.
2. If the space provided for this document is inadequate, submit information as an Annexure to this document and sign each page.
3. Complete as is applicable.

A. Details of data subject

Name / s and surname of data subject

Unique identifier / Identity number

Residential, postal or business address

Contact number/Fax number / E-mail address

B. Details of responsible party

Registered Name of Business / responsible party

Postal / business address

Contact numbers

Fax number / E-mail address

C. Reasons for the objection in terms of section 11(1)(d) to (f). (Please provide detailed reasons for the objection)

“ANNEXURE G”

Request for correction or deletion of personal information, destroying or deletion of record of personal information in terms of section 24 (1) of the Protection of Personal Information Act, 2013

1. Affidavits or other documentary evidence as applicable in support of the request may be attached.
2. If the space provided for in this document is inadequate, submit information as an annexure to this document and sign each page.
3. Complete as applicable.

Mark the appropriate box with an X. Request for:

☐	Correction or deletion of the personal information about the data subject which is in possession or under the control of the responsible party.
☐	Destroying or deletion of a record of personal information about the data subject which is in possession or under control of the responsible party and who is no longer authorised to retain the record of information.

A. Details of data subject

Name/s and surname

Unique identifier / Identity number

Residential / postal address

Contact number/s

Fax number / E-mail address

B. Details of responsible party

Name of registered business

Business address / Postal address

Contact number/s

Fax number / E-mail address

C. Reasons for objection in terms of section 11(1)(D) to (F).

(Please provide detailed reasons for the objection)

D. Reasons for correction or deletion of the personal information about the data subject in terms of section 24(1)(a) which is in possession or under the control of the responsible party; and or the reasons for destruction or deletion of a record of personal information about the data subject in terms of section 24(1)(b) which the responsible party is no longer authorised to retain. (Please provide detailed reasons for the request)

“ANNEXURE H”

(To be inserted in contract of employment, personal particulars etc.)

EMPLOYEE CONSENT AND CONFIDENTIALITY

- Personal information shall include but not limited to race, gender, sex, pregnancy, marital status, national or ethnic origin, colour, sexual orientation, age, physical or mental health, disability, religion, conscience belief, culture, language, birth of a person, information relating to education or medical, financial, criminal, employment history, any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier, biometric information, personal opinion, views or preferences, correspondence sent by the person that is explicitly or explicitly and views or opinions of another individual about the person.
- Wipe-It is inclusive of all its Divisions and Subsidiaries.
- Wipe-It undertakes to process and or further process the personal information only in accordance with the conditions of lawful processing as contemplated by the POPIA and with due cognizance of Wipe-Its' relevant policies and procedures available to all employees within the framework of employment.
- The employee acknowledges that the collection, retention, dissemination and processing of personal information is both necessary and require a legal obligation which falls within the scope of execution of the legal function and obligation of the Company. The employee therefore irrevocably and unconditionally agrees:
 - That he/she is notified of the purpose and reason for the collection and processing of his/her personal information insofar it relates to Wipe-It discharge of its obligations and to perform its function as an employer.
 - That he/she consents and authorises Wipe-It to undertake the collection, processing and further processing of the employee's personal information by the Company for the purposes of securing and further facilitating the employee's employment with Wipe-It.
 - Without detracting from the generality of the aforestated, the employee consents to Wipe-It collection and processing of personal information pursuant to any of the Company's internet, E-mail and interception of communication policies relevant to personal information.
- To make available to Wipe-It all necessary personal information required by the Company for the purpose of securing and further facilitate the employee's employment within Wipe-It.
- To absolve and indemnify Wipe-It from any liability in terms of POPIA for failing to obtain the employee's consent or to notify the employee of the reasons for the processing of any of the employee's personal information.

- To absolve Wipe-It with regards to the disclosure of personal information to any third party where the employer has a legal duty or contractual obligation to disclose such personal information.
- The employee furthermore agrees to the disclosure of his /her personal information for any reason enabling Wipe-It to carry out or to comply with any business / operational obligation the Company may have or to pursue a legitimate interest of the Company for Wipe-It to perform and maintain its business on a day-to-day business.
- The employee acknowledges that during the scope and course of the performance of his / her services, he / she may gain access to and become acquainted with the personal information of other employees, clients, service providers and suppliers. The employee will treat personal information as a confidential business asset and agrees to respect their privacy accordingly. The employee is furthermore bound with regards to relevant confidential undertakings as contained in the contract of employment and other relevant policies and procedures of the Company.
- Employees are strictly prohibited to directly or indirectly utilise, disclose, or make public in any manner to any person or third party, either within Wipe-It or externally, any personal information, unless such information is already publicly known, or the disclosure is necessary in order for the employee to perform his / her duties on behalf of the employer.