	PRIVACY & RECORDS POLICY		CONFIDENTIAL – CONTROLLED DOCUMENT FOR INTERNAL USE
	Responsibility: Finance		
	Approved by: Operations Director	<i>Fritz Deuback</i>	
Date: June 2021	Rev: 1	Captured by: Finance	Doc no: recpol

1. Pre-amble

The company collects records in order to conduct its business effectively but does so within the confines of applicable legislation.

2. Purpose

The purpose of this policy is to set out the manner in which records are obtained, processed, stored and destroyed so as to ensure integrity and security of information.

3. Scope

This policy applies to all employees who deal with information processing and all types of records obtained by the organisation

4. Related Legislation

- 4.1. Promotion of Access to Information Act no 2 of 2000
- 4.2. Protection of Personal Information Act no 40 of 2013

5. Definitions and abbreviations

- Communication channels
- Data subject – person for whom data is collected
- Information Officer – Person assigned as responsible for information within the organisation
- Information Regulator – regulatory body responsible for managing data privacy

6. General Policy

6.1. Responsible

- The person responsible for the monitoring of information security is the Operations Director, duly assigned as the Information Officer registered with the organisation. The Deputy Information Officer is the Accountant and both have been duly registered with the Information Regulator as required by law.

6.2. Consent

- Consent is required from data-subjects to approve use of information to be processed within the confines of the intended use.

6.3. Purpose

- The purpose of the collection of information from clients is to ensure that the business can continue with its business of design, manufacture and sale of manufactured fibreglass products in accordance with client's needs.

6.4. Retention

- Records will be retained in accordance with the organisation's Records Retention Schedule which will provide information about records, whether or not they contain personal information, how the records will be safeguarded, for how long they will be retained and when they will be destroyed.

6.5. Types of information

- The schedule will identify the types of records and whether or not they contain personal or sensitive information. Information will only be gathered for specific reasons and only be used for the purpose for which they were intended.

6.6. Quality of information



- The organisation will ensure that data subjects have the opportunity to check and update their information on a regular basis.

6.7. Transparency

- The organisation has a POPI manual which is lodged with the information regulator and contains key contacts for the access of information.

6.8. Security

- The organisation ensures that information is retained securely in locked files with restricted access or on data-bases. Information on data-bases is backed up regularly and private information is accessible only with passwords. Third parties who process

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information do so under strict contractual terms. Breaches of information security are reported to the Information Regulator.

6.9. Client data

- Clients have the opportunity to view, amend, object to processing of their data and request deletion of their data at any stage.

7 Procedure

7.2 Roles

- Information Officer – ensure meeting of legislative requirements for the organisation in terms of integrity and security of data
- Deputy Information Officer – Accountant who carries out role on the ground
- Data Operators – Carry out requirements of policy in terms of processing of information
- Data subjects – check own data periodically and provide approval for its use

7.3 Process

- Data subjects provide information for use in the business on a regular basis and ensure it is correct and approve for its use for intended purpose
- Data operators process information for the intended use
- Deputy Information Officer ensures on behalf of the Information Officer that the data has integrity and that it is secure
- Deputy Information Officer ensures that data is retained and destroyed in line with the Records Schedule

8 Revision History

8.2 Originate policy – June 21

9 Document References

9.1 Records Schedule

9.2 PAIA Manual