
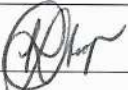


<b>Policy Owner</b>	Human Resources (HR)		
<b>Effective date</b>	30 June 2021		
<b>Authorized by</b>	CEO		15-06-2021
		Signature	Date
	Human Resources Manager		15-06-2021
		Signature	Date
<b>Note</b>	Ferro Eleganza (PTY) LTD reserves the right to amend the contents of this policy as and when required. The policy currently in effect will apply to all employees regardless of the policy that applies at the time of employment.		

### 1. Scope and objective of the policy

The Protection of Personal Information (POPI) policy is intended to ensure the legitimate concerns of individuals/companies about the ways in which their data may be used. The policy further aims to promote the protection of personal information of Ferro Eleganza (PTY) LTD /the individual and provide for minimum conditions that should be followed in the lawful processing of information.

### 2. Definitions

- 2.1 **"competent person"** - means any person who is legally competent to consent to any action or decision being taken in respect of any matter concerning a child;
- 2.2 **"Consent"** - means any voluntary, specific and informed expression of will in terms of which permission is given for the processing of personal information;
- 2.3 **"Company"** - a legal registered entity.
- 2.4 **"Privacy"** - is about ensuring that both individuals and juristic entities are aware of what is being done with their personal information.

### 3. Legal Principles

The following legislation is applicable to this policy:

- 3.1 the Constitution of South Africa act 108 of 1996.

#### 4. Policy

- 4.1 The policy applies to any information regarding clients, suppliers and employees including contact details and correspondence. Human resources and payroll data, curricula vitae, applications for employment, CCTV records, performance reviews and internal e-mail records of the employee, customers, and Ferro Eleganza (PTY) LTD .
- 4.2 The policy conditions impact technology, processes, and the way Ferro Eleganza (PTY) LTD process personal information.
- 4.3 Personal information may only be used for the purpose agreed with your customers, clients, and employees.
- 4.4 Marketing by means of unsolicited e-mail is prohibited unless certain provisions apply – Ferro Eleganza (PTY) LTD to implement opt-in and opt-out strategies.
- 4.5 Personal information may only be retained for as long as necessary – Ferro Eleganza (PTY) LTD to specify retention periods.
- 4.6 Ferro Eleganza (PTY) LTD shall not process more personal information than is necessary.
- 4.7 Processing of special personal information is prohibited unless provisions stipulated in this policy apply.
- 4.8 Personal information of employees, clients, customers and Ferro Eleganza (PTY) LTD will be sufficiently protected and used in a manner that facilitates transparency around the following:
  - 4.8.1 what is done with the personal information;
  - 4.8.2 why and how it is processed (i.e. this covers all phases of a typical information management life cycle – from collection, to usage, sharing, disposal, archiving, etc);
  - 4.8.3 who the personal information is shared with (i.e. third parties – both locally and internationally, other legal entities – sometimes within the same group or company, etc);
  - 4.8.4 what types of personal information is processed and for what purpose.
- 4.9 Personal Information of the employees, clients, and customers includes:
  - 4.9.1 contact details;
  - 4.9.2 demographic information;
  - 4.9.3 personal history, criminal record;
  - 4.9.4 email addresses, date of birth and age;
  - 4.9.5 education information physical address; and

4.9.6 financial information as well as communication records.

4.10 Personal information (PI) of Ferro Eleganza (PTY) LTD includes:

- 4.10.1 financial information;
- 4.10.2 intellectual property (processes, methods);
- 4.10.3 ICT systems/ programmes; and
- 4.10.4 CCTV surveillance and guard monitoring systems

## 5. Procedure

- 5.1 Ferro Eleganza (PTY) LTD is expected to identify what they classify as Personal Information and take reasonable measures to protect the data. This will likely reduce the risk of data breaches and avoid legal ramifications for Ferro Eleganza (PTY) LTD
- 5.2 Ferro Eleganza (PTY) LTD, therefore, must receive consent from individuals before they can obtain and retain personal information for communication or any other purpose.
- 5.3 The employee, clients, customers, and Ferro Eleganza (PTY) LTD will be kept updated of what is being done with their information and the associated reasoning.
- 5.4 In accordance with the Protection of Personal Information Act, as soon as a privacy breach is detected and established, it must be reported to the regulator and to the party whose information was accessed.
- 5.5 All responsible parties need to know and be able to explain how the breach occurred, what has been done to contain any harm and how will any such breach be prevented in the future.
- 5.6 Should employees for any given reason no longer service the organisation; information prescribed as personal (financial information, intellectual property) as according to Ferro Eleganza (PTY) LTD policy should not be disclosed to the public (i.e. companies operating in the same industry). The same principal applies to Ferro Eleganza (PTY) LTD.
- 5.7 Those concerned (Ferro Eleganza (PTY) LTD the employee, and clients) have the right to complain and escalate any issues related to privacy, especially if they believe that their right to information privacy has been violated.
- 5.8 Employees are expected to protect the private information of Ferro Eleganza (PTY) LTD e.g.:
  - 5.8.1 confidential files are expected to be put in a secure area (locked draws); and
  - 5.8.2 personal login details to Ferro Eleganza (PTY) LTD's ITC systems are expected to be kept confidential to avoid unauthorized access to private systems.

5.9 Failure to comply with the requirements of the policy will result in immediate dismissal, fine or severe legal consequences.

**6. Relevant Policies**

Code of Conduct Policy

**7. Relevant Documents**

N/A