

PURPOSE OF THIS POLICY

- To provide our staff, clients and temporary workers with mechanisms that will ensure the protection of their data in accordance with the provisions of the Protection of Personal Information (POPI) Act No. 4 of 2013.
- To ensure that all staff follow the necessary rules in terms of data protection.

POLICY CONTENT

Personal Information broadly means any information relating to an identifiable, living person or juristic person (i.e. companies) and includes, but is not limited to:

- **Contact details:** email, telephone, address etc.;
- **Demographic information:** age, sex, race, birth date, ethnicity etc.;
- **History:** employment, financial, educational, criminal, medical history;
- **Biometric information:** blood type etc.;
- **Opinions** of and about the person;
- **Private correspondence** etc.

1. Acquisition and use of personal information

A24Group Ltd. will clearly indicate the purposes of use when acquiring personal information and will not use it for any other purpose other than for what would have been highlighted to the data subject and agreed.

2. Accuracy

A24Group Ltd.. employees will regularly ensure that:

- Records remain accurate and consistent;
- ICT systems will be designed, where possible, to encourage and facilitate the entry of accurate data;
- Data on any individual will be held in as few places as necessary, and all staff will be discouraged from establishing unnecessary additional data sets;
- Effective procedures will be implemented to ensure that all relevant systems are updated when information about any individual changes.

3. Security Measures

A24Group Ltd. employees will ensure appropriate safeguarding of personal information by implementing security measures to prevent loss, leakage or unauthorised alteration of personal information.

Setting security levels

Access to information on the main A24Group Ltd. computer systems will be controlled and regulated. Access will be granted in accordance with assigned responsibilities.

4. Provision of personal information

A24Group Ltd. employees will not provide personal information to third parties for any purpose other than the specified purposes of use, unless required where we have a duty or a right to disclose in terms of applicable laws or legislation.

Forms of consent

A24Group Ltd. employees undertake to gain written consent from the data subject where appropriate before providing information to third parties; alternatively a recording must be kept of verbal consent.

5. Disclosure, correction and suspension of use of personal information

A24Group Ltd. employees will promptly respond to a request or complaint concerning disclosure, correction or suspension of use of personal information it has obtained from the person who is the subject of personal information (data subject) by escalating the request to their manager. All reasonable steps will be taken to confirm identity before providing details of personal information or making changes to personal information.

6. Establishment and amendment of rules concerning Protection of Personal Information

A24Group Ltd. will review the Protection of Personal Information Policy and other related rules and procedures as and when necessary.

7. Staff training & acceptance of responsibilities

Induction

A24Group Ltd. will ensure that all staff that have access to any kind of personal information will have their responsibilities outlined during their induction procedures.

Acceptance of policy

A24Group Ltd. will ensure that all staff who are tasked with collecting and processing of personal information, sign acceptance of this policy once they have had a chance to read and understand the policy and to understand their responsibilities in terms of the policy and the POPI Act. Non-compliance with this policy may result in disciplinary action where applicable.

In confirmation of the above, the staff member will sign in the relevant section below and a copy will be kept on each staff members file.

DECLARATION

I hereby confirm that I have read, understood and am familiar with the details displayed in the Protection of Personal Information Act (POPI) Policy.:

Agency Worker

Reviewed date