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Managing Director		22 nd June 2021
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Deputy Information Officer	Thys Visagie	20/06/2021
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1. INTRODUCTION

- 1.1. This policy is prepared with respect to Giscoe (Pty) Ltd (Registration Number:1990/004119/07) as well as any subsidiaries trading under any name whatsoever (hereinafter referred to as the "Company").
- 1.2. This Protection of Personal Information Act – Policy and Compliance (hereinafter referred to as the "Policy") serves to:
 - 1.2.1. Indicate the method in which the Company will meet and fulfil its legal obligations and requirements concerning the protection, processing, and disclosure of personal and confidential information; and
 - 1.2.2. Indicate the method in which the Company will meet and fulfil its legal obligations and requirements concerning confidentially and information security standards.

- 1.3. This Policy is based broadly on the Protection of Personal Information Act 4 of November 2013, as may be amended from time to time and in respect whereof regulations and guidelines may be issued (hereinafter referred to as the "Act").
- 1.4. The Company is committed to ensuring it complies and adheres to the requirements as set out in the Act.
- 1.5. The Company contact details are:
- 1.5.1. Head of the Company: Steve Hine
 - 1.5.2. Information Officer: Steve Hine
 - 1.5.3. Deputy Information Officer: Thys Visagie
 - 1.5.4. Postal Address: PO Box 652
Halfway House
Midrand
Gauteng
1685
- Registered Address: Building 1, First Floor, Hazel Close
141 Witch- Hazel Avenue
Highveld
Centurion
0169
- 1.5.5.
 - 1.5.6. Telephone Number: +27 104 100 100
 - 1.5.7. Email Address: shine@giscoe.com
- 1.6. This policy applies to all directors, employees, contractors, sub-contractors, persons/entities/bodies/individuals, agents and appointees of the Company and shall be applicable to both on- and offsite collection, storing and processing of personal information.
- 1.7. Any service provider that provides IT services, including data storage services, to the Company must adhere to the requirements of the Act to ensure that any personal information held by them on behalf of the Company is sufficiently protected.

2. DEFINITIONS

- 2.1. Consent The voluntary, specific and informed expression of will.
- 2.2. Data subject Any natural or juristic person to whom the personal data relates.
- 2.3. Direct marketing The approaching of a data subject directly for the purposes of selling a product or service to them, or any further and/or alternative activities incidental to the above.
- 2.4. Personal information Any information relating to an identifiable living

natural person, or an identifiable, existing juristic person as defined in the Act.

- 2.5. Processing An operation or activity, whether by automatic means or not, concerning personal information.
- 2.6. Special personal information Information relating to:
Religious, philosophical or political views and beliefs;
Race or ethnic origin;
Trade union membership;
Health or sex life;
Biometric information (including blood type, DNA, retinal scanning, voice recognition, and photographs);
Criminal behaviour; or
Information concerning a child.

3. REQUIREMENTS

- 3.1. In terms of the Act, the Company is required to inform any and all data subjects of the purpose for which their personal information is collected and will be processed, stored, and/or used.
- 3.2. In terms of the Act, the Company is required to protect any and all information assets from all internal and external threats.

4. INFORMATION OFFICER

- 4.1. The Information Officer shall be responsible for:
- 4.1.1. Conducting a preliminary assessment;
 - 4.1.2. Implementing, monitoring, and adjustment of this Policy;
 - 4.1.3. Ensuring sufficient and appropriate documentation is available to support this Policy;
 - 4.1.4. Ensuring that all documentation in connection with this policy is relevant and up to date; and
 - 4.1.5. Ensuring this Policy, and any subsequent amendments and/or replacements and/or updates thereto, are communicated to all relevant parties.

5. PRINCIPLES

5.1. Accountability:

- 5.1.1. The Company will take reasonable steps that personal information obtained from data subjects is stored in a safe and secure manner.

5.2. Processing limitation:

- 5.2.1. The Company undertakes to, as far as reasonably possible, collect personal information directly from the data subject or any party authorised by them to release such information.
- 5.2.2. Personal information may be collected by the Company from a source other than the data subject, provided that:
 - 5.2.2.1. The personal information is obtained from a public record;
 - 5.2.2.2. The personal information was made public by the data subject in a deliberate manner;
 - 5.2.2.3. The personal information is collected from another source with the data subject's consent;
 - 5.2.2.4. The collection of the personal information from another source does not have any reasonable possibility of prejudicing the data subject;
 - 5.2.2.5. The collection of the personal information from another source is required to comply with any law;
 - 5.2.2.6. The collection of the personal information from another source is required to maintain or exercise any legal right;
 - 5.2.2.7. The collection of the personal information from the data source would prejudice the lawful purpose of the collection; or
 - 5.2.2.8. The collection of personal information from the data source is not reasonably practical.
- 5.2.3. The Company undertakes to, as far as reasonably possible, process and disclose any personal information received from a data subject only with the consent of the data subject, or if required to so release the information by law.
- 5.2.4. Where the Company is required to disclose any personal information by law, it will take reasonable steps to inform the data subject of such disclosure.

5.3. Specific purpose:

- 5.3.1. The Company undertakes to collect personal information from data subjects insofar as such information is required for any and all activities related to and/or incidental to its business operations, including, but not limited to the supply of products, and the rendering of services, the registering of learnerships with the relevant bodies, the supplying of information to bodies requiring such information under any law, and the direct marketing of services to clients and students through electronic communication.
- 5.3.2. The Company may only process special personal information if:
 - 5.3.2.1. The data subject has consented to such processing;
 - 5.3.2.2. The special personal information was made public by the data subject in a deliberate manner;

5.3.2.3. The processing of the special personal information is required for the establishment of a right or defence in law;

5.3.2.4. The processing of the special personal information is for statistical, historical or research purposes; or

5.3.2.5. If the special personal information relates to race or ethnic origin, such special personal information must be processed to comply with affirmative action laws.

5.4. Limitation of further processing:

5.4.1. The Company shall not be entitled to process personal information in a manner which is incompatible with the purpose wherefore the information was initially collected, as set out in Clause 5.3 hereof.

5.4.2. Further processing will be compatible with the purpose set out in Clause 5.3 hereof if:

5.4.2.1. The data subject has consented to such further processing;

5.4.2.2. The personal information is obtained in a public record;

5.4.2.3. The personal information was made public by the data subject in a deliberate manner;

5.4.2.4. The collection of the personal information from another source is required to comply with any law;

5.4.2.5. The collection of the personal information from another source is required to maintain or exercise any legal right; or

5.4.2.6. Such further processing is required to prevent or mitigate a threat to public health or safety or the life or health of the data subject or a third party.

5.5. Information quality:

5.5.1. The Company will ensure that all reasonable measures are taken to ensure a data subject's personal information is complete, up to date, and accurate before such personal information is used.

5.5.2. To ensure that any and all personal information is complete, up to date and accurate, the Company may request a data subject, from time to time, to update the personal information and to confirm the same is still relevant.

5.5.3. Should the Company be unable to reach a data subject for the purposes of confirming the personal information held for the said data subject, the Company is entitled to permanently remove and/or delete such personal information from its records.

5.6. Transparency and openness:

5.6.1. The Company will reasonably endeavour to ensure that a data subject is aware of the following where any personal information relating to said data subject was collect from any source other than the data subject directly:

5.6.1.1. That the data subject's personal information is being collected;

5.6.1.2. Who is collecting the data subject's personal information; and

5.6.1.3. The reason for which the data subject's personal information has been collected.

5.7. Security safeguards:

5.7.1. The Company will ensure that all reasonable technical and organisational measures have been taken to secure the integrity of data subject's personal information, and to guard against the risk of loss, damage and/or destruction thereof.

5.7.2. The Company will ensure that all reasonable measures are taken to protect against the unauthorised and/or unlawful access, processing and/or use of a data subject's personal information.

5.7.3. The Company will ensure that all reasonable measure are taken to ensure that a data subject's personal information is only used for legitimate purposes by authorised persons as consented to by the data subject.

5.8. Participation of data subjects:

5.8.1. Any and all data subjects are entitled to know the particulars of the personal information held by the Company insofar the said personal information relates to the particular data subject.

5.8.2. Any and all data subjects are entitled to know the identity of any authorised person of the company who has had access to the personal information insofar the personal information relates to the particular data subject.

5.8.3. Any and all data subjects are entitled to correct any and all personal information held by the Company insofar the personal information relates to the particular data subject.

6. CONSIDERATIONS

6.1. Monitoring:

6.1.1. The Directors of the Company in general, and the Information Officer in particular, are responsible for administering and overseeing the implementation of this Policy and any supporting guidelines, standard operating procedures, notices, consents, and related documentation and processes, if applicable.

6.1.2. The Company undertakes to reasonably train any and all authorised persons, in accordance with the relevant function of such person, in the requirements, policies, guidelines and regulations governing the protection of personal information.

6.1.3. The Company will undertake periodic reviews and audits to ensure compliance with this policy and guidelines, if and when required and applicable.

6.2. Operating controls:

6.2.1. The Company will take all reasonable steps to establish appropriate standard operating procedures which are consistent with this Policy and the regulatory environment, including:

6.2.1.1. The allocation of information security responsibilities;

6.2.1.2. The establishment of incident reporting and management;

6.2.1.3. The introduction of user identification;

6.2.1.4. Information security training and education; and

6.2.1.5. Data backup.

6.3. Policy compliance:

6.3.1. Any and all breaches of this Policy may result in disciplinary action and the possible termination of employment.

7. PROCESSING OF PERSONAL INFORMATION

7.1. The Company may use any and all personal information in its possession for the following purposes:

7.1.1. Conducting credit reference checks and assessments;

7.1.2. The administration of agreements;

7.1.3. Providing products and services to customers;

7.1.4. Discounting and asset funding purposes;

7.1.5. The detection and prevention of fraud, crime, money laundering and other unlawful practices;

7.1.6. The conducting market or customer satisfaction research;

7.1.7. Marketing and sales;

7.1.8. In connection with legal proceedings;

7.1.9. Staff administration;

7.1.10. The maintenance of accounts and records;

7.1.11. Ensuring compliance with legal and regulatory requirements;

7.1.12. Registering students with the relevant bodies for learnerships;

7.1.13. Sharing data cross-border with affiliated companies;

7.1.14. Profiling data subjects for the purposes of direct marketing; and

7.1.15. Any other and/or further activities which relate directly or indirectly or are incidental to the Company's business activities.

7.2. The Company may possess the following records relating to supplier, employees, directors, service providers, contractors and customers:

7.2.1. Customers: Natural persons Full names;
Contact details;
Physical and postal addresses;
Date of birth;
Identity number;
Tax related information;
Nationality;
Gender;
Confidential correspondence; and
Any further information voluntarily
supplied by the customer.

7.2.2 Customers: Juristic persons Names of contact persons;
Registered name of the legal entity;
Physical and postal address;
Contact details;
Financial information;
Registration number;
Founding documents;
Tax related information;
Authorised signatories;
Beneficiaries;
Ultimate beneficial owners;
Shareholding information;
BBBEE information;
Confidential correspondence; and
Any further information voluntarily
supplied by the customer.

7.2.3. Service providers/contractors: Names of contact persons;
Registered name of the legal entity;
Physical and postal address;
Contact details;
Financial information;
Registration number;
Founding documents;
Tax related information;
Authorised signatories;
Beneficiaries;
Ultimate beneficial owners;
Shareholding information;
BBBEE information;
Confidential correspondence; and
Any further information voluntarily
supplied by the service
provider/contractor.

- 7.2.4. Employees and directors: Gender;
Race;
Age;
Language;
Education information;
Financial information;
Employment history;
Identity number;
Physical and postal address;
Contact details;
Criminal record;
Mental and physical well-being; and
Any further information voluntarily
supplied by the employee/director.
- 7.2.5. Students: Full names;
Contact details;
Physical and postal addresses;
Date of birth;
Identity number;
Nationality;
Gender;
Confidential correspondence; and
Any further information voluntarily
supplied by the customer.

8. AGREEMENT

- 8.1. The submission of any documentation, contract, agreement, proposal, contact request, and/or the sending of any correspondence by a data subject whereby any personal information is disclosed and/or provided to the Company, such data subject acknowledges that:
- 8.1.1. The data subject has read and understood this Policy;
- 8.1.2. The data subject accepts the terms contained in this policy;
- 8.1.3. The data subject has no objection to the personal information so provide being used by the Company as described in Clause 5 of this Policy;
- 8.1.4. The personal information which has been provided is true, correct, and up to date.
- 8.2. All data subjects retain the right to, at any time, refuse consent and/or to withdraw consent to the processing of personal information in terms of this Policy insofar the personal information relates to that data subject.
- 8.3. All data subjects retain the right to, at any time, object to the processing of personal information on any of the grounds set out in Clause 5 of this Policy insofar the personal information relates to that data subject unless the processing of the personal information is required by law.
- 8.4. If the data subject withdraws consent to the processing of personal information insofar the personal information relates to that data subject, the Company shall refrain from any further processing of such personal information.

- 8.5. Upon the signing of a contract of employment with the Company, all employees acknowledge and agree that they become a data subject of the Company and that the Company shall be entitled to collect and process their personal information in line with Clause 7.2.4 of this Policy.
- 8.6. The employees of the Company, as data subjects agree and consent to certain of their personal information, including, but not limited to their contact details, full names, identity numbers, and date of birth being processed and provided to customers for the purpose of the tender process and/or ensuring the customer is able to communicate effectively with the employee.

9. Cross-border data transfer:

- 9.1. The Company reserves the right to provide any information, whether such information is personal or not, to GISCOE (PTY) Ltd. insofar such a transfer is required by any Agreement between the Company and GISCOE (PTY) Ltd. or by any laws governing the relationship between GISCOE (PTY) Ltd. and the Company.
- 9.2. The Company shall be required to ensure that any and all information, whether such information is personal or not, that is transferred to GISCOE (PTY) Ltd. is sorted, maintained and/or processed in terms of the relevant law governing such storage, maintenance and/or processing.

10. Website privacy policy:

- 10.1. The Company may use standard technology, including Cookies, to collect information concerning the use and access of its website, which technology does not enable the Company to identify individual users, but merely provides data for statistical purposes.
- 10.2. The Company is entitled to utilise temporary or session cookies to track users' browsing habits.
- 10.3. A cookie is a small file placed on the user's hard drive to keep a record of the user's interaction with the website and to facilitate user convenience.
- 10.4. Cookies in itself will not be used to identify users personally but may be used to compile identified statistics relating to the use of services offered or to provide the Company with feedback on the performance of its website.
- 10.5. The Company is entitled to use the collect the following information in respect of users who have enabled cookies:
 - 10.5.1. Browser software used;
 - 10.5.2. IP address;
 - 10.5.3. Date and time of visiting the website;
 - 10.5.4. URLs of internal pages of the website visited; and
 - 10.5.5. Referrers.
- 10.6. If a user does not wish to have cookies utilised to customise their interaction with the Company's website, the manner in which the browser handles cookies may be altered.

- 10.7. If the manner in which the browser handles cookies is altered, certain of the website's services may not be available to the user.
- 10.8. Upon completion of the 'Online Contact Form' on the Company's website, the user will no longer remain anonymous to the Company as he/she will voluntarily provide the Company with the following personal information:
 - 10.8.1. Full names;
 - 10.8.2. Telephonic contact details;
 - 10.8.3. Email address; and
 - 10.8.4. Additional information relating to the particular query, which may include, but is not limited to a company name, physical or postal address, and/or additional and further contact details.

11. GENERAL

- 11.1. The Company reserves the right to alter and/or amend and/or substitute and/or replace this Policy at any time without the need to explicitly inform any current and/or future data subjects of such alteration, amendment, substitution and/or replacement.
- 11.2. Clause 9.1 shall apply regardless of whether such alteration and/or amendment and/or substitution and/or replacement relates to any particular Clause, provision and/or part of this Policy or to the Policy as a whole.
- 11.3. The Company confirms that it will retain any and all information, whether personal or otherwise, relating to a data subject for as long as its relationship with the said data subject shall continue.
- 11.4. The Company confirms that, once its relationship with a data subject has ended, it will retain any and all information, whether personal or otherwise, relating to the said data subject for the minimum period prescribed by law, including the periods prescribed by the Financial Intelligence Centre Act 38 of 2008, the Tax Administration Act 28 of 2011, the Companies Act 71 of 2008, the Prevention of Organised Crime Act 121 of 1998, the Value Added Tax Act 89 of 1991, and the Income Tax Act 58 of 1962 as these Acts may be amended from time to time.
- 11.5. Despite any provision in any law prescribing a minimum retention period for any information, whether personal or otherwise, the Company may, in its sole discretion, retain any and all such information which is deemed to be worth retaining for any period of time which is longer than the prescribed minimum retention period.
- 11.6. The Company undertakes to take reasonable measures to ensure that any and all information, whether personal or otherwise, which is retained after the termination of the relationship between it and a data subject shall be stored and kept in a manner which is consistent with the provisions of the Act.
- 11.7. The Company undertakes to take reasonable measure to ensure that any and all information, whether personal or otherwise, which is retained after the termination of the relationship between it and a data subject shall be processed only in a manner which is consistent with the provisions of the Act, or as set out in Clauses 5.3 and 5.4 of this Policy.