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POPI PRIVACY MANUAL AND PRIVACY POLICY

PREPARED IN ACCORDANCE WITH THE PROMOTION OF ACCESS TO INFORMATION ACT, 2000 TO ADDRESS REQUIREMENTS OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013

1. INTRODUCTION AND PURPOSE OF THIS MANUAL

The Protection of Personal Information Act (“POPI”) aims to give effect to the constitutional right of privacy by balancing it against that of access to information, POPI requires that personal information pertaining to individuals be processed lawfully and in a reasonable manner which does not infringe on the right to privacy.

This document therefore relates to and explains how we obtain, process, use, store, disclose and destroy personal information in accordance with the requirements of POPI.

2. COMPANY DETAILS

COMPANY NAME	PNEUMATIC ELECTRIC CONTROL SYSTEMS (PTY) LTD
COMPANY REGISTRATION NUMBER	1952/000604/07
EMAIL ADDRESS	pecs@mweb.co.za
PHYSICAL ADDRESS	8 Balance Road, Stamfordhill, Durban, 4001
POSTAL ADDRESS	P.O. Box 47396, Greyville, 4023
TELEPHONE NUMBER	031 3033701
WEBSITE ADDRESS	http://pecspower.co.za
INFORMATION OFFICER	NAREN SURJUPROSAD
EMAIL ADDRESS	naren@pecspower.co.za
DATE	30 JUNE 2021

3. PERSONAL INFORMATION COLLECTED

Personal information may only be processed if the purpose for which it is processed is adequate, relevant and not excessive. The type of information collected and processed is usually for the purpose of understanding a related parties requirements in order for us to perform our services and can largely be summarized as follows:

ENTITY TYPE	PERSONAL INFORMATION PROCESSED
<i>Clients: Natural Persons</i>	<i>Names, contact details, physical and postal addresses, date of birth, ID number</i>
<i>Clients: Juristic Persons/Entities</i>	<i>Names of Owners / Directors, Name of Legal Entity, Physical and Postal addresses and contact details Financial information: Registration Number, Vat related information, Authorised signatories,</i>
<i>Employees / Directors</i>	<i>Gender, Marital Status, Colour, Age, Education Information Employment History: ID number, physical and postal address, contact details, Criminal behavior, Well-being</i>
<i>Website end-users</i>	<i>Electronic identification data: IP address, cookies</i>

4. USE AND DISCLOSURE OF PERSONAL INFORMATION

We will only use personal information for the purpose in which it was generated and as agreed by you in order for us to conduct our daily operational activities. In addition, where necessary, some information may be retained for legal purposes for us to comply with the relevant laws, such as FICA requirements.

For example:

- To gather contact information
- To confirm and identify your identity or verify that you are an authorized user for security purposes
- For the detection and prevention of fraud, crime, money laundering or other malpractice
- To conduct market or customer satisfaction research or for statistical analysis
- For audit and record keeping purposes
- In connection with legal proceedings

Our policy is not to disclose person information to stakeholders, including our service providers who are associated with our business activities. In the event this becomes necessary, we have taken various measures in this regard to ensure that agreements are in place with such stakeholders and service providers to ensure compliance with the requirements with POPI.

5. ACCESS AND CORRECTION OF PERSONAL INFORMATION

You have right to request a copy of the personal information we hold about you. Should you wish to update, correct or delete your personal information you may do so by contacting us using the information contained in clause 2 of this document and specifying what information you require and/or would like to update.

6. INFORMATION SECURITY

We are legally obliged to provide adequate protection for the personal information we hold and to stop unauthorized access and use of personal information. We will, on a on-going basis, continue to review our security controls and related processes to ensure that your personal information remains secure.

Our security policies and procedures cover:

- Computer network security
- Access to personal information
- Secure communications
- Security in contracting out activities or functions
- Retention and disposal of information
- Acceptable usage of personal information
- Governance and regulatory issues
- Monitoring access and usage of private information
- Investigation and reaction to security incidents

When we contract with third parties, we impose appropriate security, privacy and confidentiality obligations on them to ensure that the personal information which we remain responsible for, is kept secure. We will ensure that anyone to whom we pass your personal information to agrees to treat the information with the same level of protection as we are obliged to.

7. REQUESTING ACCESS AND LOGGING COMPLAINTS

If for whatever reason you are unhappy with the way in which personal information is collected, processed, used or stored and you believe that we are not complying with the provisions set out in POPI, you may lodge a complaint with the office of the Information Regulator using the official Form 5 complaint form.