



Data Privacy Policy 22 June 2021

Data Privacy Policy:
Numeral
July 2021

DOCUMENT TITLE:	DATA PROTECTION POLICY
DOCUMENT NUMBER:	01
VERSION NUMBER:	ONE (1)
COMPILED BY:	Harry van der Westhuizen
REVIEWED BY:	HR Department
SIGNED:	
RECOMMENDED BY:	Harry vand er Westhuizen
SIGNED:	
APPROVED:	HR Department
SIGNED:	
EFFECTIVE DATE:	1 JULY 2021

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1. DEFINITION OF TERMS

Term	Description
Personal Information	Information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person.

2. ACRONYMS / ABBREVIATIONS

Abbreviation	Description
PAIA	Promotion of Access to Information Act 2 of 2000
POPIA	Protection of Personal Information Act 4 of 2013

3. INTRODUCTION TO THE DATA PROTECTION POLICY

3.1. Background

- 3.1.1. Numeral and its group of companies (referred to as “the Company”) is a group of companies that offers various services that include but is not limited to technical assistance, product development, IT systems, support and services, capital raising, Fintech enhancement, etc..
- 3.1.2. The Company is obligated to comply with the Protection of Personal Information Act 4 of 2013 (POPIA). POPIA requires the Company to inform its stakeholders as to how their personal information is used, disclosed and destroyed.
- 3.1.3. The Company guarantees its commitment to protecting its stakeholders’ privacy and ensuring that their personal information is used appropriately, transparently, securely and under applicable laws.

3.2. Purpose of the Data Protection Policy

- 3.2.1. The Policy sets out how the organisation deals with its stakeholders’ personal information and stipulates the purpose for which such personal information is used. The Policy is made available on the Company’s website (if available) and by request from the head office.

3.3. Scope

- 3.3.1. The Policy applies to all employees, third parties, and all other users of the Company information and communication technology facilities and all forms of information resources of the Company group.

3.4. Policy Review

- 3.4.1. The Policy will be reviewed annually. Interim changes might be approved by the Executive Committee if they are not material. Material changes must be approved by the Board. Stakeholders are advised to access the Company website periodically to keep abreast of any changes to the Policy. Where material changes take place, stakeholders will be notified directly, or changes will be updated on the website.

4. PROTECTION OF PERSONAL INFORMATION IN TERMS OF POPIA

4.1. Personal Information Collected

- 4.1.1. Section 9 of POPIA states that “Personal Information may only be processed if, given the purpose for which it is processed, it is adequate, relevant and not excessive.”
- 4.1.2. The Company collects and processes personal information as received from the stakeholders or specifically relating to the stakeholders' needs. The type of information will depend on the need for which it is collected and will be processed for that purpose only. Whenever possible, the Company will inform the stakeholder as to the information required and the information deemed optional.
- 4.1.3. Website usage information may be collected using “cookies” which allows the Company to collect standard internet visitor usage information.

4.2. The Usage of Personal Information

- 4.2.1. Personal Information will only be used for the purpose for which it was collected and as agreed.
- 4.2.2. This may include:
 - 4.2.2.1. Providing services to stakeholders and carrying out the transactions requested;
 - 4.2.2.2. For sharing with other third parties, if necessary;
 - 4.2.2.3. Marketing products to corporates and individuals;
 - 4.2.2.4. Processing applications for the Company and Company products;
 - 4.2.2.5. Processing Company and other related payment;
 - 4.2.2.6. Confirming, verifying and updating stakeholders' details;
 - 4.2.2.7. For the detection and prevention of fraud, crime, money laundering;

4.2.2.8. For audit and record-keeping purposes;

4.2.2.9. In connection with legal proceedings;

4.2.2.9.1. Providing communication in respect of the Company and regulatory matters that may affect stakeholders; and

4.2.2.9.2. In connection with and to comply with legal and regulatory requirements or when it is otherwise allowed by law.

4.2.3. According to section 10 of POPIA, personal information may only be processed if certain conditions, listed below, are met along with supporting information for the processing of personal information:

4.2.3.1. The stakeholder consents to the processing: - consent is obtained from stakeholders during the introductory, appointment and application stage of the relationship;

4.2.3.2. Processing complies with an obligation imposed by the Medical Schemes Act, as well as other related legislation; and

4.2.3.3. Processing protects the legitimate interest of the stakeholder.

4.3. Disclosure of Personal Information

4.3.1. The Company may disclose a stakeholder's personal information to any of its third-party service providers. The Company has agreements in place to ensure compliance with confidentiality and privacy conditions.

4.3.2. The Company may also share personal information with, and obtain information about stakeholders from third parties for the reasons already discussed above.

4.3.3. The Company may also disclose a stakeholder's information where it has a duty or a right to disclose in terms of applicable legislation, the law, or where it may be deemed necessary to protect its rights.

4.4. Safeguarding Stakeholders' Personal Information

4.4.1. POPIA requires the Company to adequately protect personal information. The Company continuously reviews its security controls and processes to ensure that personal information is secure.

4.4.2. The following procedures are in place to protect personal information:

- 4.4.2.1. The Company's Information Officer is Mr Harry van der Westhuizen whose details are available below and who is responsible for the compliance with the conditions of the lawful processing of personal information and other provisions of POPIA. He is assisted by Miranda Beumer who will function as the Deputy Information Officer;
- 4.4.2.2. This Policy has been put in place throughout the organisation and training on this Policy and the POPIA Act has already taken place;
- 4.4.2.3. Each new employee is required to sign an employment contract containing relevant consent clauses for the use and storage of employee information, or any other action so required, in terms of POPIA;
- 4.4.2.4. Every employee currently employed within the Company is required to sign an addendum to their employment contracts containing relevant consent clauses for the use and storage of employee information, or any other action so required, in terms of POPIA;
- 4.4.2.5. The Company archived stakeholder information is stored in the cloud in a secure location that is password-protected as governed by POPIA, and access is limited to these areas to authorised personal;
- 4.4.2.6. The organisation's suppliers, insurers and other third-party service providers are required to sign a service level agreement guaranteeing their commitment to the Protection of Personal Information. This is however an ongoing process that is evaluated as needed;
- 4.4.2.7. All electronic files or data are backed up by the Company which is also responsible for system security that protects third party access and physical threats. The Company is responsible for Electronic Information Security; and
- 4.4.2.8. The Company's' policies and procedures cover the following:
 - 4.4.2.8.1. Physical security;
 - 4.4.2.8.2. Computer and network security;
 - 4.4.2.8.3. Access to personal information;
 - 4.4.2.8.4. Secure communications;
 - 4.4.2.8.5. Security in contracting out activities or functions;
 - 4.4.2.8.6. Retention and disposal of information;

- 4.4.2.8.7. Acceptable usage of personal information;
- 4.4.2.8.8. Governance and regulatory issues;
- 4.4.2.8.9. Monitoring access and usage of private information; and
- 4.4.2.8.10. Investigating and reacting to security incidents.

4.4.3. Consent to process stakeholder information is obtained from stakeholders (or a person who has been given authorisation from the stakeholder to provide the stakeholder's personal information) during the introductory, appointment and application stage of the relationship.

4.5. Access and Correction of Personal Information

- 4.5.1. Stakeholders have the right to access the personal information the Company holds about them;
- 4.5.2. Stakeholders also have the right to ask the Company to update, correct or delete their personal information on reasonable grounds;
- 4.5.3. Once a stakeholder objects to the processing of their personal information, the Company may no longer process said personal information; and
- 4.5.4. The Company will take all reasonable steps to confirm its stakeholders' identity before providing details of their personal information or making changes to their personal information.

The details of the Company's Information Officer are shown below.

5. RETENTION & CONFIDENTIALITY OF DOCUMENTS, INFORMATION AND ELECTRONIC TRANSACTIONS

5.1. Access to documents:

- 5.1.1. All personal information is dealt with in the strictest confidence and may only be disclosed, without fear of redress, in the following circumstances:
 - 5.1.1.1. where disclosure is under compulsion of law;
 - 5.1.1.2. where there is a duty to the public to disclose; and
 - 5.1.1.3. where the interests of the Company require disclosure.

5.2. Disclosure to 3rd parties:

5.2.1. All employees have a duty of confidentiality concerning the Company and its stakeholders. In addition to the provisions of clauses above, the following are also applicable:

5.2.1.1. Information on stakeholders: Our stakeholders' right to confidentiality is protected in the Constitution and terms of legislation. Information may be given to a 3rd party if the stakeholder has consented in writing to that person receiving the information; and

5.2.1.2. Requests for the Company information: These are dealt with in terms of PAIA, which gives effect to the constitutional right of access to information held by the State or any person (natural and juristic) that is required for the exercise or protection of rights. The Company may however refuse access to records if disclosure would constitute an action for breach of the duty of secrecy owed to a third party.

5.2.2. In terms hereof, requests must be made in writing on the prescribed form to the Information Officer in terms of PAIA. The requesting party has to state the reason for wanting the information and has to pay a prescribed fee.

5.2.3. The Company's' manual in terms of PAIA, which contains the prescribed forms and details of prescribed fees, is available on the website.

5.2.4. Confidential, the Company and/or business information may not be disclosed to third parties as this could constitute industrial espionage. The affairs of the Company are kept strictly confidential at all times; and

5.2.5. The Company views any contravention of this policy very seriously and employees who are guilty of contravening the policy will be subject to disciplinary procedures, which may lead to the dismissal of any guilty party.

6. DESTRUCTION OF DOCUMENTS

6.1. Documents may be destroyed after the termination of the specified retention periods;

6.2. Each department is responsible for attending to the destruction of its documents, which must be done regularly. Files must be checked to make sure that they may be destroyed and also to ascertain if there are important original documents in the file. Original documents are returned to the holder thereof, failing which, they are retained by the Company pending such return; and

6.3. Documents may also be stored off-site, in storage facilities approved by the Company.

7. NON-COMPLIANCE WITH THE POLICY

7.1. Appropriate disciplinary action is taken against employees who contravenes this Policy.

8. AVAILABILITY OF THE PAIA MANUAL

8.1. The PAIA manual is made available in terms of Regulation Number R. 187 of 15 February 2002. The manual is available at our reception and the Company offices.

9. INFORMATION OFFICER DETAILS

Name	Harry van der Westhuizen
Telephone Number	072 524 6008
E-mail Address	<u>harry@status.holdings</u>

DEPUTY INFORMATION OFFICER DETAILS

Name	Miranda Beumer
Telephone Number	082 381 8422
E-mail Address	<u>miranda@status.holdings</u>