	INTEGRATED MANAGEMENT SYSTEM		Doc No	IMS-POL-003
	<u>PROTECTION OF PERSONAL INFORMATION POLICY</u>		Rev	01
			Compiled By	Sagree Singh
			Approved By	Managing Director
			Issue Date	1/12/2022

1. Introduction

The Protection of Personal Information Act 4, 2013 (“POPIA”), South Africa’s privacy or data protection legislation, applies to the processing (which includes collection, use, receipt and destruction) of personal information, such as names and contact details, of individuals and juristic persons, in South Africa. Purple Rain has a legal obligation to comply with the POPIA.

This policy applies to all Purple Rain staff members and third parties who process personal information on its behalf, in the protection of all Purple Rain’s data subjects.

It is the responsibility of every staff member and 3rd party processing data on behalf of Purple Rain to respect the rights of Purple Rain’s data subjects and adhere to this policy. All line managers shall be responsible for facilitating the implementation of this policy and monitoring adherence in their respective areas of responsibility. The General Manager shall be responsible for review of concerns, complaints, or questions about the application of this Policy as referred to them by a member of public, management, or staff.

2. Purpose of the Policy

This policy describes Purple Rain’s commitments to comply with the POPIA, and employee responsibilities to help Purple Rain comply with these laws.


3. Objectives of the Policy

- To safeguard personal information.
- To regulate the manner in which personal information is processed.
- To give effect to rights and remedies regarding protection of personal information.
- To establish an information protection Regulator.

4. Definitions

“**personal information**” means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to:

- information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or 5 mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;
- information relating to the education or the medical, financial, criminal or employment history of the person;
- any identifying number, symbol, e-mail address, physical address, telephone 10 number, location information, online identifier or other particular assignment to the person;

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- the biometric information of the person;
- the personal opinions, views or preferences of the person;
- correspondence sent by the person that is implicitly or explicitly of a private 15 or confidential nature or further correspondence that would reveal the contents of the original correspondence;
- the views or opinions of another individual about the person; and
- the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person;

“data subject” means the person to whom personal information relates;

5. Protecting Personal Information

Proactive steps that employees must take in protecting personal information, include:

- Clear your desk and bag; destroy all unnecessary information and file the rest.
- Clear/delete all unnecessary information on your personal electronic drives. Save important, critical information on the file server.
- Mandatory provisions for POPI will be included in agreements with third parties who process personal information on Purple Rain’s behalf.


Steps that employees must follow when an incident (such as a data breach, hack, mistake, loss of hard copy, etc) is identified, include:

- Step 1 – Inform your manager as well as the information officer (IO).
- Step 2 – Make sure you secure your personal information and data the same day. (seal the leak)
- Step 3 – The incident is logged, investigated and resolved by the IO
- Step 4 – Inform clients and data subjects where applicable.

6. Privacy

Purple Rain is committed to protecting your privacy and to ensure that your personal information is collected and used properly, lawfully and transparently.

We collect information directly from data subjects where they provide us with their personal details. Where possible, we will inform them what information they are required to provide to us, for what purpose, and what information is optional. Website usage information may be collected using “cookies” which allows us to collect standard internet visitor usage information.

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We will use personal information only for the purposes for which it was collected and agreed with a data subject. In addition, where necessary this information may be retained for legal or research purposes; for example:

- To gather contact information;
- To confirm and verify an identity and user authorisation 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.
- Disclosure of information

We may disclose personal information to our service providers for the execution of a specific service. We have agreements in place to ensure that they comply with the privacy requirements as required by the POPIA. We may also disclose information:

- Where we have a duty or a right to disclose in terms of law or industry codes;
- Where we believe it is necessary to protect our rights.

7. Correction of Information

A data subject has the right to ask us to update, correct or delete their personal information. We will require a copy of their ID document to confirm their identity before making changes to personal information we may hold. We would appreciate it if data subject would keep their personal information accurate.

8. Disciplinary Procedures


Where an employee does not comply with this policy, this shall constitute misconduct on the part of the staff member and appropriate disciplinary action shall be taken in terms of the Purple Rain Disciplinary Policy and Procedures.

Purple Rain takes this policy very seriously and violations may lead to disciplinary action up to, and including, termination of employment. While Purple Rain retains discretion as to how to respond to any violation of this policy, any disciplinary process will be undertaken in accordance with all applicable local laws and other legal requirements.

Where a 3rd Party does not comply with this policy, a quality incident report will be raised with the 3rd Party.

9. Changes to this Policy

We reserve the right to revise or modify this Privacy Policy. In addition, we may update this Privacy Policy to reflect changes to our data practices. If we make any material changes we will notify you by means of a notice on our company website prior to the change becoming effective. We encourage you to periodically review our company website for the latest information on our privacy practices.

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