



POPI Policy And Procedure

1. Purpose

This Privacy Policy sets forth how Trade Link Retail Systems (Pty) Ltd will manage the personal information collected during course of business for specific business operations and/or to meet the requirements of business services per contractual obligation.

2. Scope of the Policy

This Privacy Policy is applicable to the company specifically this Privacy Policy applies to:

- 2.1.1. All individuals who provide Personal Information, such as associates, job applicants, employees, retirees, clients, training providers, government, SETA's, and others.
- 2.1.2. All methods of contact, including in person, written documentation, electronically mail, via the Internet, newsletters, telephone, or facsimile.

This Privacy Policy is designed to inform all associates about their obligation to protect the privacy of all individuals and their Personal Information.

3. Protection

The Company has in place, reasonable commercial standards of technology and operational security to protect all information provided by clients. All reasonable steps will be taken to secure all clients personal information. Authorised staff, who are responsible for the maintenance of any Special Personal Information submitted or received, are required to maintain the confidentiality of such information.

The company has measures in place to secure all electronic data and systems, such as username and passwords which, shall not be shared with other staff or persons. Any person, business or entity who delivers or attempts to deliver any unauthorised, damaging, or malicious code or attempts to gain unauthorised access to the company website shall be held criminally liable, and if the company should suffer any damage or loss, civil damages will be claimed.

4. Liability

As the responsible party the company is fully liable and responsible. The company cannot transfer liability to anyone expect a 3rd party through contractual law. Make regular backups of all sensitive information.

5. Policy

This Privacy Policy describes the company's standard procedure governing access to, and use of the personal information received. As part of the privacy policy, the company will comply with the following legislation pertaining to the business practices; Basic Conditions of Employment Act, Employment Equity Act, Skills Development Act and Occupational Health and Safety Act, Unemployment Insurance Fund, Labour Relations Act, Promotion of Access to Information Act, and other legislation that may apply to the company, its associates, or its clients.

This Privacy Policy does not necessarily describe how local management may handle the Personal Information to comply with local legislations. Local management, in conjunction with Human Resources manager(s), will be responsible for accessing and complying with local regulations regarding the processing of Personal Information.

6. Definitions

RESPONSIBLE PARTY	Refers to the company and its authorized third parties, which determine the purposes and means of processing of Personal Information.
DATA SUBJECT	Refers to any natural or juristic person/s whose information (data elements) are collected, processed, saved, retained, and used within the daily operations of the Responsible Party.
GENERAL BUSINESS PURPOSE	Defined as the Processing of Personal Information for an activity related to the commercial operations of the company. This could include, but is not limited to, sales and marketing, research, and development operations; protecting intellectual property; provision of services; internal operations; information technology and general employment matters. Data processing for general purposes includes, but is not limited to maintaining files, conducting needs analysis and skills audits, various submissions, and processing, conducting reviews, and intra-company communications.
PERSONAL INFORMATION	Defined as any information related to a natural or juristic person. E.g., ID/ Passport number, Phone number, Email address, Physical address, etc.
OPERATOR / 3rd PARTY	Defined as a legal person, or any other entity that processes Personal Information on behalf of the Responsible Party, under its control. In this context, the Operator may be a payroll preparation firm that works on behalf of the company, under the company's control. The company requires Operators to protect the privacy, confidentiality, and security of Personal Information as per the mandate provided to the Operator by the Responsible party.
PROCESSING	Defined as any operation or any set of operations performed upon Personal Information, whether by automatic means, such as collection, submissions, recording, organization, storage, adaption or alteration, retrieval, consultation, disclosure by transmission, dissemination, alignment, or combination, blocking, deletion, or destruction.
SPECIAL PERSONAL INFORMATION (SPI)	Defined as a subset of Personal Information that refers to Religious/ Philosophical beliefs, Ethnic origin, Health/ Sex Life, Biometric data, Criminal record, Disability Status and Salary/ Wages, etc. SPI can only be processed once request from the Information Regulator has been approved and/or is based on requirement from similar legislation and/or explicit consent has been received from the Data Subject

7. Procedure

Use of Personal Information

General business operations authorised individuals within the company, may occasionally utilize and/or transfer Personal Information for necessary General business purposes. Specifically Personal Information may be used as follows:

- i. To identify a Data Subject personally.
- ii. To communicate with a Data Subject (Directly or Indirectly).
- iii. To comply with Human Resource requirements.
- iv. To comply with government legislations; and

- v. To provide manage the business effectively

Integrity of Personal Information

Trade Link Retail Systems (Pty) Ltd will take reasonable steps that Personal Information and Special Personal Information are:

- i. Obtained directly from the Data Subject whom the Personal Information relates as far as reasonably possible.
- ii. Obtained and processed fairly and lawfully by the company for General business purposes.
- iii. Relevant to and no more revealing than is necessary for General business purposes; and
- iv. Updated to maintain accuracy, while information is under control of the company and kept only for long as reasonably necessary.

8. Notice

The company informs Data Subjects about the purposes for which Personal information is collected and used. In certain situations, Personal Information may be rendered anonymous so that the names of the Data Subjects are not known by Operators.

9. Access to Personal Information

Trade Link Retail Systems (Pty) Ltd takes steps to make sure that the Personal Information it uses is correct and will allow Data Subjects reasonable access to Personal Information about themselves during normal working hours and upon request and will be allowed to update and/or correct any inaccurate information. This can be managed and accessed using the PAIA process. The PAIA Manual, which is available to all requestors on the company website or reception desk must be completed to ensure that the right to access information is valid and due course is followed.

10. Procedure for Assessing Personal Information

Questions about Personal Information and/or authorisation to access such information are to be directed to Data Subject's Human Resource manager where applicable internally. Unauthorised access may be grounds for disciplinary actions.

11. Security of Personal Information

Trade Link Retail Systems (Pty) Ltd will take reasonable precautions to protect Personal Information loss, misuse, unauthorised access, disclosure, alteration, and destruction and will direct its associates with responsibility for handling physical documents containing personally identifiable information for such documents (1) must be stored in locked file cabinets when not in use (2) must not be left unsecured in plain view when in use.

12. Transfer of Personal Information

Subject to this policy, the company may occasionally transfer Personal Information for necessary General business purposes, in compliance with country-of-origin regulations. Electronic documents containing personally identifiable information will only be shared with associates who are authorized to process such information and have a need to know such information.

The company will direct its associates with responsibility for handling electronic documents containing Personal information that such electronic documents must be password protected when stored on the Company's information systems or servers that are backed up.

13. Choice

Any Associate whose Personal Information is to be transferred to Third Parties as described in This Privacy Policy may choose not to have their Personal Information transferred. A Data Subject must communicate their desire to "opt-out" as outlined below. Data Subjects who exercise their right to opt-out are to be informed of the impact such opt-out will have on their employment within the company.

A Data Subject may not opt out of transfer of Personal Information which is transferred by Trade Link Retail Systems (Pty) Ltd to a Third Party for the following purposes:

- i. Submission Purposes.
- ii. Meeting applicable legal requirements.
- iii. Permitting the legitimate interests of the company in making promotions, appointments, preparing succession planning and other employment decisions.

14. Accountability

Trade Link Retail Systems (Pty) Ltd expects its associates, employees, and partners to maintain the trust placed in the Company by those Data Subjects who provide personal information to the Company. The company may periodically audit privacy compliance, and where necessary, will extend by contract its privacy policies and information protection practices to the Company' business relationships. Annual assessments will be performed on processes and systems for the evaluation of the security protection and privacy of personally identifiable data.

15. Procedure for Inquiries, Complaints and Opt-Out

Only a customer/client who meet the requirements of other laws based on the retention policy of the company may Opt-Out of their information being processed.

16. Enforcement

The company uses a self-assessment approach to assure compliance with this Privacy Policy and periodically verifies that the policy is accurate, comprehensive for the information intended to be covered, prominently displayed, completely implemented and accessible and in conformity with the principles.

The Company encourages interested persons to raise any concerns using the contact information provided and we will investigate and attempt to resolve any complaints and disputes regarding use and disclosure of Personal Information in accordance with the principles.

17. Enforcement

The company is committed to following the Principles for all Personal Information. However, certain information is subject to policies (e.g. Marketing practices of the company) that may differ in some respects from the general policies set forth in this Privacy Policy. Questions or inquiries concerning this Privacy Policy should be directed to Management.