



1 July 2021

POPI and Privacy Policy

1. Policy Objectives

- The Protection of Personal Information Act, Act No. 4 of 2013 (POPIA), which is effective from 1 July 2021, aims to protect the personal information as defined herein (including Special Personal information) of all persons and further outlines how institutions should safeguard, collect, process, store, share and manage this information.
- **Fernridge Solutions (Pty) Ltd knows that you care how information about you is used and shared and we appreciate your trust in us to do that carefully and sensibly.**
- We respect your privacy and is committed to keeping your personal information secure and confidential in compliance with POPIA.
- We are committed to protecting your privacy and ensuring transparency in how we handle your data. We therefore have this policy in place.
- This policy describes the types of personal information that we may collect about you, the purposes for which we use the information, and the steps that we take to safeguard the information to protect your privacy.
- As used throughout this policy, the term " the Company, "us" or "we" refers to Fernridge Solutions (Pty) Ltd.
- By engaging with us, you are accepting and consenting to the practices described in this privacy policy.

2. What is personal information?

Personal information refers to any information that identifies an individual or specifically relates to you. Personal information includes, but is not limited to, the following information about you:

- Marital status
- National origin
- Age

- Language
- Birth place
- Education
- Relevant financial history
- Identifying number (like an employee number, identity number, or passport number)
- E-mail address; physical address (like residential address, work address or your physical location); telephone number
- Biometric information (like fingerprints, facial features, signature, or voice)
- Race; gender; sex; pregnancy status; ethnic origin; social origin; colour; sexual orientation
- Physical health; mental health; well-being; disability; religion; belief; conscience; culture
- Medical history; criminal history; employment history
- Personal views, preferences and opinions
- Another's views or opinions about you
- Full names and initials

3. Special Personal information

Personal information also includes special personal information which is information about the following:

- Race (like where a company submits reports to the Department of Labour where the statistical information must be recorded)
- Ethnic origin
- Trade union membership
- Health (like where you apply for an insurance policy)
- Biometric information (like to verify your identity); and / or your criminal activity and alleged commission of an offense.

4. When will we process your personal information?

We will only process this personal information for lawful purposes relating to our business if the following applies:

- If you have consented thereto (which, in the case of an employee, you have done so in your employment contract)
- If a person legally authorised by you, the law, or a court, has consented thereto
- If you interact with us and have knowledge or could reasonably expected to have knowledge of this privacy policy
- If it is necessary to conclude or perform under a contract we have with you
- If the law or public international law requires or permits it.
- If it is required to protect or pursue your, our, or a third party's legitimate interest.

- If the personal information has deliberately been made public.
- For historic, statistical or research purpose that serves the public interest or if it would be disproportionate or impossible to obtain consent, however your privacy will not be infringed upon disproportionately.

5. Reasons we need to process your personal information

We will process your personal information for the following reasons:

- To provide you with products, goods, and services.
- To market our products, goods, and services to you.
- To respond to your enquiries and complaints.
- To prepare a quotation for services.
- To comply with legislative, regulatory, risk, and compliance requirements (including directives, sanctions, and rules), voluntary and involuntary codes of conduct and industry agreements or to fulfil reporting requirements and information requests.
- To conduct market and behavioural research.
- To develop, test, and improve products and services for you.
- For historical, statistical, and research purposes, like market segmentation.
- To process payment instruments.
- To create, manufacture, and print payment advices, payslips and invoices.
- To enable us to deliver goods, documents, or notices to you.
- For security, identity verification, and to check the accuracy of your personal information.
- To communicate with you and carry out your instructions and requests.
- For customer satisfaction surveys, and promotional offerings.
- To enable you to take part in and make use of value-added products and services.
- To pursue our legitimate interests or yours.
- For any other related purposes.

6. Does the Company share the information it receives?

Information about our clients, partners and employees is an important part of our business and we do not sell it to others.

7. Access to Personal Information

7.1 You have certain rights under POPIA including the following, a right of access and having provided adequate proof of identity has the right to:

7.1.1 request us to confirm whether any personal information is held about you; and/or

7.1.2 request us to provide a description of the personal information held by us including information about third parties who have or have had access to the personal information.

7.2 We will confirm, free of charge, whether we hold any personal information about you, and to obtain the record or description of personal information concerning you it and any information regarding the recipients or categories of recipients who have or had access to the personal information. Such record or description is to be provided within a reasonable time, and in a reasonable manner and format and in a form that is generally understandable. You may also request us to –

7.2.1 correct or delete personal information about you in our possession or under our control that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully;

7.2.2 or destroy or delete a record of personal information about you that we are no longer authorised to retain records in terms of POPIA's retention and restriction of records provisions.

7.3 On receipt of such a request, we are required to, as soon as is reasonably practicable –

7.3.1 correct the information;

7.3.2 delete or destroy the information;

7.3.3 provide you with evidence in support of the information; or

7.3.4 where we cannot reach agreement on the request and if requested by you we will take reasonable steps to attach to the information an indication that correction has been requested but has not been made;

7.3.5 a right to withdraw consent and to object to processing. If you previously consented to the processing of your personal information, you have the right to withdraw such consent and may do so by providing us with notice to such effect at the address set out above. Further, you may object, on reasonable grounds, to the processing of personal information relating to you.