g) **Security safeguards** - a Responsible Party must take reasonable steps to ensure that adequate safeguards are in place to ensure that Personal Information is being processed responsibly and is not unlawfully accessed.

h) **Data Subject participation** - the Data Subject must be made aware that their information is being processed and must have provided their informed consent to such processing.

11. PURPOSE OF THE PROCESSING

Personal Information may only be Processed for a specific purpose. The Company uses personal information under its care in the following manner:

a) Administration
b) Rendering services according to contractual agreements
c) Staff administration
d) Complying with Tax Laws
e) Keeping accounts of records

12. CATEGORIES OF DATA SUBJECTS

As per section 1 of POPI, a Data Subject may either be a natural or a juristic person. The table below sets out the various categories of Data Subjects that the Company processes.

The Company may process records relating to:

Data Subject	Information Processed
Clients – Natural Persons	Names, contact details, postal address, date of birth, ID number, Tax related information, nationality, gender, confidential correspondence
Clients – Juristic Persons / Entities	Names of contact persons, Name of Legal Entity, Physical and Postal address and contact details, Registration Number, Founding documents, Tax related information, authorised signatories, Employee details (name, email, address, contact number)
Service Providers	Names of contact persons; Name of Legal Entity, Physical and Postal address and contact details, Registration Number, Founding document, Tax related information, authorised signatories, beneficiaries, ultimate beneficial owners
Vendors	Names of contact persons; Name of Legal Entity, Physical and Postal address and contact details, Registration Number, Founding document, Tax related information, authorised signatories, beneficiaries, ultimate beneficial owners

Employees / Directors	Gender, Pregnancy, Marital Status, Ethnicity, Age, Language, Education information, Financial Information, Employment History, ID number, Physical and Postal address, Contact details, Criminal behaviour and history, Well-being

13. RECIPIENTS OF PERSONAL INFORMATION

The below mentioned outlines the recipients to whom the Company may provide a Data Subjects Personal Information to:

a) Any firm, organisation or person that the Company uses to collect payments and recover debts or to provide a service on its behalf;
b) Any firm, organisation or person that/who provides the Company with products or services;
c) Any payment system the Company uses;
d) Regulatory and governmental authorities or ombudsmen, or other authorities, including tax authorities, where the Company has a legal duty to share information;
e) Third parties to whom payments are made on behalf of employees;
f) Financial institutions from whom payments are received on behalf of data subjects; and
g) Employees, contractors and temporary staff;

14. CROSS-BORDER FLOWS OF PERSONAL INFORMATION

14.1. Section 72 of POPI provides that Personal Information may only be transferred out of the Republic of South Africa:

a) If the recipient country can offer such data an "adequate level" of protection. This means that its data privacy laws must be substantially like the Conditions for Lawful Processing as contained in POPI; or
b) If the Data Subject consents to the transfer of their Personal Information; or
c) If the transfer is necessary for the performance of a contractual obligation between the Data Subject and the Responsible Party; or
d) If the transfer is necessary for the performance of a contractual obligation between the Responsible Party and a third party, in the interests of the Data Subject; or
e) If the transfer is for the benefit of the Data Subject, and it is not reasonably practicable to obtain the consent of the Data Subject, and if it were, the Data Subject, would likely provide such consent

14.2. Personal Information may be transmitted cross – border to the Company's suppliers in other countries, and Personal Information may be stored in data servers hosted outside South Africa, which may not have adequate data

protection laws. The Company will endeavour to ensure that its dealers and suppliers will make all reasonable efforts to secure such data and Personal Information.

15. DESCRIPTION OF INFORMATION SECURITY MEASURES TO BE IMPLEMENTED

The Company undertakes to institute and maintain the data protection measures to accomplish the following objectives outlined below. The details given are to be interpreted as examples of how to achieve an adequate data protection level for each objective. The Company may use alternative measures and adapt to technological security development, as needed, provided that the objectives are achieved

a) **Access Control of Persons**
The Company shall implement suitable technical and organizational measures in order to prevent unauthorized persons from gaining access to the data processing equipment where the data is processed.

b) **Data Memory Control**
The Company undertakes to implement suitable measures to prevent unauthorized input into data memory and the unauthorised reading, alteration or deletion of stored data.

c) **User Control**
The Company shall implement suitable measures to prevent its data processing systems from being used by unauthorised persons by means of data transmission equipment.

d) **Access Control to Data**
The Company represents that the persons entitled to use the Company's data processing system are only able to access the data within the scope and to the extent covered by their respective access permissions (authorisation).

e) **Transport Control**
The Company shall implement suitable measures to prevent data from being read, copied, altered or deleted by unauthorized persons during the transmission thereof or during the transport of the data media.

16. OBJECTION TO THE PROCESSING

Section 11 (3) of POPI and regulation 2 of the POPIA Regulations provides that a Data Subject may, at any time object to the Processing of his/her/its Personal Information in the prescribed form attached to this manual (Annexure A).

17. REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION

Section 24 of POPI and regulation 3 of the POPI Regulations provides that a Data Subject may request for their Personal Information to be corrected/deleted in the prescribed form as per Annexure B.

18. REQUEST TO ACCESS RECORD

18.1. Section 17 of POPI provides that the Responsible Party must maintain the documentation of all processing operations under its responsibility. Should the Data Subject require access to a record, the Data Subject is required to complete Form 2 "Request to Access Record."

18.1.1. Form 2 is available for download on the Company's website.

18.1.2. Once Form 2 is completed kindly submit same to: Richardh@firsttech.co.za and mekailr@firsttech.co.za

19. OUTCOME OF REQUEST AND OF FEES PAYABLE

19.1. After the Data Subject's request as per Form 2 is received, the Data Subject will receive Form 3 (as soon as reasonably possible) which contains the details pertaining to the fees that must be paid prior to processing the Data Subjects the request.

19.2. A copy of Form 3 is available for download and perusal on the Company's website.

ACCEPTANCE

Agreed to and accepted for and on behalf of the Company on this the 16TH day of OCTOBER 2023.

Name : Mekail Ramjee

Capacity : Head of Group Risk and Compliance

(Duly Authorised)

ANNEXURE A

Prescribed Form for the Objection to the Processing of Personal Information

(Section 11(3), Protection of Personal Information Act,2013 (Act No. 4 Of 2013))

Please Note:

a. Affidavits or other documentary evidence in support of the object needs to be attached to this form.
b. If more space is required add additional pages as appendices to this form.

A	DETAILS OF DATA SUBJECT
Name(s) and surname/ registered name of data subject:	
Unique Identifier/ Identity Number	
Residential or business address:	
Contact number(s):	
E-mail address:	
B	**DETAILS OF RESPONSIBLE PARTY**
Name(s) and surname/ registered name of data subject:	
Residential or business address:	
Contact number(s):	
E-mail address:	
C	**REASONS FOR OBJECTION IN TERMS OF SECTION 11(1)(d) to (f) (Please provide detailed reasons for the objection)**

ANNEXURE B

Prescribed Form for a Request for Correction or Deletion of Personal Information or Destroying or Deletion of Record of Personal Information in terms of Section 24(1) of the Protection of Personal Information Act, 2013

Regulations Relating to the Protection of Personal Information, 2018 [Regulation 3]

Note:

1. Affidavits or other documentary evidence as applicable in support of the request may be attached.
2. If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.
3. Complete as is applicable.
4. Mark the appropriate box with an "**x**".

I. ☐ Correction or deletion of the personal information about the data subject which is in possession or under the control of the responsible party

II. ☐ Destroying or deletion of a record of personal information about the data subject which is in possession or under the control of the responsible party and who is no longer authorised to retain the record of information

A	Details of Data Subject
Name(s) and surname/ registered name of data subject:	
Unique Identifier/ Identity Number	
Residential, postal or business address:	
Contact number(s):	
E-mail address:	
B	**DETAILS OF RESPONSIBLE PARTY**
Name(s) and surname/ registered name of data subject:	
Residential, postal or business address:	

Contact number(s):	
E-mail address:	
C	**Reasons for Objection in Terms of Section 11(1)(D) to (F) (Please Provide Detailed Reasons for The Objection)**
D	**Reasons for *Correction or Deletion of the Personal Information about the Data Subject in Terms of Section 24(1)(a) which is in Possession or Under the Control of the Responsible Party; and or Reasons for *Destruction or Deletion of a Record of Personal Information about the Data Subject in Terms of Section 24(1)(b) which the Responsible Party is no longer Authorised to Retain. (Please Provide Detailed Reasons for the Request)**