

POPI Policy Document

PROTECTION OF PERSONAL INFORMATION ACT POLICY

The Focus Human Resource Group (Pty) Ltd and all associated subsidiary or related companies, including Focus Kamoso (Pty) Ltd and The Focus Employee Benefits Group (Pty) Ltd.

P.O.Box. 411030, Craighall, 2024

30 Seventh Avenue, Parktown North, Johannesburg, 2193

Phone number:011 486 9700

Email : sharen@focusgroup.co.za / gavin@focusgroup.co.za

Introduction

We are committed to compliance with The Protection of Personal Information (POPI) Act and will always:

1. Sufficiently inform Data Subjects (clients, client's employees, Data Subjects/applicants/work-seekers hereafter referred to as "Data Subjects"), the specific purpose for which we will collect and process their personal information;
2. Protect Personal Information from threats, whether internal or external, deliberate or accidental, to ensure business continuation, minimise business damage and maximise business opportunities.

This Policy establishes measures, processes and standards for the protection and lawful processing of personal information.

The **Information Officer**, Sharen Govender, is responsible for:

- Monitoring this policy;
- Ensuring that this policy is supported by appropriate documentation;
- Ensuring that this policy and subsequent updates are communicated to relevant managers, representatives, staff and associates, where applicable.

All employees are responsible for adhering to this policy and for reporting any security breaches or incidents to the Information Officer.

IT and Off-site Data Storage Service Providers/Operators must satisfy us that they provide adequate protection of the data they hold on our behalf.

Policy Principles

Accountability for Data to be collected.

- We shall take reasonable steps to safeguard all Data and Personal Information collected from Data Subjects for the purpose of any services provided by The Focus Group.

Processing Limitation/Purpose for Data Collection

- We will collect personal information directly from Data Subjects.
- Personal Information from Social Networks and Job-seeker portals will be collected with express consent of the Data Subject/s.
- Once in our possession we will only process or further process Data Subject information with their consent, except where we are required to do so by law. In the latter case we will always inform the Data Subject.

Specific Purpose

- Personal information collected from Data Subjects will be used to provide services to Data Subjects including Recruitment Services, Payroll Services, Employee Benefits Services, Financial Services, Human Resource Services and additional related services as requested from Data Subjects.

Limitation on Further Processing

- Personal information may not be further processed in a way that is incompatible with the initial purpose for which it was collected and will only be done with the express consent of the Data Subject.

Information Quality

- We shall ensure that Data Subjects information is complete, up to date and accurate before we use it. We will request Data Subjects, at least once annually, to update their information and confirm that we may continue to store/retain same. If we are unable to contact a Data Subject their information will be deleted from our records.

Transparency/Openness

- Where personal information is collected from a source other than directly from a Data Subjects (EG Social media, Job portals) we will make Data Subjects aware:
 - That their information is being collected and the specific reason;
 - Who is collecting their information by giving them our details;

Data Security

- We will implement sufficient measures to guard against the risk of unlawful access, loss, damage or destruction of personal information that is held;
 - Physically;
 - in our electronic data base;
 - by a Data Storage Service Provider;
 - in any electronic devices (that will be Password protected).
- Data encryption of storage devices will be installed.
- We are committed to ensuring that information is only used for legitimate purposes with Data Subjects consent and only by authorised employees of The Focus Group.

Participation of Individuals/Complaints

- Data Subjects are entitled access to, and to correct any information held by us.
- Complaints should be submitted in writing to the Information Officer for Resolution.
- Requests to Access, Correct or Delete information must be made on the attached *Annexures 1 and 2* and submitted to the Information Officer.

Operational Considerations

Monitoring

The Board/Management and Information Officer are responsible for ensuring adherence to Standard Operating Procedures.

All employees and individuals directly associated with providing service activities will be trained in the regulatory requirements governing the protection of Personal Information.

We will conduct periodic reviews and audits, where appropriate, to ensure compliance with this policy and guidelines.

Policy Compliance

Any breach of this policy could result in disciplinary action and termination of employment.