



PROTECTION OF PERSONAL INFORMATION POLICY¹

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	SGT Solutions (Pty) Ltd	Document Number
		900020-00001N00
	Protection of Personal Information Policy	Revision Number
		01.00
	Date	
	2021-06-17	

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1. PROCESSING OF PERSONAL INFORMATION

SGT Solutions (Pty) Ltd (SGT) takes the privacy and protection of personal information very seriously and will only process personal information in accordance with the South African legislation and regulations (as amended from time to time). Accordingly, the relevant personal information privacy principles relating to the processing thereof (including, but not limited to, the collection, handling, transfer, sharing, correction, storage, archiving and deletion) will be applied to any personal information processed by SGT.

2. THE PURPOSE OF PROCESSING OF PERSONAL INFORMATION BY SGT


We process personal information for a variety of purposes, including, but not limited to, the following:

- To provide or manage any information, products and/or services requested by data subjects;
- To help us identify data subjects when they contact SGT;
- To maintain customer records;
- For recruitment purposes;
- For employment purposes;
- For apprenticeship purposes;
- For travel purposes;
- For general administration, financial, audit and tax purposes;
- For legal and/or contractual purposes;
- For health and safety purposes;
- To monitor access, secure and manage our premises and facilities;
- To transact with our suppliers and business partners;
- To help us improve the quality of our products and services;
- To help us detect and prevent fraud and money laundering;
- To help us recover debt;
- To carry out analysis and customer profiling; and
- To identify other products and services that may be of interest to data subjects and to inform them about our products and services.

3. GENERAL RULES RELATING TO PERSONAL INFORMATION

Personal information shall at all times be:

- Processed fairly and lawfully, in accordance with legal standards applicable to such data or data categories;
- Obtained only for a specific lawful purpose;
- Adequate, relevant and not excessive;
- Accurate, and kept up to date;
- Held for no longer than necessary for the purpose it was obtained for;
- Processed in accordance with the rights of data subjects;
- Be protected in appropriate ways, methodologies and procedures and according to suitable methods, both organizationally and technically;
- Not be disclosed or transferred or exported illegally, or in breach of any agreement with a supplier, service provider or a customer.

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4. CATEGORIES OF DATA SUBJECTS AND PERSONAL INFORMATION PROCESSED BY SGT

Categories of data subjects and personal information processed by SGT include the following:

Categories of Data Subjects	Personal Information Processed
Customers and potential customers	Customer personal information Customer contracts, products & warranties
OEM's/suppliers/partners <ul style="list-style-type: none"> ▪ Their employees 	OEM/supplier/partner/or its representative's personal information No information processed
SGT employees	Employee personal information Employee medical information (including medical aid) Employee disability information Employee pension & provident fund information Employee contracts Employee performance records Payroll records Electronic access records Physical access records Surveillance records Health and safety records Training records Employment history Time & attendance records
Job applicants	CV & application forms Criminal checks Background checks
Children – External parties	No information processed
Children – SGT employees	Limited information processed
Visitors	Physical access records Electronic access records Surveillance records


5. RECIPIENTS OR CATEGORIES OF RECIPIENTS WITH WHOM PERSONAL INFORMATION IS SHARED

We may share the personal information of our data subjects for any of the purposes outlined in Clause 2, with the following:

- Our carefully selected business partners who provide products and services; and
- Our service providers who perform services on our behalf.

We do not share the personal information of our data subjects with any third parties, except if:

- We are obliged to provide such information for legal or regulatory purposes;
- We are required to do so for purposes of existing or future legal proceedings;
- We are involved in the prevention of fraud, loss, bribery or corruption;
- They perform services and process personal information on our behalf;
- This is required to provide or manage any information, products and/or services to data subjects; or
- Needed to help us improve the quality of our products and services.

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We will send our data subjects notifications or communications if we are obliged by law, or in terms of our contractual relationship with them.

We will only disclose personal information to government authorities if we are required to do so by law.

Our employees, service providers and suppliers are required to adhere to data privacy and confidentiality principles and to attend data privacy training.

6. INFORMATION SECURITY MEASURES TO PROTECT PERSONAL INFORMATION

Reasonable technical and organizational measures have been implemented for the protection of personal information processed by SGT and its operators. In terms of the PoPI Act, operators are third parties that process personal information on behalf of SGT.

We continuously implement and monitor technical and organizational security measures to protect the personal information we hold, against unauthorized access, as well as accidental or willful manipulation, loss or destruction.

We will take steps to ensure that operators that process personal information on behalf of SGT apply adequate safeguards as outlined above.

7. TRANSBORDER FLOWS OF PERSONAL INFORMATION

We will only transfer personal information across South African borders if the relevant business transactions or situation requires transborder processing, and will do so only in accordance with South African legislative requirements, or if the data subject consents to transfer of their personal information to third parties in foreign countries.

We will take steps to ensure that operators are bound by laws, binding corporate rules or binding agreements that provide an adequate level of protection and uphold principles for reasonable and lawful processing of personal information, in terms of the PoPI Act.

We will take steps to ensure that operators that process personal information in jurisdictions outside of South Africa, apply adequate safeguards as outlined in Clause 6.

8. PERSONAL INFORMATION RECEIVED FROM THIRD PARTIES

When we receive personal information from a third party on behalf of a data subject, we require confirmation that they have written consent from the data subject that they are aware of the contents of SGT's PoPI & PAIA Manual² and this Data Protection Policy, and do not have any objection to our processing their information in accordance with this policy.

1. This policy applies to and is available to all external parties, i.e. OEM's, partners, suppliers, service providers and customers.
2. SGT's PoPI & PAIA Manual is available on written request addressed to the "Commercial Department: Legal Services" and sent by email to sgtinfo@sgtsolutions.co.za or jkruger@sgtsolutions.co.za