	Personal Information Protection Policy (Copper 360 Ltd)				Document Ref.:	LAW - 003
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PERSONAL INFORMATION PROTECTION POLICY


Administrative Information

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PERSONAL INFORMATION PROTECTION POLICY

1. OUR CONTACT DETAILS

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2. INTRODUCTION

Copper 360 Ltd (“**Copper 360**”) has a proud tradition of conducting business in accordance with the highest ethical standards and in full compliance with all applicable laws. The Personal Information Protection Policy was developed at the direction of Copper 360 to provide clear guidance to all Copper 360 employees and to ensure a consistent approach to business practices throughout Copper 360 expanding operations.


Copper 360 is fully committed to conduct business with the highest level of integrity, and we expect your strict adherence to the Personal Information Protection Policy and the law. There will be zero tolerance of non-compliance, and any violations will result in swift corrective action, including possible termination of employment from Copper 360.

This Policy lays down the rules and principles relating to the processing of personal information of persons of concern to Copper 360. Copper 360 continually has access to and needs to process personal and general information.

This policy sets out how such personal information shall be processed, handled and stored to meet the Personal Information Protection standards of Copper 360 and to comply with the legal standards governing its clients as well as future legislation which may be enacted into law in South Africa in the foreseeable future.

This Personal Information Protection Policy seeks to ensure that Copper 360:

- Complies with international legal standards and best practice for the receipt, importing, processing, handling and storing of personal information of our clients (“**Information Subjects**”), both as received from its clients, and as held in respect of its own employees;

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- Protects the rights of its own employees, as well as that of its clients and third parties in respect of client information;
- Transparently renders how it processes, handles and stores client information;
- Protects itself from the risks of an information breach.

3. LEGISLATIVE ENVIRONMENT

This policy seeks to align best practice in Copper 360 with legal standards governing its clients, as well as the *Protection of Personal Information Act 4 OF 2013 (“POPI”)*.

In doing so, it is acknowledged that Copper 360 does not collect or gather information from its clients but receives and/or imports information from clients to enable Copper 360 to providing services. Copper 360 does however, collect or gather information from its own employees for various purposes related to human resources and employment benefit administration.

4. SCOPE


4.1. Application

Any information related to an individual who can be identified from that information; from that information and other information; or by means reasonably likely to be used related to that information.

This policy applies to all employees of Copper 360 in respect of all personal information accessed in the provision of services by Copper 360 to its clients, as well as the management of its employment relationships with its own employees.

It further applies to all information that it holds relating to identifiable clients, including, but not limited to the following:

- names of individuals;
- physical addresses;
- postal addresses;
- email details;
- all telephone and mobile phone numbers;
- all social media tags and identifiers;
- absolutely all information and information relating to an individual received from a client in the course of providing services to such client, and/or all information of an information subject protected for the benefit of such individual in terms of POPIA or sought to be protected by the latter statute.

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4.2. Protection

This policy seeks to protect Copper 360 from various very real information security risks including;

Breaches of confidentiality through information breaches, hacking risks, and the risks of liability in relation to its clients, third parties' information acquired from such clients and all its own employees.

The rules and standards set out in this policy applies regardless of –

- whether personal information relates to a client or an employee of Copper 360, and/or
- is stored electronically, digitally, on paper, or on other materials, or through other methods.


5. 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 information or information categories;
- obtained only for specific lawful purposes;
- 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 Information Subjects;
- be protected in appropriate ways, methodologies and procedures and according to suitable methods, both organisationally and technologically;
- not be disclosed or transferred or exported illegally, or in breach of any agreement with a client.

6. RESPONSIBLE PARTIES

All employees shall continually be responsible for ensuring the safeguarding, protection and avoidance of any unauthorised disclosure or breach of information personal information in the execution of employment duties and services to Copper 360, or otherwise in the course of rendering services or being associated with the company.


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6.1. The Information Officer shall -

- be registered as the responsible officer under POPI;
- execute, and bear responsibility for reporting to executive management about compliance with all technological and operational Personal Information Protection standards and protocols and advise of any risk of breach at the earliest opportunity with a view to avoiding any risk or breach or limiting any damage resulting from it. To ensure compliance with this provision, a Breach Notification Form must be completed by any employee of Copper 360 who becomes aware of any breach /or possible breach;
- ensure that all operational and technological Personal Information Protection standards are complied with;
- arrange Personal Information Protection training and provide advice and guidance to all employees;
- be entitled and have authorisation to initiate disciplinary proceedings against any employee who at any time breaches any technological and/or organisational and/or operational Personal Information Protection standard, rule, custom, instruction, policy, practice and/or protocol (verbal, in writing or otherwise) ("**rule**") applicable in any department or area of the operations of the company;
- review and approve any contracts or agreements with third parties to the extent that they may handle or process information subject information;
- attend to requests from individuals to access information Copper 360 holds about them ("**Information Subject Requests**").

6.2. The IT Manager (External IT Service Provider) shall -

- ensure that all systems services and equipment used for processing and/or storing information adhere to internationally acceptable standards of security and information safeguarding, and is regularly updated to continue to comply with such standards;
- issue appropriate, clear, regular rules and directives, whether for the organisation as a whole or a particular part of it, department, person or level of person in relation to any aspect of the company's work, including password protocols, information access protocols, levels of persons who enjoy access to certain information sign-on procedures, password safeguarding protocols, sign-on and sign-off procedures, log-on and log-off procedures; the description of accessories, applications and equipment that will or may be used, and/or that may not be used under any circumstances, and the like.
- evaluate any third-party services the company is considering or may acquire to process or store information, e.g. cloud computing services.

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Note: It is acknowledged that these rules, directives and protocols are in themselves operationally confidential and to the company and organisation, and may be adjusted or changed at any time whether verbally or otherwise for a particular individual or group of individuals or the company as a whole, in order to ensure an adaptive, responsive, efficient functional IT management system which serves the requirements and risks of Copper 360 and all its clients and employees. For this reason, it is confirmed that not all such rules, directives and protocols will be captured in writing, as it may undermine or impair the afforested goals, if should this be the case.

7. GENERAL PERSONAL INFORMATION PROTECTION RULES

All personal information shall be deemed confidential information and be handled as such.


The only person/s entitled to access information covered by this policy, will be those who need to access it for the execution of their direct work services or required outputs.

Under no circumstances will information or personal information be shared outside the scope of required work outputs, or informally. In the event of any doubt, an employee shall be entitled to access confidential information only after obtaining authorisation from their manager, where any work output requiring access is unusual or out of the ordinary.

Employees will receive induction and on-the-job training in relation to all security standards applicable to such employee's service delivery and work outputs involving personal information of information subjects. Employees shall keep all information secure by taking sensible practical precautions and complying with all rules, practices and protocols:

- In particular, strong passwords shall be used at all times;
- Passwords shall not be shared under any circumstances.

Note: In the exceptional circumstance that a password may require to be shared, it shall only take place after explicit, provable authorisation has been procured from a manager before sharing it, and then only for the stated purpose. All necessary steps shall be taken after a password has been shared in such exceptional circumstances, to reset it to a strong, unique password to avoid future information compromise or breach.

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8. INFORMATION STORAGE

8.1. Paper

Where information is stored on paper, it will always be kept in a secure place where an unauthorised person cannot access or see it. This also applies to information stored electronically which has been printed out.

When the papers are not required by an employee, such papers should be kept in a locked drawer, safe or cabinet.

Employees should ensure that paper and print outs are not left in places where unauthorised persons can see them, e.g. on a printer, and all unwanted paper must be shredded.

8.2. Electronic Information


Where information is stored electronically, it must be protected from unauthorised access, accidental deletion or any risk of exposure to malicious hacking attempts:

- Information should be protected by strong passwords that are changed regularly and never shared between employees;
- Where information is stored on removable media such as a CD, DVD or USB these must at all times be locked away securely when not in immediate use;
- All information will only be stored on designated drives and servers and shall only be uploaded to approved cloud computing services;
- All servers containing personal information will be located in a secure and protected location;
- Information will be backed up frequently in accordance with backup protocols. Such backups will be tested regularly in line with the organisation's standard backup procedures and protocols under the direction of the IT Manager. The Information Officer will be responsible to schedule a minimum of two random tests each year;
- All servers and computers containing information will be protected by approved security software, and one or more firewalls under the direction of the IT Manager.

9. BASIC PRINCIPLES OF PERSONAL INFORMATION PROCESSING

Copper 360 employees need to respect and apply the following basic principles when processing personal information:

- Legitimate and fair processing

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- Purpose specification
- Necessity and proportionality
- Accuracy
- Respect for the rights of the Information Subject
- Confidentiality
- Security
- Accountability and supervision


10. INFORMATION USE

- It is acknowledged that personal information is at the greatest risk of loss, breach of confidentiality, corruption, hacking or theft when it is accessed or used. Therefore when working with personal information, employees should ensure that screens of their computers are always locked when left unattended;
- Personal information will not be shared informally, and in particular it will never be sent by email or without protection with appropriate passwords, where required to be sent by email;
- Information shall be encrypted before being transferred electronically. The IT manager together with the Information Officer will develop and maintain protocols for information transfer to ensure it is sent in protected form to authorised external contacts only, and to avoid it being sent to any unauthorised external or internal parties;
- Personal information shall never be transferred or sent to any entity not authorised directly to receive it;
- Employees are prohibited from saving copies of personal information to their own computers;
- Employees will at all times access and update only the central, official copy of any information or work output document.

Personal information is not of value to Copper 360, unless the business makes use of it in the course of providing services to its clients or administering its own employment relationships with employees.

11. INFORMATION ACCURACY

- Employees shall take reasonable steps to comply with organisation rules and work practices to ensure information is kept accurate and up to date;
- The more important the accuracy of any component of personal information is, the greater the effort and measures will be to ensure its accuracy;

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- Information will always be held in as few places as necessary to ensure efficient service delivery and risk avoidance. Employees are not permitted to create any unnecessary additional information sets;
- Employees will make use of every opportunity to ensure that an information component is accurate and up to date, e.g. by confirming details when handling a client call.

Employees shall at all times remain knowledgeable and informed about all information updating practices and work protocols used by Copper 360, such as updating via official, acknowledged websites and platforms used by clients.