

DATA PROTECTION AND PRIVACY POLICY

2026**REV 003**

Introduction

The Protection of Personal Information – or POPI – Act regulates how organisations handle personal information, whether it's for individuals or other businesses. This Data Protection and Privacy Policy includes how information will be stored, processed and shared by ASPASA.

Procedure

Data Protection

- ASPASA commits to continually uphold that the person responsible for instructing the Information Technology contractors to ASPASA, is the person responsible for the processing of the information.
- ASPASA addressed all security on all personal information. Personal information is at least secure, but not limited to, in the following areas:
 - On end-points;
 - Data in transit;
 - Data stored in cloud;
 - In terms of antivirus, malware, trojan's, worms, phishing employed etc.
- All Company officials, employees, vendors and clients are appropriately informed of measures taken to protect personal information and the processing of personal information. Unauthorized persons have no access to personal information and all persons who do have access, have minimum appropriate access to personal information.
- Those who hold or process information consent to full surveillance of processing of personal information and consented to personal accountability for such processing. All processors committed to protect personal information and to procure instruction on deemed processing.
- ASPASA procured the commitment of all processors of personal information to employ maximum security and secrecy on all personal information and to personally assume the responsibility to employ measures to protect personal information on all electronic equipment.
- Mobile devices are to be treated like firearms. Devices are always kept on the processor's person. Neither the device nor any information on the device is ever given to third parties who do not hold the written consent of the data subject. Business data will always be kept separate from personal data – i.e., personal information.
- Data is encrypted in order to safeguard data against third parties. Data pertains to non-electronic files, end-point data, data in transit and hosted or cloud data. Least number of security codes are kept by least number of employees. The data specialist appointed by ASPASA will take into account all risk factors and address same to the satisfaction of the POPI Act. Where possible, the number of data storages is maximized.
- ASPASA has done a risk and impact assessment on all cloud computing and is satisfied that its cloud computing adheres to the requirements of the POPI Act.
- All non-electronic personal information is kept safe and rules and regulations are applicable to access of filing facilities and office spaces. Risk is reduced to the minimum on all aspects of processing personal information in that information is held behind the maximum practical guarded physical barriers as the environment allows.
- All handlers of physical security acknowledged that they are responsible for compliance and undertake to ensure full compliance to the POPI Act. All personal information will always be kept and attended to in a secure manner.
- Personal information is only used for the purpose obtained as instructed by the data subject.

ASPASA MANCOM:

Letisha van den Berg – ASPASA Director; Collin Ramukhubathi – Chairperson; Trevor McAdam – Vice Chairperson; Glenn Johnson; Jeremy Hunter-Smith; Arthur Ndindani; Oscar Goudriaan; Victor Lupuwana; Herkie Sandenbergh; Jacques Stokes

Privacy Policy

- For the POPI Act, ASPASA is deemed to be an organization that engages in all aspects of business. It follows that personal information could be processed in some of the following categories:
 - Employees
 - Clients
 - Vendors
 - Stakeholders, i.e. shareholders
 - Governing bodies, i.e. directors
 - Statutory bodies, i.e. SARS
 - Public viewers, i.e. websites
 - Hostile invaders i.e. hackers
- A list of the processors, persons privy to the processing is inserted here. The following general information is collected from the parties above:
 - Name
 - Surname
 - Address
 - Contact Details
 - All labour related information
 - All client information relating to accounting, products, services in common
 - All vendor information relating to accounting, products, services in common
 - Information stakeholders could be interested in
 - Information governing bodies could be interested in
 - All Statutory information on which ASPASA is to report / act upon
 - Information destined for marketing and sales in future
 - Purpose for holding information
- ASPASA vows to protect the information as prescribed by the POPI Act. As far as ASPASA understands, all personal information is private and attended to according to the POPI Act.
- ASPASA will at all times measure the risk of breach of the POPI Act and actively manage same on a daily basis.

References

“POPI” THE PROTECTION OF PERSONAL INFORMATION ACT, ACT No. 4 OF 2013

This policy will be reviewed annually and revised when necessary.



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