

Protection of Personal Information Policy



CIVIL CONCEPTS (PTY) LTD

Definitions

Data Subject	means the person to whom personal information relates
POPIA	means the Protection of Personal Information Act 4 of 2013
Responsible Party	means a public or private body or any other person which, alone or in conjunction with others, determines the purpose of and means for processing personal information (for the purpose of this document will mean the party with a contractual obligation to Civil Concepts

1. Data protection principles

Civil Concepts is committed to processing data in accordance with its responsibilities under the POPIA.

POPIA requires that personal data shall be:

- a. processed lawfully, fairly and in a transparent manner in relation to individuals;
- b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;

- e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the POPIA in order to safeguard the rights and freedoms of individuals; and
- f. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.”

2. General provisions

- a. This policy applies to all personal data processed by Civil Concepts.
- b. The Responsible Person shall take responsibility for the Organisation’s ongoing compliance with this policy.
- c. This policy shall be reviewed at least annually.
- d. The Organisation shall register with the Information Commissioner’s Office as an organisation that processes personal data.

3. Lawful, fair and transparent processing

- a. To ensure its processing of data is lawful, fair and transparent, the Organisation shall maintain secure systems.
- b. The systems shall be reviewed continually.
- c. Individuals have the right to access their personal data and any such requests made to Civil Concepts shall be dealt with in a timely manner.

4. Lawful purposes

- a. All data processed by Civil Concepts must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests.
- b. Civil Concepts shall take note of the appropriate lawful basis and purpose.
- c. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be available and systems should be in place to ensure such revocation is reflected accurately in Civil Concept’s systems.

5. Data minimisation

- a. Civil Concepts shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

6. Accuracy

- a. Civil Concepts shall take reasonable steps to ensure personal data is accurate.
- b. You may request a copy of your personal data and must inform Civil Concepts where it is shown to be incorrect.

7. Archiving / removal

- a. To ensure that personal data is kept for no longer than necessary, Civil Concepts shall put in place an archiving policy for each area in which personal data is processed and review this process annually.
- b. The archiving policy shall consider what data should/must be retained, for how long, and why.

8. Security

- a. Civil Concepts shall ensure that personal data is stored securely using modern software that is kept-up-to-date.
- b. Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- c. When personal data is deleted this should be done safely such that the data is irrecoverable.
- d. Appropriate back-up and disaster recovery solutions shall be in place.

9. Privacy

If you choose to use Civil Concept's website, electronic or email Service, then you agree to the collection and use of information in relation to this policy. The Personal Information that we collect is used for providing and improving our Service.

The app does use third party services that may collect information used to identify you.

- a. Cookies are files with a small amount of data that are commonly used as anonymous unique identifiers. These are sent to your browser from the websites that you visit and are stored on your device's internal memory.

This Service does not use these "cookies" explicitly. However, the app may use third party code and libraries that use "cookies" to collect information and improve their services. You have the option to either accept or refuse these cookies and know when a cookie is being sent to your device. If you choose to refuse our cookies, you may not be able to use some portions of this Service.

- b. We may employ third-party companies and individuals to facilitate our service, provide the service on our behalf, perform Service-related services or assist us in analyzing how our service is used.
- c. We want to inform users of this Service that these third parties have access to your Personal Information. The reason is to perform the tasks assigned to them on our behalf. However, they are obligated not to disclose or use the information for any other purpose.
- d. This Service may contain links to other sites. If you click on a third-party link, you will be directed to that site. Note that these external sites are not operated by us. Therefore, we strongly advise you

to review the Privacy Policy of these websites. We have no control over and assume no responsibility for the content, privacy policies, or practices of any third-party sites or services.

10. Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, Civil Concepts shall promptly assess the risk to people's rights and freedom and if appropriate report this breach.

END OF POLICY