

	POLICY REGARDING THE PROTECTION OF CORPORATE AND PERSONAL INFORMATION			
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1 PURPOSE

Tsebo Holdings and its group companies (“Tsebo”) are committed to protecting the privacy of the information which it gathers in the course of conducting its business.

This policy establishes how Tsebo obtains, uses, stores, discloses and destroys personal and corporate information as is required by the Protection of Personal Information Act **[Note: Full Citation Still to be Announced]**.

2 WHAT INFORMATION IS PROTECTED

For the purposes of this policy, “Information” shall mean information, in whatever form (including electronic and paper based files) related to an identified or identifiable person (either directly or indirectly) and shall include natural and juristic persons (“Person/s”).

3 SCOPE

This policy applies to Tsebo and its group companies.

Tsebo also endeavours to include appropriate wording for the protection of the Information in its contracts with employees, suppliers, agents and subcontractors with whom it does business and with whom the Information may be shared in the course and scope of conducting its business.

4 KEY PRINCIPLES

Tsebo subscribes to the following key principles in respect of the Information:

- to be compliant with all applicable legal and regulatory requirements regarding the processing of the Information;
- to collect the Information lawfully and to process the Information in accordance with the Business Purpose;
- where required by law, to inform Person/s when Information is gathered;
- where required by law, to obtain a Person’s consent to the collection of the Information;
- to strive to keep the Information accurate, up to date and reliable for the Business Purpose;
- to develop and maintain reasonable security measures and safeguard against unauthorised access, destruction, use or disclosure of the Information; and
- to strive to provide Persons with access to their Information and comply with requests to amend, update, rectify or delete Information.

5 HOW DOES TSEBO COLLECT THE INFORMATION

Tsebo collects Information when a Person provides their Information to Tsebo when they apply for a position of employment with Tsebo or when they purchase a product or service from Tsebo or when a Person makes an enquiry about services or products on the Tsebo website. The latter information is collected and stored in "cookies".

6 WHY DOES TSEBO COLLECT INFORMATION AND WHAT DOES IT USE IT FOR?

Tsebo collects the Information in order for it to be able to effectively provide a service or a product to a client, for debt tracing and recovery, for audit and record keeping purposes, for legal proceedings and regulatory compliance and to enable it to act as an employer ("the Business Purpose").

Tsebo only uses the Information for the above Business Purpose.

7 WHEN DOES TSEBO DISCLOSE THE INFORMATION?

Tsebo may disclose the Information within its group of companies and to its sub-contractors, agents and professional advisors who are involved in the provision of services to the client. However as mentioned above, Tsebo endeavours to put contractual provisions in place with the counter parties in order to protect the Information disclosed to subcontractors, agents and professional advisors.

Tsebo may also disclose the Information where it has a legal or regulatory obligation to do so and where Tsebo believes it necessary in order to protect its rights.

8 DISCIPLINARY PROCEDURES IF THIS POLICY IS BREACHED

This policy forms part of a suite of policies and procedures put in place for all Tsebo staff and is accessible to all of them through the Tsebo intranet.

It is a term of employment for each employee that they educate themselves and comply with the Tsebo policies and procedures in place from time to time. Any breach of this policy is thus a breach of their employment contract and is dealt with in terms of the Tsebo disciplinary policy in place from time to time. Moreover each employee's contract of employment contains an obligation to keep as confidential, any information which he/she gains during their employment with Tsebo.

9 HOW DOES TSEBO PROTECT THE INFORMATION ONCE GATHERED

Tsebo has implemented appropriate technical and organizational security measures to protect your personal information such as encryption, firewalls and other technology and security procedures. If these measures are breached, Tsebo classifies this as a "major incident" in terms of its Tsebo It Incident Management Process.

10 REQUEST A COPY OR UPDATE THE INFORMATION

The person responsible for the protection of corporate and personal information within Tsebo is the Chief Information Officer, together with the Human Resources Director.

A Person may request a copy of the Information which Tsebo holds about it, by contacting Tsebo on the following numbers:

- 0800 111 544
- 011 441 5300

A Person may also request their Information to be updated, corrected or deleted by contacting Tsebo on the numbers above or by contacting the Chief Information Officer or the Human Resources Director and any requests for corrections or deletions required will be responded to within 72 hours.

A Person requesting such Information will be required by Tsebo to produce proof of identification.