

**SOUTH AFRICAN POLYPROPYLENE YARNS (PTY) LTD  
THE PROTECTION OF PERSONAL INFORMATION ACT 2013 (POPI)**

**PERSONAL INFORMATION PROTECTION POLICY**

**1.1. Personal Information Policy**

\*note that the use of the words “you” or “yours” for the purposes of this Policy shall be a reference to the individual communicating with **SOUTH AFRICAN POLYPROPYLENE YARNS (PTY) LTD (SAPY)** and/or concluding any agreement with SAPY on behalf of him/herself or the juristic person whom you represent, i.e. shall be a reference to the party who is sharing their personal information in a representative capacity or personally.

**1.1.1.** We at SAPY take POPI and the protection of your personal information seriously. This policy sets out how SAPY will collect, use and protect the personal information of customers, suppliers and other 3<sup>rd</sup> parties, and those acting on their behalf, who require information, services and/or goods from us. If you have any questions or comments arising from this policy, please contact SAPY’s information officer Raveena Govender on 031 736 8700.

**1.1.2. What is personal information:** the personal information with which SAPY is most involved in dealing will be information relating to SAPY registration details, birth dates, identity numbers, passport numbers, occupation information, personal and work email and contact details, financial information, credit references where necessary, credit cards, bank accounts and other payment methods in so far as it is necessary to the terms of your agreement with SAPY.

**1.1.3.** The personal information that we will need to process will include, but will not be limited to:

- a) Credit checks where applicable including in relation to your ability to put up appropriate security;
- b) Any other form of verification reasonably necessary to consider a credit application and/or supply agreement;
- c) CIPC and/or Windeed searches on juristic entities and members/directors/officers of such juristic persons;
- d) Criminal checks;
- e) Medical history to the extent that the job you are applying for or are employed in may have specific, operational requirements that could impact on your health;
- f) Relationship status to any employees or officers of the SAPY in accordance with SAPY’s anti-nepotism policy;
- g) Current employment status;
- h) Reference checking of your previous employment;
- i) Information of your relatives and/or dependents in the event that you qualify for or receive any benefits from your employment
- j) Qualification verification;
- k) To compile statistics and market research information;

Your personal information will not be processed for a purpose other than what is identified (“**the Purpose**”) above without obtaining your consent beforehand.

**1.1.4. What is the purpose of the collection, use and disclosure (the processing) of your personal information:**

In order to

- Provide you with goods and/or services;
- Complete any transaction/s with you; or
- Conduct the application and selection process for employment and/or to fulfil our obligations in terms of your employment contract

it is necessary for us to collect, use and disclose your personal information. More specifically, you will note that your information may be collected, used and/or disclosed in instances that will include, but may not be limited to:

- to process payment that are to you, including accessing financial information to process and calculate those payments;
- to obtain payment approval, including credit approvals and care or other financial approval for payment;
- information for payment and credit banking history where necessary;
- to compile statistics and research information, including but not limited to for BBBEE and Employment Equity reporting;
- to comply with the law; and/or
- for a purpose that is ancillary to the above and that relates to your employment application and/or contract with SAPY.

**1.1.5. Consent and Permission to process your personal information:** When you sign this undertaking, you accept notification of SAPY Personal Information Policy as set out herein. SAPY will accept the following as your consent to the current or existing and future processing of your personal information:

- a) should you fail to advise SAPY that you do not agree with the Policy and you wish to exclude all or some of the provisions of it, after you receive notification of this policy as contained herein;
- b) should you directly or indirectly through an agent or representative acting on your behalf, provide us with your personal information when you request information from SAPY;
- c) should you verbally or in writing give your consent be it through a previous consent you may have given SAPY or in the circumstances of an application form or survey or similar interaction with SAPY.

SAPY draws to your attention that:

- in terms of POPI and other laws of the country, there are instances where your express consent is not necessary in order to permit the processing of your personal information, which may be related to police investigations, litigation or when your personal information is publicly available.
- where you share personal information of other parties and co-workers with SAPY, you must understand that SAPY will rely on your conduct as consent on their behalf to the collection, use and disclosure of their personal information in terms of this personal information policy, and you warrant that you are authorised to give this consent on their behalf. SAPY shall be entitled to rely on your actions as being proof of your authorisation.
- You acknowledge that it is not always possible for SAPY and/or its duly appointed Operator to obtain written consent from a data subject on each occasion. In such cases, the Operator will inform you of the reason for collection of the information and how it will be processed (including stored or transmitted) on behalf of SAPY or by SAPY.
- Operators appointed by SAPY are under an obligation to notify their immediate managers and the representatives of SAPY as soon as they discover any breach or unlawful disclosure of personal information that they may discover.

**1.1.6. How your personal information will be processed:** SAPY will only collect your information for the Purpose. We will collect information relating to any agreement / arrangement concluded between us in the following manner:

- directly from you;

- from you when you make a request of us for information, services or goods and/or relating to any arrangement between us, which request may be made in writing or verbally;
- from your agent, employer, work colleague or other duly authorised representative who may seek or request our services and/or goods on your behalf;
- from other service providers that provided you with services previously;
- from financial institutions, credit bureaus or similar entities;
- from our own records relating to our previous dealings;
- from any automated services that were used to render services to you previously; and/or
- from other service providers in another country where applicable.

**1.1.7. To whom will your personal information be disclosed:** the personal information that may be processed in terms of your agreement/s with SAPY may be disclosed to other service providers on whose behalf we act as intermediaries, other third parties referred to above in relation to the purpose or who are sources of your personal information, service providers who operate across the borders of this country (trans-border flow of information) where your personal information must be sent in order to provide you with the information and/or services and/or goods you have requested. In the event of another party/ies acquiring all, or a portion of SAPY business, your personal information will be disclosed to that party but they will equally be obliged as we are, to protect your personal information in terms of this policy and the law.

**1.1.8. Your rights regarding the processing of personal information:**

- You may withdraw your consent to the processing of your personal information at any time, and should you wish to do so, you must provide SAPY with reasonable notice to this effect. Please note that your withdrawal of your consent is still subject to the terms and conditions of any contract that is in place. Should you wish to withdraw your consent, but the withdrawal would then result in the interference of legal obligations (e.g. flowing from your contract of employment or if it makes it impossible for SAPY to send you information), then such withdrawal will only be effective if SAPY agrees to this in writing. SAPY specifically draws to your attention that the withdrawal of your consent may result in it being unable to provide you with the requested information and/or services and/or goods and/or comply with obligations in terms of any arrangement that is in place.
- In order to withdraw your consent, please contact the Information Officer Raveena Govender on 031 736 8700.
- A copy of this policy is available at our offices, situated at 49 Eaton Road, Hammarsdale, KZN.
- You are encouraged to ensure that where your personal information changes in any respect to notify SAPY so that their records may be updated. SAPY will largely rely on you to ensure that your personal information is correct and accurate.
- You have the right to access your personal information that SAPY may have in its possession and you are entitled to request the identity of which third parties will receive and/or process your information for the purpose. Please note however, that your request in this regard may be declined if:
  - it is too expensive to reproduce the information
  - the information comes under legal privilege in the course of litigation,
  - the disclosure to you of your personal information in the form it is processed may result in the disclosure of confidential or proprietary information,
  - giving you access may cause a third party to refuse to provide similar information to SAPY
  - the information was collected in furtherance of an investigation or legal dispute, instituted or being contemplated,
  - the information as it is disclosed to you may result in the disclosure of another person's information,
  - the information contains an opinion about another person and that person has not consented,
  - the disclosure is prohibited by law.

**1.1.9. Requesting access and lodging of complaints:**

- Please submit any requests for access to your personal information in writing to SAPY's information officer – Raveena Govender at cc@sapy.com. You are to please provide enough detail regarding the information you require to allow SAPY to identify what information you are seeking access to.
- With any request for access to your personal information, SAPY will require you to provide personal information to verify your identification and therefore your right to access the information.
- There may be a reasonable charge for providing you with copies of the information you are requesting.
- Please direct any request for access to your personal information or complaints regarding this policy or any aspect thereof or any of the procedures SAPY uses to process information, to the Information Officer.
- Should you feel that SAPY has not dealt with any complaint you have filed to your satisfaction or you wish to report a complaint to the Information Regulator, you have the right to contact the office of the Information Regulator.