



PROTECTION OF PERSONAL INFORMATION POLICY STATEMENT

West Coast Scaffolding (Pty) Ltd is a private company duly registered in terms of the company laws of the Republic of South Africa, conducting business as scaffolding specialists at 4 Olinia Crescent, Sagewood Estate, Parklands, Cape Town, 7441.

West Coast Scaffolding (Pty) Ltd recognises the constitutional rights to privacy and the protection of personal information of our clients as envisaged in the Protection of Personal Information Act 4 of 2013 (hereinafter referred to as "POPI").

West Coast Scaffolding (Pty) Ltd endeavours to

- respect the rights of our clients to have their personal information processed in a manner that gives effect to their right to privacy subject to limitations;
- be open and honest with our clients whose personal information our company processes;
- provide training and support to all employees who handle personal information so that they can act confidently and consistently.

OBJECTIVES

West Coast Scaffolding (Pty) Ltd guarantees our commitment to protecting the personal information of our clients and to ensure that their personal information is used appropriately, transparently, securely and in accordance with the applicable laws.

The objective of this policy is to set out the manner in which West Coast Scaffolding (Pty) Ltd deals with our clients' personal information as well as stipulates the purpose for which the information is used and is made available to all clients at our offices, 4 Olinia Crescent, Sagewood Estate, Parklands, Cape Town, 7441.

DEFINITIONS

1. "Consent" – means any voluntary, specific and informed expression of will in terms of which permission is given for the processing of personal information;
2. "Data Subject" means the natural or juristic person to whom Personal Information relates;

3. "Personal Information" - means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to;
 - information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;
 - information relating to the education or the medical, financial, criminal or employment history or of the person;
 - any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
 - the biometric information of the person;
 - the personal opinions, views or preferences of the person;
 - correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
 - the views or opinions of another individual about the person; and
 - the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person;
4. "Processing" - means any operation or activity or any set of operations, whether or not by automatic means, concerning personal information, including—
 - the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;
 - dissemination by means of transmission, distribution or making available in any other form; or
 - merging, linking, as well as restriction, degradation, erasure or destruction of information;
5. "Privacy Legislation" - means any laws that protect Personal Information and privacy of Data Subjects and which apply in the Republic of South Africa or any other territory in which Dr Veronique Eeckhout companies or operates;
6. "Regulator" - means the Information Regulator to be established in terms of the Protection of Personal Information Act.

SCOPE

The policy applies to all employees of West Coast Scaffolding (Pty) Ltd as well as external service providers and affiliated companies and professionals. It shall further be made available to all employees and training shall be scheduled to ensure that the policy is enforced throughout the company.

INFORMATION OFFICER

Mathew Van de Weg is the appointed Information Officer of West Coast Scaffolding (Pty) Ltd; it shall be the duty of the Information Officer to:

1. Develop and maintain this policy.
2. Ensure that this policy is supported by appropriate documentation.
3. Ensuring that documentation is relevant and kept up to date.
4. Ensuring that this policy and subsequent updates are communicated to relevant staff where applicable.

The Information Officer may appoint Deputy Information Officers to assist him in discharging his duties.

Details of the information officer is as follows:

Name: Mathew Paul Van de Weg

Tel: 082 797 1194

Email: mathew@wcscaffolding.co.za

PROCESSING OF PERSONAL INFORMATION

West Coast Scaffolding (Pty) Ltd subscribes to the principles of lawful processing of personal information as per the provisions of the POPI Act.

These principles are as follows:

1. Accountability

In order to comply with the provisions of the POPI Act, an information officer has been formally appointed and registered with the information Regulator and will be responsible for compliance with the act in a whole.

2. Processing Limitations

Personal information will be processed in a manner that is both lawful and reasonable, and does not infringe on the privacy of West Coast Scaffolding (Pty) Ltd's clients.

3. Purpose Specification

West Coast Scaffolding (Pty) Ltd will take all reasonable steps to ensure that clients are aware of the purpose of processing their personal information collected and where possible, obtain the necessary consent.

4. Further Processing Limitation

Personal information will not be processed in any manner which is not compatible with the original purpose for which it was collected.

5. Information Quality

West Coast Scaffolding (Pty) Ltd aims to process personal information that is relevant, accurate and up to date with respect to the purpose for which it will be processed.

6. Openness

West Coast Scaffolding (Pty) Ltd will endeavour to ensure that clients are notified of the personal information collected, the purpose for which the information was collected and their right to have access to, object to and/or rectify the information collected.

7. Security Safeguards

West Coast Scaffolding (Pty) Ltd ensures that personal information is protected by reasonable security safeguards against risks such as the loss or unauthorised access, destruction, use, modification or disclosure of personal information.

8. Participation

West Coast Scaffolding (Pty) Ltd, at the request of their clients, will confirm, free of charge, whether or not it holds personal information of that client and also update/correct this information where necessary.

COLLECTING PERSONAL INFORMATION

Personal information collected by West Coast Scaffolding (Pty) Ltd or any of its employees and/or affiliated companies and staff will only be processed if, given the purpose for which it is processed, it is adequate, relevant and not excessive.

As a scaffolding specialist; West Coast Scaffolding (Pty) Ltd collects personal information of our clients to enable us to provide specific services to such clients.

- Such information may be, but is not limited to the following:
 - Personal (identifying) particulars of the client.
 - The time, date and place of every meeting.
 - Details of referrals to and from other clients, if any.
 - Correspondence from or to a client.
 - Invoices, quotations and billing information.
 - Handwritten notes
 - Referral informati
 - Plans, drawings and visual recreations of sites or structure.

West Coast Scaffolding (Pty) Ltd further collects client's personal information for purposes of communication, invoicing and billing, referral, historical data and marketing purposes in order to ensure that our products and services remain relevant to our clients and their needs and to fulfil obligations conferred on us by the FEM and BIBC Rules and Regulations.

UTILISATION OF PERSONAL INFORMATION

Personal information of clients will only be used for the specific purpose for which it was collected which was communicated to the policy holder.

The purpose for which information is collected could include but not be limited to the following:

- Providing a quotation or invoice to a client in respect of scaffolding hire or erection and dismantling.
- Providing professional advice to a client.
- Promoting teaching and research
- Being used for administrative or other purposes
- Being kept as direct evidence in litigation or for occupational disease or injury compensation purposes

- Being used as research data
- Being kept for historical purposes
- Promoting good practices
- Serving as the basis for accreditation
- Protecting further legitimate interests of the client.
- We are not in possession of any information of minors.

DISCLOSURE OF PERSONAL INFORMATION

- West Coast Scaffolding (Pty) Ltd does not disclose personal information to any affiliated clients or companies without your informed consent to disclose such information and only in cases where such information is not already available to the public.
 - All of West Coast Scaffolding (Pty) Ltd's affiliated companies, suppliers and service providers have incorporated the provisions of the POPI Act to ensure compliance therewith as well the privacy and confidentiality of personal information.
 - West Coast Scaffolding (Pty) Ltd may also disclose a client's personal information where it has a duty or right to disclose such information in terms of applicable legislation, the law, a court order or where it may be deemed necessary by the authorities that regulate the building industry or working from heights, or Information Regulator.

CONSENT TO PROCESS

In order to process personal information West Coast Scaffolding (Pty) Ltd must ensure that we obtain the clients express and informed permission to do so. It is therefore imperative that this consent is obtained from the client at the time of his/her introduction to West Coast Scaffolding (Pty) Ltd.

SAFEGUARDING PERSONAL INFORMATION

West Coast Scaffolding (Pty) Ltd is required by the POPI Act to put measures in place to adequately protect personal information of its clients. These safety measures will be reviewed continuously to ensure that all security and controls are updated to protect personal information.

1. The following procedures are in place in order to protect personal information:
 - The information officer, responsible for compliance with the provisions of the POPI Act, contact details will be made available for all West Coast Scaffolding (Pty) Ltd employees and clients;
 - West Coast Scaffolding (Pty) Ltd will conduct training with all employees to enable seamless integration of this policy;
 - Each employee currently employed by West Coast Scaffolding (Pty) Ltd or new employees will be required to sign an addendum to their employment contract which incorporates relevant provisions of the compliance with the POPI Act, specifically related to the lawful processing and confidentiality of personal information;

- Access to personal information stored by West Coast Scaffolding (Pty) Ltd is limited to authorised personnel only.
- All external service providers who process personal information of West Coast Scaffolding (Pty) Ltd clients will be required to sign Service Level Agreements wherein they guarantee their commitment to the protection of personal information as envisaged in the POPI Act.
- Electronic files and data which contain personal information of clients are stored and backed up by West Coast Scaffolding (Pty) Ltd's external service provider who is responsible for the maintaining of a security system which ensures that the personal information is protected from any physical threat and unauthorised access.

ACCESS TO AND CORRECTION OF PERSONAL INFORMATION

West Coast Scaffolding (Pty) Ltd's clients have the right to access personal information held by the company about them. Clients have the right to request West Coast Scaffolding (Pty) Ltd to update, correct or delete personal information on reasonable grounds. Should it not be legal in respect of building regulations or POPIA to destroy such information the personal information should be stored securely and not further processed in any way without renewed consent from the client

Should the client object to the processing of their personal information West Coast Scaffolding (Pty) Ltd may not process the said information. West Coast Scaffolding (Pty) Ltd will further take all reasonable steps to confirm its client's identity before providing any details of their personal information or making changes to their personal information.

IMPLEMENTATION

This policy is implemented by West Coast Scaffolding (Pty) Ltd and will be adhered to by management and all staff who are tasked with collecting and processing personal information. Non-compliance with this policy may result in disciplinary action and possible termination of employment.