



POPI POLICY

INDUSTRIAL THERMODYNAMICS PTY (LTD)

Policy compiled to address the Lawful Requirements for Lawful Processing of Personal Information In Terms Of the Protection of Personal Information Act, 2013 (The "POPI Act") with Reference to the Promotion of Access to Information Act No. 2 of 2000 ("PAIA")

Contents of this document may only be used for and by ITD Group and may not be distributed unlawfully.



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1. APPLICATION

- 1.1 Industrial thermodynamics PTY (LTD) (“ITD Group”) as a Responsible Party and/or Operator, shall strive to observe, and comply with its obligations under the POPI Act, as well as accepted information protection principles, practices, regulations and guidelines when it processes personal information from or in respect of a Data Subject.
- 1.2 This Policy shall apply to personal information collected by ITD Group in relation to the services which ITD Group offers and provides. This may include information collected directly from its clients, employees and service providers through its website, branded pages, applications, requests for proposals, requests for quotations and purchase orders.
- 1.3 This Privacy policy does not apply to the information practices of third parties and service providers who we may engage with in relation to our business operations. These third parties and service providers may have their own privacy policies and terms and conditions.
- 1.4 ITD Group and its employees, shall adhere to this Policy in the handling of all personal information received from, but not limited to natural persons, employees, clients, suppliers, agents, representatives and business partners to ensure compliance with the POPI Act, Regulations and other rules and laws relating to the protection of personal information.

2. DEFINITIONS

- 2.1 “**Competent Person**” means a person who is legally competent to consent to any action.
- 2.2 “**Consent**” means the voluntary, specific and informed expression of will in terms of which permission is given for the processing of personal information.
- 2.3 “**Data Subject**” means a person to whom personal information relates.
- 2.4 “**De-identify**” in relation to personal information of data subject, means to delete any information that:
 - (a) Identifies the data subject;
 - (b) Can be used or manipulated by a reasonably foreseeable method to identify the data subject; or
 - (c) Can be linked by a reasonably foreseeable method to other information that identifies the data subject.And “**de-identified**” has a corresponding meaning;
- 2.5 “**Electronic communication**” means any text, voice, sound or image, message sent over an electronic communications network which is stored in the network or in the recipient’s terminal equipment until it is collected by the recipient.
- 2.6 “**Filing system**” means any structured set of personal information, whether centralized, decentralized or dispersed on a functional or geographical basis, which is accessible according to specific criteria.
- 2.7 “**Information officer**” of, or in relation to, a:
 - (a) Private body means the head of a private body as contemplated in Section 1, of the Promotion of Access to Information Act.

- 2.8 **“Operator”** means a person who processes personal information for a responsible party in terms of a contract or mandate, without coming under the direct authority of the party.
- 2.9 **“Person”** means a juristic or natural person.
- 2.10 **“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:
- (a) Information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, color, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth or the person;
 - (b) Information relating to the education or the medical, financial, criminal or employment history of the person;
 - (c) Any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
 - (d) The biometric information of the person;
 - (e) The personal opinions, views or preferences of the person;
 - (f) Correspondence sent by the person that is implicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
 - (g) The views or opinions of another individual about the person; and
 - (h) 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.
- 2.11 **“Private body”** means:
- (a) A natural person who carries or has carried on any trade, business or profession, but only in such capacity;
 - (b) A partnership which carries or has carried on any trade, business or profession; or
 - (c) Any former or existing juristic person, but excluded a public body.
- 2.12 **“Processing”** means any operation or activity or any set of operations, whether by automatic means, concerning personal information, including:
- (a) The collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;
 - (b) Dissemination by means of transmission, distribution or making available in any other form; or
 - (c) Merging, linking, as well as restriction, degradation, erasure or destruction of information.
- 2.13 **“Public Body”** means any department of state or administration in the national, provincial or local spheres of government and any other functionary exercising a power or exercising a duty in terms of the Constitution.
- 2.14 **“Public Record”** means a record that is accessible in the public domain and it is in the possession of a public body.
- 2.15 **“Record”** means nay recorded information:

- (a) Regardless of form or medium, including any of the following:
 - (i) Writing on any material;
 - (ii) Information produced, recorded or stored by means of any tape-recorder, computer equipment, whether hardware or software or both, or other device, and any material subsequently derived from information so produced, recorded or stored;
 - (iii) Label, marking or other writing that identifies or describes any thing of which it forms part, or to which it is attached by any, means;
 - (iv) Book, map, plan, graph or drawing;
 - (v) Photograph, film, negative, tape or other device in which one or more visual images are embodied so as to be capable, with or without the aid of some other equipment, of being reproduced;
- (b) In the possession of under the control of a responsible party;
- (c) Whether or not it was created by a responsible party; and
- (d) Regardless of when it came into existence.

- 2.16 **“Regulator”** means the Information Regulator established in terms of section 39.
- 2.17 **“Responsible Party”** means a public or private person who, alone or in conjunction with others, determines the purpose of and means for processing personal information.
- 2.18 **“Restriction”** means to withhold from circulation, use or publication any personal information that forms part of a filing system, but not to delete or destroy such information.
- 2.19 **“Special personal information”** means personal information as referred to in section 26;
- 2.20 **“Unique identifier”** means any identifier that is assigned to a data subject and is used by a responsible party for the purposes of operations of that responsible party and that uniquely identifies that data subject in relation to that responsible party.

3. PURPOSE OF THIS POLICY

- 3.1 The purpose of this Policy is to inform Data Subjects about how ITD Group processes their personal information.
- 3.2 The POPI Act requires that personal information be collected for a specific, explicitly defined, and lawful purpose to a function or activity of the responsible person.
- 3.3 ITD Group and its Information Officer have familiarised themselves with the contents of the POPI Act, applicable regulations and other rules relating to the protection of personal information and will strive to adhere to the conditions for lawful processing at all times.

4. THE PURPOSE FOR PROCESSING INFORMATION

- 4.1 All personal information that is processed by ITD Group will be treated with the utmost confidentiality and will only be shared where such sharing is necessary for ITD Group to provide its services and to comply as required to with any provision of the law.
- 4.2 ITD Group will only process Data Subject’s personal information for a specific, lawful and clear purpose (or for specific, lawful and clear purposes), in any event in the ordinary course and scope of its business, and will ensure that it makes the Data Subject aware of such purpose(s) as far as possible.

- 4.3 ITD Group ensures that processing relates only to the purposes for and of which the Data Subject has been made aware (and where relevant, consented to) and will not process any personal information for any other purpose(s).
- 4.4 ITD Group will generally use personal information for purposes required to operate and manage its normal business operations and these purposes include one or more of the following non-exhaustive purposes:
- (a) To develop, provide and improve ITD Group products and services.
 - (b) For the purposes of providing its services to the Data Subject from time to time;
 - (c) As required in terms of the Financial Intelligence Centre Act 38 of 2001;
 - (d) To identify individuals, employees, prospective employees.
 - (e) To obtain feedback from you on products.
 - (f) To institute any legal debt recovery proceedings.
 - (g) Performing duties in terms of any agreement with you and other consumers.
 - (h) To communicate with you by email, SMS, written correspondence, telephone or in any other way about our products and services and for the conclusion of any agreement with you or our employees.
 - (i) To open and maintain your account, to give effect to transactions, to administer claims where applicable, to manage our financial risks and maintain our overall business relationship with you.
 - (j) The payment of invoices and to process payroll.
 - (k) Comply with any other applicable laws, rules and regulations; and
 - (l) Any other reasonably required purpose relating to our business.

5 PROCESS OF COLLECTING PERSONAL INFORMATION

- 5.1 ITD Group collects personal information directly from Data Subjects, unless an exception is applicable (such as, for example, where the Data Subject has made the personal information public or the personal information is contained in or derived from a public record).
- 5.2 ITD Group will always collect personal information in a fair, lawful and reasonable manner to ensure that it protects the Data Subject's privacy and will process the personal information based on legitimate grounds in a manner that does not adversely affect the data subject in question.
- 5.3 Where ITD Group obtains personal information from third parties, it will ensure that it obtains the consent of the data subject to do so or will only process the personal information without the data subject's consent where ITD is permitted to do so in terms of paragraph 5.1 above.
- 5.4 An example of such third parties include:
- (a) Credit reference agencies;
 - (b) Other companies providing services to ITD Group; and
 - (c) Where ITD Group makes use of publicly available sources of information.

- 5.5 If you decide not to provide us with your personal information, or if you object to the processing of your personal information, please note that may result in ITD Group being unable to provide certain services which may require submission of personal information.
- 5.6 Collection of the information from another source is necessary:
- (a) To avoid prejudice to the maintenance of the law by any public body, including the prevention, detection, investigation, prosecution and punishment of offences;
 - (b) To comply with an obligation imposed by law or to enforce legislation concerning the collection of revenue;
 - (c) to conduct proceedings in any court or tribunal that have commenced or are reasonably contemplated;
 - (d) In the interest of national security; or
 - (e) To maintain the legitimate interests of ITD Group or a third party to whom the information is supplied;
 - (f) Compliance would prejudice a lawful purpose of the collection; or
 - (g) Compliance is not reasonably practicable in the circumstances of the particular case.
- 5.7 ITD Group will take reasonably practicable steps to ensure that the personal information is complete, accurate, not misleading and updated where necessary, having regard to the purpose for which the personal information is collected and further processed.
- 5.8 ITD Group may not always expressly request the data subject to verify and update his/her/its personal information, unless this process is specifically necessary.
- 5.9 ITD Group however, expects that the data subject will notify ITD from time to time in writing of any updates required in respect of his/her/its personal information.

6 RETENTION AND RESTRICTION OF PERSONAL INFORMATION

- 6.1 ITD Group may keep records of the personal information it has collected, correspondence, or written communication in an electronic or hardcopy file format.
- 6.2 ITD Group will not retain personal information for a period longer than is necessary to achieve the purpose for which it was collected or processed and is required to delete, destroy (in such way that it cannot be reconstructed) or de-identify the information as soon as is reasonably practicable once the purpose has been achieved. The prohibitions will not apply in the following circumstances:
- (a) Where the retention of the record is required or authorised by law;
 - (b) ITD Group requires the record to fulfil its lawful functions or activities;
 - (c) Retention of the record is required by a contract between the parties thereto;
 - (d) The data subject (or competent person, where either data subject is a child) has consented to such longer retentions; or
 - (e) The record is retained for historical, research or statistical purposes provided safeguards are put in place to prevent use for any other purpose.

- 6.3 Accordingly, ITD Group will subject to the exceptions noted herein, retain personal information for as long as necessary to fulfil the purposes for which that personal information was collected and/or as permitted or required by applicable law.
- 6.4 Where ITD Group retains personal information for longer periods for statistical, historical or research purposes, ITD Group will ensure that appropriate safeguards have been put in place to ensure that all recorded personal information will continue to be processed in accordance with this Policy and the applicable laws.
- 6.5 Once the purposes for which the personal information was initially collected and processed no longer applies or becomes obsolete, ITD Group will ensure that the personal information is deleted, destroyed or de-identified sufficiently so that a person cannot re-identify such personal information.
- 6.6 ITD Group will restrict the processing of personal information if:
- (a) Its accuracy is contested by the data subject for a period enabling ITD Group to verify the accuracy of the information;
 - (b) ITD Group no longer needs the personal information for achieving the purpose for which it was collected or subsequently processed, but it has to be maintained for purposes of proof;
 - (c) The data subject requests to transmit the personal data into another automated processing system.
- 6.7 Personal information that has been restricted may only be processed for purposes of proof, or with the data subject's consent, or with the consent of a competent person where the data subject is a child, or for the protection of the rights of another natural or legal person or if such processing is in the public interest.
- 6.8 Where personal information is restricted, ITD Group will inform the data subject before lifting the restriction.

7 LAWFUL PROCESSING OF PERSONAL INFORMATION

- 7.1 ITD Group will only process data subject's personal information where:
- (a) Consent of the data subject (or competent person where the data subject is a child) is obtained;
 - (b) Processing is necessary to carry out the actions for conclusion of a contract to which the data subject is party;
 - (c) Processing complies with an obligation imposed by law on ITD Group;
 - (d) Processing protects a legitimate interest of the data subject;
 - (e) Processing is necessary for pursuing the legitimate interest of ITD Group or of a third party to whom the information is supplied; and/or
 - (f) Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in ITD Group.
- 7.2 ITD Group will make the manner and reason for which the personal information will be processed clear to the data subject.
- 7.3 Where ITD Group is relying on a data subject's consent as the legal basis for processing personal information, the data subject may withdraw his/her/its consent or

may object to ITD processing of the personal information at any time. However, this will not affect the lawfulness of any processing carried prior to the withdrawal of consent.

- 7.4 If the consent is withdrawn or if there is otherwise a justified objection against the use or the processing of such personal information, ITD Group will ensure that the personal information is no longer processed.
- 7.5 In the event that ITD Group appoints or authorizes an operator to process any personal information on its behalf or for any reason, it will implement necessary agreements to ensure that the operator or anyone processing personal information on behalf of ITD Group or an operator:
- (a) processes such personal information only with the knowledge or authorization of ITD Group; and
 - (b) treats personal information which comes to his/her/its knowledge as confidential and must not disclose it, unless required by law or in the course of the proper performance of his/her/its duties;

8 TRANSBORDER TRANSFER OF INFORMATION

- 8.1 ITD Group does not transfer or share personal information about a data subject to a third party who is in a foreign country unless:
- (a) The third party who is the recipient of the information is subject to a law, binding corporate rules or binding agreement which provide an adequate level of protection that:
 - (i) Effectively upholds principles for reasonable processing of the information that are substantially similar to the conditions for the lawful processing of personal information relating to a data subject who is a natural person and where applicable, a juristic person; and
 - (ii) Includes provisions, that are substantially similar to the policy and the POPI Act provisions, relating to the further transfer of personal information from the recipient to third parties who are in a foreign country.
 - (b) The data subject consents to the transfer;
 - (c) The transfer is necessary for the performance of a contract between the data subject and ITD or for the implementation of pre-contractual measures taken in response to the data subject's request;
 - (d) The transfer is necessary for the conclusion or performance of a contract concluded in the interest of the data subject between ITD Group and a third party; or
 - (e) The transfer is for the benefit of the data subject, and –
 - (i) It is not reasonably practicable to obtain the consent of the data subject to that transfer; and
 - (ii) If it were reasonably practicable to obtain such consent the data subject would be likely to give it.

9 DIRECT MARKETING BY MEANS OF UNSOLICITED ELECTRONIC COMMUNICATIONS

- 9.1 To the extent that ITD Group acts in its capacity as a direct marketer, it shall strive to observe, and comply with its obligations under the POPI Act and, when implementing principles and practice in relation to direct marketing.
- 9.2 The processing of personal information of a data subject for the purpose of direct marketing by means of any form of electronic communication, including automatic calling machines, facsimile machines, SMS's or e-mail is prohibited unless the data subject:
- (a) Has given consent in writing to the processing; or
 - (b) Is a customer of ITD Group.
- 9.3 ITD Group may approach the data subject:
- (a) Whose consent is required; and
 - (b) Who has not previously withheld such consent, only once in order to request the consent of that data subject in prescribed manner and form.
- 9.4 Any communication for direct marketing will contain:
- (a) Details of the identity of the sender or the person on whose behalf the communication has been sent; and
 - (b) An address or other contact details which the recipient may send a request that such communications cease.
- 9.5 ITD Group will ensure that a reasonable opportunity is given to the data subject to object to the use of their personal information for ITD Group marketing purposes when collecting the personal information and on the occasion of each communication to the data subject for purposes of direct marketing.
- 9.6 ITD Group will not use your personal information to send you marketing materials if you have requested not to receive them. If you request that we stop processing your personal information for marketing purposes, ITD Group shall do so.

10 DISCLOSURE OF PERSONAL INFORMATION

- 10.1 We will not share your information without consent, whether with internal stakeholders or external third parties. **[section 20 (b)]**
- 10.2 Save to the extent listed above, personal information may be shared without your consent only in the following circumstances:
- (a) If legally required to do so to comply with applicable laws, judicial proceedings, court order or legal proceedings. **[section 18(4)(c)]**
 - (b) If necessary, to take any legal action regarding potential or violations of our policies or the protection of our legal rights.
 - (c) In cases of buying and selling of assets, or merger's, acquisition, or a similar transaction.

- (d) When such information will not be used in a form in which the data subject may be identified or used for historical, statistical or research purposes. **[section 18 (4)(f)]**
- 10.3 In the event that ITD Group has to disclose your Personal Information to third parties without your consent or prior knowledge. ITD Group will limit that disclosure to the following circumstances:
- (a) To satisfy any laws or regulations.
 - (b) To respond to requests, such as discovery, criminal, civil, or administrative process, subpoenas, court orders, or writs from law enforcement or other governmental or legal bodies.
 - (c) To bring legal action against an employee who has violated the law or policy.
 - (d) In the case of any business transfer, sale, or transfer of assets of the business.
 - (e) If ITD Group suspects any fraudulent activity within or in relation to the business, or if ITD Group notices any activity which may violate ethics, guidelines, or other applicable rules.

11 **DATA SUBJECT RIGHTS**

You have the right to:

- 11.1 Be informed that personal information is being collected. **[section 18(1)(a)]**
- 11.2 Be informed of the purpose for which the information is collected. **[section 18(1)(c)]**
- 11.3 Be informed of any law authorizing the collection of information. **[section 18(1)(f)]**
- 11.4 Be informed whether the supply of personal information is voluntary or mandatory. **[section 18(1)(d)]**
- 11.5 Be informed of the consequences for the failure to provide the information. **[section 18(1)(e)]**
- 11.6 Withdraw consent given to collect Information. **[section 11 (2)(b)]**
- 11.7 Request the erasing of data or information. **[section 5(c)]**
- 11.8 Request access to your personal information stored by ITD. **[section 5(b)]**
- 11.9 Request the Information Officer to confirm whether your information is held by ITD. **[section 23(1)(a)]**
- 11.10 Request from the Information Officer to record or describe the nature of the personal information held by ITD Group.
- 11.11 To establish whether a responsible person holds personal information and to request that we transfer your personal information to yourself or a third party.
- 11.12 Request that we correct any information stored. **[section 23(2)]**
- 11.13 Object to the method we use to collect your personal information. **[section 11(3)(a)]**
- 11.14 Request that information collected is restricted. **[section 14(6)(c)]**
- 11.15 Request that your personal information not be processed for the purposes of direct marketing. **[section 5(e)(i)]**

- 11.16 Not be subjected to decide solely based on automatic processing of personal information. **[section 5(g)]**
- 11.17 Submit or lodge a complaint to the Information Regulator regarding the alleged interference with the protection of the personal information of any person who supplied us with their personal information. **[section 5(h)]**
- 11.18 Institute civil proceedings regarding the alleged interference with the protection of personal information. **[section 5(i)]**
- 11.19 Request that ITD delete or erase any information about yourself. ITD will ensure that this request is complied with timeously. **[section 24]**

12 **INFORMATION STORAGE AND SECURITY OF INFORMATION**

- 12.1 ITD Group may store your personal information in hardcopy format and/or in electronic format using ITD Group's own secure servers or other internally hosted technology. Your personal information may also be stored by third parties, via cloud services or other technology, with whom ITD Group has contracted with, to support ITD Group's business operations.
- 12.2 ITD Group will ensure to secure the integrity and confidentiality of personal information in its possession or under its control to prevent:
 - (a) Loss of or damage to or unauthorized destruction of personal information. **[section 19 (1)(a)]**
 - (b) Unlawful access to or processing of personal information. **[section 19 (1)(b)]**
- 12.3 ITD Group only stores your Personal Information for as long as it is necessary, unless you request deletion of your personal information.
- 12.4 ITD Group may also store your Personal Information for any applicable legal record-keeping (e.g., maintaining our accountancy records or otherwise maintaining the safety and security of our Company, for a time period permitted by applicable law).
- 12.5 ITD Group employs organizational and technical security measures to protect your Personal Information, such as limiting access to your Personal Information, secured networks, and encryption.
- 12.6 ITD Group ensures that your Personal Information is protected against unauthorized access, disclosure, or destruction by utilizing practices that are consistent with standards in the industry to protect your privacy.
- 12.7 Please note, however, that no system involving the transmission of information via the Internet or the electronic storage of Information is completely secure, no matter what reasonable security measures are taken.
- 12.8 Although ITD Group takes the protection and storage of your Personal Information very seriously, and takes all reasonable steps to protect your Personal Information, ITD Group cannot be responsible for data breaches that occur outside of its reasonable control.
- 12.9 ITD Group will, however, follow all applicable laws in the event a data breach occurs, including taking reasonable measures to mitigate any harm as well as notifying you and the Information Regulator of such breaches as soon as reasonably possible.

13 **STANDARD OPERATING PROCEDURES**

- 13.1 Each department will establish the appropriate privacy standard operating procedures that are consistent with this policy, local customs and practices as well as legal and regulatory requirements.

14 **ACCESS TO PERSONAL INFORMATION**

- 14.1 The data subject has certain rights under the POPI Act, including the following:
- (a) A right of access: a data subject having provided adequate proof of identity has the right to:
 - (i) Request ITD Group to confirm whether any personal information is held about the data subject; and/or
 - (ii) Request from ITD Group a description of the personal information held by the ITD including information about third parties who have or have had access to the personal information.
 - (iii) A data subject may make the abovementioned request in line with ITD Group's manual published in terms of the Promotion of Access to Information Act, 2 of 2000.
- 14.2 Accordingly, ITD Group may request the data subject to provide sufficient identification to permit access to, or provide information regarding the existence, use or disclosure of the data subject's personal information. Any such identification shall only be used for the purposes of facilitating access to or information regarding the personal information.

15 **DATA BREACHES**

- 15.1 ITD Group will notify you and the Information Regulator as soon as it becomes aware of any data breach that may result in a risk to your rights and freedoms.
- 15.2 A data breach refers to any incident in terms of which reasonable grounds exist to believe that the personal information of a data subject has been accessed or acquired by any unauthorised person.
- 15.3 A data breach can happen for many reasons, which include:
- (a) Loss or theft of data or equipment on which personal information is stored;
 - (b) Inappropriate access controls allowing unauthorised use;
 - (c) Equipment failure;
 - (d) Human error;
 - (e) Unforeseen circumstances, such as a fire or flood;
 - (f) Deliberate attacks on systems, such as hacking, viruses or phishing scams; and/or

- (g) Alteration of personal information without the permission and loss of availability of personal information.

16 **DESTRUCTION OF DOCUMENTS**

- 16.1 All documents containing personal information shall be destroyed after the effluxion time as per required or authorized law, in any event when the purpose for which the personal information was collected has expired or no longer exists.
- 16.2 All personal information will be destroyed, deleted or de-identified as soon as reasonably practicable after there is no longer authorization to retain the personal information. **[section 14 (4)]**
- 16.3 Destruction of the personal information will be in a manner which prevents reconstruction thereof in an intelligible form. **[section 14 (5)]**

17 **CONSENT**

- 17.1 All personal information processed is done in a lawful and reasonable manner which does not infringe the privacy of the data subject. **[section 9]**
- 17.2 The information that is processed, given the purpose for which it is processed, must be relevant, adequate, and not excessive. **[section 10]**
- 17.3 All information processed is directly collected from the data subject unless: **[section 12 (1)]**
 - (a) The information is collected from a public record or source. **[section 12 (2)(a)]**
 - (b) The data subject consents to collecting the information from another source. **[section 12 (2)(b)]**
 - (c) Collecting the information from another source does not prejudice the interests of the data subject. **[section 12 (2)(c)]**
 - (d) Collection from another source is necessary. **[section 12 (2)(d)]**
 - (e) Compliance would prejudice a lawful purpose for collection. **[section 12 2(e)]**
 - (f) Compliance is not reasonably practical. **[section 12 (2)(f)]**
- 17.4 ITD Group will only process personal information if:
 - (a) A data subject consents to the processing of information. **[section 11 (1)(a)]**
 - (b) Processing is necessary to carry out actions to conclude or perform in terms of a contract to which the data subject is a party. **[section 11 (1)(b)]**
 - (c) Processing protects a legitimate interest of the data subject. **[section 11 (1)(d)]**
 - (d) Processing is necessary for the proper performance of a public law duty. **[section 11 (1)(e)]**
 - (e) Processing is necessary for pursuing the legitimate interests. **[section 11 (1)(f)]**

- 17.5 By accessing our website, entering our premises, applying for employment or accepting a contract of employment you consent to the use and collection of your personal information by us.
- 17.6 This policy may be amended from time to time. If there are major changes to this Policy, and such changes materially affect personal information stored, ITD Group will notify any person affected by the amendment, or such changes.
- 17.7 The continued use of the website and services after the updates or amendments have been made to this Policy has the effect of you agreeing to be bound by the new terms of the Privacy Policy.

18 **UPDATES**

- 18.1 The business may update, change, remove, or add any portions to the policy from time to time.
- 18.2 When this occurs, an amended or updated version of this policy will be made available.
- 18.3 The current version of this policy will govern the respective rights and obligations between you and ITD Group.

19 **INDUSTRIAL THERMODYNAMICS PTY (Ltd) CONTACT DETAILS**

- 19.1 For queries related to this Privacy Policy, our PAIA Manual, requests for deletion or updating of personal information, the below information is of reference:

NAME OF BODY

INDUSTRIAL THERMODYNAMICS PTY (Ltd)

PHYSICAL ADDRESS

18 Sidwell Avenue. Sidwell, Port Elizabeth, 6001

POSTAL ADDRESS

18 Sidwell Avenue. Sidwell, Port Elizabeth, 6001

DESIGNATED INFORMATION OFFICER

Name: JACQUES DU PREEZ
Telephone: (041) 451 4811
Email: mail@itdgroup.co.za
Website: www.itdgroup.co.za

FORM-1

OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION IN TERMS OF SECTION 11 (3) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013)

REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018

[Regulation 2.]

Note:

1. *Affidavits or other documentary evidence as applicable in support of the objection may be attached.*
2. *If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.*
3. *Complete as is applicable.*

| | |
|-------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------|
| A | DETAILS OF DATA SUBJECT |
| Name(s) and surname/ registered name of data subject: | |
| Unique Identifier/ Identity Number | |
| Residential, postal or business address: | Code () |
| Contact number(s): | |
| Fax number / E-mail address: | |
| B | DETAILS OF RESPONSIBLE PARTY |
| Name(s) and surname/ Registered name of responsible party: | |
| Residential, postal or business address: | Code () |
| Contact number(s): | |
| Fax number/ E-mail address: | |
| C | REASONS FOR OBJECTION IN TERMS OF SECTION 11 (1) (d) to (f) (Please provide detailed reasons for the objection) |
| Signed at this day of | |
| | |
| | Signature of data subject/designated person |

FORM-2

REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION OR DESTROYING OR DELETION OF RECORD OF PERSONAL INFORMATION IN TERMS OF SECTION 24 (1) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013)

REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018 [Regulation 3.]

Note:

1. Affidavits or other documentary evidence as applicable in support of the request may be attached.
2. If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.
3. Complete as is applicable.

Mark the appropriate box with an “x”.

Request for:

- Correction or deletion of the personal information about the data subject which is in possession or under the control of the responsible party.
- Destroying or deletion of a record of personal information about the data subject which is in possession or under the control of the responsible party and who is no longer authorized to retain the record of information.

| | |
|-------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| A | DETAILS OF THE DATA SUBJECT |
| Name(s) and surname/ registered name of data subject: | |
| Unique identifier/ Identity Number: | |
| Residential, postal or business address: | Code () |
| Contact number(s) & Email: | |
| B | DETAILS OF RESPONSIBLE PARTY |
| Name(s) and surname / registered name of responsible party: | |
| Residential, postal or business address: | Code () |
| Contact number(s) & Email: | |
| C | Information To Be Corrected/Deleted/ Destroyed/ Destroyed |
| D | Reasons For *Correction Or Deletion Of The Personal Information About The Data Subject In Terms Of Section 24 (1) (A) Which Is In Possession Or Under The Control Of The Responsible Party; And Or Reasons For *Destruction Or Deletion Of A Record Of Personal Information About The Data Subject In Terms Of Section 24 (1) (B) Which The Responsible Party Is No Longer Authorized To Retain (Please provide detailed reasons for the request) |
| Signed at this day of | |
| | Signature of data subject/designated person |