

PROTECTION OF PERSONAL INFORMATION

1.1. This policy applies to information relating to identifiable individuals, in terms of the Protection of Personal Information Act, 2013 (hereinafter POPI Act).

1.2. Perpetua is committed to:

1.2.1. Keeping information securely in the right hands, and;

1.2.2. Retention of good quality information.

1.3. We further aim to ensure that the legitimate concerns of individuals about the ways in which their data may be used are taken into account. In addition to being open and transparent, we will seek to give individuals as much choice as is possible and reasonable over what data is held and how it is used.

2. CLIENT INFORMATION

2.1. All personal information from our clients that we obtain and process is collected mainly to ensure compliance with legislation as well as to provide our clients with the services that we offer, to help us improve our offerings to our clients and in order to enable us to comply with all statutory requirements in rendering our services.

- 2.2. The type of information we collect will depend on the purpose for which it is collected and used. We will only collect information that we need for the purpose of rendering services to our clients.
- 2.3. The information we require we collect directly from our client. Where possible, we will inform our client what information they are required to provide to us and what information is optional.

3. EMPLOYEE INFORMATION

- 3.1. All personal information of our employees that we obtain and process is collected mainly to ensure compliance with legislation and the successful operation of our business.
- 3.2. The type of information we collect will depend on the purpose for which it is collected and used. We will only collect information that we need for the purpose of our operations.
- 3.3. With our employee's consent, we may also supplement the information that they provide to us with information we receive from other companies and or organisations such as the South African Revenue Services (SARS) in order to enable us to comply with legislation.

4. HOW WE USE OUR CLIENT AND EMPLOYEE INFORMATION

4.1. We will use our clients and employees information only for the purposes for which it was collected or agreed to with our clients and employees, for example:

4.1.1. To provide our services to our clients, to carry out the transactions our clients requested and to maintain our relationship;

4.1.2. For audit and record keeping purposes;

4.1.3. In connection with legal proceedings.

4.2. We will also use our clients and employee's information to comply with legal and regulatory requirements or industry codes to which we subscribe or which apply to us, or when it is otherwise allowed by law.

5. INFORMATION SECURITY

5.1. We are legally obliged to provide adequate protection for the personal information we hold and to prevent unauthorised access and use of personal information. We are committed to ensure that all personal information of our clients or their businesses as well as our employees will be kept safe and secure and not be disclosed to any unauthorized third parties.

5.2. No employee of the company shall be allowed to disclose any personal information of our clients or our employees to any unauthorized third party. Any

breach in this regard may lead to disciplinary action being taken which may include summary dismissal.

6. ACCESS TO INFORMATION

6.1. Our clients and employees have the right to request a copy of the personal information that we hold about them or their business. Should you wish to obtain any such information, you can lodge such a request with the company. We will take all reasonable steps to confirm your identity before providing details of your personal information.

6.2. Any such access request may be subject to a payment of an allowable administration fee.

7. CORRECT INFORMATION

7.1. Our clients and former employees have the right to ask us to update, correct or delete their personal information. They may do this by contacting us at the numbers/addresses provided on our website www.perpetua.co.za.

7.2. We will take all reasonable steps to confirm our client's identity before making changes to personal information we may hold about our client.

7.3. We would appreciate it if our clients and employees would keep their personal information accurate.

8. KEEPING ON RECORDS

8.1. Information and records of a personal nature of our client and our employees shall be stored for a period of 10 years before being destroyed.