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**Effective Date:** 01.06.2019

**SUBJECT:** **GUIDELINES DEALING WITH THE PROTECTION OF PERSONAL INFORMATION**

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**PROTECTION OF PERSONAL INFORMATION IN TERMS OF THE PROTECTION OF PERSONAL INFORMATION ACT 4 OF 2013**

**1) INTRODUCTION**

As a responsible corporate citizen, PG Group and its subsidiaries (“**the GROUP**”) complies with the Protection of Personal Information Act 4 of 2013, commonly referred to as POPIA, which requires the Group to inform their customers, suppliers, shareholders, investors, partners and employees, herein referred to as stakeholders, as to how their personal Information is used, disclosed and destroyed.

The Group confirms its commitment to protecting the afore-mentioned stakeholders’ privacy and ensuring their personal information is used appropriately, transparently, securely and in accordance with applicable laws.

This document sets out how the Group deals with their stakeholders’ personal information and, in addition, the purpose for which the information is used.

**2) PERSONAL INFORMATION COLLECTED**

Section 9 of the POPIA states that “*Personal Information may only be processed if given the purpose for which it is processed; it is adequate, relevant and not excessive.*”

The Group collects and processes stakeholder personal information in accordance with the needs of the business of the Group. The type of information processed will depend on the nature of each stakeholder (i.e. investor, employee, customer or supplier) and the need for which it is collected, and will be processed for that purpose only. Whenever possible, we will inform each stakeholder what minimum information they are required to provide us with and what information is optional. Examples of personal information we collect include but are not limited to:

- a) Employee’s Identity number; full names & surname; physical & postal addresses; marital status; how many dependants they have; tax information; banking details; race; gender, etc.
- b) Description of customer or supplier’s business; registered office; legal entity name; registration number; VAT and tax numbers; names, addresses and IDs of Directors and officers; assets & liabilities; financial information; banking details; credit scoring; clearance certificates; etc.
- c) Any information required by us in order to provide our services to customers in accordance to their needs; and
- d) Any information processed by the Group as required by the laws of the Republic of South Africa.

The PG Group also collects and processes customer Personal Information for marketing purposes to ensure our products and services remain relevant and applicable to our existing and potential customers’ current and future needs.

We aim to have agreements in place with all our suppliers, insurers and third party service providers to ensure there is a mutual understanding with regard to the protection of our customers’ Personal Information. They will be subject to the same regulations and/or responsibilities.



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With customer consent, we may also supplement the information provided with information we receive from other providers in order to offer a more consistent and personalised experience during customers' interaction with us.

**NOTE:** Reference to customers includes potential, new and existing customers.

### **3) HOW PERSONAL INFORMATION IS USED**

Customers' Personal Information will only be used for the purpose for which it was collected and agreed. This may include but is not limited to:

- a) Providing products or services to customers and to carry out the transactions required to service them;
- b) Conducting market or customer satisfaction research;
- c) Conducting credit reference checks or verification of information supplied;
- d) Confirming, verifying and updating customer details;
- e) For the detection and prevention of fraud, crime or other malpractice;
- f) For audit and record keeping purposes;
- g) In connection with legal proceedings;
- h) Providing communications in respect of PG Group and regulatory matters that may affect customers; and
- i) In connection with and to comply with legal and regulatory requirements or when it is otherwise allowed by law.

According to section 10 of the POPIA, Personal Information may only be processed if certain conditions are met which are listed below:

- a) The Customer consents to the processing, *i.e. consent is obtained during the introductory, appointment and needs analysis stage of our relationship;*
- b) The processing is necessary in order to conduct an accurate analysis of customers' needs for purposes of amongst other credit limits, insurance requirements, etc;
- c) Processing protects a legitimate interest of the customer, *e.g. it is in the customer's best interest to have a full and proper needs analysis performed in order to provide them with an applicable and beneficial product or service, which requires obtaining Personal Information;*
- d) Processing is necessary for pursuing the legitimate interests of the PG Group or of a third party to whom information is supplied, *e.g. in order to provide our customers with products and or services both ourselves and any of our product suppliers need certain Personal Information from the customers to make an expert decision on the unique and specific product and or service they may require;* and
- e) Processing complies with an obligation imposed by law on the PG Group.

### **4) DISCLOSURE OF PERSONAL INFORMATION**

We may disclose customers' Personal Information to any of our Group Companies or affiliated subsidiaries, Joint Venture Companies and/or approved third party service providers whose services we



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use to facilitate customer transactions. We have agreements in place to ensure that they comply with confidentiality and privacy conditions.

We may also share customer Personal Information with, and obtain information about customers from third parties for the reasons already discussed above. We may also disclose customers' information where we have a duty or a right to disclose in terms of applicable legislation, the law or where it may be necessary to protect our rights.

#### **5) SAFEGUARDING CUSTOMERS INFORMATION**

It is a requirement of the POPIA to adequately protect the Personal Information we hold and to avoid unauthorised access and use of your Personal Information. PG will continuously review our security controls and processes to ensure that your Personal Information is secure.

The following procedures are in place in order to protect your Personal Information:

- a) **CONSENT** to process customer information is obtained from customers (or a person who has been given authorisation from the customer to provide the customer's Personal Information) during the introductory, appointment and needs analysis stage of the relationship;
- b) New suppliers and other Third Party Service Providers will be required to sign a **SERVICE LEVEL AGREEMENT** guaranteeing their commitment to the Protection of Personal Information, and existing suppliers and other Third Party Service Providers will be encouraged to sign addendums to existing **SERVICE LEVEL AGREEMENTS** guaranteeing their commitment to the Protection of Personal Information;
- c) **NEW EMPLOYEES** will be required to sign an **EMPLOYMENT CONTRACT** containing relevant consent clauses for the use and storage of employee information, or any other action so required in terms of the POPIA;
- d) **CURRENT EMPLOYEES** within the Group will be required to sign an addendum to their **EMPLOYMENT CONTRACTS** containing relevant consent clauses for the use and storage of employee information, or any other action so required in terms of the POPIA;
- e) **ELECTRONIC FILES** or data **BACKED UP** by our outsourced IT Partners will be subject to the POPIA requirements and these service providers will be responsible for system security which should protect these Data warehouses and servers against unauthorised third party access and physical threats. PG Group IT Division is responsible for Electronic Information Security;
- f) **A SECURITY INCIDENT MANAGEMENT REGISTER** will be kept to log any security incidents and to report on and manage said incidents. This register will be maintained by an appointed Security Manager;
- g) **HARD COPY DOCUMENTS** are securely **STORED** at the transacting site and may be archived as and when required at facilities approved by the Company;
- h) **ARCHIVED** information is governed by the POPIA, and where Third Parties are involved as custodians, appropriate Service Level Agreements will be put in place; and
- i) The Company has appointed Sandy Beekhuizen as PG GROUP's **INFORMATION OFFICER**, responsible for ensuring compliance with the conditions of the lawful processing of Personal Information and other provisions of the POPIA.



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**6) ACCESS AND CORRECTION OF PERSONAL INFORMATION**

Customers have the right to access the Personal Information we hold about them. Customers also have the right to ask us to update, correct or delete their Personal Information on reasonable grounds. Once a customer objects to the processing of their Personal Information, PG Group may no longer process said Personal Information. We will take all reasonable steps to confirm our customers' identity before providing details of their Personal Information or making changes to their Personal Information.

Details of **PG GROUP INFORMATION OFFICER** are as follows:

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