

1. DEFINITIONS

- 1.1. **Data Subject:** the person who will provide Visual Impact Broadcast Solutions (Pty) Ltd or its Operator(s) with Personal Information.
- 1.2. **Information Officer:** is the person responsible for ensuring compliance with the Protection of Personal Information Act and the person responsible for dealing with Data Subject's requests.
- 1.3. **Non-personal information:** is information that cannot be used on its own to trace, or identify a person.
- 1.4. **Operator:** a natural person or juristic person who processes a Data Subject's Personal Information on behalf of Visual Impact Broadcast Solutions (Pty) Ltd in terms of a contract or mandate, without coming under the direct authority of Visual Impact Broadcast Solutions (Pty) Ltd.
- 1.5. **Personal Information:** relates to an identifiable, living, natural person, and where applicable, an identifiable, existing juristic person, including, but not limited to: race, gender, sex, pregnancy, marital status, national or ethnic origin, colour, sexual orientation, age, physical or mental health, disability, religion, conscience, belief, culture, language and birth of a person;
- 1.6. **POPIA:** means the Protection of Personal Information Act of 2013;
- 1.7. **Processing:** is any operation or activity, whether or not by automatic means, including: 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 form; merging, linking, as well a restriction, degradation, erasure or destruction.
- 1.8. **Responsible Party:** means Visual Impact Broadcast Solutions (Pty) Ltd, including its directors, management, employees and Operators who process a Data Subject's Personal Information for business purposes.
- 1.9. **Special Personal Information:** includes any information relating to an individual's: ethnicity, gender, religious or other beliefs, political opinions, membership of a trade union, sexual orientation, medical history, offences committed or alleged to have been committed by that individual, biometric details, and children's details.

2. INTRODUCTION

- 2.1. Visual Impact Broadcasting Solutions (Pty) Ltd collects and processes Personal Information belonging to the Data Subjects mainly to provide access to its services and products, and to help Visual Impact Broadcasting Solutions (Pty) Ltd improve its offerings, to provide guidance in respect of complying with POPIA, to protect the privacy rights of Visual Impact Broadcast Solutions (Pty) Ltd's employees, clients, suppliers and other individuals and to protect Visual Impact Broadcast Solutions (Pty) Ltd from adverse consequences of a breach of its responsibilities under POPIA.
- 2.2. The type of information Visual Impact Broadcasting Solutions (Pty) Ltd collects will depend on the purpose for which it is collected and used. As an example, when the Data

Subject purchases a product or service from Visual Impact Broadcasting Solutions (Pty) Ltd or when the Data Subject submits a query.

- 2.3. In addition, Visual Impact Broadcast Solutions (Pty) Ltd will use the Data Subject's Personal Information only for the purposes for which it was collected or agreed with, this may include but is not limited to:
 - 2.3.1 criminal reference checks;
 - 2.3.2 in connection with legal proceedings;
 - 2.3.3 credit reference checks;
 - 2.3.4 verifying and updating personal details;
 - 2.3.5 financial, audit and record keeping purposes;
 - 2.3.6 evaluate the use of the site, products and services;
 - 2.3.7 recruitment and employment purposes;
 - 2.3.8 contracts and business transactions;
 - 2.3.9 providing services to clients to carry out the services requested and to constantly improve the relationship;
 - 2.3.10 assessing and processing queries, enquiries and complaints;
 - 2.3.11 conducting customer satisfaction research;
 - 2.3.12 promotional and marketing purposes;
 - 2.3.13 to respond to your queries or comments;
 - 2.3.14 analyse the effectiveness of the advertisements, competitions and promotions.

3. ACCESS AND CORRECTION OF PERSONAL INFORMATION

- 3.1. The Data Subject has the right to request a copy of the Personal Information or update the Personal Information which Visual Impact Broadcast Solutions (Pty) Ltd holds, as it relates to them. Visual Impact Broadcasting Solutions (Pty) Ltd shall accordingly allow access to or make the necessary amendments to the Data Subject's information unless Visual Impact Broadcasting Solutions (Pty) Ltd deems the request to be unlawful.
- 3.2. Any and all requests must be communicated to the Information Officer.

4. APPLICATION / SCOPE

This Policy shall apply to all employees, contractors, vendors and any other third parties assigned with the processing of Personal Information on behalf of Visual Impact Broadcast Solutions (Pty) Ltd.

5. COMPLIANCE WITH POPIA

Breaches of this policy may be treated as a disciplinary matter. Where third parties are involved breach of this policy may also constitute breach of contract.

6. COLLECTION OF NON-PERSONAL INFORMATION

Visual Impact Broadcasting Solution (Pty) Ltd may automatically collect non-personal information about the Data Subject such as the type of internet browser the Data Subject may use or the website from which it linked to the website of Visual Impact Broadcasting Solutions (Pty) Ltd. Visual Impact Broadcasting Solutions (Pty) Ltd may

also aggregate details which the Data Subject may have submitted to the site (for example, the products or services the Data Subject is interested in). The Data Subject cannot be identified from this information and it is only used to assist Visual Impact Broadcasting Solutions (Pty) Ltd in providing an effective service on its website.

7. DATA PROTECTION CONDITIONS

Any employee or Operator who processes Personal Information belonging to a Data Subject on behalf of Visual Impact Broadcast Solutions (Pty) Ltd, shall comply with all the provisions of POPIA and in doing so will ensure that: the Personal Information which has been obtained is processed fairly and lawfully; has been obtained only for one or more specified and lawful purposes; is adequate, relevant and not excessive in relation to the purpose or purposes for which it was processed; is accurate and, where necessary, kept up to date; is not be kept for longer than is necessary for the purpose or those purposes for which it was obtained;

8. INFORMATION OFFICER

8.1. Visual Impact Broadcast Solutions (Pty) Ltd has appointed an Information Officer who has been tasked with ensuring that there is compliance with POPIA.

8.2. The Information Officer shall be responsible for:

- 8.2.1. developing and maintaining the POPIA Policy;
- 8.2.2. reviewing POPIA and other applicable legislation;
- 8.2.3. conducting for all employees in respect of POPIA;
- 8.2.4. dealing with requests and/or queries received from Data Subjects;
- 8.2.5. ensuring that there are security systems in place;
- 8.2.6. that any third party contracted with the processing of Visual Impact Broadcast Solutions (Pty) Ltd's Personal or confidential information in POPIA compliant.

9. PERSONAL INFORMATION PROCESSING

9.1. Visual Impact Broadcasting Solutions (Pty) Ltd is legally obliged to provide adequate protection for the Data Subject's personal information which it holds and to stop unauthorised access and use of such information. Visual Impact Broadcasting Solutions (Pty) Ltd shall, on an ongoing basis, continue to review its security controls and related processes to ensure that the Data Subject's Personal Information is secure.

9.2. Before any Personal Information is processed, the person processing such information on behalf of Visual Impact Broadcast Solutions (Pty) Ltd must bring to the Data Subject's attention the following instructions and details:

- 9.2.1. why the processing of the Data Subject's Personal Information is necessary;
- 9.2.2. the Personal Information is required;
- 9.2.3. what will be done with the Personal Information and what will be done with the Personal Information once the purpose for its collection and use has expired.
- 9.2.4. that the Data Subject's consent is required for the processing of Personal Information, unless such processing is necessary to carry out actions for the

conclusion or performance of a contract to which the Data Subject is a party; or is required and complies with an obligation imposed by law on either the Data Subject or the Responsible Party;

- 9.2.5. who the Personal Information will be shared with and whether it will be sent outside the borders of South Africa and what data security measures are in place to protect the information.

10. SAFEGUARDING PERSONAL INFORMATION

10.1. All Visual Impact Broadcast Solutions (Pty) Ltd's employees and where applicable, Operators and persons acting on behalf of Visual Impact Broadcast Solutions (Pty) Ltd must, before processing Personal Information, ensure that the appropriate security measures have been put into place and that reasonable steps have been taken to prevent any unauthorised access, disclosure and / or loss of Personal Information.

10.2. Paper or hard copies of Personal Information and portable electronic devices housing Personal Information should be stored in locked units.

10.3. The use of workplace equipment to remove and/or download Personal Information on to a portable device, or the removal of soft copies, paper or hard copies of Personal Information off the premises must be authorised in writing by the manager of the relevant department from where the information emanates. A copy of such authorisation must be sent to the Information Officer.

10.4. The person removing the Personal Information will be required to explain, justify and comply with the following:

- 10.4.1. the need for the removal in relation to the volume and sensitivity of the Personal information;
- 10.4.2. ensure that the details of the Personal Information being removed is documented and recorded;
- 10.4.3. the date must be held in a secure environment;
- 10.4.4. the data should only be stored on the date which it is immediately required and should be removed as soon as possible once completed.

10.5. Visual Impact Broadcast Solutions (Pty) Ltd undertakes to ensure that the appropriate security, privacy and confidentiality measures in respect of the Data Subjects information are adhered to when contracting with third parties. In addition, Visual Impact Broadcasting Solutions (Pty) Ltd will ensure that there is a written agreement in place between itself and any Operator which it may use from time to time.

10.6. All losses of Personal Information must be reported to the Information Officer.

10.7. Negligent loss or unauthorised disclosure of Personal Information be treated as a disciplinary matter.

11. SERVICE PROVIDERS

Visual Impact Broadcast Solutions (Pty) Ltd undertakes to ensure that any service provider, contractor and/or agent (Operator) which is tasked with the processing of Personal Information for or on behalf of Visual Impact Broadcast Solutions (Pty) Ltd, has a POPIA compliant policy in place prior to such processing.