

POPI MANUAL

This manual was prepared to address requirements set forth in the *Protection of Personal Information Act, 4 of 2013* (“**POPI**”)

This manual applies to Protoclea (Pty) Ltd
with Registration nr 2006/002809/07
(Hereafter referred to as “**PROTOCLEA**”)

Head Office / Business Address:

763 Puttick Avenue,
Sundowner,
Randburg,
2161

Drafted and prepared by:

GERRIE EBERSOHN ATTORNEYS INC

Office 5, 7 & 8, Lifestyle Riverfront Office Park,

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i. Document Management

Date	Version	Description	Author
	1.0	First Release	L. van Deventer

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1. Contact Details

NAME OF BODY	Protoclea (Pty) Ltd
INFORMATION OFFICER	Elme Coetzer / Andre Coetzer
PHYSICAL ADDRESS	763 Puttick Avenue, Sundowner, Randburg, 2161
POSTAL ADDRESS	PO Box 1027 North Riding 2062
TELEPHONE NUMBER	011 100 0935
EMAIL ADDRESS	elmec@protoclea.com / andrec@protoclea.com

2. Processing of Personal Information

2.1. Purpose of Processing

2.1.1. Protoclea uses the Personal Information under its care in the following ways:

2.1.1.1. Conducting its business including accounting to shareholders;

2.1.1.2. Staff administration;

2.1.1.3. Keeping of accounts and records; and

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2.1.1.4. Complying with tax laws and other relevant legislation.

2.2. Categories of Data Subjects and their Personal Information

2.2.1. Protoclea may possess the following records relating to directors, suppliers, contractors, service providers, staff and clients:

Entity Type	Personal Information Processed
Natural Persons: Directors / Members etc	<ul style="list-style-type: none">• Names and Surnames• Identity Numbers and / or Passport Numbers• Date of Birth• Nationality• Gender• Contact Details• Physical and Postal Addresses• Tax Related Information• Confidential Correspondence
Advisors / Consultants	<ul style="list-style-type: none">• Names of Contact persons• Name of Legal Entity and Registration Number• Physical and Postal Address and Contact Details• Financial Information• Founding documents• Tax related information• Authorised signatories• Beneficiaries• Ultimate Beneficial Owners

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Contracted Service Providers	<ul style="list-style-type: none"> • Names of contact persons • Name of Legal Entity • Registration Number • Physical and Postal address • Contact Details • Financial information
	<ul style="list-style-type: none"> • Founding documents • Tax related information • Authorised signatories • Beneficiaries • Ultimate beneficial owners
Employees / Directors	<ul style="list-style-type: none"> • Name and Surname • ID number • Gender • Pregnancy • Marital Status • Colour • Age • Language • Educational information • Financial Information • Employment History • Physical and Postal address • Contact details • Opinions • Criminal behaviour criminal record • Information pertaining to Employee Well-being and medical records

2.2.2. Protoclea may supply the Personal Information to service providers whorender the following services:

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- 2.2.2.1. Capturing and organising of data;
- 2.2.2.2. Storing of data;
- 2.2.2.3. Sending of emails and other correspondence to directors and / or shareholders;
- 2.2.2.4. Conducting due diligence checks.

2.3. Actual or Planned Transborder Flows of Personal Information

- 2.3.1. Protoclea has no planned Transborder Flows of Personal Information.

2.4. General Description of Information Security Measures

- 2.4.1. Protoclea employs up to date technology to ensure the confidentiality, integrity and availability of the Personal Information under its care. Measures include:
 - 2.4.1.1. Firewalls and virus protection software and update protocols;
 - 2.4.1.2. Logical and physical access control;
 - 2.4.1.3. Secure setup of hardware and software making up the IT infrastructure; and
 - 2.4.1.4. Outsourced Service Providers who process Personal Information on behalf of Protoclea that are contracted to implement security controls.

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3. Remedies Available If Request for Information Is Refused

3.1. Internal Remedies

3.1.1. Protoclea does not have internal appeal procedures. As such, the decision made by the information officer pertaining to a request is final, and requestors will have to exercise such external remedies at their disposal if a request is refused, and the requestor is not satisfied with the response provided by the information officer.

3.2. External Remedies

3.2.1. A requestor that is dissatisfied with the information officer's refusal to disclose information, may within 30 days of notification of the decision, apply to a court for relief. Likewise, a third party dissatisfied with the information officer's decision to grant a request for information, may within 30 days of notification of the decision, apply to a court for relief. For purposes of the Act, courts that have jurisdiction over these applications are the Constitutional Court, the High Court or another court of similar status.

4. List of Applicable Legislation

4.1. Records of the Protoclea and other legal entities in which Protoclea has a direct interest or an indirect controlling interest through its subsidiaries) may be kept by or on behalf of the Company in accordance with the following legislation (some of which legislation may not be applicable to Protoclea), as well as with other legislation that may apply to Protoclea and/or its subsidiaries from time to time:

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<i>Basic Conditions of Employment Act 57 of 1997</i>
<i>Broad-based Black Economic Empowerment Act 53 of 2003</i>
<i>Collective Investment Schemes Control Act 45 of 2002</i>
<i>Companies Act 71 of 2008</i>
<i>Compensation for Occupational Injuries and Diseases Act 130 of 1993</i>
<i>Copyright Act 98 of 1978</i>
<i>Currencies and Exchanges Act 9 of 1993</i>
<i>Electronic Communications and Transactions Act 25 of 2002</i>
<i>Employment Equity Act 55 of 1998</i>
<i>Financial Intelligence Centre Act 38 of 2001</i>
<i>Income Tax Act 58 of 1962</i>
<i>Inspection of Financial Institutions Act 80 of 1998</i>
<i>Labour Relations Act 66 of 1995</i>
<i>Occupational Health and Safety Act 85 of 1993</i>
<i>Regulation of Interception of Communications and Provision of Communication-Related Information Act 70 of 2002</i>
<i>Prevention of Organised Crime Act 121 of 1998</i>
<i>Prevention and Combating of Corrupt Activities Act 12 of 2004 Promotion of Access to Information Act 2 of 2000</i>
<i>Protected Disclosures Act 26 of 2000</i>
<i>Protection of Constitutional Democracy against Terrorist and Related Activities Act 33 of 2004</i>
<i>Securities Transfer Tax Act 25 of 2007</i>
<i>Securities Transfer Tax Administration Act 26 of 2007</i>
<i>Trademarks Act 194 of 1993</i>
<i>Unemployment Insurance Act 30 of 1966</i>
<i>Unemployment Insurance Contributions Act 4 of 2002</i>
<i>Value Added Tax Act 89 of 1991</i>

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5. Availability of The Manual

5.1. The manual is available for inspection, on reasonable prior notice, at the office of Protoclea free of charge.

6. Approval

SIGNED ON BEHALF OF THE COMPANY ON THIS _____ DAY 20_____

Alaetzn

Designation: _____

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