



**POLICY ON THE PROTECTION OF  
PERSONAL INFORMATION IN TERMS OF THE  
PROTECTION OF PERSONAL INFORMATION  
ACT 4 OF 2013 (POPIA)**

Reference	PO-CS-004
Revision	1.0
Approval date	09-07-2021
Approved by	KPAL EXCO
Resolution No.	WR_2021_07_020
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<b>INTRODUCTION</b>	<p>1. The Protection of Personal Information Act, 4 of 2013 (POPIA) regulates and controls the processing of Personal Information.</p> <p>Kansai Plascon Africa Limited (“The Company”) is comprised of a group of companies engaged in the manufacture, sale and marketing of paint and allied products throughout Southern and central Africa.</p> <p>The Company, for the purposes of carrying out its business and related objectives, does and will from time to time, processes the Personal Information of living individuals and legal entities including public and private entities, such as Personal Information pertaining to employees and staff, prospective employees and job applicants, students and interns, service providers and contractors, vendors, clients, customers, and other third parties.</p> <p>The Company recognises that it is obligated to comply with POPIA, and the data protection conditions contained in POPIA with respect to the processing of Personal Information.</p> <p>This Policy describes how the Company will discharge its duties in order to ensure continuing compliance with POPIA in general and the information protection conditions and rights of data subjects in particular.</p>
<b>SCOPE</b>	<p>2. This policy applies to all employees of Kansai Plascon Africa Limited, all subsidiaries, service providers, clients and third parties.</p>
<b>PURPOSE AND OBJECTIVES</b>	<p>3.</p> <p>3.1 This Policy sets out how the Company deals with Personal Information.</p> <p>3.2 This Policy forms part of KPAL’s commitment to the safeguarding of Personal Information processed by it and its staff, operators and or service providers.</p> <p>3.3 The objective and purpose of this Policy is to:</p> <p>3.3.1 set out KPAL’s policy on the processing of Personal Information;</p> <p>3.3.2 ensure that all Company directors, executives, employees, and where applicable Company service providers, clients and Operators process Personal Information in accordance with POPIA and the POPIA conditions for the lawful processing of personal information;</p> <p>3.3.3 provide a guideline to Company directors, executives, employees, and where applicable Company service providers, clients and Operators, on how the Company will process Personal Information.</p> <p>3.4 This Policy is drafted in conjunction with KPAL’s Privacy statement, the Company section 18 Informed Consent notice, Operator contract and POPIA guidelines and is available on request from the Company Information Officer.</p>



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**DEFINITIONS**

**"KPAL Group or The Company"** means Kansai Plascon Africa Limited and any subsidiary in the Group.

Take note of the following definitions which will be used throughout this Policy and which are used under POPIA.

**"biometrics"** means a technique of personal identification that is based on physical, physiological or behavioural characterisation including blood typing, fingerprinting, DNA analysis, retinal scanning and voice recognition;

**"child"** means a natural person under the age of 18 years who is not legally competent, without the assistance of a competent person, to take any action or decision in respect of any matter concerning him-or herself;

**"competent person"** means any person who is legally competent to consent to any action or decision being taken in respect of any matter concerning a child;

**"consent"** means any voluntary, specific and informed expression of will in terms of which permission is given for the processing of Personal Information;

**"data subject"** means the person (natural or juristic) to whom Personal Information relates;

**"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 that party;

**"person"** means a natural person or a juristic person;

**"PAIA"** means Promotion of access to Information Act 2 of 2000.

**"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, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of 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;



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- (f) correspondence sent by the person that is implicitly or explicitly 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.

**Examples of Personal Information include:**

- *A person's name and address (postal and email)*
- *Date of birth*
- *Statement of fact*
- *Any expression or opinion communicated about an individual*
- *Minutes of meetings, reports*
- *Emails, file notes, handwritten notes, sticky notes*
- *Photographs and CCTV footage if an individual can be identified by the footage*
- *Employment and student applications*
- *Spreadsheets and/or databases with any list of people set up by code or student/staff*
- *Employment number*
- *Employment or education history*

**"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
- Children's details

**"processing"** means any operation or activity or any set of operations, whether or not 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;



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	<p><b>"public record"</b> means a record that is accessible in the public domain and which is in the possession of or under the control of a public body, whether or not it was created by that public body;</p> <p><b>"record"</b> means any recorded information—</p> <ul style="list-style-type: none"> <li>(a) regardless of form or medium, including any of the following: <ul style="list-style-type: none"> <li>(i) Writing on any material;</li> <li>(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;</li> <li>(iii) label, marking or other writing that identifies or describes anything of which it forms part, or to which it is attached by any means;</li> <li>(iv) book, map, plan, graph or drawing;</li> <li>(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;</li> </ul> </li> <li>(b) in the possession or under the control of a responsible party;</li> <li>(c) whether or not it was created by a responsible party; and</li> <li>(d) regardless of when it came into existence;</li> </ul> <p><b>"responsible party"</b> means a public or private body or any other person who, alone or in conjunction with others, determines the purpose of and means for processing personal information.</p>
<b>POLICY AND PROCESS</b>	<p><b>4. THE DATA PROTECTION PRINCIPLES AND CONDITIONS</b></p> <p>It is the duty of the Company as a Responsible Party to comply with all the data protection conditions set out under section 4 of POPIA, which are as follows:</p> <ul style="list-style-type: none"> <li>4.1 Personal Information shall be obtained and processed fairly and lawfully.</li> <li>4.2 Personal Information shall be obtained only for one or more specified and lawful purposes and shall not be further processed in any manner incompatible with that purpose or those purposes, unless specific consent to do so has been obtained.</li> <li>4.3 Personal Information shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.</li> <li>4.4 Personal Information shall be accurate and, where necessary, kept up to date.</li> <li>4.5 Personal Information processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.</li> <li>4.6 Personal Information shall be processed in accordance with the rights of data subjects under POPIA.</li> <li>4.7 Appropriate technical and organisational safeguards and measures must be put in place to protect and guard against unauthorised or unlawful processing of</li> </ul>



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Personal Information and against accidental loss or destruction of, or damage to, personal data.

4.8 Personal Information shall not be transferred to another country unless that country or the person transferring the Personal Information ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

**5. APPLICATION AND SCOPE**

This Policy applies to all Personal Information processed by or on behalf of the Company and to the following persons:

5.1 All employees of KPAL, who for the purposes of this Policy, means and will include all members of staff including permanent, fixed term, and temporary staff, directors and executives, secondees, any third party representatives, agency workers, volunteers, interns, agents and sponsors engaged with the Company in South Africa, or overseas.

5.2 All employees employed by any of KPAL's subsidiary or associated companies.

5.3 All Operators, service providers, contractors and agents acting for or on behalf of KPAL, to the extent they have been made aware of this Policy.

**6. COLLECTION OF PERSONAL INFORMATION**

6.1 The Company collects and processes Personal Information from a number of Data Subjects in order to carry out and pursue its business and related operational interests.

6.2 The type of Personal Information, which the Company processes, will depend on the need for which it is collected and will be processed for that purpose only.

6.3 Examples of Personal Information which the Company will from time to time collect includes but is not limited to:

- the Data Subject's identity number, name, surname, address, postal code, marital status, and how many dependents they have;
- the Data Subject's description of residence, business, assets; financial information, banking details;
- the Data Subject's description of health, biometric details, expertise, qualification and skills;
- any other information required by the Company or its service providers, and suppliers in order to provide an accurate analysis of that Data Subject needs;
- Information on a Data Subject's requirements, needs and specifications which is or may be used for marketing purposes to ensure that the Company products, services and offerings remain relevant and applicable;
- further processing provided it is in line with the provisions of POPIA.



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6.4 Any Data Subject, be it an employee or a person acting on behalf of the Company will provide each person from whom Personal Information is collected for the purpose of processing, a standard Company section 18 informed consent document, a copy of which is annexed hereto.

**7. HOW PERSONAL INFORMATION IS USED**

The Company will only use a Data Subject's Personal Information for the purpose for which it was collected and agreed. This may include:

- recruitment and employment purposes;
- conducting criminal reference checks;
- for risk assessments, insurance and underwriting purposes;
- assessing and processing queries, enquiries, complaints, and / or claims;
- conducting credit reference searches or verification;
- confirming, verifying and updating the Data Subject's details;
- for purposes of personnel and other claims history;
- for the detection and prevention of fraud, crime, money laundering or other malpractice;
- conducting market or customer satisfaction research;
- direct marketing purposes;
- audit and record keeping purposes;
- in connection with legal proceedings;
- providing services to clients to carry out the services requested and to maintain and constantly improve the relationship;
- providing communications in respect of KPAL, its employees or other persons to governmental officials and regulatory agencies; and
- in connection with and to comply with legal and regulatory requirements or when it is otherwise required or allowed by law.

**8. EXPRESS INFORMED CONSENT**

In accordance with POPIA, The KPAL Group, its employees and or Operators, will use its best endeavours, (save where it is unable to and this is due to it protecting the legitimate interests of the person whose Personal Information it is processing or the legitimate interests of the Company itself), to only process Personal Information if the below mentioned conditions are met, which conditions are set out in the Company standard section 18 informed consent document, annexed hereto:

- 8.1 the Data Subject is told why the processing is necessary, what information is required and what will be done with it;
- 8.2 the Data Subject consents to the processing, which consent will be obtained at the time when that Data Subject's Personal Information is processed;



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- 8.3 the processing is necessary i.e. in order to conduct an accurate analysis of that person's needs for purposes of amongst other employment reasons, credit limits, insurance requirements;
- 8.4 the processing is required as a result of or in order to comply with an obligation imposed by law on KPAL Group;
- 8.5 the processing protects a legitimate interest of the Data Subject and it is in the person'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;
- 8.6 processing is necessary for pursuing the legitimate interests of the Company or of a third party to whom the Personal Information is supplied.

**9. DISCLOSURE AND SHARING OF PERSONAL INFORMATION**

The Company may from time to time have to disclose certain Personal Information, which it has obtained from Data Subjects to other parties, including its group companies or subsidiaries, joint venture companies and or approved product or third party service providers, regulators and or governmental officials, overseas service providers and related companies or agents, but such disclosure will always be subject to an agreement which will be concluded as between the Company the party to who it is disclosing, which contractually obliges the recipient of the Personal Information to comply with strict confidentiality and data security conditions. A copy of this standard type agreement is available on request from the Information Officer.

**10. SAFEGUARDING PERSONAL INFORMATION**

- 10.1 All Company employees and where applicable, Operators and persons acting on behalf of the Company must before processing Personal Information ensure that the data will be kept secure and that appropriate measures and safeguards are in place to prevent any unauthorised access, disclosure and / or loss of such Personal Information.
- 10.2 Removing and Downloading Personal Information on to portable devices from workplace equipment or taking soft copies of Personal Information off-site must be authorised in writing by the manager of the relevant department from where the information emanates and a copy of such authorisation sent to the Information Officer, and which removal will be subject to the following provisions:
  - 10.2.1 the person removing the Personal Information must explain and justify the operational need for the removal in relation to the volume and sensitivity of the Personal Information and ensure that the details of the Personal Information being removed is documented and recorded under a "removal register";
  - 10.2.3 the Personal Information to be removed must be strongly encrypted;



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	<p>10.2.4 the person removing and using said data should only store the data necessary for their immediate needs and should remove the data as soon as possible once dealt with and such removal should be confirmed by way of a recordal in the removal register;</p> <p>10.2.5 to avoid loss of encrypted data, or in case of failure of the encryption software, an unencrypted copy of the data must be held in a secure environment;</p> <p>10.3 Where it is necessary to store Personal Information on portable devices such as laptops, USB flash drives, portable hard drives, CDs, DVDs, or any computer not owned by the Company all Company employees and where applicable, Operators and persons acting on behalf of the Company without exception must before storing said Personal Information ensure that the data is encrypted and is kept secure and that appropriate measures and safeguards are in place to prevent unauthorised access, disclosure and loss of such Personal Information and points 10.2.1- 10.2.5 will apply to said data.</p> <p>10.4 Where soft copies of Personal Information are removed from Company premises, all Company employees and where applicable, Operators and persons acting on behalf of the Company without exception must before removing said Personal Information ensure that only that data necessary for the purpose it is being removed is taken, is documented in a removal register and is thereafter whilst away from Company premises kept safe and secure and that appropriate measures and safeguards are in place to prevent unauthorised access, disclosure and loss of such Personal Information .</p> <p>10.5 Soft copies of Personal Information and portable electronic devices housing Personal Information should be stored in locked units, and they should not be left on desks overnight or in view of third parties.</p> <p>10.6 Personal Information which is no longer required should be securely archived and retained, with consideration for the format and retention period requirements relating to the data and destroyed when no longer required, all to be done in line with the Company Records management and archive policy and procedures.</p> <p>10.7 Personal Information must not be disclosed unlawfully to any third party.</p> <p>10.8 Transfers of Personal Information to third parties as per the provisions of clause 9, must be authorised by the manager of the relevant department from where the information emanates. Furthermore, such transfer must be protected by adequate contractual provisions or data processor agreements, as set out under clause 9 above.</p> <p>10.9 All losses of Personal Information must be reported to the relevant manager of the department from where the information emanates, the departmental Data Protection Coordinator and the Information Officer.</p>
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	<p>10.10 Negligent loss or unauthorised disclosure of Personal Information, or failure to report such events, may be treated as a disciplinary matter.</p> <p>10.11 The Company via its ICT department will continuously review its security controls and processes to ensure that all Personal Information is secure.</p> <p><b>11. ACCESS AND CORRECTION OF PERSONAL INFORMATION</b></p> <p>11.1 Any Data Subject has the right to access their Personal Information which the Company holds about them, provided that they follow the right to access procedure set out under KPAL's PAIA Manual which can be obtained here.....insert hyperlink..</p> <p>11.2 Any Data Subject will also have the right to ask the Company to update, correct or delete their Personal Information on reasonable grounds by completing the relevant form found under KPAL's PAIA Manual which can be obtained here.....insert hyperlink..</p> <p>11.3 Any Data Subject has the right to object to the Company processing their Personal Information which the Company currently holds about them, by filing a notice of objection, which is found under KPAL's PAIA Manual which can be obtained here.....insert hyperlink., which objection must be brought to the attention of the Information Officer.</p> <p>11.4 Once a Person objects to the processing of their Personal Information, the Company may no longer process said Personal Information.</p> <p>11.5 The details of the Company Information Officer are set out at the back of this Policy.</p> <p><b>12. RECORDS MANAGEMENT</b></p> <p>12.1 Records in all formats containing Personal Information must be created, safely and securely stored and disposed of in accordance with KPAL's Records management and archiving policies and any associated procedures and codes of practice in place from time to time.</p> <p>12.2 All records of Personal Information must be as accurate as possible and capable of speedy and efficient retrieval.</p> <p>12.3 All records of Personal Information must not be retained for periods not exceeding the periods permitted in KPAL's retention schedule as per KPAL's Records management and archiving policies unless there is a specific reason there for and such retention is required for operational or statistical reasons.</p>
<p><b>ROLES AND RESPONSIBILITIES</b></p>	<p><b>13.1 Information Officer</b></p> <p>The Company Information Officer has primary responsibility for KPAL's compliance with POPIA. This comprises:</p>



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- Ensuring that the Company has a POPIA compliance program in place and that all employees and operators, service providers, contractors and agents acting for or on behalf of the Company are aware of this Policy and their obligations in relation to the POPIA compliance program;
- Maintaining KPAL's notification with the Regulator as necessary;
- Handling Data Subject access requests and requests from third parties for Personal Information;
- Promoting and maintaining awareness of POPIA and its regulations, including training;
- Investigating breaches and unauthorised disclosures of personal Information.

**13.2 Deputy Information Officers**

Deputy Information Officers are responsible for ensuring compliance of POPIA within their areas of responsibility i.e. Business units or Functions. They must ensure that their employees and where applicable all Operators, service providers, contractors and agents acting for or on behalf of the Company understand the role of the Information Protection conditions in their day-to-day work, through induction, training and performance monitoring, and for monitoring compliance within their own areas of responsibility i.e. Business Units or Functions. Deputy Information Officers must keep the Information Officer apprised of all relevant matters such as significant risks identified or data security breaches. Deputy Information Officers must determine the training needs for their respective areas of responsibility.

**13.3 POPIA Committee Members**

Those appointed by the Deputy Information Officers described in 13.3, as POPIA Committee Members, must assist their relevant Deputy Information Officer to ensure compliance in their respective Business Units or Functions. POPIA Committee Members are required to:

- 13.3.1 Advise employees and where applicable Operators, service providers, contractors and agents acting for or on behalf of the Company in their departments on the implementation of and compliance with POPIA and this Policy and any associated guidance / codes of practice;
- 13.3.2 Ensure appropriate technical and organisational measures are taken within their departments to ensure against unauthorised or unlawful processing of Personal Information and against accidental loss or destruction of, or damage to, Personal Information;
- 13.3.3 Support KPAL's notification with the Regulator where necessary;
- 13.3.4 Keep their Deputy Information Officer informed of changes in the collection, use, and security of Personal Information within their department;
- 13.3.5 Report any loss of Personal Information to their Deputy Information Officer;



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13.3.5 Ensure the proper completion of all section 18 informed consent documents.

**13.4 Employees**

All the Company employees are responsible for:

- 13.4.1 Processing Personal Information in accordance with POPIA, the POPIA conditions for processing, and any guidelines and instructions issued by the Company from time to time;
- 13.4.2 Ensuring that they only process Personal Information, which is relevant and accurate and only for the purpose for which it is required;
- 13.4.3 Ensuring that all special Personal Information will only be processed in line with the provisions set out under POPIA and in accordance with instructions set out by the Information Officer from time to time;
- 13.4.4 Ensuring that all Personal Information and all records housing such Personal Information are safely retained, stored and archived and/ or destroyed when no longer required in accordance with the Company Records management and archiving Policy and procedures
- 13.4.5 Complying with all security and monitoring measures in order to safeguard and protect any Personal Information which he or she may be in possession of;
- 13.4.6 Ensuring that any transfer of Personal Information to third parties is authorised, lawful and that appropriate and safe transport mechanisms are employed in respect of the Personal Information so transferred such as encryption;
- 13.4.6 Ensuring that only authorised downloading of electronic Personal Information onto portable devices or the removal of manual Personal Information from Company premises occurs;
- 13.4.7 Raising any concerns in respect of the processing of Personal Information with the Information Officer;
- 13.4.8 Promptly passing on to the Information Officer all data subject access requests and requests from third parties for Personal Information;
- 13.4.9 Reporting losses or unauthorised disclosures of Personal Information to the Information Officer;
- 13.4.10 Ensuring the Personal Information they provide about themselves is up to date.
- 13.4.11 Not attempting to gain access to information that is not necessary to hold, know or process.

**13.5 Operators and service providers**

- 13.5.1 All operators, service providers, contractors and agents acting for or on behalf of the Company have a responsibility to act only on KPAL's instructions and to



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	<p>ensure that their processing of Personal Information provided to them by the Company is carried out strictly in compliance with this Policy, any operator agreement, and in accordance with POPIA and the eight data protection conditions housed under POPIA.</p> <p>13.5.2 Where any employee asks any operators, service providers, contractors and / or agents to process Personal Information on behalf of KPAL, such Employee must ensure that a written operator agreement is concluded with the aforementioned data processor which adequately addresses these responsibilities.</p> <p><b>13.6 Disciplinary Action</b></p> <p>Disciplinary action will be taken against any employee who is found to be in contravention of any of the provisions of this policy.</p>
<b>POLICY REVIEW AND RESPONSIBILITY</b>	<p>This policy will be reviewed annually or whenever the process changes.</p> <p>The policy is the responsibility of the Information Officer.</p>



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**DEPUTY INFORMATION OFFICER DETAILS (cont.,)**

NAME: **Kenny Mokoka**

TELEPHONE NUMBER: 011 951 4500

POSTAL ADDRESS: P.O. Box 4010 Luipaardsvlei 1743

PHYSICAL ADDRESS: 10 Frederick Cooper Drive, Factoria, Krugersdorp 1739



**POLICY ON THE PROTECTION OF  
PERSONAL INFORMATION IN TERMS OF THE  
PROTECTION OF PERSONAL INFORMATION  
ACT 4 OF 2013 (POPIA)**

Reference	PO-CS-004
Revision	1.0
Approval date	09-07-2021
Approved by	KPAL EXCO
Resolution No.	WR_2021_07_020
Pages	15 of 18

E-MAIL ADDRESS: [kmokoka@kansaiplascon.co.za](mailto:kmokoka@kansaiplascon.co.za)

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**HEAD OFFICE DETAILS**

**Kansai Plascon Africa Limited**

TELEPHONE NUMBER: 011 951 4500

POSTAL ADDRESS: P.O. Box 4010 Luipaardsvlei 1743

PHYSICAL ADDRESS: 10 Frederick Cooper Drive, Factoria, Krugersdorp 1739

E-MAIL ADDRESS: [companysecretary@kansaiplascon.co.za](mailto:companysecretary@kansaiplascon.co.za)

WEBSITE: [www.plascon.co.za](http://www.plascon.co.za)



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## ANNEXURE

CONSENT TO PROCESS PERSONAL INFORMATION IN TERMS OF THE PROTECTION OF INFORMATION ACT, 4 OF 2013 (POPIA)

For Kanai Plascon (Pty) Ltd (“The Company”)

### Introduction

In terms of POPIA, a “Responsible Party” (The Company) has a legal duty to process a “Data Subject’s” Personal Information (in this case being your personal information and related details) in a lawful, legitimate and responsible manner. In order to discharge this duty, the Company requires your express and informed permission to process your Personal Information.

### 1. Purpose for the collection

1.1 The purpose for the collection of your Personal Information and the reason for the Company requiring your Personal Information is to enable the Company –

1.1.1 to comply with lawful obligations, including amongst others, all applicable labour, tax and financial legislation such as:

- i. The Financial Advisory and Intermediary Services Act 37 of 2002 (FAIS);
- ii. The Financial Intelligence Centre Act 38 of 2001 (FICA);
- iii. The National Credit Act 34 of 2005; and
- iv. The Broad Based Black Economic Empowerment laws (B-BBEE).

1.1.2 to give effect to a contractual relationship between the Company and yourself;

1.1.3 to conduct its business operations; and

1.1.4 to protect the legitimate interests of the Company, yourself and or any third parties.

1.2 All Personal Information which you provide to the Company will only be used for the purposes set out above.

### 2. Withholding Consent

You are within your rights to withhold consent to the Company collecting and processing your Personal Information. In the event that you withhold consent to providing the Company with your Personal Information, the Company will not be able to engage with you or to enter into an agreement or relationship with you.

### 3. Storage of Personal Information

3.1 All Personal Information, whether hard copy or a soft copy, which you provide to the Company will be held and stored securely and for the purpose for which it was collected.

For the current issue, refer to the Electronic Document Management System





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- 3.2 The secure storage facilities for the Personal Information will be audited regularly by the Company.
- 3.3 The Information as contained in soft copies, will be stored electronically in a centralised data base.
- 3.4 Where appropriate, hard copies of Personal Information will be stored and retained safely under lock and key.
- 3.5 Where data is stored electronically out of the borders of South Africa, such is done only in countries which have similar privacy laws to our own or where such facilities are bound contractually to no lesser regulations than those imposed by POPIA.

#### 4. Right to Object

In terms of section 11(3) of POPIA you have the right to object in the prescribed manner to the Company processing your Personal Information. On receipt of your objection the Company will place a hold on any further processing until the cause of the objection has been resolved.

#### 5. Accuracy of Information and Onus

POPIA requires that all your Personal Information and related details, as supplied are complete, accurate and up to date. Whilst the Company will always use its best endeavours to ensure that your Personal Information is reliable, it will be your responsibility to advise the Company of any changes to your Personal Information, as and when these may occur.

#### 6. Access to the Information by the Data Subject

You have the right at any time to ask the Company to provide you with:

- 6.1 the details of any of your Personal Information which the Company holds on your behalf; and
- 6.2 the details as to what the Company has done with that Personal Information.

Provided that such request is made using the standard section 51 PAIA process, which procedure can be accessed by downloading and completing the standard request for information form, housed under section 51 of our PAIA Manuals – obtained under our website at: [www.plascon.co.za](http://www.plascon.co.za).

#### 7. Direct Marketing, Advertising and Promotional activities

The Company

- may / may not use my Personal Information for the marketing and / or promotion of its own goods and services;
- may / may not use my Personal Information for the marketing and / or promotion of other parties' goods and services.



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8. Complaints

You have the right to address any complaints to the Company Information Officer or to the Personal Information Regulator.

9. Declaration and informed consent

- 9.1 I/We consent to providing the Personal Information required, to the Company, on the understanding that the Company is responsible to abide by the principles set out in POPIA, in the Company POPIA Policy, and in this document.
- 9.2 I/We declare that all Personal Information being supplied by me to the Company is accurate, up to date, not misleading, and that it is complete in all material respects.
- 9.3 I/We undertake to advise the Company immediately of any changes to my Personal Information, should any of the details change.
- 9.4 By providing the Company with my Personal Information, I/we consent and give the Company permission to process and further process the Personal Information, as and when required, that I/we supply to the Company, understanding the purposes for which the Personal Information is required and for which it will be use.

For and on behalf of: \_\_\_\_\_.

Name and Surname: \_\_\_\_\_ Signed \_\_\_\_\_