

## WOOL TESTING BUREAU S.A.

Registration No. 1990/003582/08

### **PROTECTION OF PERSONAL INFORMATION POLICY**

#### **1. INTRODUCTION**

- 1.1 The WTB will process Personal Information from time to time. As such, the WTB is obliged to comply with the POPIA.
- 1.2 The WTB is committed to protect the privacy of Data Subjects and ensuring that their Personal Information is used appropriately, transparently and in accordance with applicable laws and this Policy details the manner in which the WTB deals with such Personal Information.
- 1.3 This Policy should be read in conjunction with the POPIA. To the extent that any conflict may arise between this Policy and the POPIA, the POPIA shall prevail.
- 1.4 In addition to this Policy, the WTB also has a Manual<sup>1</sup> in terms of the PAIA which regulates the process of requests for information disclosure.

#### **2. DEFINITIONS**

- 2.1 **Data Subject** means the person (an existing identifiable natural or juristic person) to whom Personal Information relates, and for the purposes of the WTB includes (but not limited to) its employees (potential, past and existing), clients (potential, past and existing) and suppliers (past and existing, once-off or recurring).
- 2.2 **Personal Information** means information relating to a Data Subject including, but not limited to, social factors (e.g. race, gender, culture, age etc.), financial history, banking and account information, and contact details (e.g. e-mail addresses, physical address, telephone/mobile numbers, location information).
- 2.3 **Processing/Processed/Process** means (a) the collection, receipt, recording, organization, collation, storage, updating or modification, retrieval, alteration, consultation or use; (b) dissemination by means of transmission, distribution or making available in any other form; (c) merging, linking, erasure or destruction of information.
- 2.4 **PAIA** means the Promotion of Access to Information Act, 2000.
- 2.5 **POPIA** means the Protection of Personal Information Act, 2013.
- 2.6 **Regulations** means the Regulations relating to the Protection of Personal Information, GNR.1383 of 14 December 2018, Government Gazette No. 42110.
- 2.7 **WTB** means the Wool Testing Bureau S.A.

#### **3. DETAILS OF WTB**

Name	Wool Testing Bureau S.A.
Telephone Number	(041) 503 6600
Street Address	Cnr. of Gomery Avenue and University Way, Summerstrand, Port Elizabeth
Postal Address	PO Box 1867, Port Elizabeth, 6000
Email Address	popia@wtbsa.co.za

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<sup>1</sup> <https://www.wtbsa.co.za/media/website/paia.pdf>

#### **4. COLLECTION OF PERSONAL INFORMATION**

- 4.1 During the course of ordinary business activities, the WTB will collect Personal Information from Data Subjects from time to time. The nature of the Personal Information collected will depend on the specific need therefor and it will be Processed for that purpose only. In this regard the WTB will Process:
- 4.1.1 employees' Personal Information including, but not limited to, the following purposes (a) submissions to the Department of Labour and Receiver of Revenue, (b) for audit and record purposes, (c) in connection with legal/disciplinary proceedings/legal and regulatory requirements/administrative functions of the WTB, (d) employment benefits, (e) employment checks and screening and (f) any other purpose for which the employee may be notified;
- 4.1.2 clients'/ suppliers' Personal Information including, but not limited to, the following purposes (a) provision of services, (b) transmission of accounts and communications, (c) confirming, verifying and updating details, (d) for audit and record purposes, (e) in connection with legal proceedings/legal and regulatory requirements/administrative functions of the WTB, (f) conducting market or client research/marketing purposes and (f) for any other purpose which the client/supplier may be notified.
- 4.2 The supply of Personal Information may be voluntary or mandatory given the specific circumstance or purpose. The WTB will inform the Data Subject of the consequence of any non-disclosure. For example, the supply of Personal Information by a client may be required to place the WTB in a position to render the services.
- 4.3 The WTB will process Personal Information (a) lawfully and in a reasonable manner and (b) where the consent of the Data Subject is needed, with such consent.
- 4.4 Personal Information will be Processed when (a) necessary to carry out actions for the conclusion or performance of a contract; (b) complying with an obligation imposed by law; (c) protecting a legitimate interest of the Data Subject or pursuing a legitimate interest of the WTB.

#### **5. RETENTION OF RECORDS OF PERSONAL INFORMATION**

The WTB shall retain records of Personal Information for a period (a) not longer than is necessary for achieving the purpose for which the Personal Information was collected or (b) required in terms of or authorized by any law, (c) for which the WTB may reasonably require related to its functions or activities, (d) as may be required by any contract between the parties, or (e) consented to by the Data Subject.

#### **6. DISCLOSURE OF PERSONAL INFORMATION**

The WTB may disclose Personal Information (a) with authorized third parties as well as obtain Personal Information of an employee/client/supplier from such third party, and (b) where there is a duty or right to disclose in terms of applicable legislation/law or for the protection of rights/interests of the Data Subject or the WTB.

## **7. CONSENT, OBJECTION, ACCESS AND CORRECTION**

- 7.1 Consent to Process Personal Information is obtained from employees/clients/suppliers at sign-on/appointment/contracting/application for services (as the case may be).
- 7.2 A Data Subject may at any time on reasonable grounds object to the WTB's Processing of its Personal Information (unless such Processing is required by law) on Form 1 of the Regulations.
- 7.3 A Data Subject (having provided adequate proof of identity) has the right to access to any Personal Information that the WTB holds about it. The WTB's Manual in terms of the PAIA shall be applicable to such requests and in responding thereto, the WTB will also conform with section 23 of the POPIA.
- 7.4 A Data Subject has the right to request the WTB to update, correct or delete its Personal Information on Form 2 of the Regulations.
- 7.5 Any objection or request must be sent on the prescribed form by e-mail to the Information Officer, or delivered by hand to the Street Address of the WTB marked for the attention of the Information Officer.

## **8. SECURITY SAFEGUARDS**

- 8.1 The WTB shall take appropriate, reasonable technical and organizational measures to secure the integrity and confidentiality of Personal Information in its possession or under its control and prevent loss, damage, unauthorized destruction and unlawful access of/to Personal Information, including, but not limited to (a) the identification of internal and external risks, (b) establishing and maintaining appropriate safeguards, (c) updating safeguards, and (d) implementing generally accepted information security practices and procedures.
- 8.2 Where there are reasonable grounds to believe that Personal Information has been accessed by an unauthorized person, the WTB will, in terms of section 22 of the POPIA, notify the Information Regulator and/or the Data Subject (to the extent provided in terms of the POPIA).

## **9. LODGEMENT OF COMPLAINT**

- 9.1 A Data Subject has the right to lodge a complaint to the Information Regulator, which complaint must be in writing and on Part I of Form 5 of the Regulations.
- 9.2 The contact details of the Information Regulator are as follows:

Name	The Information Regulator (South Africa)
Street Address	JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
Postal Address	PO Box 31533, Braamfontein, Johannesburg, 2017
E-mail Address	<a href="mailto:POPIAComplaints.IR@justice.gov.za">POPIAComplaints.IR@justice.gov.za</a>
Website	<a href="https://justice.gov.za/inforeg/">https://justice.gov.za/inforeg/</a>

## **10. AMENDMENTS**

The WTB may effect amendments to this Policy from time to time and notice of such amendment(s) will be given, including by means of publication of the WTB's website.

## **11. GENERAL**

Any requests and/or enquiries regarding this Policy may be directed to the Information Officer per e-mail.