

DATA PROTECTION & INFORMATION SHARING POLICY

Policy Statement

The Company collects and uses Personal Information of the individuals and corporate entities with whom it interacts with to operate and carry out its business effectively. The Company regards the lawful and appropriate processing of all Personal Information as crucial to successful service delivery and essential to maintaining confidence between the Company and those individuals and entities who deal with it. The Company therefore fully endorses and adheres to the principles of the PO PI.

Processing of Personal Information

Purpose of Processing

The Company uses the Personal Information under its care in the following ways:

- Conducting credit reference checks and assessments
- Administration of agreements
- Providing products and services to customers
- Conducting market or customer satisfaction research
- Marketing and sales
- Staff administration
- Keeping of accounts and records
- Complying with legal and regulatory requirements

Retention of Personal Information Records

The Company may retain Personal Information records indefinitely unless the Data Subject objects thereto. If the Data Subject objects to indefinite retention of its Personal Information the Company shall retain the Personal Information records to the extent permitted or required by law.

General Description of Information Security Measures

The Company employs up to date technology to ensure the confidentiality, integrity, and availability of the Personal Information under its care. Measures include:

- Firewalls
- Virus protection software and update protocols
- Logical and physical access control.

- Secure setup of hardware and software making up the IT infrastructure.
- Outsourced Service Providers who process Personal Information on behalf of the Company are contracted to implement security controls.

Destruction of Documents

Documents shall be destroyed after the termination of the retention period specified in the relevant legislation, or as determined by the Company from time to time.

Each department is responsible for attending to the destruction of its documents and electronic records, which must be done on a regular basis. Files must be checked to make sure that they may be destroyed and to ascertain if there are important original documents in the file. Original documents must be returned to the holder thereof, failing which, they should be retained by the Company pending such return.

The documents must be made available for collection by the Shred-It, or other approved document disposal company.

Deletion of electronic records must be done in consultation with the IT Department, to ensure that deleted information is incapable of being reconstructed and/or recovered.