



INNOVATION™
DELIVERY
RESULTS

DATA PRIVACY AND SECURITY POLICY

for

**FIRST TECHNOLOGY INVESTMENTS (PTY) LTD
AND ALL OF ITS AFFILIATES**

In accordance with

PROTECTION OF PERSONAL INFORMATION ACT 4 OF 2013

This document (including but not limited to manuals, policies, procedures, forms) applies to all Affiliated Companies of First Technology Investments (Pty) Ltd.

“Affiliated Company(ies)” means, in relation to First Technology Investments (Pty) Ltd, a subsidiary of this entity, or any division or operating branch of each subsidiary of this entity and all of its subsidiaries. Including but not limited to:

- First Technology National (Pty) Ltd
- First Technology Western Cape (Pty) Ltd
- First Technology KwaZulu Natal (Pty) Ltd
- First Technology (Central) (Pty) Ltd
- FirstNet Technology Services (Pty) Ltd
- First Technology (Pty) Ltd
- First Technology Digital (Pty) Ltd
- First Technology MPS (Pty) Ltd
- First Technology (Audio) (Pty) Ltd
- First Technology Enterprise Data Solutions (Pty) Ltd
- First Technology IT Suppliers (Pty) Ltd
- Marketplace Solutions (Pty) Ltd
- Galdon Data Computer Services (Pty) Ltd
- Phoenix Distribution (Pty) Ltd
- BUI Medical and Technology Suppliers (Pty) Ltd
- BUI Security Services (Pty) Ltd
- EVAR Technology (Pty) Ltd
- Complexus (Pty) Ltd
- The CRM Team (Pty) Ltd
- Pilot (Pty) Ltd
- IT Certification Academy (Durban) (Pty) Ltd
- Ascent Technology (Pty) Ltd
- CHM Irrigation Suppliers (Pty) Ltd

This list is subject to amendment at the sole discretion of the First Technology Investments (Pty) Ltd and will include all affiliates whether listed or not.

BUI SECURITY SERVICES (PTY) LTD

DIRECTORS: A. Sharp, R. Roseveare, V. Pillay, W. Malan

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Legal Division

Revision 5

Effective Date: January 2020

POL: POPI-External

Revision and Signoff Sheet

Revision History

Version Number	Revision Date	Effective Date	Compiled By	Approved by Head of Legal	Description of change
01	06/2016	07/2016	Reinardt Munnik	Yuraisha Mari	First version
02	01/2017	02/2017	Reinardt Munnik	Yuraisha Mari	Included revision history table and quality records table
03	11/2017	11/2017	Rob Catterall	Yuraisha Mari	Review and Update
04	03/2019	03/2019	Grace Uchena	Richard Hammond	Review and Update
05	01/2020	01/2020	Nandi Ndaba	Richard Hammond	Review and Update

Quality Records Table- Retention Table

Department: Legal Contracts Department

Identification	Storage	Protection	Retention Time	Version in Process	Disposition
Data Privacy and Security Policy	Electronic	Back-up	N/A	POL: POPI-External -02	N/A
Data Privacy and Security Policy	Electronic	Back-up	N/A	POL: POPI-External 03	N/A
Data Privacy and Security Policy	Electronic	Back-up	N/A	POL: POPI-External 04	N/A
Data Privacy and Security Policy	Electronic	Back-up	N/A	POL: POPI-External -02	N/A

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1. INTRODUCTION

- 1.1 First Technology Investments (Pty) Ltd (Registration number: 1998/019350/07) including its Affiliates) “Affiliate” means, in relation to First Technology Investments (Pty) Ltd, a subsidiary of this entity, or any division or operating branch of each subsidiary of this entity and all of its subsidiaries) (hereinafter collectively referred to as “First Technology”, “we”, “us” or “our”), are committed to respecting the privacy of your personal data and to providing you with the best possible IT solution whilst still maintaining the integrity of any information you may share with us. To demonstrate our commitment, First Technology has created this Data Privacy and Security Policy in order to communicate its intent to provide effective processes for the appropriate handling of such private information and to comply with applicable legislation that governs the authentication, protection and disclosure of personal information. By procuring any IT related hardware, software, services and/or solutions (“services and/or products”) from First Technology, you consent to the use of your personal identifiable information within the scope of the data practices described in this statement.
- 1.2 “You” and “Your” in these Terms refers to: (i) Your subscribing organization, (ii) you, an individual, and (iii) any other subscribing organization personnel engaging with First Technology on the subscribing organization’s behalf. If you are engaging with First Technology on behalf of a company, entity, or organization (collectively, a “subscribing organization”) then you represent and warrant that you are an authorized representative of that subscribing organization with the authority to bind such subscribing organization to this policy, and that you consent to this policy on behalf of such Subscribing Organization.
- 1.3 This document constitutes a legal agreement between you and First Technology, which is in addition to any other agreements you may have in place with First Technology. This policy governs any engagement and/or interaction between you and First Technology. You acknowledge that you have read, understood, and expressly consent to be bound by the contents of this policy, and any additional policies and future modifications. If at any time you do not agree to the contents of this policy, please immediately terminate your engagement with First Technology.
- 1.4 By doing business with First Technology, you accept the terms contained in this document and consent to First Technology collecting and using your personal information in accordance with this policy.

2. WHAT CONSTITUTES PERSONAL INFORMATION

- 2.1 For purposes of this policy, personal information is that as defined in the Protection of Personal Information Act 4 of 2013, or more simply any information that can be used to personally identify an individual, for example your name and surname, contact details, address and country of residence.

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3. TYPES OF INFORMATION COLLECTED BY FIRST TECHNOLOGY

- 3.1 In For the purpose of business communications, administration and transacting we may collect and use your personal identifiable information, for example:
- 3.1.1 your name or your company name and details;
 - 3.1.2 your address or your company address;
 - 3.1.3 home/business telephone number;
 - 3.1.4 e-mail address;
 - 3.1.5 account details.
- 3.2 We also collect anonymous demographic information, which is not unique to you, such as your postal code, age, gender, preferences, interests and favourites. There is also information about your computer hardware and software that is automatically or manually collected by us. This information can include: your IP address, browser type, domain names, access times and referring Web site addresses.
- 3.3 This will enable us to:
- 3.3.1 Respond to queries or requests submitted by you;
 - 3.3.2 Process orders placed by you or applications submitted by you;
 - 3.3.3 Provide you with the requested services and/or products;
 - 3.3.4 Resolve problems with goods and/or services previously supplied; and/or
 - 3.3.5 Create products and/or services that may meet your future requirements.
- 3.4 This information is also used by us for the operation of any services and/or the provision of any products, to maintain the quality of any services and/or products provided, and to provide general statistics regarding use of First Technology Services to yourself.
- 3.5 We also use your personally identifiable information to inform you of other products and/or services available from First Technology. We may also contact you via surveys to conduct research about your opinion of current services and/or products provided or of potential new services and/products that may be offered.

4. HOW FIRST TECHNOLOGY COLLECTS PERSONAL INFORMATION

- 4.1 We collect personal information directly from you in different ways and through various situations, which includes:
- 4.1.1 when you place orders with First Technology;
 - 4.1.2 when we respond to your requests and inquiries;
 - 4.1.3 when we communicate with you via telephone, email or in person;
 - 4.1.4 when we market our products, services and solutions to you;
 - 4.1.5 when you access and use our website

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5. THE USE OF COOKIES

- 5.1 We may store some information (commonly known as a "cookies") on your computer when you visit our web site. This enables us to recognise you during subsequent visits. The type of information gathered is non-personal, such as:
- 5.2.1 the IP address of your computer;
 - 5.2.2 the date and time of your visit;
 - 5.2.3 which pages you browsed;
 - 5.2.4 whether the pages have been delivered successfully.
- 5.2 Apart from merely establishing basic connectivity and communications, First Technology may also use this data in aggregate form to develop customised services - tailored to your individual interests and needs. Should you choose to do so, it is possible (depending on the browser you are using), to be prompted before accepting any cookies, or to prevent your browser from accepting any cookies at all. This may however cause certain features of the web site not to be accessible.

6. THE SECURITY OF PERSONAL IDENTIFIABLE DATA

- 6.1 First Technology has implemented technology, policies and processes aimed at protecting the confidentiality, integrity and availability of your personal information. We update and refine these measures on an on-going basis. However, First Technology cannot be responsible for the privacy policies and practices of other web sites you may access using links from First Technology web sites. We recommend that you check the policy of each web site you visit and that you contact that specific organisation if you have any concerns or questions regarding their privacy policies and practices. Please be aware that internet communications are inherently not secure unless they have been encrypted. Your communications may be routed through any number of countries before reaching our web site. First Technology therefore assumes no responsibility or liability of any nature whatsoever for the interception or loss of personal information beyond our control.

7. DISCLOSURE OF PERSONAL IDENTIFIABLE INFORMATION

- 7.1 First Technology does not distribute, sell, rent or lease any of your personal information to third parties; unless it's required to deliver the products or services requested by you. In addition, First Technology will not sell your personal information to third parties unless you give us your specific permission to do so. For example, we may disclose your data to a credit card company to obtain payment for a purchase you initiated. It may also be necessary to pass on your data to a Distributor who will deliver the product on order. In addition, First Technology may be obligated to disclose personal information to meet any legal or regulatory requirements of applicable laws or to adhere to any court orders. First Technology may share data with trusted partners to help us perform statistical analysis, send you an email or postal mail, provide customer support, or arrange for deliveries. All such third parties are prohibited from using your personal information except to provide these services to First Technology, and they are contractually obligated to

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maintain the confidentiality of your information.

- 7.2 First Technology may, from time to time, contact you on behalf of external business partners about a particular offering that may be of interest to you. In those cases, your unique personally identifiable information (e-mail, name, address, telephone number) is not transferred to the third party.
- 7.3 First Technology does not use or disclose sensitive personal information, such as race, religion, or political affiliations, without your explicit consent.

8. YOUR CONSENT AND ACCESSING YOUR INFORMATION

- 8.1 First Technology will collect, store, process, transmit or otherwise handle personal identifiable information only with the knowledge and consent of you as provided by you in this document and the applicable agreement(s) entered into by and between you and First Technology
- 8.2 First Technology requires your consent to provide you with its services and/or products. Without your consent, First Technology will not be able to provide you with its services and/or products. You have the right to update, correct or delete your personal information that has been previously provided to us at any time. You are under an obligation keep your personal information up to date and accurate. If you wish to access, update, correct or delete any of your personal information, please send a written request to: legalenquiries@firsttech.co.za.
- 8.3 First Technology will assist you with your request timeously. Please be aware that we may require certain information and/or documentation from you for security purposes. Certain information will be retained in order to fulfil any obligations that we might have towards you.
- 8.4 You furthermore warrant that all information, personal identifiable information and personal data provided by you to First Technology is true, correct and accurate and that you indemnify First Technology from any liability, whether direct or indirect, howsoever arising, from its reliance on such information provided.

9. AMENDMENTS TO THIS DATA PRIVACY AND SECURITY POLICY

- 9.1 First Technology reserves the right to amend or modify this Data Privacy and Security Policy at any time in response to new privacy legislation.
- 9.2 Monitoring or recording of your calls, e-mails or SMS's may take place for business purposes to the extent permitted by law, such as for example quality control, detecting fraud and training for the purposes of marketing and improving the products and/or services we provide you. However, in these situations, we will not disclose information that could be used to personally identify you

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10. PROCESSING OF PERSONAL IDENTIFIABLE INFORMATION

- 10.1 First Technology will process your Personal Identifiable Information in accordance with the contents of this Policy and the contents of our Internal Data Privacy and Security Policy. If you require access to our Internal Data Privacy and Security Policy, please send a written request to legalenquiries@firsttech.co.za.

11. GENERAL DATA PROTECTION REGULATIONS

- 11.1. The European Union General Data Protection Regulation (GDPR) is a set of rules governing the processing of personal data of data subjects. GDPR lays out responsibilities for organisations to ensure the privacy and protection of personal data, provides data subjects with certain rights, and assigns powers to regulators to ask for demonstrations of accountability to GDPR requirements. The First Technology Group ensures full compliance with the GDPR requirements.