

POPI POLICY

1. INTRODUCTION

The right to privacy is an integral human right recognised and protected in the South African Constitution and in the Protection of Personal Information Act 4 of 2013 ("POPIA").

POPIA aims to promote the protection of privacy through providing guiding principles that are intended to be applied to the processing of personal information in a context-sensitive manner.

Any reference in this policy to the Company shall be interpreted to include a reference to Tractionel Enterprise (Pty)Ltd, Tractionel Maintenance Services (Pty) Ltd, Tractionel Group Holdings (Pty) Ltd, Tractionel Specialised Plant (Pty) Ltd and Overhead Track Supplies (Pty) Ltd.

Through the provision of quality goods and services, the Company is necessarily involved in the collection, use and disclosure of certain aspects of the personal information of clients, customers, employees, and other stakeholders.

A person's right to privacy entails having control over his or her personal information and being able to conduct his or her affairs relatively free from unwanted intrusions.

Given the importance of privacy, the Company is committed to effectively managing personal information in accordance with POPIA's provisions.

The Company's board of directors, its managers, employees, volunteers, contractors, suppliers, and any other persons acting on behalf of the Company are required to familiarise themselves with this policy's requirements and undertake to comply with the stated processes and procedures.

2. DEFINITIONS

2.1 PERSONAL INFORMATION

Personal information is any information that can be used to reveal a person's identity. Personal information relates to an identifiable, living, natural person, and where applicable, an identifiable, existing juristic person (such as a company), including, but not limited to information concerning:

- race, gender, sex, pregnancy, marital status, national or ethnic origin, colour, sexual orientation, age, physical or mental health, disability, religion, conscience, belief, culture, language, and birth of a person;
- information relating to the education or the medical, financial, criminal or employment history of the person;
- any identifying number, symbol, email address, physical address, telephone number, location information, online identifier, or other assignment to the person;
- the biometric information of the person;
- the personal opinions, views, or preferences of the person;

- 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;
- the views or opinions of another individual about the person;
- 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.

2.2 DATA SUBJECT

This refers to the natural or juristic person to whom personal information relates, such as an employee of the Company, an individual client, customer, or supplier of the Company.

2.3 RESPONSIBLE PARTY

A responsible party is the entity that needs the personal information for a particular reason and determines the purpose of and means for processing the personal information. In this case, the Company is the responsible party.

2.4 OPERATOR

An 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. For example, a third-party service provider that has contracted with the Company to shred documents containing personal information. When dealing with an operator, it is considered good practice for a responsible party to include an indemnity clause.

2.5 INFORMATION OFFICER

The Information Officer is responsible for ensuring the Company's compliance with POPIA. The Company appointed its Group Chief Executive Officer as its Information Officer. The Company also appointed a two Deputy Information Officers. The contact details are:

Name:	Neresh Pather	Quinton Cryer
Contact Number:	086-18-19-600	086-18-19-600
E-mail Address:	popia@traction.co.za	popia@traction.co.za

2.6 PROCESSING

The act of processing information includes any activity or any set of operations, whether by automatic means, concerning personal information and includes:

- the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;
- dissemination by means of transmission, distribution or making available in any other form; or
- merging, linking, as well as any restriction, degradation, erasure, or destruction of information.

2.7 RECORD

Means any recorded information regardless of form or medium including:

- Writing on any material;
- 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;
- Label, marking or other writing that identifies or describes anything of which it forms part, or to which it is attached by any means;
- Book, map, plan, graph or drawing;
- Photograph, film, negative, tape or other device in which one or more visual images are embodied to be capable, with or without the aid of some other equipment, of being reproduced.

2.7 FILING SYSTEM

Means any structured set of personal information, whether centralised, decentralised, or dispersed on a functional or geographical basis, which is accessible according to specific criteria.

2.8 UNIQUE IDENTIFIER

Means any identifier that is assigned to a data subject and is used by a responsible party for the purposes of the operations of that responsible party and that uniquely identifies that data subject in relation to that responsible party.

2.10 DE-IDENTIFY

This means to delete any information that identifies a data subject, or which can be used by a reasonably foreseeable method to identify, or when linked to other information, that identifies the data subject.

2.11 RE-IDENTIFY

In relation to personal information of a data subject, means to resurrect any information that has been de-identified that identifies the data subject, or can be used or manipulated by a reasonably foreseeable method to identify the data subject.

2.12 CONSENT

Means any voluntary, specific, and informed expression of will in terms of which permission is given for the processing of personal information.

2.13 DIRECT MARKETING

Means to approach a data subject, either in person or by mail or electronic communication, for the direct or indirect purpose of:

- Promoting or offering to supply, in the ordinary course of business, any goods or services to the data subject; or
- Requesting the data subject to donate any kind for any reason.

2.14 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.

3. POLICY PURPOSE

The purpose of this policy is to protect the Company from the compliance risks associated with the protection of personal information which includes:

- Breaches of confidentiality. For instance, the Company could suffer loss in revenue where it is found that the personal information of data subjects has been shared or disclosed inappropriately.
- Failing to offer choice. For instance, all data subjects should be free to choose how and for what purpose the Company uses information relating to them.
- Reputational damage. For instance, the Company could suffer a decline in shareholder value following an adverse event such as a computer hacker deleting the personal information held by the Company.
- This policy demonstrates the Company's commitment to protecting the privacy rights of data subjects in the following manner:
 - Through stating desired behaviour and directing compliance with the provisions of POPIA and best practice.
 - By cultivating an organisational culture that recognises privacy as a valuable human right.
 - By developing and implementing internal controls for the purpose of managing the compliance risk associated with the protection of personal information.
 - By creating business practices that will provide reasonable assurance that the rights of data subjects are protected and balanced with the legitimate business needs of the Company.
 - By assigning specific duties and responsibilities to control owners, including the appointment of an Information Officer and where necessary, Deputy Information Officers to protect the interests of the Company and data subjects.
 - By raising awareness through training and providing guidance to individuals who process personal information so that they can act confidently and consistently.

4. POLICY APPLICATION

This policy and its guiding principles apply to:

- The Company's board of directors;
- All branches, business units and divisions of the Company;
- All employees and volunteers;
- All contractors, suppliers and other persons acting on behalf of the Company.

The policy's guiding principles find application in all situations and must be read in conjunction with POPIA as well as the Promotion of Access to Information Act (Act No 2 of 2000).

The legal duty to comply with POPIA's provisions is activated in any situation where there is:

Processing of personal information entered into a **record** by a **responsible person** who is **domiciled** in South Africa.

POPIA does not apply in situations where the processing of personal information:

- is concluded during purely personal or household activities, or
- where the personal information has been de-identified.

5. RIGHTS OF DATA SUBJECTS

Where appropriate, the Company will ensure that its clients and customers are made aware of the rights conferred upon them as data subjects.

The Company will ensure that it gives effect to the following seven rights:

5.1 THE RIGHT TO ACCESS PERSONAL INFORMATION

The Company recognises that a data subject has the right to establish whether the Company holds personal information related to him, her or including the right to request access to that personal information by using the prescribed "Personal Information Request Form" which can be found under Annexure A.

5.2 THE RIGHT TO HAVE PERSONAL INFORMATION CORRECTED OR DELETED

The data subject has the right to request, where necessary, that his, her or its personal information must be corrected or, where the Company is no longer authorised to retain the personal information, that it be deleted.

5.3 THE RIGHT TO OBJECT TO THE PROCESSING OF PERSONAL INFORMATION

The data subject has the right, on reasonable grounds, to object to the processing of his, her or its personal information. In such circumstances, the Company will give due consideration to the request and the requirements of POPIA. The Company may cease to use or disclose the data subject's personal information and may, subject to any statutory and contractual record keeping requirements, also approve the destruction of the personal information.

5.4 THE RIGHT TO OBJECT TO DIRECT MARKETING

The data subject has the right to object to the processing of his, her or its personal information for purposes of direct marketing by means of unsolicited electronic communications.

5.5 THE RIGHT TO COMPLAIN TO THE INFORMATION REGULATOR

The data subject has the right to submit a complaint to the Information Regulator regarding an alleged infringement of any of the rights protected under POPIA and to institute civil proceedings regarding the alleged non-compliance with the protection of his, her or its personal information.

Our “POPI Complaint Form” can be found under Annexure B.

5.6 THE RIGHT TO BE INFORMED

The data subject has the right to be notified that his, her or its personal information is being collected by the organisation.

The data subject also has the right to be notified in any situation where the organisation has reasonable grounds to believe that the personal information of the data subject has been accessed or acquired by an unauthorised person.

6. GENERAL GUIDING PRINCIPLES

All employees and persons acting on behalf of the Company will always be subject to, and act in accordance with, the following guiding principles:

6.1 ACCOUNTABILITY

Failing to comply with POPIA could potentially damage the Company’s reputation or expose the Company to a civil claim for damages. The protection of personal information is therefore everybody’s responsibility.

The Company will ensure that the provisions of POPIA and the guiding principles outlined in this policy are complied with through the encouragement of desired behaviour. However, the Company will take appropriate sanctions, which may include disciplinary action, against those individuals who through their intentional or negligent actions and/or omissions fail to comply with the principles and responsibilities outlined in this policy.

6.2 PROCESSING LIMITATION

The Company will ensure that personal information under its control is processed:

- in a fair, lawful and non-excessive manner, and
- only with the informed consent of the data subject, and
- only for a specifically defined purpose.

The Company will inform the data subject of the reasons for collecting his, her or its personal information and obtain written consent prior to processing personal information.

On receiving the POPI EMPLOYEE CONSENT AND CONFIDENTIALITY FORM (QUAL POL 9), The Company may share personal information between its associated companies but will not share any information with any individuals that are not directly involved with facilitating the purpose for which the information was originally collected. QUAL POL 9 can be found under Annexure C.

6.3 PURPOSE SPECIFICATION

The Company will process personal information only for specific, explicitly defined, and legitimate reasons. The Company will inform data subjects of these reasons prior to collecting or recording the data subject's personal information.

6.4 FURTHER PROCESSING LIMITATION

Personal information will not be processed for a secondary purpose unless that processing is compatible with the original purpose. Where the Company seeks to process personal information, it holds for a purpose other than the original purpose for which it was originally collected, and where this secondary purpose is not compatible with the original purpose, the Company will first obtain additional consent from the data subject.

6.5 INFORMATION QUALITY

The Company will take reasonable steps to ensure that all personal information collected is complete, accurate and not misleading.

Where personal information is collected or received from third parties, the Company will take reasonable steps to confirm that the information is correct by verifying the accuracy of the information directly with the data subject or by way of independent sources.

6.6 OPEN COMMUNICATION

The Company will take reasonable steps to ensure that data subjects are always aware that their personal information is being collected including the purpose for which it is being collected and processed.

The Company will ensure that it establishes and maintains a "contact us" facility via its website for data subjects who want to:

- Enquire whether the organisation holds related personal information, or
- Request access to related personal information, or
- Request the organisation to update or correct related personal information, or
- Make a complaint concerning the processing of personal information.

6.7 SECURITY SAFEGUARDS

The Company will manage the security of its filing system to ensure that personal information is adequately protected. To this end, security controls will be implemented to minimise the risk of loss, unauthorised access, disclosure, interference, modification, or destruction.

Security measures will be applied in a context-sensitive manner. For example, the more sensitive the personal information, such as medical information, the greater the security required.

The Company will continuously review its security controls which will include regular testing of protocols and measures put in place to combat cyber-attacks on the organisation's IT network.

The Company will ensure that all paper and electronic records comprising personal information are securely stored and made accessible only to authorised individuals.

All new employees will be required to sign the POPI EMPLOYEE CONSENT AND CONFIDENTIALITY FORM (QUAL POL 9) (Annexure C), and employment contracts will contain contractual terms for the use and storage of employee information. Confidentiality clauses will also be included to reduce the risk of unauthorised disclosures of personal information for which the organisation is responsible.

All existing employees will, after the required consultation process has been followed, be required to sign an addendum to their employment containing the relevant consent and confidentiality clauses as well as the POPI EMPLOYEE CONSENT AND CONFIDENTIALITY FORM (QUAL POL 9) (Annexure C).

The Company's operators and third-party service providers will be required to enter into service level agreements or subcontracts with the Company where both parties pledge their mutual commitment to POPIA and the lawful processing of any personal information pursuant to the agreement.

6.8 DATA SUBJECT PARTICIPATION

A data subject may request the correction or deletion of his, her or its personal information held by the Company.

The Company will ensure that it provides a facility for data subjects who want to request the correction or deletion of their personal information.

Where applicable, the organisation will include a link to unsubscribe from any of its electronic newsletters or related marketing activities.

7. INFORMATION OFFICERS

The Company will appoint an Information Officer and where necessary, Deputy Information Officers to assist the Information Officer. The Company's Information Officer is responsible for ensuring compliance with POPIA.

Consideration will be given on an annual basis to the re-appointment or replacement of the Information Officer and the re-appointment or replacement of any Deputy Information Officers. The Company's Information Officer and Deputy Information Officers are registered with the South African Information Regulator established under POPIA.

The Company's current Information Officer is Mr Neresh Pather, and the Deputy Information Officer is Mr Quinton Cryer.

	Information Officer	Deputy Information Officer	Deputy Information Officer
Name:	Neresh Pather	Quinton Cryer	Stephen Anderson
Contact Number:	086-18-19-600	086-18-19-600	086-18-19-600
E-mail Address:	popia@traction.co.za	popia@traction.co.za	popia@traction.co.za

8. SPECIFIC DUTIES AND RESPONSIBILITIES

8.1 BOARD OF DIRECTORS

The Company's board of directors cannot delegate its accountability and is ultimately answerable for ensuring that the Company meets its legal obligations in terms of POPIA.

The board of directors may however delegate some of its responsibilities in terms of POPIA to management or other capable individuals.

The board of directors is responsible for ensuring that:

- The Company appoints an Information Officer, and where necessary, Deputy Information Officers.
- All persons responsible for the processing of personal information on behalf of the organisation:
 - are appropriately trained and supervised to do so,
 - understand that they are contractually obligated to protect the personal information they encounter, and
 - are aware that a wilful or negligent breach of this policy's processes and procedures may lead to disciplinary action being taken against them.

Data subjects who want to make enquires about their personal information are made aware of the procedure that needs to be followed should they wish to do so.

The scheduling of a periodic POPI Audit to accurately assess and review the ways in which the Company collects, holds, uses, shares, discloses, destroys, and processes personal information.

8.2 INFORMATION OFFICER

The Company's Information Officer is responsible for:

- Taking steps to ensure the Company's reasonable compliance with the provision of POPIA.
- Keeping the board of directors updated about the Company's information protection responsibilities under POPIA. In the case of a security breach, the Information Officer must inform and advise the board of directors of their obligations pursuant to POPIA.
- Continually analysing privacy regulations and aligning them with the Company's personal information processing procedures. This will include reviewing the Company's information protection procedures and related policies.

- Ensuring that POPI Audits are scheduled and conducted on a regular basis.
- Ensuring that the Company makes it convenient for data subjects who want to update their personal information or submit POPI related complaints to the organisation.
- Approving any contracts entered with operators, employees and other third parties which may have an impact on the personal information held by the Company.
- Encouraging compliance with the conditions required for the lawful processing of personal information.
- Ensuring that employees and other persons acting on behalf of the Company are fully aware of the risks associated with the processing of personal information and that they remain informed about the Company's security controls.
- Organising and overseeing the awareness training of employees and other individuals involved in the processing of personal information on behalf of the Company.
- Addressing employees' POPIA related questions.
- Addressing all POPIA related requests and complaints made by the Company's data subjects.
- Working with the Information Regulator in relation to any ongoing investigations. The Information Officers will therefore act as the contact point for the Information Regulator authority on issues relating to the processing of personal information and will consult with the Information Regulator where appropriate, about any other matter.

The Deputy Information Officers will assist the Information Officer in performing his or her duties.

8.3 ICT ADMINISTRATOR

The Company's ICT Administrator is responsible for:

- Ensuring that the Company's IT infrastructure, filing systems and any other devices used for processing personal information meet acceptable security standards.
- Ensuring that all electronically held personal information is kept only on designated drives and servers and uploaded only to approved cloud computing services.
- Ensuring that servers containing personal information are sited in a secure location, away from the general office space.
- Ensuring that all electronically stored personal information is backed-up and tested on a regular basis.
- Ensuring that all back-ups containing personal information are protected from unauthorised access, accidental deletion, and malicious shacking attempts.
- Ensuring that personal information being transferred electronically is encrypted.

- Ensuring that all servers and computers containing personal information are protected by a firewall and the latest security software.
- Performing regular IT audits to ensure that the security of the Company's hardware and software systems are functioning properly.
- Performing regular IT audits to verify whether electronically stored personal information has been accessed or acquired by any unauthorised persons.
- Performing a proper due diligence review prior to contracting with operators or any other third-party service providers to process personal information on the Company's behalf.

8.4 PERSON IN CHARGE OF MARKETING AND COMMUNICATIONS

The Company's person responsible for Marketing & Communication is responsible for:

- Approving and maintaining the protection of personal information statements and disclaimers that are displayed on the organisation's website, including those attached to communications such as emails and electronic newsletters.
- Addressing any personal information protection queries from journalists or media outlets such as newspapers.
- Where necessary, working with persons acting on behalf of the Company to ensure that any outsourced marketing initiatives comply with POPIA.

8.5 EMPLOYEES AND OTHER PERSONS ACTING ON BEHALF OF THE COMPANY

Employees and other persons acting on behalf of the Company will, during the performance of their services, gain access to and become acquainted with the personal information of certain clients, suppliers, and other employees.

Employees and other persons acting on behalf of the Company are required to treat personal information as a confidential business asset and to respect the privacy of data subjects.

Employees and other persons acting on behalf of the Company may not directly or indirectly, utilise, disclose or make public in any manner to any person or third party, either within the Company or externally, any personal information, unless such information is already publicly known, or the disclosure is necessary for the employee or person to perform his or her duties.

Employees and other persons acting on behalf of the Company must request assistance from their line manager or the Information Officer if they are unsure about any aspect related to the protection of a data subject's personal information.

Employees and other persons acting on behalf of the Company will only process personal information where:

- The data subject, or where the data subject is a child, a competent person, consents to the processing; or

- The processing is necessary to carry out actions for the conclusion or performance of a contract to which the data subject is a party; or
- The processing complies with an obligation imposed by law on the responsible party; or
- The processing protects a legitimate interest of the data subject; or
- The processing is necessary for pursuing the legitimate interests of the Company or of a third party to whom the information is supplied.

Furthermore, personal information will only be processed where the data subject:

- Clearly understands why and for what purpose his, her or its personal information is being collected; and
- Has granted the Company with explicit written or verbally recorded consent to process his, her or its personal information.

Employees and other persons acting on behalf of the Company will consequently, prior to processing any personal information, obtain a specific and informed expression of will from the data subject, in terms of which permission is given for the processing of personal information.

Informed consent is therefore when the data subject clearly understands for what purpose his, her or its personal information is needed and who it will be shared with.

Consent can be obtained in written form which includes any appropriate electronic medium that is accurately and readily reducible to printed form.

Consent to process a data subject's personal information will be obtained directly from the data subject, except where:

- the personal information has been made public, or
- where valid consent has been given to a third party, or
- the information is necessary for effective law enforcement.

Employees and other persons acting on behalf of the Company will under no circumstances:

- Process or have access to personal information where such processing or access is not a requirement to perform their respective work-related tasks or duties.
- Save copies of personal information directly to their own private computers, laptops or other mobile devices like tablets or smart phones. All personal information must be accessed and updated from the Company's central database or a dedicated server.
- Share personal information informally. Personal information should never be sent by email, as this form of communication is not secure. Where access to personal information is required, this may be requested from the relevant line manager or the Information Officer.

- Transfer personal information outside of South Africa without the express permission from the Information Officer.

Employees and other persons acting on behalf of the Company are responsible for:

- Keeping all personal information that they encounter secure, by taking sensible precautions and following the guidelines outlined within this policy.
- Ensuring that personal information is held in as few places as is necessary. No unnecessary additional records, filing systems and data sets should therefore be created.
- Ensuring that personal information is encrypted prior to sending or sharing the information electronically. The IT Manager will assist employees and where required, other persons acting on behalf of the Company, with the sending or sharing of personal information to or with authorised external persons.
- Ensuring that all computers, laptops, and devices such as tablets, flash drives and smartphones that store personal information are password protected and never left unattended. Passwords must be changed regularly and may not be shared with unauthorised persons.
- Ensuring that their computer screens and other devices are switched off or locked when not in use or when away from their desks.
- Ensuring that where personal information is stored on removable storage medias such as external drives, that these are kept locked away securely when not being used.
- Ensuring that where personal information is stored on paper, that such hard copy records are kept in a secure place where unauthorised people cannot access it. For instance, in a locked drawer of a filing cabinet.
- Ensuring that where personal information has been printed out, that the paper printouts are not left unattended where unauthorised individuals could see or copy them. For instance, close to the printer.
- Taking reasonable steps to ensure that personal information is kept accurate and up to date. Where a data subject's information is found to be out of date, authorisation must first be obtained from the relevant line manager or the Information Officer to update the information accordingly.
- Taking reasonable steps to ensure that personal information is stored only for as long as it is needed or required in terms of the purpose for which it was originally collected. Where personal information is no longer required, authorisation must first be obtained from the relevant line manager or the Information Officer to delete or dispose of the personal information in the appropriate manner.
- Undergoing POPI Awareness training from time to time.

Where an employee, or a person acting on behalf of the Company, becomes aware or suspicious of any security breach such as the unauthorised access, interference, modification, destruction or the unsanctioned disclosure of personal information, he or she must immediately report this event or suspicion to the Information Officer or the Deputy Information Officers.

9. POPI AUDIT

The Company's Information Officer will schedule periodic POPI Audits.

The purpose of a POPI audit is to:

- Identify the processes used to collect, record, store, disseminate and destroy personal information.
- Determine the flow of personal information throughout the Company. For instance, the Company's various business units, divisions, branches, and other associated companies.
- Redefine the purpose for gathering and processing personal information.
- Ensure that the processing parameters are still adequately limited.
- Ensure that new data subjects are made aware of the processing of their personal information.
- Re-establish the rationale for any further processing where information is received via a third party.
- Verify the quality and security of personal information.
- Monitor the extend of compliance with POPIA and this policy.
- Monitor the effectiveness of internal controls established to manage the Company's POPI related compliance risk.

In performing the POPI Audit, Information Officers will liaise with line managers to identify areas within in the Company's operation that are most vulnerable or susceptible to the unlawful processing of personal information.

Information Officers will be permitted direct access to and have demonstrable support from line managers and the Company's board of directors in performing their duties.

10. REQUEST TO ACCESS PERSONAL INFORMATION PROCEDURE

Data subjects have the right to:

- Request what personal information the Company holds about them and why.
- Request access to their personal information.
- Be informed how to keep their personal information up to date.

Access to information requests can be made by email, addressed to the Information Officer. The Information Officer will provide the data subject with a "Personal Information Request Form."

Once the completed form has been received, the Information Officer will verify the identity of the data subject prior to handing over any personal information. All requests will be processed and considered against the Company's PAIA Policy.

The Information Officer will process all requests within a reasonable time.

11. POPI COMPLAINTS PROCEDURE

Data subjects have the right to complain in instances where any of their rights under POPIA have been infringed upon. The Company takes all complaints very seriously and will address all POPI related complaints in accordance with the following procedure:

- POPI complaints must be submitted to the Company in writing. Where so required, the Information Officer will provide the data subject with a “POPI Complaint Form.”
- Where the complaint has been received by any person other than the Information Officer, that person will ensure that the full details of the complaint reach the Information Officer within 1 working day.
- The Information Officer will provide the complainant with a written acknowledgement of receipt of the complaint within 5 working days.
- The Information Officer will carefully consider the complaint and address the complainant’s concerns in an amicable manner. In considering the complaint, the Information Officer will endeavour to resolve the complaint in a fair manner and in accordance with the principles outlined in POPIA.
- The Information Officer must also determine whether the complaint relates to an error or breach of confidentiality that has occurred and which may have a wider impact on the Company’s data subjects.
- Where the Information Officer has reason to believe that the personal information of data subjects has been accessed or acquired by an unauthorised person, the Information Officer will consult with the Company’s governing body where after the affected data subjects and the Information Regulator will be informed of this breach.
- The Information Officer will revert to the complainant with a proposed solution with the option of escalating the complaint to the Company’s governing body within 7 working days of receipt of the complaint. In all instances, the Company will provide reasons for any decisions taken and communicate any anticipated deviation from the specified timelines.
- The Information Officer’s response to the data subject may comprise any of the following:
 - A suggested remedy for the complaint,
 - A dismissal of the complaint and the reasons as to why it was dismissed,
 - An apology (if applicable) and any disciplinary action that has been taken against any employees involved.
- Where the data subject is not satisfied with the Information Officer’s suggested remedies, the data subject has the right to complain to the Information Regulator.
- The Information Officer will review the complaints process to assess the effectiveness of the procedure on a periodic basis and to improve the procedure where it is found wanting. The reason for any complaints will also be reviewed to ensure the avoidance of occurrences giving rise to POPI related complaints.

12. DISCIPLINARY ACTION

Where a POPI complaint or a POPI infringement investigation has been finalised, the Company may recommend any appropriate administrative, legal, and/or disciplinary action to be taken against any employee reasonably suspected of being implicated in any non-compliant activity outlined within this policy.

In the case of ignorance or minor negligence, the Company will undertake to provide further awareness training to the employee.

Any gross negligence or the wilful mismanagement of personal information, will be considered a serious form of misconduct for which the organisation may summarily dismiss the employee. Disciplinary procedures will commence where there is sufficient evidence to support an employee's gross negligence.

Examples of immediate actions that may be taken after an investigation include:

- A recommendation to commence with disciplinary action.
- A referral to appropriate law enforcement agencies for criminal investigation.
- Recovery of funds and assets to limit any prejudice or damages caused.

PERSONAL INFORMATION REQUEST FORM

Please submit the completed form to the Information Officer:

Contact Number:	086-18-19-600
Email Address:	popia@traction.co.za

Please be aware that we may require proof of identity prior to processing your request. There may also be a reasonable charge for providing copies of the information requested.

A. Particulars of Data Subject:

Name and Surname:	
Identity Number:	
Postal Address:	
Contact Number:	
Email Address:	

B. Request:

I request the Company to:

Inform me whether it holds any of my personal information	
Provide me with a record or description of my personal information	
Correct or update my personal information	
Destroy or delete a record of my personal information	

C. Instructions:

[illegible]

D. Signature of requestor:

Date:		Signature:	
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E. For office use:

Information provided:	Yes	No
If No, Provide reasons. If Yes, Provide brief description:		

Signature of Information Officer

Date:		Signature:	
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POPI COMPLAINT FORM

We are committed to safeguarding your privacy and the confidentiality of your personal information and are bound by the Protection of Personal Information Act

Please submit your complaint to the Information Officer:

Contact Number: 086-18-19-600

Email Address: popia@traction.co.za

Where we are unable to resolve your complaint to your satisfaction you have the right to complaint to the Information Regulator.

The Information Regulator:

Physical Address: SALU Building, 316 Thabo Sehume Street, Pretoria

Email: inforreg@justice.gov.za

Website: <http://www.justice.gov.za/inforeg/index.html>

A. Particulars of Complainant:

Name and Surname:

Identity Number:

Postal Address:

Contact Number:

Email Address:

B. Particulars of Complaint:
C. Desired Outcome
D. Signature of requestor:

Date:

Signature:

E. For office use:

Complaint Resolved:

Yes

No

Provide brief description:

Signature of Information Officer

Date:

Signature:

**EMPLOYEE PERSONAL INFORMATION
CONSENT AND CONFIDENTIALITY FORM**

1. INTRODUCTION

Tractionel Group Holdings (Pty) Ltd and its subsidiaries (collectively referred to as the Company) understand that your personal information is important to you and that you may be apprehensive about disclosing it. Your privacy is just as important to the Company, and we are committed to safeguarding and processing your information in a lawful manner.

The Company wants to make sure that you understand how and for what purpose we process your personal information. If, for any reason, you think that your information is not processed in a correct manner, or that your information is being used for a purpose other than that for what it was originally intended, you can contact our Information Officers.

The Company undertakes to process your Personal Information only in accordance with the conditions of lawful processing as set out in terms of POPIA and in terms of the Company’s relevant policy available to you on request and only to the extent that it is necessary to discharge its obligations and to perform its functions as an employer and within the framework of the employment relationship and as required by South African law.

POPIA means the Protection of Personal Information Act, Act 4 of 2013

2. PERSONAL INFORMATION

Your personal information that the Company may hold include:

Age	Employment history and references	Pension / Provident Fund records
Attendance records	Family responsibility leave supporting documents (minor child sick notes, death certificates of spouse, parents, or grandparents)	Performance appraisals
Banking details	Gender	Physical and postal address
Biometric information	Identity document and number	Physical or mental health
Birth date	Language	Preferred name
Covid-19 records	Leave records	Pregnancy status
Criminal records.	Marital Status and date of marriage	Qualifications and training records (CV)
Curriculum Vitae	Medical aid records	Race or ethnic origin
Details of payments to third parties (deductions)	Medical history and records	Religious preference or belief
Disability	Leave records	Residency status
Disciplinary records	Marital Status and date of marriage	Salary / wage records
Email address	Medical aid records	Spouse details (Surname, name, telephone number and address)
Emergency contact details	Medical history and records	Tax Number
Employee number	Nomination of beneficiary details (Pension/Provident)	Telephone number
Employment contracts	Occupation	Your First and last name
Employment Equity plans	Passport document and number	Your title

3. DISCLOSURE TO 3RD PARTIES

The Company collect, hold, use and disclose your personal information mainly to regulate the contractual Employer/Employee relationship, but sometimes it is also necessary to provide or share your personal information with other third parties. These third parties may include:

National Bargaining Council for the Electrical Industry		
Information Disclosed		Purpose
Age	Medical history and records	Recording Identity and processing monthly contributions and/or withdrawals
Attendance records	Nomination Membership number of beneficiary details	
Banking Details	Occupation	
Birth date	Passport document and number	
Disability	Physical and postal address	
Email address	Race or ethnic origin	
Employee number	Salary / wage records	
Fund claims-required documents	Tax Number	
Gender	Telephone number	
Identity document and number	Your First and last name	
Marital Status and date of marriage	Your title	

Liberty Provident Fund		
Information Disclosed		Purpose
Age	Membership number	Recording Identity and processing monthly contributions and/or withdrawals
Banking Details	Nomination of beneficiary details	
Birth date	Occupation	
Disability	Passport document and number	
Email address	Physical and postal address	
Email address	Race or ethnic origin	
Employee number	Salary / wage records	
Fund claims-required documents	Tax Number	
Gender	Telephone number	
Identity document and number	Your First and last name	
Marital Status and date of marriage	Your title	
Medical history and records		

Discovery Medical Aid (You and your dependent's)		
Information Disclosed		Purpose
Banking Details	Medical aid records	Recording Identity and processing monthly contributions
Birth date	Medical history and records	
Disability	Membership number	
Email address	Occupation	
Employee number	Passport document and number	
First and last name	Preferred name	
Fund claims-required documents	Previous medical aid details	
Gender	Race or ethnic origin	
Identity document and number	Salary / wage records	
Marital Status and date of marriage	Telephone number	

Unions		
Information Disclosed		Purpose
Age	Membership number	Recording Identity and processing monthly contributions
Attendance records	Nomination of beneficiary details	
Banking Details	Occupation	
Birth date	Passport document and number	
Disability	Physical and postal address	
Email address	Race or ethnic origin	
Employee number	Salary / wage records	
Fund claims-required documents	Tax Number	
Gender	Telephone number	
Identity document and number	Your First and last name	
Marital Status and date of marriage	Your title	
Medical history and records		

3rd Party payments (Emolument Attachment Order)		
Information Disclosed		Purpose
Age	Passport document and number	Recording Identity and processing monthly contributions
Employee number	Race or ethnic origin	
Gender	Salary / wage records	
Identity document and number	Telephone number	
Occupation	Your title	

Clients / Prospective Clients including Cross-border Clients / Prospective Clients and Training Providers		
Information Disclosed		Purpose
Age	Identity document and number	Recording Identity and processing of qualifications and training records to determine competencies. Processing and recording ethnic/racial and gender compliance by the Company
Disability	Occupation	
Employee number	Qualifications and Training Records (CV)	
Gender	Race or ethnic origin	
Health and Safety related records including medical results.	Your First and last name	

Other regulatory and governmental authorities, including tax authorities, where the Company has a duty to share information.

4. PURPOSE FOR DISCLOSING PERSONAL INFORMATION

The Company will only process your personal information for a lawful purpose in terms of (POPIA) which may include:

- 4.1 Verifying your identity and other information provided during the recruitment process;
- 4.2 Confirming, verifying and updating your information;
- 4.3 Complying with any legal and regulatory requirements;
- 4.4 General matters relating to Employees like payroll processing, pension/provident fund processing, disciplinary records, training, medical information etc.

5. RIGHT TO REQUEST INFORMATION

You can request access to the information the Company hold about you by completing and submitting the Personal Information Request Form at any time.

If you think that we have outdated information, request us to update or correct it.

Our Information and Deputy Information Officer's contact details:		
Name:	Neresh Pather	Quinton Cryer
Contact Number:	086-18-19-600	086-18-19-600
E-mail Address:	popia@traction.co.za	popia@traction.co.za

6. CONSENT TO DISCLOSE AND SHARE YOUR INFORMATION.

The Employee acknowledges that the collection of the Employee's personal information is both necessary and requisite as a legal obligation, which falls within the scope of execution of the legal functions and obligations of the Company.

The employee therefore irrevocably and unconditionally agrees:

- 6.1 That the Employee is notified of the purpose and reason for the collection and processing of the Employees Personal Information insofar as it relates to the Company's discharge of its obligations and to perform its functions as an employer.

- 6.2 That the Employee consents and authorises the Company to undertake the collection, processing and further processing of the Employee's Personal Information by the Company for the purposes of securing and further facilitating the employee's employment with the Company.
- 6.3 Without derogating from the generality of the aforesaid, the Employee consents to the Company's collection and processing of Personal Information pursuant to any of the Company's Internet, Email and Interception policies in place insofar as Personal Information of the Employee is contained in relevant electronic communications.
- 6.4 To make available to the Company all necessary Personal Information required by the Company for the purpose of securing and further facilitating the employee's employment with the Company.
- 6.5 To absolve the Company from any liability in terms of POPIA for failing to obtain the Employee's consent or to notify the Employee of the reason for the processing of any of the employee's Personal Information.
- 6.6 To the disclosure of the Employees Personal Information by the Company to any third party, where the Company has a legal or contractual duty to disclose such Personal Information.
- 6.7 The employee further agrees to the disclosure of the Employee's Personal Information for any reason enabling the Company to carry out or to comply with any business obligation the Company may have or to pursue a legitimate interest of the Company for the Company to perform its business on a day-to-day basis.
- 6.8 The employee authorises the Company to transfer the Employee's Personal Information outside of the Republic of South Africa for any legitimate business purpose of the Company within the international community. The Company undertakes not to transfer or disclose the Employee's Personal Information unless it is required for its legitimate business requirements and shall comply strictly with legislative stipulations in this regard.

7. CONFIDENTIALITY

- 7.1 The employee acknowledges that during the performance of the Employee's services, the Employee may gain access to and become acquainted with the personal information of certain clients, suppliers, and other employees. The employee will treat personal information as a confidential business asset and agrees to respect the privacy of clients, suppliers, and other employees.
- 7.2 To the extent that the Employee is exposed to or insofar as Personal Information of other employees or third parties are disclosed, the Employee hereby agree to be bound by appropriate and legally binding confidentiality and non-usage obligations in relation to the Personal Information of third parties or employees.
- 7.3 Employees may not directly or indirectly, utilise, disclose or make public in any manner to any person or third party, either within the organisation or externally, any Personal Information, unless such information is already publicly known, or the disclosure is necessary for the employee or person to perform his or her duties on behalf of the employer.

I hereby authorise and consent to the Company sharing my Personal Information in line with this document:

Employee Name and Surname:			
Employee Number:		Date:	YYYY / MM / DD
Employee Signature:			