

E-mail > <a href="mailto:legal@micro-ctrl.co.za">legal@micro-ctrl.co.za</a>

# Micro-Ctrl Protection of Personal Information Customer Notification 1 July 2021

# 1. Introduction:

- 1.1. Micro-Ctrl, a leading reseller of technologies operating within the South African environment who is obliged to comply with The Protection of Personal Information Act (POPI).
- 1.2. POPI requires Micro-Ctrl to inform their customers, suppliers as to how their Personal Information is used, disclosed, and destroyed.
- 1.3. Micro-Ctrl guarantees its commitment to protecting their customers' privacy and ensuring their Personal Information is used appropriately, transparently, securely and in accordance with applicable laws.
- 1.4. This Policy sets out how Micro-Ctrl deals with their customers' personal information and in addition to what purpose said information is used for. This Policy is made available by request at our offices from the compliance officer.
- 1.5. Section 9 of POPI states that "Personal Information may only be processed if, given the purpose for which it is processed, it is adequate, relevant and not excessive."

# 2. The Personal Information Collected:

- 2.1. Micro-Ctrl collects and processes customer, supplier and employees', personal information pertaining to specific needs. The type of information will depend on the need for which it is collected and will be processed for that purpose only. Whenever possible, we will inform the customer what information they are required to provide us with and what information is optional. Examples of the Personal Information we collect includes, but is not limited to:
- Identity number, name, surname, address, postal code, marital status, and number of dependents.
- Description of customer's business addresses.
- Description of customer nature of business and industry.
- 2.2. Micro-Ctrl also collects and processes customer personal information for marketing purposes to ensure our products and services remain applicable to our customers.



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- 2.3. We have agreements in place with all our Product Suppliers and third-party service providers who come in contact with personal information to ensure that there is a mutual understanding with regard to the protection of customer information. Our suppliers are subject to the same regulations as we are subjected to.
- 2.4. For purposes of this Policy, customer and suppliers include potential and existing customers and suppliers.

### 3. How Personal Information Is Used:

- 3.1. Customer personal information will only be used for the purpose for which it was collected and agreed. This may include:
- Providing credit to customers to carry out the transactions requested;
- Conducting credit reference searches or verification for customers;
- Confirming, verifying and updating customer details;
- For the detection and prevention of fraud, crime, money laundering

# Or other malpractice;

- Conducting market or customer satisfaction research;
- For audit and record keeping purposes;
- In connection with legal proceedings;
- Providing our services to customer in order to carry out the services requested and to maintain and constantly improve the relationship;
- Providing communications in respect of Micro-Ctrl and regulatory matters that may affect customer; and
- In connection with and to comply with legal and regulatory requirements or when it is otherwise allowed by law.
- 3.2. According to s10 of POPI, personal information may only be processed if certain conditions are met which are listed below along with supporting information for Micro-Ctrl processing of Personal Information:
- Customer, supplier, and employee consents to the processing consent is obtained from customer;
- The processing is necessary in order to conduct an accurate analysis of doing business with customers;
- Processing protects a legitimate interest of the customer;
- Processing is necessary for pursuing the legitimate interests of Micro-Ctrl or of a third party to whom information is supplied.



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# 4. Safeguarding Customer Information:

4.1. It is a requirement of POPI to adequately protect the Personal Information we hold and to avoid unauthorized access and use of your personal information.

We will continuously review our security controls and processes to ensure that your personal information is secure.

- 4.2. The following procedures are in place to protect your personal information:
- The Micro-Ctrl Information Officer is John Goulas whose details are available below and is responsible for the encouragement of compliance with the conditions of the lawful processing of Personal Information and other provisions of POPI;
- THIS POLICY has been put in place within Micro-Ctrl and training on this policy and the POPI Act will take place during June 2021 by the Compliance Officer/ Information Officer;
- Each employee will be required to sign a CONFIDENTIALITY AGREEMENT, which will be considered an annexure to their Employment Contract by 31 December 2021; Employees who joined Micro-Ctrl prior to 1 July 2020, signed a confidentiality agreement, which is considered an annexure to their Employment Contract.

Employees who joined Micro-Ctrl after the above-mentioned date is not required to sign a separate confidentiality agreement as this forms part of the new employment contract.

- Our product suppliers and other third-party service providers will be required to sign a one-page POPI AGREEMENT guaranteeing their commitment to the Protection of Personal Information these will be in place by 31 December 2021;
- Our hard copy files and archived files are stored on our access controlled premises within locked cabinets
- Micro-Ctrl internal server hard drives are RAIDed and electronic files are BACKED UP daily, these files are stored on access controlled virtual servers for system security, which protects third-party access and physical threats.
- A SECURITY INCIDENT MANAGEMENT REGISTER will be kept logging any security incidents and to report on and manage said incidents.
- This register will be maintained by the Compliance Officer for Micro-Ctrl.
- A PROCEDURE MANUAL has been drafted and will be implemented by 31 December 2021 to ensure all employees follow Micro-Ctrl professional procedures to ensure customer, supplier and employee information is processed accurately and securely; and
- CONSENT to process customer information is obtained from the customer, (or a person who has been given authorization from the customer to provide the respective information).



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### 5. Access and Correction of Personal Information:

5.1. Customers have the right to access the personal information we hold about them.

Customers also have the right to ask us to update, correct or delete their personal information on reasonable grounds. Once a customer objects to the processing of their personal information, Micro-Ctrl may no longer process said personal information. We will take all reasonable steps to confirm our customer identity before providing details of their personal information or making changes to their personal information.

5.2. The details of our Information Officer and head office are as follows:

# **INFORMATION OFFICER DETAILS**

Name: John Goulas

Telephone Number: 011 467 2793

Physical Address: 15 Westway Rd, Fourways, 2092

E-Mail Address: john@micro-ctrl.co.za