



**PRIVACY
AND
PROTECTION OF PERSONAL INFORMATION POLICY**

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1. INTRODUCTION

- 1.1 Fusion Credit Solutions recognises that the constitutional right to privacy includes the right to the protection of the personal information from being unlawfully accessed, disclosed, and processed. Fusion Credit Solutions is committed to implementing measures to balance the legitimate needs of the business to process personal information against the right of individuals to have their personal information processed lawfully and in accordance with the provisions of the Protection of Personal Information Act of 2013 [POPI].
- 1.2 In accordance with the objectives of **POPI**, Fusion Credit Solutions promotes the protection of a data subject's personal information to which our employees are privy and shall safe guard the personal information of data subjects and the processing of personal information in accordance with legal requirements.

2 SCOPE OF APPLICATION

This policy applies to all employees who are privy to and/or responsible for processing personal information of applicants for employment, fellow employees, and personal information about third parties including but not limited to suppliers, clients, and service providers.

3 TERMINOLOGY

- 3.1 Data subject bears reference to the person to whom personal information relates including but not limited to applicants for employment, employees and third parties.
- 3.2 Personal information bears reference to information relating to an identifiable person or an entity including but not limited to:
- 3.2.1 race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;
 - 3.2.2 the education or the medical, financial, criminal or employment history of the person;
 - 3.2.3 any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
 - 3.2.4 the biometric information of the person;

- 3.2.5 the personal opinions, views or preferences of the person;
 - 3.2.6 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;
 - 3.2.7 the views or opinions of another individual about the person; and
 - 3.2.8 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.
- 3.3 Processing bears reference to any operation or activity or any set of operations, whether or not by automatic means, concerning personal information, including:
- 3.3.1 the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;
 - 3.3.2 dissemination by means of transmission, distribution or making available in any other form; or merging, linking, as well as restriction, degradation, erasure or destruction of information.
- 3.4 Record bears reference to any recorded information regardless of form or medium, including any of the following:
- 3.4.1 writing on any material;
 - 3.4.2 information produced, recorded or stored by means of any tape-recorder;
 - 3.4.3 computer equipment, whether hardware or software or both, or other device, and any material subsequently derived from information so produced, recorded or stored;
 - 3.4.4 label, marking or other writing that identifies or describes anything of which it forms part, or to which it is attached by any means;
 - 3.4.5 book, map, plan, graph or drawing.

- 3.5 Responsible party bears reference to any person which, alone or in conjunction with others, determines the purpose of and means for processing personal information.

4 PRIVACY AND THE PROTECTION OF PERSONAL INFORMATION

- 4.1 All employees who are privy to and/or involved in processing personal information must comply with the eight conditions established under the provisions of POPI as follows:

4.1.1 Condition 1: Accountability

All measures implemented by Fusion Credit Solutions to give effect to compliance with POPI.

4.1.2 Condition 2: Processing limitations

Lawful processing of personal information. Personal information may only be processed if it is relevant to the purpose for which it is processed and if the data subject has consented.

4.1.3 Condition 3: Purpose Specification

Personal information must not be retained any longer than is necessary for achieving the purpose for which the information was collected or subsequently processed, unless retention of the record is required or authorised by law. Employees must comply with Fusion Credit Solutions rules and/or directives concerning retention periods for personal information and concerning the safe disposal of personal information.

4.1.4 Condition 4: Further processing specification

Further processing of personal information must be done in accordance with or compatible with the purpose for which it was collected.

4.1.5 Condition 5: Information quality

Personal information must be processed in a manner which is complete, accurate and not misleading.

4.1.6 Condition 6: Openness

Maintain the documentation of processing operations and compliance with processing operations.

4.1.7 Condition 7: Security Safeguards

Secure the integrity and confidentiality of personal information by taking reasonable measures to prevent loss of, damage to or unauthorised destruction of personal information; and unlawful access to or processing of personal information.

4.1.8 Condition 8: Data subject participation

A data subject may seek access to his/her records processed by Fusion Credit Solutions. Certain legal conditions apply to these requests. Accordingly, all data subject requests must be referred to Fusion Credit Solutions Information Officer for consideration and response.

- 4.2 Personal information about a data subject may not be disclosed by any employee to fellow employees or third parties in the absence of written approval from the Information Officer and/or his/her duly authorised delegate.
- 4.3 Only duly authorised employees are permitted to access and/or process personal information, which may only be done for legitimate business purposes.
- 4.4 All employees must treat personal information to which they are privy to or involved in processing in strict confidence.
- 4.5 Personal information to which employees are privy must not be disclosed to fellow employees and/or third parties.
- 4.6 Reasonable steps must be taken by employees to safeguard personal information to which they are privy, have access to and/or involved in processing.
- 4.7 Requests for information concerning former employees or third parties are to be referred to and dealt with by the Information Officer or his/her duly authorised delegate.
- 4.8 Employees are duty bound to immediately notify the Information Officer if they have reasonable grounds to believe that personal information of a data subject has been accessed or acquired by any unauthorised employee or third party.

5 BREACH

- 5.1 A breach of this policy will be treated as a serious disciplinary offence.