

POPIA MANUAL
FOR
MAIN STREET 1523 PROPRIETARY LIMITED T/A SIX SENSE
MARKETING

as prescribed by the provisions of
the Protection of Personal Information Act, 2013

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1. INTERPRETATION

1.1. Main Street 1523 Proprietary Limited t/a Six Sense Marketing is defined as a private body in terms of the Act.

1.2. In this policy document, unless the context indicates a contrary intention, the following words and expressions shall bear the meanings assigned to them and cognate words and expressions shall bear corresponding meanings:

1.2.1 **“the Act”** the Protection of Personal Information Act No 4 of 2013 and the Regulations thereto;

1.2.2 **“Associates”** any other person who assists in carrying out or conducting the business of Six Sense, including its directors, employees, and consultants;

1.2.3 **“Biometrics”** 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;

1.2.4 **“Consent”** any voluntary, specific, and informed expression of will in terms of which permission is given for the processing of Personal Information;

1.2.5 **“Constitution”** the Constitution of the Republic of South Africa, 1996;

- 1.2.6 **“Customers”** refers to any natural or juristic person making use of the Services provided by Six Sense;
- 1.2.7 **“Data Subject”** means the natural or juristic person to whom the Personal Information relates;
- 1.2.8 **“De-Identify”** to delete any information that identifies a Data Subject, can be used or manipulated, or can be linked by a reasonably foreseeable method to other information that identifies the Data Subject;
- 1.2.9 **“Electronic Communication”** any text, voice, sound, or image message sent over an electronic communications network which is stored in the network or in the recipient's terminal equipment until it is collected by the recipient;
- 1.2.10 **“Filing System”** any structured set of Personal Information, whether centralised, decentralised, or dispersed on a functional or geographical basis, which is accessible according to specific criteria;
- 1.2.11 **“Information Officer”** the individual appointed in terms of the Act;
- 1.2.12 **“Operator”** a person who processes Personal Information for Six Sense in terms of a contract or mandate, without coming under the direct authority of Six Sense;

1.2.13 “PAIA”	the Promotion of Access to Information Act No 2 of 2000 and the Regulations thereto;
1.2.14 “Person”	a natural or juristic person as the case may be;
1.2.15 “Personal Information”	the information set out in paragraph 7 below;
1.2.16 “PIIA”	a Personal Information Impact Assessment for purposes of establishing a record of the manner in which Personal Information is being processed and to evaluate the impact thereof on the privacy rights of Persons;
1.2.17 “Policy”	this policy and the annexures thereto;
1.2.18 “Processing”	<p data-bbox="861 1086 1461 1355">includes anything that is done with Personal Information and includes any operation or activity, whether or not by automated means concerning Personal Information including:</p> <ul data-bbox="861 1400 1461 1919" style="list-style-type: none"> <li data-bbox="861 1400 1461 1601">- the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use; <li data-bbox="861 1612 1461 1758">- dissemination by means of transmission, distribution or making available in any other form; or <li data-bbox="861 1769 1461 1919">- merging, linking, as well as restriction, degradation, erasure or destruction of information;

- 1.2.19 **“Record”** any recorded information regardless of form or medium in the possession or under the control of Six Sense whether or not it was created by Six Sense and regardless of when it came into existence;
- 1.2.20 **“Regulator”** the Information Regulator as established in terms of section 39 of the Act;
- 1.2.21 **“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, can be used or manipulated by a reasonably foreseeable method to identify the Data Subject, or can be linked by a reasonably foreseeable method to other information that identifies the Data Subject;
- 1.2.22 **“Six Sense”** Main Street 1523 Proprietary Limited, registration number 2017/122138/07, a subsidiary of Main Street 1533 Proprietary Limited, referred to in the policy document as Six Sense or we/us/our;
- 1.2.23 **“Sensitive Personal Information”** Personal Information as referred to in section 26, relating to race or ethnicity, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health, sexual life, any actual or alleged criminal offences or penalties, national identification number, or any other

information that may be deemed to be sensitive under applicable law;

1.2.24 **“Services”**

the Six Sense services including but not limited to the development of unique marketing solutions and related matters;

1.2.25 **“Service providers”**

third party providers of various services that Six Sense engage with, including but not limited to, providers of information technology, communication, file storage, data storage, copying, printing, accounting or auditing services, legal advisors, insurers and other professional advisors;

1.2.26 **“Website”**

any website operated or maintained by Six Sense or on our behalf.

2. INTRODUCTION

2.1 Six Sense is a dynamic marketing company in the Republic of South Africa.

2.2 Our relationship with our employees, Customers and Service Providers is based on mutual trust and honesty and we are committed to protecting privacy rights pertaining to the processing of Personal Information in accordance with the prescripts of the Act.

3. PURPOSE

3.1 The purpose of this Policy is to establish a compliancy framework in terms of the Act and to adopt measures for the protection and use of Personal Information and Sensitive Personal Information.

3.2 This Policy explains how we protect and process your Personal Information.

3.3 By providing us with your Personal Information and Consent, you:

3.3.1 agree to this Policy and authorise us to process such information as set out herein; and

3.3.2 authorise us, our Associates, Service Providers and other third parties to process Personal Information for the purposes stated in this policy.

4. AVAILABILITY OF THE POLICY

4.1 This Policy is made available in terms of section 4(1)(c) of the Regulations to the Act.

4.2 Copies of this Policy can be obtained from the Information Officer or from our Website.

5. COMPANY DETAILS

Physical address:	Unit 1 Sax Centre, Pinotage Road, Saxenburg Park, Blackheath, Kuilsriver, 7580
Postal address:	PO Box 1370, Sanlamhof, 7532
Telephone number:	021 907 3860

6. INFORMATION OFFICER

6.1 The Act prescribes the appointment of an Information Officer where such Information Officer is responsible to, *inter alia*, encourage compliance with the conditions for the lawful processing of Personal Information, to ensure that PIIA's are done, to ensure internal measures are developed together with adequate systems to process requests for information or access thereto and to ensure internal awareness is created within Six Sense through training and other measures.

6.2 Six Sense has opted to appoint an Information Officer to ensure compliance as well as to oversee its required functions in terms of the Act.

- 6.3 The Information Officer may appoint, where it is deemed necessary one or more Deputy Information Officer(s).
- 6.4 All request for information in terms of this Act must be addressed to the Information Officer.
- 6.5 The contact details of the Information Officer and Deputy Information Officer are as follows:

Information Officer:	Barry Fourie Bornman
Physical address:	Unit 3 & 4 Sax Centre, Pinotage Road, Saxenburg Park, Blackheath, 7580
Postal address:	PO Box 1370, Sanlamhof, 7532
Telephone number:	021 907 3860
E-mail address:	Info.officer@sixsensemarketing.co.za

Deputy Information Officer:	Michael Koorsse
Physical address:	Unit 3 & 4 Sax Centre, Pinotage Road, Saxenburg Park, Blackheath, 7580
Postal address:	PO Box 1370, Sanlamhof, 7532
Telephone number:	021 907 3860
E-mail address:	mike@tradeonsa.co.za

7. CATEGORIES OF PERSONAL INFORMATION

- 7.1. We may collect or obtain Personal Information about you:
- 7.1.1 directly from you;
 - 7.1.2 in the course of our relationship with you;
 - 7.1.3 in the course of providing the Services to you or your organisation;
 - 7.1.4 when you make your Personal Information public; and
 - 7.1.5 when you visit and/or interact with our Website.

- 7.2. We may also receive Personal Information about you from third parties such as the Companies and Intellectual Property Commission and the Registrar of Deeds.
- 7.3. The Personal Information in the context of the Act can relate to any of the below identifiable characteristics in respect of a Person:
- 7.3.1 Personal details: race, pregnancy, marital status, ethnic, or social origin, colour, sexual orientation, physical or mental health, well-being, disability;
 - 7.3.2 Demographic information: gender, age, nationality, salutation, title, and language preferences;
 - 7.3.3 Identifier information: passport or national identity number, utility provider details, bank statements, tenancy agreements;
 - 7.3.4 Contact detail: e-mail address, physical address, telephone number, location information, online identifier, or other particular assignment to the person;
 - 7.3.5 Contract details: details of individuals entering into service or other agreements with Six Sense, Personal Information included in correspondence, documents, evidence, or other materials that Six Sense processes in the course of providing the Services;
 - 7.3.6 Attendance records: details of meetings and other events organised by or on behalf of Six Sense that you have attended;
 - 7.3.7 Consent records: records of any consents you may have given, together with the date and time, means of consent and any related information;
 - 7.3.8 Payment details: billing address, payment method, bank account number or credit card number, invoice records, payment records, SWIFT details, IBAN details, payment amount, payment date, and records of cheques;
 - 7.3.9 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;
 - 7.3.10 Data relating to your visits to our Website: your device type, operating system, browser type, browser settings, IP address, language settings, dates and times of connecting to the Website, and other technical communications information;

- 7.3.11 Content and advertising data: records of your interactions with our online advertising platform, records of advertising and content displayed on pages displayed to you, and any interaction you may have had with such content or advertising (including, but not limited to, mouse hover, mouse clicks and any forms you complete).
 - 7.3.12 Information relating to the education or the medical, financial, criminal or employment history of the person;
 - 7.3.13 Biometrics; and
 - 7.3.14 The personal opinions, views, or preferences; religion, conscience, belief, or culture.
- 7.4. Where we need to process your Sensitive Personal Information, we will do so in the course and scope of rendering the Services, for a legitimate purpose, and in accordance with applicable law.

8. LAWFUL PROCESSING OF PERSONAL INFORMATION

- 8.1 Personal Information will either be processed directly by Six Sense or may be processed by an Operator as authorised by Six Sense.
- 8.2 The following conditions as set out in Chapter 3 of the Act are applicable for the lawful processing of Personal Information:

Accountability	We are accountable for complying with the measures as prescribed in the Act;
Processing Limitation	Personal Information may only be processed lawfully and in a reasonable manner that does not infringe on your right to privacy. Six Sense will restrict its processing of Personal Information to data which is sufficient for the fulfilment of the primary and legitimate purpose for which it was collected. Your consent is required, and you may object to the processing of Personal Information. You will be required to complete Annexure 1 if you object to the processing of your Personal Information.

<p>Purpose Specification</p>	<p>Personal Information will be collected for a specific and explicitly defined purpose related to a function or activity of Six Sense. We shall only retain and store Personal Information in the Filing System for the period for which the data is required to serve its primary purpose or a legitimate interest or for the period required to comply with applicable legislation, whichever is longer. Records containing Personal Information will be destroyed or deleted as soon as reasonably practicable. This will be done in a manner that will prevent the reconstruction of the document.</p>
<p>Further Processing Limitation</p>	<p>Further processing of Personal Information must be in accordance with the purpose for which it was initially collected as indicated above and may include the De-identification and Re-identification of Personal Information.</p>
<p>Information Quality</p>	<p>The Personal Information provided to Six Sense should be accurate, complete, and up to date and we must be informed of any changes.</p>
<p>Openness</p>	<p>All documentation related to processing operations will be maintained by Six Sense in its Filing System in accordance with section 51 of PAIA. We will inform you of the information being collected, the purpose for which the information is being collected and whether the information will be transferred to third parties.</p>
<p>Security Safeguards:</p>	<p>Six Sense implements appropriate technical and organisational security measures to protect your Personal Information against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, unauthorised access, in accordance with applicable law. Where there are reasonable grounds to believe that your Personal Information has been accessed or acquired by any unauthorised person you will be notified in writing. Because the internet is an open system, the transmission of information via the internet is not completely secure. Although we implement all reasonable measures to protect your Personal Information, we cannot guarantee the security of any information transmitted using the internet and we cannot</p>

	be held liable for any loss of privacy occurring during such transmission.
Your Participation	You are entitled to request Six Sense to confirm whether we hold Personal Information about you or to request the record from us including details of any third parties who have or had access to the information. You may request Six Sense to correct or delete Personal Information that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, obtained unlawfully; or destroy or delete a record of Personal Information about you that Six Sense is no longer authorised to retain. Please refer to Appendix 2 .

9. ADDITIONAL RIGHTS

In addition to the rights as contemplated above, the following rights are afforded to you.

- 9.1 You have the right not to have your Personal Information processed for purposes of direct marketing by means of unsolicited electronic communications from third parties unknown to you.
- 9.2 Six Sense is not permitted to provide your Personal Information to any third party for direct marketing purposes without your consent.

10. THE PROCESSING OF PERSONAL INFORMATION AND RELATED MATTERS

- 10.1 Six Sense will process your Personal Information in the ordinary course of its business and in order to render the Services.
- 10.2 Your Personal Information may be subject to processing during the course of various activities, including, without limitation, to the following:
- 10.2.1 operating our business;
 - 10.2.2 analysis, evaluation, review, and collation of information in order to determine legal and contractual compliance, prepare or comment on opinions, memoranda, agreements, correspondence, reports, publications, documents relating to legal proceedings and other

- documents and records (whether in electronic or any other medium whatsoever);
- 10.2.3 compliance with applicable laws and fraud prevention;
 - 10.2.4 transfer of information to our Service Providers and other third parties for legitimate purposes;
 - 10.2.5 international transfer of information within Six Sense;
 - 10.2.6 recruitment;
 - 10.2.7 training;
 - 10.2.8 risk assessments, PIIA's, information security management, statistical purposes, trend analysis and planning purposes;
 - 10.2.9 corruption detection, prevention, investigation, and prosecution;
 - 10.2.10 monitoring and recording calls and electronic communications with you for quality, training, investigation, and fraud prevention purposes;
 - 10.2.11 to enforce or defend our rights; and
 - 10.2.12 to manage our relationship with you and for marketing activities in order to establish, maintain and/or improve our relationship with you and with our Service Providers.
- 10.3 Your Personal Information may be processed for internal management and management reporting purposes, including but not limited to, conducting internal audits, conducting internal investigations, implementing internal business controls, providing central processing facilities, for insurance purposes and for management reporting analysis and for safety and security purposes.
- 10.4 The processing of your Personal Information referred to above applies *mutatis mutandis* to the international transfer within Six Sense.

11. RETENTION OF PERSONAL INFORMATION RECORDS

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

12. INTERNATIONAL TRANSFER OF PERSONAL INFORMATION

- 12.1. Personal Information may only be transferred out of the Republic of South Africa to a third party in a foreign country under limited circumstances, namely:
- 11.1.1 if the third party to which the data is transferred to is subject to law, binding corporate rules or a binding agreement that provides for an adequate level of protection substantially similar to the Act;
 - 11.1.2 the operator or third party undertakes to protect the Personal Information in line with applicable data protection legislation;
 - 11.1.3 if you consent to the transfer thereof;
 - 11.1.4 if the transfer is necessary for the performance of a contractual obligation between you and Six Sense or between Six Sense and a third party; or
 - 11.1.5 if the transfer is for your benefit, and it is not reasonably practicable to obtain your consent, and if it were, you would in all likelihood provide such consent.
- 12.2. For purposes of the above, it is recorded that the Six Sense Associates comply with paragraph 12.1 above.

13. INFORMATION SECURITY MEASURES

- 13.1. The details given below are to be interpreted as examples of how Six Sense aims to achieve an adequate data protection level for each objective. We may use alternative measures and adapt to technological security development, as needed, provided that the objectives are achieved.
- 13.2. Six Sense shall implement suitable measures in order to:
- 13.2.1. prevent unauthorised persons from gaining access to data processing equipment where Personal Information is processed;
 - 13.2.2. prevent the unauthorised manipulation of media, including reading, copying, alteration or removal of the data media used by Six Sense;
 - 13.2.3. prevent unauthorised input into data memory and the unauthorised reading, alteration, or deletion of stored data;

- 13.2.4. prevent data processing systems from being used by unauthorised persons by means of data transmission equipment;
- 13.2.5. ensure that the persons entitled to use data processing systems are limited to access based on their authority / access limitations;
- 13.2.6. enable the verification and tracing of the locations and destinations applicable to the transfer of Personal Information;
- 13.2.7. prevent Personal Information from being accessed, copied, altered, or deleted by unauthorised persons during the transmission thereof; and
- 13.2.8. maintain our internal organisation in a manner that meets the requirements of this policy.

14. REMEDIES

Six Sense has not adopted internal appeal procedures in relation to the Act. As such, if you are of the opinion that your right to privacy has been infringed, you would need to exercise external remedies at your disposal.

OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION IN TERMS OF SECTION 11(3) OF THE ACT

Note:

1. Affidavits or other documentary evidence, as applicable in support of the objection, may be attached.
2. If the space provided for in this Form is inadequate, submit information as an annexure to this form and sign each page.
3. Complete as applicable.

A: YOUR DETAILS	
Name(s) and surname:	
Identity Number:	
Residential and postal address:	
Contact number(s):	
E-mail address:	
B: DETAILS OF RESPONSIBLE PARTY	
Name(s) and surname/ registered name of employee:	
Business address:	
Contact number(s):	
E-mail address:	
<p>C: REASONS FOR OBJECTION IN TERMS OF SECTION 11(1)(d) to (f) AS SET OUT BELOW</p> <p>Personal Information may only be processed if:</p> <ol style="list-style-type: none"> a. processing protects a legitimate interest of the data subject; b. processing is necessary for the proper performance of a public law duty by a public body; or 	

c. processing is necessary for pursuing the legitimate interests of the responsible party or of a third party to whom the information is supplied.

Signed at _____ on this _____ day of _____ 20__

SIGNATURE

REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION OR DESTROYING OR DELETION OF RECORD OF PERSONAL INFORMATION IN TERMS OF SECTION 24(1) OF THE ACT

Note:

1. Affidavits or other documentary evidence as applicable in support of the request may be attached.
2. If the space provided for in this form is inadequate, submit information as an annexure to this form and sign each page.
3. Complete as applicable.

Mark the appropriate box with an "X".

Correction or deletion of the Personal Information which is in possession or under the control of Six Sense.

Destroying or deletion of a record of Personal Information which is in possession or under the control of Six Sense and who is no longer authorised to retain the record of information.

A: YOUR DETAILS	
Name(s) and surname:	
Identity Number:	
Residential and postal address:	
Contact number(s):	
E-mail address:	
B: DETAILS OF RESPONSIBLE PARTY	
Name(s) and surname/ registered name of employee:	
Business address:	

Contact number(s):	
E-mail address:	
C: INFORMATION TO BE CORRECTED/DELETED/ DESTROYED/ DESTROYED	
D: REASONS FOR CORRECTION OR DELETION OF THE PERSONAL INFORMATION WHICH IS IN POSSESSION OR UNDER THE CONTROL OF SIX SENSE; AND OR REASONS FOR DESTRUCTION OR DELETION OF A RECORD OF PERSONAL INFORMATION WHICH SIX SENSE IS NO LONGER AUTHORISED TO RETAIN	

Signed at _____ on this _____ day of _____ 20__

SIGNATURE