

# Stefanutti Stocks (Pty) Ltd

## Protection of Personal Information Policy Statement



Stefanutti Stocks (Pty) Ltd recognises its employees' constitutional right to privacy and protection of their personal information in line with the Protection of Personal Information Act No. 4 2013 ("POPI Act").

Stefanutti Stocks (Pty) Ltd will endeavour to: -

- respect its employees' right to have their personal information processed in a manner that gives effect to their right to privacy subject to justifiable limitations;
- be open and honest with employees whose personal information it processes;
- provide training and support to all employees who handle personal information so that they can act confidently and consistently.

Stefanutti Stocks (Pty) Ltd subscribes to the principles for lawful processing of personal information as reflected in the POPI Act, which principles are as follows: -

- **Accountability:** The Company has appointed an information officer who is responsible for compliance with POPI Act.
- **Processing limitations:** Employees' personal information will be processed in a manner that is both lawful and in a reasonable manner that does not infringe on the privacy of the employees.
- **Purpose specification:** The Company will take all reasonable steps to ensure that employees are aware of the purpose of processing their personal information collected and where possible, the necessary consent has been obtained.
- **Further processing limitation:** The Company will not process personal information in a manner incompatible with the purpose for which it was collected.
- **Information quality:** The Company aims to process personal information that is relevant, accurate and up to date with respect to the purpose for which it will be processed.
- **Openness / Transparency:** The Company will endeavour to ensure that employees are notified of the personal information collected, the purpose for which the information was collected and their right to have access to, object to and/or rectify the information collected.
- **Security safeguards:** The Company will ensure that personal information is protected by reasonable security safeguards against risks such as the loss or unauthorised access, destruction, use, modification or disclosure of personal information.
- **Individual (employee) participation:** Employees and job applicants will be allowed to participate in and have a measure of influence over the processing of their personal information.

A detailed policy is available on the Company Portal.

  
Russell Crawford  
Chief Executive Officer  
Revised: 01/07/2022