



## Protection of Personal Information Policy

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Revision	0
Effective Date	23.06.2021
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### Introduction

Gearbox and Diff (Pty) Ltd. is an automotive engineering provider that is obligated to comply with The Protection of Personal Information Act 4 of 2013.

POPI requires Gearbox and Diff to inform their clients and personnel as to the manner in which their personal information is used, disclosed and destroyed. Gearbox and Diff guarantees its commitment to protecting its client's privacy and ensuring that their personal information is used appropriately, transparently, securely and in accordance with applicable laws. The Policy sets out the manner in which Gearbox and Diff deals with their clients and Employees personal information and stipulates the purpose for which said information is used. The Policy is made available on the Gearbox and Diff website [www.gearboxanddiffcentre.co.za](http://www.gearboxanddiffcentre.co.za) and by requesting it from the business.

### Personal Information Collected

Section 9 of POPI states that "Personal Information may only be processed if, given the purpose for which it is processed, is adequate, relevant and not excessive." Gearbox and Diff collects and processes client's personal information pertaining to the client's 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, Gearbox and Diff will inform the client as to the information required and the information deemed optional. Examples of personal information we collect include, but is not limited to:

- The Client's Identity number, name, surname, address, postal code;
- Description of the client's residence, business, assets; financial information, banking details, etc.-.

Gearbox and Diff also collects and processes the client's personal information for marketing purposes in order to ensure that our products and services remain relevant to our clients and potential clients.

### The Usage of Personal Information

The Client's Personal Information will only be used for the purpose for which it was collected and as agreed. This may include:

- Providing products or services to clients and to carry out the transactions requested;
- Conducting credit reference searches or- verification;
- Conducting market or customer satisfaction research;
- Providing Gearbox and Diff services to clients, to render the services requested and to maintain and constantly improve the relationship;
- Providing communication in respect of Gearbox and Diff and regulatory matters that may affect clients;
- In connection with and to comply with legal and regulatory requirements or when it is otherwise allowed by law.

According to section 10 of POPI, personal information may only be processed if certain conditions, listed below, are met along with supporting information for Gearbox and Diff processing of Personal Information:

- The client's consents to the processing: - consent is obtained from clients during the first interaction and needs analysis stage of the relationship;
- The necessity of processing in order to conduct an accurate analysis of the client's needs.



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### Disclosure of Personal Information

Gearbox and Diff may disclose a client's personal information to any group companies or subsidiaries, joint venture companies and or approved product- or third party service providers whose services or products clients elect to use. Gearbox and Diff has agreements in place to ensure that compliance with confidentiality and privacy conditions. Gearbox and Diff may also disclose a client's information where it has a duty or a right to disclose in terms of applicable legislation, the law, or where it may be deemed necessary in order to protect Gearbox and Diff rights.

### Safeguarding Client and Employee Information

It is a requirement of POPI to adequately protect personal information. Gearbox and Diff will continuously review its security controls and processes to ensure that personal information is secure.

The following procedures are in place in order to protect personal information:

- Gearbox and Diff has appointed an information officer as per the act.
- This Policy will be in place throughout Gearbox and Diff, and training on this policy and the POPI Act will take place and will be completed before June 2021;
- Each new employee will be required to sign an Employment Contract, containing relevant consent clauses for the use and storage of employee information, or any other action so required, in terms of POPI;
- Every employee currently employed within Gearbox and Diff will be required to sign a new Employment Contract containing relevant consent clauses for the use and storage of employee information, or any other action so required, in terms of POPI;
- Gearbox and Diff archived client information is stored on site which is also governed by POPI, access is limited to these areas to authorized personal.
- Gearbox and Diff product suppliers and other third party service providers will be required to submit their commitment to the Protection of Personal Information; this is however an ongoing process that will be evaluated as needed.

Consent to process client information is obtained from clients (or a person who has been given authorization from the client to provide the client's personal information) during the introductory, appointment and needs analysis stage of the relationship.

### Access and Correction of Personal Information

Clients and Employees have the right to access the personal information Gearbox and Diff hold about them. They also have the right to ask Gearbox and Diff to update, correct or delete their personal information on reasonable grounds. Once a person objects to the processing of their personal information, Gearbox and Diff may no longer process said personal information. Gearbox and Diff will take all reasonable steps to confirm the person's identity before providing details of their personal information or making changes to their personal information.

### Amendments to This Policy

Amendments to, or a review of this Policy, will take place on an ad hoc basis or at least once a year. Clients are advised to access Gearbox and Diff website periodically to keep abreast of any changes. Where material changes take place, clients will be notified directly or changes will be stipulated on the Gearbox and Diff website.



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### The Information Officer has the following responsibilities:

Developing, publishing and maintaining a POPI Policy which addresses all relevant provisions of the POPI Act, including but not limited to the following:

- Reviewing the POPI Act and periodic updates as published
- Ensuring that POPI Act induction training takes place for all staff
- Ensuring that periodic communication awareness on POPI Act responsibilities takes place
- Ensuring that Privacy Notices for internal and external purposes are developed and published
- Approving unusual or controversial disclosures of personal data
- Ensuring that appropriate policies and controls are in place for ensuring the Information Quality of personal information
- Ensuring that appropriate Security Safeguards in line with the POPI Act for personal information are in place
- Handling all aspects of relationship with the Regulator as foreseen in the POPI Act

Provide direction to any Deputy Information Officer if and when appointed

**John Viviers**  
**Managing Member**

Signature:

Date: 23 June 2021