

PROTECTION OF PERSONAL INFORMATION (POPI) POLICY

In terms of Section 51 of POPIA No 4 of 2013

This Policy applies to **TENSHO (PTY) LTD**
Registration Number 2017/390102/07
(the “Company”)
(Including all Subsidiaries)

01 July 2021

Registered office address:

85 HOBART ROAD
BRYANSTON
JOHANNESBURG
2021

Contact Details:

Telephone: +27 (0) 82 750 0689

Email: i@tensho.com

Tel +27 (0) 82 750 0689 | i@tensho.com | www.tensho.com
85 Hobart Road | Bryanston | Johannesburg | South Africa
Comp Reg: No 2017/390102/07 | PSIRA Reg: No 1449204
Established in 2005



1. Objective

This policy provides for the lawful processing of personal information of the responsible party as required by the Protection of Personal Information Act 4 of 2013.

2. Scope

This Policy includes the Company's operations outside the Republic of South Africa and will serve to provide a reference regarding the records held by the Company at its Registered Office and various operations within the borders of the Republic of South Africa.

The Company as a whole is furthermore required to align and ensure compliance with the GDPR where information is required to cross borders.

3. Information Officer

Tensho has appointed an Information Officer in terms of the Act. Amongst others, the following shall be the responsibilities of the office:

- 3.1. To establish conditions under which the lawful processing of personal information may be conducted;
- 3.2. Working with the Regulator in relation to investigations conducted in relation to the Act;
- 3.3. Ensuring compliance with the provisions of the Act. This is an ongoing responsibility that will include training of new employees;
- 3.4. Specify measures to be taken in storing data, disposing of data, managing requested data, legislative indications on data, etc.

The Company is required to set up complaint channels and procedures in terms of this Policy. Clear terms and timelines must be communicated in terms of managing complaints with record keeping.

4. Key Principles

Tensho is committed to processing personal information lawfully and complying with the following principles;

- To be transparent with regard to the procedures of collection and processing personal information;
- Comply with all applicable regulatory requirements regarding the collection and processing of personal information;
- Where required by regulatory provisions, inform individuals when personal information is collected about them;
- To treat sensitive personal information that is collected or processed with the highest of care as prescribed by the Act;

- To strive to keep personal information accurate, complete and up to date and reliable for their intended purpose;
- To develop reasonable security safeguards against risks such as loss, unauthorized access, destruction, use, amendment, or disclosure of personal information;
- To provide individuals with the opportunity to access the personal information relating to them and, where applicable, to comply with requests to correct, amend or delete personal information.

5. Monitoring

The management of TENSHO (PTY) LTD and the Information Officer is responsible for administering and overseeing the implementation of this policy.

6. Implementation

This policy is implemented by TENSHO (PTY) LTD and will be adhered to by all key individuals, representatives and staff who are tasked with collecting and processing personal information. Noncompliance with this policy may result in disciplinary action and possible termination of employment or mandate, where applicable.

Implementation date: 01 July 2021