



Protection of Personal Information and Data Security Policy

Logichem Process International (Pty) Ltd hereafter called Logichem

1. Purpose

- 1.1 The Protection of Personal Information Act, 4 of 2013 ("POPIA") requires that we keep plans and process in place on how we process, store and share personal information. We respect our clients' right to privacy and endeavour to collect and use information minimally, transparently, and for the purpose for which it was collected.
- 1.2 This Policy and supporting documents are written in easily understandable language so that is practical and usable to a wide audience in the business.
- 1.3 Logichem is committed to keeping information safe and secure, to provide persons with reasonable access to their information, and to give effect to the rights in terms of POPIA. To this extent, we emphasise that only the necessary information is collected and used accordingly. The collection serves to protect legitimate legal interests and ensure that we can offer clients a service or product.

2. Definitions

- 2.1 Data Subject means the person to whom personal information or electronic data relates and can be a natural or legal person.
- 2.2 Personal Information means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to:
- information relating to the 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;
 - information relating to the education or the medical, financial, criminal or employment history of the person;
 - any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
 - the biometric information of the person;
 - the personal opinions, views or preferences of the person;
 - 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;
 - the views or opinions of another individual about the person; and
 - 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;
 - Personal information concerning a child.
- 2.3 Third Party Operator means a person (natural or legal) who processes personal information or electronic data for a responsible party in terms of a contract or mandate, without coming under the direct authority of that party.



2.4 Information Security means the protecting measures implemented by an organization to protect the integrity of data and information from a wide range of threats to adhere to legislation, minimize business risk and maximise returns on investment.

3. Application

3.1 The obligations in this policy apply to Logichem, its management, staff members, and representatives.

3.2 Any Third Parties who Logichem entrusts personal information to are also bound by the terms in this policy.

3.3 It applies to all Personal Information and Electronic Data gathered from Data Subjects.

4. Requirements

4.1 Where appropriate, Logichem will ensure that data subjects are made aware of their rights. Logichem gives effect to the following seven rights:

- The right to access personal information
- The right to have personal information corrected or deleted
- The right to object to the processing of personal information
- The right to object to direct marketing
- The right to complain to the Information Regulator
- The right to be informed

5. Legal Framework

5.1 Protection of Personal Information Act 2013 (POPIA or POPI)

5.2 Promotion of Access to Information Act 2000 (PAIA)

6. Accountability

6.1 Failing to comply with POPIA could potential damage Logichem's reputation or expose us to a civil claim for damages. The protection of personal information is therefore everybody's responsibility.

6.2 Logichem shall ensure that the provisions of POPIA and the guiding principles outlined in this policy are complied with through the encouragement of desired behaviour. However, Logichem will take appropriate sanctions, which may include disciplinary action, against those individuals who through their intentional or negligent actions and/or omissions fail to comply with the principles and responsibilities outlined in this policy.



7. Security Measures with regards to confidentiality of personal information

7.1 Purpose of Collection

- Logichem requires certain categories of information to ensure that clients receive high quality services and that client needs are met as they may require from time to time.
- The same goes for any partnerships, due diligence or other third party interactions where personal information is gathered.
- Information may be collected for explicitly defined purposes or incidental to the function, activity or service of Logichem or a third party that might be our service providers.
- Logichem warrants that personal information will never be used for a reason that is not in line with what it was collected for.
- Should the purpose for which we collect information not be specified in this clause, the purpose will be communicated to you in writing and agreed to in our interactions with data subjects which might include varied and different parties.

7.2 Consent

- Any information that we collect from data subjects will be with consent.
- The rule of thumb is if the business is collecting information from any person whether natural or legal it must obtain a signed Popia Consent and Commitment Form, see Appendix A (available on Logichem Quality Management System\2. LEADERSHIP\2.2 Policy\Templates).
- Consent may be obtained from data subjects during introductory meetings, application forms, electronic media or ongoing interaction. It might also be via online website cookies or any other form of valid consent.
- Where data subjects provide us with information, they need to do so willingly and voluntarily with the understanding that we require the information to pursue both our clients' legitimate interests as well as our own. To carry on business and to protect or facilitate data subject interests, we require personal information from time to time and will treat it with utmost confidentiality. Should a data subject at any time object to the processing of their information, they may withdraw consent by furnishing us with reasonable notice and on the prescribed form, Objection to the Processing of Personal Information Form, see Appendix B (available on Logichem Quality Management System\2. LEADERSHIP\2.2 Policy\Templates).

7.3 Information We Require

- Logichem collects different categories of information from data subjects depending on their needs and our agreements with them.
- We do not collect information that is unnecessary or irrelevant for the purpose specified. We strive to collect only the information that is necessary for us to deliver our service.
- Please bear in mind that this is not an exhaustive list, and we may at times require information that is not contained herein.



- We will inform data subjects as to the information we collect from them whenever practicable, whether such information is voluntary or mandatory, and what the consequences are if information (whether voluntary or mandatory) is not provided. Usually, if the information requested is not provided, we can only offer a limited service or no service at all.

7.4 Access to and Integrity of Information

- Logichem is committed to maintaining the integrity and accuracy of data subject information. To this extent, data subjects are reminded via consent forms that they may request access to their own information at any time and to request that we update or correct any information that may be outdated or incorrect as per our POPIA Consent and Commitment Form, see Appendix A (available on Logichem Quality Management System\2. LEADERSHIP\2.2 Policy\Templates).
- We take reasonable and routine steps to ensure that the information we collect is up to date and accurate. Where information does not need to be updated to fulfil the purpose for which it was collected, such information will not be updated without the client's express request.
- Logichem provides for four categories of requestors for access to information:
 - A person requesting his or her own information;
 - A person requesting information for and on behalf of another person
 - A person requesting information about another person; or
 - A public body that requests information in the public interest

Requestors must provide proof of identity and a Power of Attorney where applicable and fill in the Request for Access to Record Form see Appendix C (available on Logichem Quality Management System\2. LEADERSHIP\2.2 Policy\Templates).

7.5 Information Security and Regular Monitoring

- The safety and confidentiality of Data Subject information is of paramount importance to Logichem and its staff. To this extent, Logichem is committed to preventing unauthorized access, damage, loss of or destruction of personal information by ensuring that industry-appropriate and adequate security measures are implemented and persistently reviewed.
- We do our best to identify risks both internally and externally, and to adapt accordingly we implement security systems and controls with due regard to generally accepted information security practices.
- Electronic Information is secured by firewalls, anti-virus and password secured access;
- Electronic Information on shared drives operates on access control and permissions,
- To support our security efforts, we conduct regular monitoring of our personal information security measures, which entail:
 - Policy Review
 - GAP Analysis Review
 - File Sampling
 - Testing of protocols and measures put in place to combat cyber-attacks on Logichem's IT Network



7.6 Holding Periods

- Information we collect on data subjects will not be held for longer than necessary, or if the purpose for which said information was collected has ultimately been fulfilled, or if the collected information has become obsolete.
- We will destroy Records of Personal Information as soon as reasonably practicable, unless further retention is required by the laws mentioned above or agreed to between the parties.
- For more information on durations of specific records, please refer to the Retention and Destruction of Information Policy. (available on Logichem Quality Management System\4. SUPPORT\4.3 Administration and Communication\Documents)

7.7 Information Erasure

- Logichem will endeavour that information be destroyed, where reasonable, after its retention period has lapsed as set out in the Retention and Destruction of Information Policy as per clause 6.6 above.
 - the information is no longer necessary for the specified purpose it was collected for; or
 - where the data subject withdraws consent in terms of this policy; or
 - the collected personal information is inaccurate, irrelevant, excessive or incomplete.
- If data subjects prefer for Logichem to cease processing their information instead of deleting it, reasonable notice may be given to this effect following which we will immediately stop processing your information.
- Notice in terms of erasure must be provided in the prescribed format on the Request for Correction or Deletion of Personal Information Form see Appendix D (available on Logichem Quality Management System\2. LEADERSHIP\2.2 Policy\Templates).

7.8 Direct Marketing

- We will never process personal information for the purpose of direct marketing (or spam) unless Data Subjects:
 - have consented to such processing; or
 - had not previously refused consent; and if
 - contact details were obtained in the context of providing them with our services; and if
 - they were given reasonable opportunity to object to the direct marketing; or
 - was already a data subject.
- To give consent complete the Application for Consent Form – Direct Marketing see Appendix E (available on Logichem Quality Management System\2. LEADERSHIP\2.2 Policy\Templates).



8. Security measures regarding an operator or person acting under authority

8.1 Disclosure of Information

- Logichem staff are regularly reminded that they have a confidentiality obligation towards data subjects who hold a Right to Privacy under the Constitution, and neither Logichem nor its staff will disclose data subject information to a third party unless:
 - we are required to do so by law; or
 - the disclosure is necessary to enable us to perform our functions as per our clients' mandates; or
 - it is vital to protecting the rights of Logichem

8.2 Authority

- If information is to be disclosed to a third party, Logichem will ensure that the third party receiving personal information is as committed to protecting your privacy and information as we are.
- We do this via obtaining a POPIA Consent and Commitment Form, see Appendix A (available on Logichem Quality Management System\2. LEADERSHIP\2.2 Policy\Templates). from the third party in written form where the third party agrees to keep information confidential and maintains security measures.

9. Data Breach Management

9.1 A Data Breach incident is an event that has caused or can potentially cause damage to our organisation's assets, reputation and / or personnel which includes our customers/clients and any other personal information we process, store or share. A Data Breach can occur when there is intrusion, compromise and misuse of information by a party that does not have lawful access rights to the information that was compromised.

9.2 An Information Security Incident includes, but is not restricted to, the following;

- The illegitimate use of our systems for the processing, storage or sharing of data by any person.
- The transfer of personal information to persons who are not entitled to receive that information.
- The loss or theft of personal and/or classified data and information via any means, for example hacking or even attempted hacking.
- Unauthorised changes to personal information via our system hardware or software.
- Unauthorised disruption or denial of service to our system.

9.3 Where there are reasonable grounds to suspect that the personal information of a data subject has been breached (accessed, acquired, deleted or damaged by an unauthorised third party), we will:

- notify the data subject of such a breach in detail, as well as
- inform the information regulator as soon as reasonably possible after the breach is discovered.



9.4 Data breach communication to the data subject can be done in one of the following methods:

- Mailed to the data subject's last known physical or postal address;
- Sent by e-mail to the data subject's last known e-mail address;
- Placed in a prominent position on our website;
- Published in the news media; or
- As may be directed by the Regulator.

9.5 The communication must include enough information so that the data subject can take protective measures and should include:

- A description of the possible consequences of the breach;
- A description of the measures that Logichem intends to take or has taken to address the security breach;
- A recommendation with regard to the measures to be taken by the data subject
- To mitigate the possible adverse effects of the breach; and
- If known to Logichem, the identity of the unauthorised person who may have accessed or acquired the personal information.

9.6 Data breaches need to be reported by any of the persons or entities mentioned in par. 3 above.

10. Prohibited Data Processing and Exemptions

10.1 Due to the nature of our business we may from time to time obtain data that is prohibited to enable us to offer our services and to comply with the laws applicable to our business. As such we aim to make use of the exemptions that POPIA provides in instances where the information is needed. We obtain consent for this personal information and may include but not be limited to:

- The religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life or biometric information of a data subject; or
- The criminal behaviour of a data subject to the extent that such information relates to-
 - The alleged commission by a data subject of any offence; or
 - Any proceedings in respect of any offence allegedly committed by a data subject or the disposal of such proceedings.
 - Personal information concerning a child.

11. Information Officer

11.1 Logichem shall appoint an Information Officer and where necessary Deputy Information Officer, once appointed, Logichem shall register the Information Officer with the South African Information Regulator and retain a registration Certificate for their records. (available on Logichem Quality Management System\2. LEADERSHIP\2.2 Commitment\Records\POPIA_PAIA).

11.2 The appointment of the Information Officer will be included in the responsible person's Job Description (available on Logichem Quality Management System\4. SUPPORT\4.1 Human Resources\Documents)



11.3 Logichem's Information Officer is Claudia Bower with Contact Number +27 21 873 6499 and E-Mail Address: logichem@iafrica.co.za.

11.4 Logichem's Information Officer is responsible for:

- Ensuring reasonable compliance to the provisions of POPIA
- Ensuring information policies are reviewed, monitored, up to date and sufficient.
- Ensuring an Impact Assessment is done
- Ensuring the PAIA Manual is developed, monitored, maintained and available as prescribed
- Handling complaints or requests made in terms of this policy;
- Supporting this policy with relevant documentation;
- Ensuring POPI training or awareness is conducted;
- Backing up data;
- Reporting incidents and allocating security responsibilities; and
- Any other relevant information-related duty or responsibility.

11.5 The Deputy Information Officer is Mia Liebenberg with Contact Number +27 21 873 6499 and E-Mail Address: logichem@iafrica.co.za.

12. Personal Information Transfers outside South Africa

12.1 Due to the pervasive and widespread use of cloud technology and the disappearance of national borders in the broader context of the digital age we live in it is accepted that Personal Information of Data Subjects will almost always be transferred internationally.

12.2 It is not always possible to pinpoint exactly in which country the cloud service is hosted as this may change from time to time as data centres operate internationally in several countries. It may well be the case that Personal Information is transferred to multiple countries.

12.3 The use of these services is required to be able to operate as a business, to stay competitive and to keep up to date with new digital technological innovation. We also require the use of these services to be able to provide clients with our services.

12.4 For all Data Subjects we obtain consent to transfer their information across borders and this is to be done before we do so.

12.5 The reasons or platforms we use to transfer Personal Information across borders are:

- Cloud services for data file storage such as Dropbox, GoogleDrive, OneDrive etc.
- Cloud server services for email.
- Proprietary software services and client CRM



13. POPIA Awareness


- 13.1 Logichem conducts POPI training sessions with all staff.
- 13.2 All previously mentioned persons will be required to have completed the POPIA Consent and Commitment Form, see Appendix A (available on Logichem Quality Management System\2. LEADERSHIP\2.2 Policy\Templates) to assure Awareness.
- 13.3 From time to time more in-depth POPI awareness sessions may be held with the Information Officer and Deputy Information Officer

14. Review


- 14.1 This Policy will be reviewed in January 2025 to ensure sustained compliance with POPIA and other relevant legislation.

15. Authorisation

As authorised signatory of Logichem I, Mia Liebenberg hereby confirm official adoption of this policy.


2023/01/15
Signed & Dated – Director

Mia Liebenberg
Full name and surname – Director


2023/01/15
Signed & Dated – Information Officer

Claudia Bouwer
Full name and surname – Information Officer