



POPIA POLICY MANUAL AND COMPLIANCE FRAMEWORK

(Prepared in terms of Chapter 3 - Part A of the Protection of Personal Information Act, 2013 - POPIA)

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1. Introduction

JET TRACK is a Tracking solutions provider Company. We provide a product that we source in order to provide a professional solution service to individuals and companies across a broad spectrum of disciplines.

We assist with the provision of tracking solutions in the market.

As the Responsible Party, JET TRACK is committed to comply with The Protection of Personal Information (POPI) Act which requires us to:

- 1.1.** Sufficiently inform clients (data subjects), of the purpose for which we will process their personal information;
 - 1.2.** Protect our Information assets from threats, whether internal or external, deliberate or accidental, to ensure business continuation, minimize business damage and maximize business opportunities.
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1.3. This policy and compliance framework establishes measures and standards for the protection and lawful processing of personal information within the Company and provides principles regarding the right of an individual to privacy and the reasonable safeguarding of their personal information.

1.4. All employees, subsidiaries, business units, departments and individuals directly associated with JET TRACK are responsible for adhering to this policy and for reporting any security breaches or incidents to the Information Officer.

1.5. Any Service Provider that provides Information Technology services, including data storage facilities, to our organization must adhere to the requirements of the POPI Act to ensure adequate protection of personal information held by them on our behalf. Written confirmation to this effect must be obtained from relevant service providers.

2. Purpose

The purpose of this policy is to inform clients and enable JET TRACK to:

- 2.1.** Comply with the laws in respect of all personal information it holds about clients;
- 2.2.** Follow good practice;
- 2.3.** Protect JET TRACK's reputation;
- 2.4.** Protect JET TRACK from the consequences of a breach of its responsibilities;
- 2.5.** Protect the clients against loss or breach of their personal information.

3. Policy Principles

3.1. Accountability

JET TRACK will take reasonable steps to ensure that all personal information obtained from clients is stored safely and securely.

3.2. Processing Limitation

- JET TRACK will collect personal information directly from clients.
- JET TRACK will obtain personal information from its website where clients register to enquire about our products and services
- Once in our possession, JET TRACK will only process or release client information with a client's consent, except where we are required to do so by law. In the latter case JET TRACK will always inform the client.

3.3. Specific Purpose

JET TRACK collects personal information from clients for the purpose of supplying tracking solutions.

3.4. Limitation on Further Processing

Personal information may not be processed further in a way that is incompatible with the purpose for which the information was collected initially. JET TRACK collects personal information for application to solutions and general communication with clients. It will only be used for this purpose.

3.5. Information Quality

JET TRACK is responsible for ensuring that client information is complete, up to date and accurate before use. This means that it may be necessary to request clients, from time to time, to update their information and confirm that it is still relevant. If we are unable to reach a client for this purpose their information will be deleted from our records.

3.6. Transparency/Openness

Where personal information is collected from a source, other than directly from a client, (EG. Social media, referrals, etc.) JET TRACK is responsible for ensuring that the client is aware:

- That their information is being collected;
- Who is collecting their information by giving them our details;
- Of the specific reason for the collection of their information.

3.7. Security Safeguards

- JET TRACK will ensure technical and organisational measures to secure the integrity of personal information.
- Guard against the risk of loss, damage or destruction thereof.
- Personal information must also be protected against any unauthorised or unlawful access or processing.
- JET TRACK is committed to ensuring that information collected is only used for legitimate purposes with client consent and only by authorised employees of our Business.

3.8. Participation of Individuals

- Clients are entitled to know the particulars of their personal information held by JET TRACK, as well as the identity of any authorised employee of our Company that has access thereto.
- Clients are entitled to correct any information at any time.
- Clients are entitled to request JET TRACK to remove their information from its records at any time.

4. Operational Considerations

4.1. Monitoring

- Management and the Information Officer are responsible for administering and overseeing the implementation of this policy and, as applicable, supporting guidelines, standard operating procedures, notices, consents and appropriate related documents and processes.
- All employees and individuals directly associated with JET TRACK are to be trained, according to their functions, in the regulatory requirements, policies and guidelines that govern the protection of personal information.
- JET TRACK will conduct periodic reviews and audits, where appropriate, to ensure compliance with this policy and guidelines.

4.2. Operating controls

JET TRACK will establish appropriate standard operating procedures that are consistent with this policy and regulatory requirements. This will include:

- Allocation of information security responsibilities.
- Incident reporting and management.
- User ID addition or removal.
- Information security training and education.
- Data backup.

5. Storage of Information

JET TRACK makes use of a hosting storage service and the server which holds our information is based in Germany. In terms of Section 72 of the POPIA, JET TRACK must adhere to the following conditions:

- 5.1. The recipient of the information (hosting service) is subject to a law which regulates trans-border information flow and personal information in a way which is substantially similar to POPIA;
- 5.2. JET TRACK must obtain a client's consent;
- 5.3. JET TRACK must inform a client where his/her information is stored.

The hosting services utilized by JET TRACK are fully compliant with The General Data Protection Regulation (GDPR) which is globally recognized. The GDPR is a unified framework of data privacy rules which is similar to that of the POPIA and it imposes strict regulations on how organizations collect, store and manage personal information.

The hosting service has a dedicated team of security experts who constantly monitors and improves its security policies to help protect data in line with the provisions of the GDPR. JET TRACK's data is stored on their Germany based servers for as long as we need and we have the ability to the complete removal of information at any moment in time.

6. Company and Information Officer Details

6.1. Jet Track Holdings

Po Box 1520, Ballito, 4420
Tel: +27 (0) 32 946 0020
Company Registration Number: 2015/269699/07
Fax (086) 641 7878
P.O. Box 436, Umhlali, 4420

6.2. Information Officer:

Po Box 1520, Ballito, 4420
Tel: +27 (0) 32 946 0020
Contact: Leonard Herselman
Email: leonard@jettrack.co.za

6.3. The Information Officer is responsible for:

- Conducting a preliminary assessment;
- The development, implementation and monitoring of this policy and compliance framework;
- Ensuring that this policy is supported by appropriate documentation;
- Ensuring that documentation is relevant and kept up to date;
- Ensuring this policy and subsequent updates are communicated to relevant representatives and associates, where applicable.

7. Policy Compliance

Any breach of this policy may result in disciplinary action and possible termination of employment