

## **POPIA ACT COMPLIANCE POLICY**

### **VERSION 3.0**

### **July 2025**

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Mobile : Jenna Brown +27 81 047 5315

Email : jenna@jractivate.co.za

Office Landline : +27 87 807 7743

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### **1. Purpose**

The purpose of this policy is to ensure that JR Activate comply with the Protection of Personal Information Act (POPIA), Act 4 of 2013. This document outlines the principles and procedures adopted by the company to process personal information lawfully and protect the privacy rights of individuals.

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### **2. Scope**

This policy applies to all employees, contractors, and third-party service providers of JR Activate who have access to personal information collected or processed by the company.

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### **3. Definitions**

- Data Subject: A person whose personal information is processed.
- Personal Information: Any information relating to an identifiable natural or juristic person.
- Processing: Any operation or activity concerning personal information, including collection, storage, retrieval, use, dissemination, or destruction.
- Responsible Party: JR Activate determining the purpose and means of processing.
- Operator: A party that processes information on behalf of JR Activate

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## 4. POPIA Principles

JR Activate commit to processing personal information in accordance with the 8 conditions for lawful processing:

- Accountability – We accept responsibility for ensuring compliance.
- Processing Limitation – Information is collected for a specific purpose and processed with minimal intrusion.
- Purpose Specification – Information is collected for explicitly defined purposes.
- Further Processing Limitation – Processing beyond the original purpose must be compatible with that purpose.
- Information Quality – We take reasonable steps to ensure accuracy, completeness, and relevance.
- Openness – Data subjects are informed about the collection and use of their information.
- Security Safeguards – Adequate safeguards are in place to prevent loss, damage, or unauthorized access.
- Data Subject Participation – Data subjects have the right to access and correct their information.

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## 5. Categories of Personal Information Processed

We may process the following types of personal information:

- Employee details (ID, contact details, employment records)
- Customer information (names, contact info, account history)
- Supplier and service provider data
- Visitor and security access logs

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## 6. Consent and Justification for Processing

JR Activate ensures that personal information is processed:

- With explicit consent of the data subject; or
- As required by law; or
- In fulfillment of a contract; or
- As necessary for legitimate interests pursued by the company.

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## 7. Information Security

We implement appropriate technical and organizational security measures, including:

- Data encryption and secure storage
- Controlled access with role-based permissions
- Regular vulnerability assessments
- Incident response procedures

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## 8. Roles and Responsibilities

- Information Officer: Responsible for overall POPIA compliance, including policy enforcement and breach reporting.
- All Staff: Must handle personal information responsibly and report any breaches.
- IT Department: Ensures security infrastructure is in place and maintained.

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## 9. Third-Party Processing

When outsourcing processing to operators, JR Activate ensures:

- A written agreement is in place.
- The operator complies with POPIA standards;
- No data is transferred cross-border without legal basis.

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## 10. Data Subject Rights

JR Activate respects and enables data subjects' rights, including:

- Right of access to personal information;
- Right to request correction or deletion;
- Right to object to processing;
- Right to lodge a complaint with the Information Regulator.

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## 11. Breach Notification

All personal data breaches must be reported immediately to the Information Officer of JR Activate will notify the Information Regulator and affected data subjects in accordance with Section 22 of the POPI Act.

## 12. Policy Review

This policy will be reviewed annually or when changes in legislation or processing practices occur.

## 13. Contact Details

Director:

[Name] Jenna Brown

[Email Address] jenna@jractivate.co.za

[Phone Number] +27 81 047 5315

