

# Jurumani Data Protection and Privacy Policy

Version 1.1

15 December 2020

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## **1. Introduction**

Jurumani is committed to process personal information honestly, ethically, with integrity and always consistent with applicable laws and our values.

Failure to proactively identify, assess, manage and mitigate privacy risks will lead to high likelihood of people's privacy rights being breached and/or failure to comply with applicable privacy laws (e.g Protection of Protection Information Act ("PoPIA")). This is likely to result in fines and/or reputational damage, including a severe impact on Jurumani customer satisfaction index and employer reputation.

To this end, this Data Protection and Privacy Policy ("Policy") regulates the conduct of all directors, officers and employees of Jurumani and its subsidiaries when they handle personal information of Jurumani's data subjects.

## **2. Policy, purpose and objective**

It is Jurumani's policy to protect the privacy and information of all its data subjects.

2.1 The Purpose and objective of this policy is to:

2.2.1 standardise information privacy and data protection practices across all Jurumani's operations.

2.2.2 define Jurumani's privacy vision and principles which must be implemented consistently across Jurumani in order to ensure conformance with our Risk Tolerance and Principles.

2.2 This Policy also regulates the governance structure and implementation framework for the processing of Personal Information

2.3 This Policy sets out how the Jurumani operations, divisions and practice areas, in South Africa or in any other country in which Jurumani operates and hereinafter collectively referred to as "**Jurumani**") uses and protects the Personal Information (defined below) that it collects, stores, processes and disseminates from and to its clients, employees, customers, business partners, suppliers and other stakeholders.

### **3. Scope and application**

#### **Applicability**

- 3.1 This Policy is applicable to the processing of all Personal Information throughout the information life cycle, from the point of first collection of Personal Information until the time that such information is destroyed, deleted or de-identified.

#### **Jurumani entities**

- 3.2 This Policy applies to all countries in which Jurumani operates and must be applied in conjunction with any legal and/or regulatory requirements applicable in each relevant country. In instances where applicable legislation or regulation in any country prescribes lower standards for the protection of privacy, the requirements of this Policy will take precedence.

- 3.3 Specifically this includes:

3.3.1 Jurumani telco services

3.3.2 Tangent Solutions

3.3.2.1 Custom Development

3.3.2.2 Cloud: Azure

3.3.2.3 Cloud: AWS

3.3.2.4 Intelligent automation

3.3.2.5 Connect

- 3.4 This Policy should be read in conjunction with all other relevant Jurumani policies regulating privacy and protection of information.

#### **Services**

- 3.5 Unless otherwise stated the policy applies to all divisions and Practice areas, including

3.5.1 Jurumani telco services

3.5.2 Tangent Solutions

3.5.2.1 Custom Development

3.5.2.2 Cloud: Azure

3.5.2.3 Cloud: AWS

3.5.2.4 Intelligent automation

3.5.2.5 Connect

## People

3.6 This Policy must be adhered to by:

3.6.1 all employees, directors, officers and other staff of Jurumani ("Jurumani Personnel"); and

3.6.2 all third parties who Process the Personal Information of Jurumani's Data Subjects on behalf of Jurumani or as part of any functions or duties which they carry out (whether contractual or otherwise) for Jurumani ("Authorised Third Parties").

3.7 Jurumani employees are specifically referred to section 12 of this Policy, which deals with employee non-compliance with this Policy.

3.8 For the avoidance of any doubt, any reference to "Jurumani" in this document is to be considered as reference to the Jurumani Personnel, unless the context indicates otherwise.

## Policy Monitoring

3.9 The various owners and champions are accountable for monitoring policy implementation within their business units.

## Compliance

3.10 Compliance levels are monitored and reviewed by appropriate governance bodies. Any breach will be treated as a serious disciplinary offence and may be subject to disciplinary action.

## 4. Policy

### Jurumani Privacy Vision and Principles

#### 4.1 Jurumani's objective is to:

- 1.1.1 be open and transparent about the way we process personal information to customers and suppliers, to manage personal information responsibly and to offer secure services to our customers and employees;
- 1.1.2 gain competitive advantage and manage privacy risks through a world class, demonstrable, consistent and mature privacy program;
- 1.1.3 create opportunities and strategic advantage through development of privacy by design, as it supports our clients and internal development;

#### 4.2 Jurumani's privacy principles are:

##### 4.1.1 How we operate

- **Accountability:** We are accountable for living up to the privacy principles including when working with our partners and suppliers.
- **Lawful:** We comply with privacy laws and act with integrity and fairness.
- **Openness and honesty:** We communicate clearly about our actions that may impact privacy.

##### 4.1.2 How we manage and protect information

- **Responsible Data Management and limited disclosures:** We apply appropriate data management practices to govern the processing of personal information. We choose partners who participate in the processing of personal information carefully and we limit disclosures of personal information to such partners to what is described in our privacy notices or to what has been authorized.
- **Security safeguards:** We implement appropriate technical and organizational measures to protect personal information against unauthorized access, use, modification or loss.

##### 4.1.3 How we design our products and services

- **Privacy-by-design:** Respect for privacy is a key component in the design, development and delivery of our products and services, for clients and ourselves.

## 5. Implementation

- 5.1 The CEO is accountable for effective implementation of this Policy across Jurumani, including allocation of appropriate resources to operationalize the Policy and to monitor compliance thereof.
- 5.2 The Practice Lead for each area or division within Jurumani is accountable for compliance with this Policy in the relevant operating company, including allocation of appropriate resources and responsibilities for implementation and monitoring compliance with this Policy.

## 6. Terms and principles

| Principle                     | Explanation   |
|-------------------------------|---|
| Accountability                | Jurumani shall put in place measures to comply with applicable privacy laws and principles contained in this Policy.  |
| Processing Limitation         | Personal information must be processed in a lawful and reasonable manner that does not infringe the privacy of the data subject.  |
| Purpose specification         | The Processing must be for a specific and explicitly defined purpose.   |
| Further processing limitation | Any further Processing of Personal Information must be compatible with the purpose for which it was collected (i.e. if Jurumani and/or any Authorised Third Party wishes to Process any Personal Information outside of the stated purpose for which it was collected). |
| Quality                       | The information processed must be complete, accurate and where necessary, kept updated.   |
| Openness                      | The Data Subject must be made aware of the Processing.  |
| Security                      | The integrity and confidentiality of the Personal Information must be ensured.  |
| Data Subject participation    | The right of the Data Subject to access their Personal Information and where necessary request correction or deletion of the Personal Information should be guaranteed.   |

## Key terms from POPIA:

| Term                        | Meaning/explanation   |
|-----------------------------|---|
| <i>Child</i>                | Means a person under the age of 18 (eighteen)   |
| <i>Data Subjects</i>        | Means all persons whose Personal Information Jurumani and/or the third parties is processing, including all customers, employees, shareholders, suppliers, service providers and any other natural or juristic persons  |
| <i>Personal Information</i> | <p>Means information (whether oral, written or in electronic form) relating to any Data Subject, including but not limited to (i) views or opinions of another individual about the Data Subject; and (ii) information relating to such Data Subject's -</p> <ul style="list-style-type: none"> <li>i. race, sex, gender, sexual orientation, pregnancy, marital status, nationality, ethnic or social origin, colour, age, physical or mental health, well-being, disability, religion, conscience, belief, cultural affiliation, language and birth;</li> <li>ii. education, medical, financial, criminal or employment history;</li> <li>iii. names, identity number and/or any other personal identifier, including any number(s), which may uniquely identify a data subject, account or client number, password, pin code, customer code or number, numeric, alpha, or alpha-numeric design or configuration of any nature, symbol, e-mail address, domain name or IP address, physical address, cellular phone number, telephone number or other particular assignment;</li> <li>iv. blood type, fingerprint or any other biometric information;</li> <li>v. personal opinions, views or preferences;</li> <li>vi. correspondence that is implicitly or expressly of a personal, private or confidential nature (or further correspondence that would reveal the contents of the original correspondence); and</li> <li>vii. corporate structure, composition and business operations (in circumstances where the Data Subject is a juristic person) irrespective of whether such information is in the public domain or not.</li> </ul> |

|                                     |   |
|-------------------------------------|---|
| <i>Privacy Officer</i>              | Means the Jurumani Privacy Officer, currently being Mark Fricke   |
| <i>Process, Processing</i>          | Means any operation or activity or any set of operations concerning Personal Information, whether automated or not and including -<br><ul style="list-style-type: none"> <li>i. the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;</li> <li>ii. dissemination by means of transmission, distribution or making available in any other form by electronic communications or other means; or</li> <li>iii. merging, linking, blocking, degradation, erasure or destruction;</li> </ul> |
| <i>PoPI Act</i>                     | The Protection of Personal Information Act No 4 of 2013 (South African Legislation)   |
| <i>Special Personal Information</i> | Means information concerning a Data Subject's religious, spiritual or philosophical beliefs, race or ethnic origin, trade union membership, political opinions, physical or mental health, biometric information, sexual life, or criminal behaviour of a data subject to the extent that such information relates to alleged commission of any offence or any proceedings in respect of any offence allegedly committed by a Data Subject.   |

## **7. Special information and protected principles**

7.1 Jurumani and/or third parties shall not Process any Special Personal Information unless there is a compelling reason to do so and in such cases, such processing will only take place with the express permission of the Privacy Officer.

7.2 Jurumani and/or third parties will only process Special Personal Information if:

7.2.1 the consent of the Data Subject has been obtained;

7.2.2 directed by an order of a court;

7.2.3 it is necessary to disclose such information in order to provide products and services to the Data Subject (who is already a customer of Jurumani); or

7.2.4 required in terms of any applicable law.

- 7.3 Jurumani and/or Authorised Third Parties may not process any Personal Information concerning a Child and will only do so where it has obtained the consent of the parent or guardian of that Child or where Jurumani is permitted to do so in accordance with applicable laws.

## **8. Implementation framework**

8.1 Responsibility of each Practice Area: All Jurumani businesses are required to comply with this Policy and implement measures to comply with its provisions.

8.2 Work with the Privacy Officer: Each Practice area and third parties shall work through the office of the Privacy Officer as the first point of contact in its implementation of and ongoing compliance with this Policy.

8.3 Training: All employees must attend privacy training as required.

8.4 Establish and Maintain Personal Information Location Register: In order to ensure effectiveness of privacy control measures it is essential that Jurumani knows where its Personal Information is stored. To this end, each business unit that processes Personal Information must maintain a separate, up-to-date Personal Information Location Register to ensure effective management of all Personal Information Processed by that business unit.

We recognise this is not yet implemented and the due date for such is:

31 July 2021

8.5 Maintain Privacy Risk Register: In order to monitor and manage privacy risks across Jurumani, a Privacy Risk Register (recording all identified high privacy risks) must be maintained by all departments and business units, in which all identified risks affecting their respective departments are recorded. In this regard the register will, amongst other things, identify the risk in question, background to the risk and context, concerns and issues, steps taken to mitigate the risk and the person tasked with mitigating the identified risk.

We recognise this is not yet implemented and the due date for such is:

31 July 2021

8.6 Privacy Risk Impact Assessment: All business units that process Personal Information must, in consultation with the Privacy Officer, identify, prioritise and conduct regular privacy impact assessments, which serves as an important tool for providing relevant

metrics relating to risks that need to be addressed and offering a methodology for prioritizing the manner in which risks will be addressed.

- 8.7 All Jurumani products and services must take measures to comply with this Policy: All Jurumani Personnel and any Authorised Third Parties must implement measures to adhere and comply with this Policy and any other policies that govern privacy and the protection of Personal Information when developing products and rendering services, by identifying any privacy risks that might be posed by the product and/or service to be developed and by putting in place processes to mitigate these identified risks.

## **9. Processing Jurumani information**

- 9.1 Jurumani's Human Resources function shall ensure that they comply with this Policy in respect of all Jurumani Personnel data which they have collected and which falls within the definition of Personal Information, including that HR will only collect personnel personal information as is necessary for their employment relationship with Jurumani. This includes information collected from the time that a potential employee applies for a job, during the interview and selection process and if such candidate is successful, all information processed during the course of their employment and on the termination of their employment.
- 9.2 The appropriate consent forms should be included as part of the terms of engagement and/or employment contracts concluded with each of the Jurumani Personnel (including employees, temporary employees, independent contractors, consultants, etc).

## **10. Policy violation**

Non-compliance with this Policy constitutes misconduct and could, in the case of employees of Jurumani, result in disciplinary action in terms of Jurumani's Disciplinary Procedure and Code and could lead to dismissal and/or further legal action being taken against the responsible Jurumani employee(s).

## 11. Document history

| Version | Date     | Changes                    | Other standards affected | Approved by |
|---------|----------|----------------------------|--------------------------|-------------|
| 1.0     | 01/04/19 | Draft and approved Version |                          | M Fricke    |
| 1.1     | 15/12/20 | Revisions                  |                          | M Fricke    |