

POPI Manual

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1. Introduction

This manual outlines the policies and procedures of SinnnetITA (“we,” “us,” or “our”) for compliance with the Protection of Personal Information Act 4 of 2013 (POPIA) of South Africa.

2. Information Officer

We have appointed an Information Officer responsible for ensuring compliance with POPIA:

Name: Stephan de Kock

Contact details: stephandk@sinnetita.com, +27 79 382 4414

3. Personal Information We Process

We collect and process the following types of personal information:

- Identification information (e.g., name, ID number)
- Contact information (e.g., email, phone number, address)
- Financial information (e.g., bank account details)
- Employment information (for employees and job applicants)
- Website usage data

4. Purpose of Processing

We process personal information for the following purposes:

- Providing our products/services
- Managing customer relationships
- Employment and recruitment
- Marketing and communications
- Compliance with legal obligations

5. Data Subject Categories

We process personal information relating to the following categories of data subjects:

- Customers/Clients
- Employees and job applicants
- Suppliers and service providers
- Website visitors

6. Recipients of Personal Information

We may share personal information with:

- Service providers and third-party processors
- Regulatory and government bodies
- Professional advisors (e.g., lawyers, accountants)

7. Trans-border Flows of Personal Information

If we transfer personal information outside of South Africa, we ensure that the recipient country has adequate data protection laws or that the transfer is subject to appropriate safeguards.

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8. Information Security Measures

We implement reasonable technical and organizational measures to protect personal information, including:

- Access controls and authentication
- Encryption of sensitive data
- Regular security assessments
- Employee training on data protection

9. Data Subject Rights

Data subjects have the following rights under POPIA:

- Right to access personal information
- Right to correct or delete personal information
- Right to object to processing
- Right to submit a complaint to the Information Regulator

10. Information Regulator

Complaints can be submitted to the Information Regulator at:

Address: JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
Website: www.justice.gov.za/inforg

11. Data Retention

We retain personal information only for as long as necessary to fulfill the purposes for which it was collected, or as required by law.

12. POPIA Compliance Framework

We have implemented a POPIA compliance framework that includes:

- Regular privacy impact assessments
- Data protection policies and procedures
- Employee training programs
- Incident response plans

13. Updates to This Manual

This manual will be reviewed and updated periodically to ensure ongoing compliance with POPIA.

14. Availability of the Manual

This manual is available at our offices and on our website at <https://sinneta.com>.