






4.6.6 Protection of Personal Information and retention of documents PAIA manual

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Approval and revision control

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1. Introduction

The Company is obligated to comply with the Protection of Personal Information Act 4 of 2013 (POPI). POPI requires the Company as “the responsible party” to ensure that the personal information of its customers, suppliers, employees, vendors, service providers and business partners (“data subjects”) is used appropriately, securely and in accordance with applicable laws.

2. Objective of the Policy

The policy sets out the manner in which the Company deals with data subjects’ personal information. The Policy is available on the York company website www.york.co.za. POPI prescribes certain conditions for the lawful processing of personal information. These conditions form the framework of this policy.

3. Scope

This policy applies throughout the Company where personal information is processed.

4. Definitions and abbreviations

‘**Personal information**’ means information relating to an identifiable, living, natural person and,

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where applicable, information relating to an identifiable, existing juristic person. Personal information includes, but is not limited to, the following:

- information relating to the race, gender, sex, pregnancy, marital status, nationality, 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 including performance appraisals;
- any identifying number, symbol, email 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 private or confidential, and further correspondence that would reveal the contents of the original correspondence;
- the views or opinions of another individual about the person;
- 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.
- 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;
- the criminal behaviour of a data subject to the extent that the information relates to
 - (i) an alleged offence committed by a data subject or
 - (ii) any proceedings related to an alleged offence committed by a data subject, or the disposal of proceedings.

‘data subject/s’ refers to a natural or juristic person to whom personal information relates, such as an employee, individual client, vendor, service provider, supplier, business partner, customer or a company that supplies the company with products, goods or services.

‘Responsible party’ means the entity that needs the personal information for a particular reason and determines the purpose of and means for processing the personal information. In this case, the Company is the responsible party.

‘Data operator’ means a person who processes personal information for a responsible party in terms of a contract or mandate, without coming under the direct authority of that party.

‘Information Officer’ is responsible for ensuring the Company’s compliance with POPI.

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‘Processing’ means any operation, set of operations or activity – whether automatic or not – concerning personal information. This includes:

- the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use of personal information;
- dissemination by transmitting, distributing or making personal information available in any other form;
- merging or linking personal information, as well as restricting, degrading, erasing or destroying it.

‘Record’ means any recorded information, regardless of form or medium, including:

- Writing on any material;
- Information produced, recorded or stored by means of any tape-recorder, machine or digital equipment, whether hardware or software or both, or other device, and any material subsequently derived from information so produced, recorded or stored;
- Label, marking or other writing that identifies or describes anything of which it forms part, or to which it is attached by any means;
- Book, map, plan, graph or drawing;
- Photograph, film, negative, tape or other device in which one or more visual images or footage are embodied so as to be capable, with or without the aid of some other equipment, of being reproduced.

‘Consent’ means any voluntary, specific and informed expression of will in terms of which permission is given for the processing of personal information.

‘Information Regulator’ means the regulator as established in section 39 of POPI.

5. Policy/ Procedure

5.1 Personal Information collected

5.1.1 Personal information collected by the Company must be collected for a specific, explicitly defined and legitimate purpose. Personal information may also not be kept for longer than is needed to achieve the purpose for which it is collected or subsequently processed, save to adhere to other statutory requirements.

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5.1.2 The Company collects and processes data subjects' personal information relative to the services it provides to them. The type of information will depend on the need for which it is collected and will be processed for that purpose only.

5.1.4 Data subjects' personal information will only be used as agreed, and for the purpose for which it is collected. This may include:

- providing products or services to customers;
- confirming, verifying and updating clients' details;
- conducting market or customer satisfaction research;
- in connection with legal proceedings including debt collection;
- providing our services to clients to carry out the services requested and to maintain and constantly improve the relationship;
- in connection with legal and regulatory requirements, to comply with such requirements or when it is otherwise allowed by law;
- general customer communications;
- criminal/ background/ police clearance/ credit rating;
- FICA verification;
- reference check;
- promotional or marketing material;
- social media posts;
- integrated annual report;
- Company newsletter or communique.

5.2 Further processing limitation and exceptions

5.2.1 The Company cannot further process personal information in a way that is incompatible with the purpose for which it was collected in the first place.

5.2.2 The Company does not need to obtain further consent if:

- a) The data subject consents to such further processing
- b) Personal information is available in or derived from a public record or has deliberately been made public by the data subject
- c) Further processing is necessary to prevent or mitigate a serious or imminent threat of public health/ safety or life/ health of the data subject or

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another individual

- d) Information is used for historical, statistical or research purposes and the Company ensures that the further processing is carried out solely for such purpose and will not be published in identifiable form
- e) Further processing is in accordance with an exemption granted by the Regulator.

5.3 Information Quality

5.3.1 The Company will take reasonable, practical steps to ensure that personal information is complete, accurate, not misleading and updated where necessary.

5.3.2 The Company will regularly review its procedures to ensure that its records remain accurate and consistent. In particular, the Company will also ensure that:

- where possible, systems are designed to encourage and facilitate the accurate entry of data;
- effective procedures are in place so that all relevant systems are updated when personal information about any data subject changes;
- employees who keep more detailed information about individuals are given additional training on accurate record-keeping.

5.4 Safeguarding client information

It is a requirement of POPI to protect personal information adequately. The Company will continuously review its security controls and processes to ensure that personal information is secure.

The following procedures are in place for POPI readiness and implementation:

5.4.1 The Company has appointed a Group Information Officer, whose responsibilities are as set out in section 55(1) and regulation 4 of POPI. The Group Compliance Officer is assisted by Deputy Information Officers appointed in each division.

5.4.2 Employee training on POPI and procedures to follow when processing

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personal information.

- 5.4.3 The employment contract for employees joining the Company as of 1 July 2021 will contain relevant consent clauses for the processing of the employee information, or any other action so required, in terms of POPI.
- 5.4.4 Every employee currently employed by the Company will be required to sign an addendum to their employment contracts containing relevant consent clauses for processing of employee information, or any other action so required, in terms of POPI.
- 5.4.5 Employees that are required to process personal information of data subjects to the extent necessary will be required to sign declaration forms whereby they agree to protect such personal information.
- 5.4.6 Company archived data subject information is stored on site and in some cases are cloud based, which is also governed by POPI, and access is limited to these areas to authorised employees.
- 5.4.7 Suppliers, vendors and other third party service providers will be required to sign a service level agreement guaranteeing their commitment to the protection of personal Information, this is however an ongoing process.
- 5.4.8 All electronic files or data are backed up by the Company IT division which is also responsible for system security that protects third party access and physical threats. The Company IT division is responsible for Electronic Information Security.

5.5 Access and correction of personal information

- 5.5.1 Data subjects have the right to access personal information that the Company holds about them. Data subjects also have the right to ask the Company to update or correct their personal information on reasonable grounds.
- 5.5.2 Once a data subject objects to the processing of their personal information, the Company may no longer process said personal information unless the Company is required to do so under law.

5.6 Device usage

- 5.6.1 Restrictions on authorised use

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5.6.1.1 Employees whose personal devices have camera, video or recording capability are restricted from using those functions anywhere in the building or on Company property at any time unless authorised in advance by management.

5.6.1.2 While at work, employees are expected to exercise the same discretion in using their personal devices as is expected for the use of Company devices. Company policies pertaining to harassment, discrimination, trade secrets, confidential information and ethics apply to employee use of personal devices for work-related activities.

5.6.2 Privacy/ Company access

5.6.2.1 The Company has the right, at any time, to monitor and preserve any communications that use the Company's networks in any way, including data, voice mail, telephone logs, internet use and network traffic, to determine proper use.

5.6.2.2 Management reserves the right to review or retain personal and company-related data on personal devices or to release the data to government agencies or third parties during an investigation or litigation.

5.6.2.3 If it is believed that there is company information captured or recordings made of meetings on personal or company devices, the employee must immediately hand over such information and allow the Company to make a back up of the information. No employee may withhold information from the Company.

5.7 Amendments to this Policy

5.7.1 Amendments to, or review of this policy, will take place on an ad-hoc basis or as is necessary.

6. RETENTION AND CONFIDENTIALITY OF DOCUMENTS, INFORMATION AND ELECTRONIC TRANSACTIONS

6.1 Introduction

Due to various legislative requirements, documents must be retained for a certain

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number of years, depending on the legislation. This policy will refer to the legislation and identify the timeframe that certain documents have to be kept.

6.2 Objective of the Policy

6.2.1 To exercise effective control over the retention of documents and electronic transactions as prescribed by legislation and as dictated by business practice.

6.2.2 Documents need to be retained in order to prove the existence of facts and to exercise rights the Company may have. Documents are also necessary for defending legal action, for establishing what was said or done in relation to business of the Company and to minimise the Company's reputational risks.

6.2.3 To ensure that the Company's interests are protected and the Company's and customers' rights to privacy and confidentiality are not breached.

6.2.4 Queries may be referred to the Company Secretary.

6.3 Definitions and Abbreviations

6.3.1 **'Customers'** include but are not limited to shareholders, debtors, creditors as well as the affected personnel and/ or departments related to the Company.

6.3.2 **'Confidential information'** refers to all information or data disclosed or obtained by the Company by any means whatsoever and shall include, but not limited to:

6.3.2.1 financial information and records; and

6.3.2.2 all other information including information relating to the structure, operations, processes, intentions, product information, know-how, trade secrets, market opportunities, customers and business affairs but excluding the exceptions listed hereunder.

6.3.3 **'Data'** refers to electronic representations of information in any form.

6.3.4 **'Documents'** include books, records, security or accounts and any information that has been stored or recorded electronically, photographically, magnetically, mechanically, electro-mechanically or optically, or in any other form.

6.3.5 **ECTA:** Electronic Communications and Transactions Act, 25 of 2002.

6.3.6 **'Electronic communication'** refers to a communication by means of data messages.

6.3.7 **'Electronic signature'** refers to data attached to, incorporated in, or logically

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associated with other data and which is intended by the user to serve as a signature.

6.3.8 **'Electronic transactions'** include emails sent and received.

6.3.9 **'PAIA'** Promotion of Access to Information Act 2 of 2000.

6.4 Policy/ Procedure

6.4.1 Access to documents:

6.4.1.1 where disclosure is under compulsion of law;

6.4.1.2 where there is a duty to the public to disclose;

6.4.1.3 where the interests of the Company require disclosure;

6.4.1.4 where disclosure is made with the express or implied consent of the client.

6.4.2 Disclosure to third parties

6.4.2.1 All employees have a duty of confidentiality in relation to the Company and clients.

6.4.2.2 The clients' right to confidentiality is protected by the Constitution of South Africa and in terms of the ECTA. Information may be given to a third party if the client has consented in writing to that person receiving the information.

6.4.2.3 Requests for company information are dealt with in terms of PAIA, which gives effect to the constitutional right to access to information held by the State or any person (natural or juristic) that is required for the exercise or protection of rights. Private bodies, like the Company, must however refuse access to records if disclosure would constitute an action for breach of the duty or secrecy owed to a third party.

6.4.2.4 Requests must be made in writing on the prescribed form to the Company Secretary, and in terms of PAIA, the requesting party has to state the reason for requesting the information and has to pay a prescribed fee. Refer to "Annexure A".

6.4.2.5 Confidential company and/ or business information may not be disclosed to third parties as this could constitute industrial espionage. The affairs of the Company must be kept strictly confidential at all times.

6.4.2.6 The Company views any contravention of this policy very seriously and employees who are guilty of contravening the policy will be subjected to disciplinary procedures, which may lead to the dismissal of any guilty party.

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6.4.3 Security Safeguards

6.4.3.1 The Company undertakes to comply with the security safeguard requirements imposed by POPI. These specifications require the Company to take appropriate technical and organisational measures to secure the integrity of personal information. The Company must provide safeguards against the risks of loss, damage or destruction of personal information and against the unauthorised or unlawful access to or processing of personal information.

6.4.3.2 The Company identified the increasing threat that cybercrime poses. As such, the Company has taken adequate steps to protect the Company and its assets, of which personal information is a key part.

6.5 Storage of documents

6.5.1 Hard copies

6.5.1.1 Companies Act, No 71 of 2008

In terms of the Companies Act 71 of 2008 and the Companies Amendment Act 3 of 2011 (the Act), hardcopies of the documents mentioned below must be retained for 7 (seven) years:

- Any documents, accounts, books, writing, records or other information that a company is required to keep in terms of the Act;
- Notice and minutes of all shareholders meetings, including resolutions adopted and documents made available to holders of securities;
- Copies of reports presented at the annual general meeting of the company;
- Copies of annual financial statements required by the Act;
- Copies of accounting records as required by the Act;
- Record of directors and past directors, after the director has retired from the company;
- Written communication to holders of securities and
- Minutes and resolutions of directors meetings, audit committee and directors' committees.

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Copies of the documents mentioned below must be retained indefinitely:

- Registration certificate;
- Memorandum of Incorporation and alterations and amendments;
- Rules;
- Securities register and uncertified securities register;
- Register of company secretary and auditors;
- Regulated companies (companies to which Chapter 5, Part B, C and Takeover regulations apply)
- Register of disclosure of person who holds beneficial interest equal to or in excess of 5% of the securities of that class issued.

6.5.1.2 Consumer Protection Act, No 68 of 2008

The Consumer Protection Act seeks to promote fair, accessible and sustainable marketplace and therefore requires a retention period of 3 (three) years for information provided to a consumer by an intermediary such as:

- Full names, physical address, postal address and contact details;
- ID number and registration number;
- Contact details of public officer in case of juristic person;
- Services rendered;
- Intermediary fee;
- Cost to be recovered from the consumer;
- Frequency of accounting to the consumer;
- Amounts, sums values, charges, fees, remuneration specified in monetary terms;
- Disclosure in writing of a conflict of interest by the intermediary in relevance to goods or service to be provided;
- Record of advice furnished to the consumer reflecting the basis on which advice was given;
- Written instruction sent by intermediary to the consumer;
- Conducting a promotional competition refer to Section 36(11)(b) and Regulation 11 of Promotional Competitions;
- Documents Section 45 and Regulation 31 for Auctions.

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6.5.1.3 Compensation for Occupational Injuries and Diseases Act, No 130 of 1993:

Section 81(1) and (2) of the Compensation for Occupational Injuries and Diseases Act requires a retention period of 4 (four) years for the documents mentioned below:

- Register, record or reproduction of the earnings, time worked, payment for piece work and overtime and other prescribed particulars of all the employees.

Section 20(2) documents with a required retention period of 3 (three) years:

- Health and safety committee recommendations made to an employer in terms of issues affecting the health of employees and of any report made to an inspector in terms of the recommendation;
- Records of incidents reported at work.

Asbestos Regulations, 2001, regulation 16(1) requires a retention period of minimum 40 (forty) years for the documents mentioned below:

- Records of assessment and air monitoring, and the asbestos inventory;
- Medical surveillance records;

Hazardous Biological Agents Regulations, 2001, Regulations 9(1) and (2):

- Records of risk assessments and air monitoring;
- Medical surveillance records.

Lead Regulations, 2001, Regulation 10:

- Records of assessments and air monitoring;
- Medical surveillance records.

Noise - induced Hearing Loss Regulations, 2003, Regulation 11:

- All records of assessment and noise monitoring;
- All medical surveillance records, including the baseline audiogram of every employee.

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Hazardous Chemical Substance Regulations, 1995, Regulation 9 requires a retention period of 30 years for the documents mentioned below:

- Records of assessments and air monitoring;
- Medical surveillance records.

6.5.1.4 Basic Conditions of Employment Act, No 75 of 1997:

The Basic Conditions of Employment Act requires a retention period of 3 (three) years for the documents mentioned below:

Section 29(4):

- Written particulars of an employee after termination of employment;

Section 31:

- Employee's name and occupation;
- Time worked by each employee;
- Remuneration paid to each employee;
- Date of birth of any employee under the age of 18 years.

6.5.1.5 Employment Equity Act, No 55 of 1998:

Section 26 and the General Administrative Regulations, 2009, Regulation 3(2) requires a retention period of 3 (three) years for the documents mentioned below:

- Records in respect of the company's workforce, employment equity plan and other records relevant to compliance with the Act;
- Section 21 and Regulations 4(10) and (11) require a retention period of 3 (three) years for the report which is sent to the Director General as indicated in the Act.

6.5.1.6 Labour Relations Act, No 66 of 1995:

Sections 53(4), 98(4) and 99 require a retention period of 3 (three) years for the documents mentioned below:

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- Registered employer's organizations must retain books of account, supporting vouchers, records of subscriptions or levies paid by its members, income and expenditure statements, balance sheets, auditor's reports and minutes of the meetings;
- Registered employer's organizations must retain the ballot papers;
- Records to be retained by the employer are the collective agreements and arbitration awards.

Sections 99, 205(3), Schedule 8 of Section 5 and Schedule 3 of Section 8(a) require an indefinite retention period for the documents mentioned below:

- Registered employer's organizations must retain a list of its members;
- An employer must retain prescribed details of any strike, lock-out or protest action involving its employees;
- Records of each employee specifying the nature of any disciplinary transgressions, the actions taken by the employer and the reasons for the actions;

6.5.1.7 Unemployment Insurance Act, No 63 of 2002:

The Unemployment Insurance Act, applies to all employees and employers except:

- Workers working less than 24 hours per month;
- Learners;
- Public servants;
- Foreigners working on a contract basis;
- Workers who get a monthly State (old age) pension;
- Workers who only earn commission.

Section 56(2)(c) requires a retention period of 5 (five) years, from the date of submission, for the documents mentioned below:

- Employers must retain personal records of each of their current employees in terms of their names, identification number, monthly remuneration and address where the employee is employed.

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6.5.1.8 Tax Administration Act, No 28 of 2011:

Section 29 of the Tax Administration Act, states that records of documents must be retained to:

- Enable a person to observe the requirements of the Act;
- Are specifically required under a Tax Act by the Commissioner by the public notice;
- Will enable SARS to be satisfied that the person has observed these requirements.

Section 29(3)(a) requires a retention period of 5 years, from the date of submission for taxpayers that have submitted a return and an indefinite retention period, until the return is submitted, then a 5 year period applies for taxpayers who were meant to submit a return, but have not.

Section 29(3)(b) requires a retention period of 5 years from the end of the relevant tax period for taxpayers who were not required to submit a return, but had capital gains/losses or engaged in any other activity that is subject to tax or would be subject to tax but for the application of a threshold or exemption.

Section 32(a) and (b) require a retention period of 5 years but records must be retained until the audit is concluded or the assessment or decision becomes final, for documents indicating that a person has been notified or is aware that the records are subject to an audit or investigation and the person who has lodged an objection or appeal against an assessment or decision under the TAA.

6.5.1.9 Income Tax Act, No 58 of 1962:

Schedule 4, paragraph 14(1)(a)-(d) of the Income Tax Act requires a retention period of 5 (five) years from the date of submission for documents pertaining to each employee that the employer shall keep:

- Amount of remuneration paid or due by him to the employee;
- The amount of employees tax deducted or withheld from the remuneration paid or due;
- The income tax reference number of that employee;

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- Any further prescribed information;
- Employer Reconciliation return.

Schedule 6, paragraph 14(a)-(d) requires a retention period of 5 years from the date of submission or 5 (five) years from the end of the relevant tax year, depending on the type of transaction for documents pertaining to:

- Amounts received by that registered micro business during a year of assessment;
- Dividends declared by that registered micro business during a year of assessment;
- Each asset as at the end of a year of assessment with cost price of more than R 10 000;
- Each liability as at the end of a year of assessment that exceeded R 10 000.

6.5.1.10 Value Added Tax Act, No 89 of 1991:

Section 15(9), 16(2) and 55(1)(a) of the Value Added Tax Act and Interpretation Note 31, 30 March requires a retention period of 5 (five) years from the date of submission of the return for the documents mentioned below:

- Where a vendor's basis of accounting is changed the vendor shall prepare lists of debtors and creditors showing the amounts owing to the creditors at the end of the tax period immediately preceding the changeover period;
- Importation of goods, bill of entry, other documents prescribed by the Custom and Excise Act and proof that the VAT charge has been paid to SARS;
- Vendors are obliged to retain records of all goods and services, rate of tax applicable to the supply, list of suppliers or agents, invoices and tax invoices, credit and debit notes, bank statements, deposit slips, stock lists and paid cheques;
- Documentary proof substantiating the zero rating of supplies;
- Where a tax invoice, credit or debit note, has been issued in relation to a supply by an agent or a bill of entry as described in the Customs and Excise Act, the agent shall maintain sufficient records to enable the name, address and VAT registration number of the principal to be ascertained.

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6.5.2 Electronic storage

6.5.2.1 Scanned documents: If documents are scanned, the hard copy must be retained for as long as the information is used or for 1 (one) year after the date of scanning, with the exception of documents pertaining to personnel. Any document containing information on the written particulars of an employee, including: employee's name and occupation, time worked by each employee.

6.5.2.3 Section 51 of the Electronic Communications Act No 25 of 2005 requires that personal information and the purpose for which the data was collected must be kept by the person who electronically requests, collects, collates, processes or stores the information and a record of any third party to whom the information was disclosed must be retained for a period of 1 (one) year or for as long as the information is used.

6.5.2.4 It is also required that all personal information which has become obsolete must be destroyed.

6.5.3 Destruction of documents

6.5.3.1 Documents may be destroyed after the termination of the retention periods specified above. Respective departments will be requested to attend to the destruction of their documents and these requests shall be attended to as soon as possible.

6.5.3.2 Each department is responsible for attending to the destruction of its documents, which must be done in accordance with the retention periods stipulated above. Files must be checked in order to make sure that they may be destroyed and also to ascertain if there are important original documents in the file. Original documents must be returned to the holder thereof, failing which, they should be retained by the Company pending such return.

6.5.3.3 Documents may also be stored off-site, in storage facilities approved by the Company.

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7. Appendix

Annexure “A” prescribed form to request information.

8. Records

Not Applicable.

9. References

Not Applicable

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