

# Knowledge Integration Dynamics (PTY) Ltd Registration Number: 1999/07653/07

KID House, 812 Hammets Crossing, 2 Selborne road, Maroeladal, Johannesburg, South Africa 2191 P O Box 1770 Honeydew 2040 South Africa Tel: 27 11 462 1277 Fax: 27 11 462 1174 www.kid.co.za

Knowledge Integration Dynamics Pty (Ltd) and its subsidiaries (KID) hereby notifies you (the subject, person or juristic person) of its policy for processing personal information (PI) in terms of the Protection of Personal Information Act, 2013 ("POPIA").

Knowledge Integration Dynamics Pty (Ltd) subsidiaries :

- IT and Business Services (SA) Pty (Ltd). Reg# 2002/020436/07
- Infoflow Pty (Ltd). Reg# 2005/037547/07
- KID Enterprise Information Management Pty (Ltd). Reg# 2014/162453/07
- Information Dynamics Pty (Ltd). Reg# 2014/184236/07
- Centerfield Software Pty (Ltd). Reg# 2002/011957/07
- Cubic Blue Pty (Ltd). Reg# 2010/000921/07

Your right to security, protection and privacy of your personal data / information is important and KID is committed to safeguarding and processing your personal information in a lawful manner.

### 1. Responsible party

Knowledge Integration Dynamics Pty (Ltd) and subsidiaries (KID) - head office situated at:

KID House, 812 Hammets Crossing Office Park,

2 Selborne road, Maroeladal, Johannesburg,

South Africa, 2191

#### 2. Information Officers – Contact details

KID's Information Officers (IO) are responsible for ensuring compliance with POPIA and can be contacted on:

Contact Number	011 462 1277
E-mail	kid.contact@kid.co.za
Website	www.kid.co.za



#### 3. Personal Information

Personal information is any information that can be used to reveal a person's identity. Personal Information relates to an identifiable, living, natural person, and where applicable, an identifiable, existing juristic person (such as a company), including, but not limited to information concerning:

- name, surname, title, race, gender, sex, pregnancy, marital status, national or ethnic origin, colour, sexual orientation, age, physical or mental health, disability, religion, conscience, belief, culture, language, occupation, birthdate, banking details;
- where the subject is a company the main place of business and contact details where the subject
  is a company, its name, registration number, assets, information on how the business trades or
  their main trade of business, the name/s, surname/s, address/es and identity number/s of the
  director/s and/or members;
- any identifying number (e.g. identity / passport / tax / registration number), symbol, email address, physical address, contact details, telephone number, location information, online identifier or other particular assignment to the person;
- information relating to the education or the medical, financial, criminal or employment history of the subject;
- 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 of a private or confidential nature or 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.

#### 4. Juristic types of information

KID may process the following information of a juristic subject (e.g. a partner organization, client company) via a organizations such as the credit bureau (ITC), a bank, a MIE agency and / or the CIPC:

- Names, surnames, identity numbers, shareholding details, physical and postal addresses, credit checks / information, criminal checks and contract details of directors, company registration, members, business plans, auditor practice numbers, business profiles;
- b. CIPC print outs, SARS compliance, BEE status, expenditure, banking details, remuneration breakdown, remuneration structures, views and opinions, financial soundness declarations, management and financial accounts, annual financial statements, third-party service providers.

### 5. Purpose for Collecting and Processing your Information

KID collects and processes PI from time-to-time to provide our products and services in terms of an engagement, contract or agreement with you. This will be done for the following reasons in order to perform our service / product delivery mandate to you:

- Negotiating and finalizing project or work agreements and contracts;
- Sharing advice, costs and quotes for products and services (solutions);
- Assisting with administering and/or managing solutions;



- Managing related issues on projects, products and services;
- Notifying of new services, products or developments that are relevant / of interest to you;
- Confirming, verifying and updating your details;
- Addressing requests and requirements as raised;
- Complying with any contractual, legal and regulatory related obligations.

The act of processing the information includes any activity or any set of operations, whether or not by automatic means, concerning personal information, and includes:

- collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;
- dissemination via transmission, distribution or making available in any other form;
- merging, linking, restriction, degradation, erasure or destruction of information.

PI is originally supplied by you the subject engaged with KID. It may also be accessed / acquired through third parties such as the Companies and Intellectual Property Commission (CIPC), the Receiver of Revenue (SARS), banks, credit bureaus, legal entities and other relevant companies. Regardless, it will only be collected and processed upon your <u>consent</u>.

PI may be collected by KID or by an intermediary of KID from you directly, and/or through verification agencies, service providers, outsource partners, consultants and/or other third parties.

We will only process your PI (upon your consent) for a purpose that you would reasonably expect, which includes:

- 5.1 confirming, verifying and updating PI details and statuses of you the subject;
- 5.2 conducting reference searches and checks;
- 5.3 confirming operational skill and ability and personal character details;
- 5.4 confirming registration and compliance with banks, SARS and other regulatory requirements;
- 5.5 managing, administering and/or amending employment details and contracts;
- 5.6 managing and administering employment related issues, development and support;
- 5.7 assessing and / or verifying your capabilities;
- 5.8 assessing and / or complying with legal, statutory or industry requirements that may apply;
- 5.9 monitoring compliance with contractual obligations or processes;
- 5.10 fraud detection and prevention;
- 5.11 market research.

#### 6. Recipients of Personal Information

The following people/entities may be recipients of the PI that is being processed by KID (or who KID could share your PI with) in order to give effect to the purpose of collecting and processing PI:

- a. HR and Management Staff members of KID;
- b. KID Clients;
- c. Approved intermediary and/or outsourced legal service providers of KID;
- d. Regulatory and Law entities;
- e. Third-party officers / consultants / professional advisers / investigators.



PI may be hosted on servers and processed by recipients and third parties, which may be located outside of South Africa.

The recipients and third parties are also required to take precautions to treat your personal information confidentially and with the appropriate security measures and protocols.

Although KID may share PI with relevant recipients and third parties in order to give effect to any of the purposes stated above, it will be done only with <u>consent</u> from you the subject. Restated, KID will only process and store PI that it requires to give effect to the purpose of collection in the course of KID's business.

### 7. Right to Access, Rectify, Complain, Object

Note that failure to furnish required PI from a subject may result in the engagement tasks with KID being postponed, terminated or declined, resulting in: a state of non-assurance or no service / product agreements being concluded.

You the subject can request access to its PI that KID holds about them at any time. A subject has the right to request that their PI be deleted where KID is no longer authorised to retain or no longer uses for the PI.

If any information or your PI needs to be updated, corrected or deleted, then please request any of KID's Deputy Information Officers (see contact details above) to affect the respective change.

A subject has on reasonable grounds the right to object to the processing of their PI. In such circumstances, KID will give due consideration to the request and the requirements of POPIA.

Please refer to Annexures A and B for information request and complaints forms templates should you have the need to use it.

KID may cease to use or disclose personal information and, subject to any statutory and contractual record keeping requirements, also destroy the PI.

You have the right to complain about the management or outstanding requests pertaining to your PI – complaints to be sent to KID's Deputy Information Officers. If KID is unable to resolve your complaint to your satisfaction, you have the right to complain to the Information Regulator.

Address: The Information Regulator. SALU Building, 316 Thabo Sehume Street, Pretoria

Email: <a href="mailto:inforreg@justice.gov.za">inforreg@justice.gov.za</a>

Website: <a href="http://www.justice.gov.za/inforeg/index.html">http://www.justice.gov.za/inforeg/index.html</a>

## 8. Data / Information Security measures

KID endeavours to protect the personal data / information that it processes. The security measures that are put in place is to ensure that no unauthorised personal accesses your personal data / information.

KID will take appropriate, reasonable technical and organisational measures to avoid loss of or unlawful access and usage of personal data / information.

The control measures include manual data protection, confidentiality of accessing personal data / information and IT controls as regulated by the following policies of KID:

Data / Information protection policy for staff;



- Records retention and destruction policy;
- Security and Privacy statement for staff/clients (this document).

The following operational controls are suggestions that KID has implemented in its own business.

- access controls to premises;
- confidentiality clauses in employment and supplier agreements;
- POPIA and data protection training.

### ICT controls:

- Firewalls;
- Password protections on computers and laptops;
- Storage of electronic data in a cloud that is access controlled;
- Storage of hard copies of data / information of subjects in locked cabinets.



# ANNEXURE A: PERSONAL INFORMATION REQUEST FORM

# PERSONAL INFORMATION REQUEST FORM

Please submit the completed form to the Information Officer:		
Name		
Contact Number		
Email Address:		
Please be aware tha	t we may require you to provide proof of identification prior to processing your	
request. There may a	also be a reasonable charge for providing copies of the information requested.	
A. Particulars of Data	Subject	
Name & Surname		
Identity Number:		
Postal Address:		
Contact Number:		
Email Address:		
B. Request		
I request KID to:		
(a) Inform me whether it holds any of my personal information		
(b) Provide me with a record or description of my personal information		
(c) Correct or update my personal information		
(d) Destroy or delete a record of my personal information		
C. Instructions		
D. Signature Page		
Signature:	Date:	



### **ANNEXURE B: POPIA COMPLAINT FORM**

Please submit your complaint to the Information Officer:

## **POPIA COMPLAINT FORM**

We are committed to safeguarding your privacy and the confidentiality of your personal information and are bound bythe Protection of Personal Information Act.

Hairio	
Contact Number	
Email Address:	
Where we are unable Information Regulator The Information Re	
A. Particulars of C	ompiainant
Name & Surname	
Identity Number: Postal Address:	
Contact Number:	
Email Address:	
B. Details of Comp	plaint
C. Desired Outcon	ne
D. Signature Page	
Signature:	Date:

