


<b>PERSONAL INFORMATION SHARING POLICY</b>	
<b>Classification</b>	POPIA / 06
<b>Responsible person</b>	Information Officer / deputy information officers
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<b>Guideline documents</b>	Werksmans Attorneys
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<b>Signature</b>	

## 1 INTRODUCTION

This Personal Information Sharing Policy ("**Policy**") seeks to define King Pie's approach towards sharing Personal Information internally within Bidvest, its subsidiaries, as well as externally with third parties and organisations. This Policy incorporates all aspects of information sharing including its justification in ethical and legal terms, secure transfer, information sharing agreements or protocols and allocation of responsibility for information sharing within Bidvest's governance framework.

## 2 SCOPE

This Policy applies to all forms of records and information, regardless of the medium, that contain Personal Information regarding a data subject that may need to be shared either internally within Bidvest or externally with third parties. This Policy does not account for instances where Bidvest makes use of shared services centres.

## 3 DUTIES AND RESPONSIBILITIES

- 3.1 Bidvest's duly appointed Information Officer ("**IO**") is the person responsible for overseeing all aspects of confidentiality and security in relation to Personal Information.

- 3.2 All employees of Bidvest that share information are obliged to adhere to this Policy. The unauthorised sharing of Personal Information is a serious matter. Unauthorised disclosure warrants consideration of disciplinary action and risks legal action by others.
- 3.3 Operationally, information-sharing decisions will be made by the persons occupying management/executive positions within Bidvest, or whomever such person may delegate or designate to share such information.
- 3.4 Management at all levels are responsible for ensuring that employees for whom they are responsible are aware of, and adhere to, this Policy. They are also responsible for ensuring staff are updated in respect of any changes in this Policy.

#### **4 SHARING OF INFORMATION**

- 4.1 Bidvest may share or transfer a data subject's Personal Information as follows or as otherwise described in this Policy –
- 4.1.1 with its customers, companies within the Bidvest Group or other third parties whom only have access to such information as is necessary to perform their functions or give effect to an agreement or legal obligation and not any other purpose unless that purpose is aligned to the initial purpose for which the Personal Information was collected;
- 4.1.2 any operators will act on Bidvest's instructions and be contractually bound to take all reasonable steps to protect the Personal Information they process;
- 4.1.3 in response to a request for information if Bidvest believe disclosure is in accordance with any applicable law, regulation, or legal process, or as otherwise required by any applicable law, rule or regulation; and
- 4.1.4 in connection with, or during negotiations of, any merger, sale of Bidvest's assets, financing, or acquisition of all or a portion of Bidvest's business to another company

(we will request a purchaser to treat our data under the privacy/confidentiality statement in place at the time of its collection).

4.2 The disclosure of Personal Information by Bidvest will be undertaken in line with the requisite legal requirements where applicable, and where such disclosure relates to confidential information, appropriate measures will be adopted to ensure that the receiving individual/party maintains the confidentiality or sensitivity of the information in accordance with the conditions imposed by us.

## 5 INFORMATION SECURITY

5.1 We undertake to ensure that all Personal Information is handled as follows from a security perspective –

5.1.1 secure filing cabinets which are only accessible to authorised personnel will be used;

5.1.2 electronic data transmission mechanisms will be secured by password protection methods to be determined by the IT Department;

5.1.3 we will regularly update our security measures such as software, anti-virus programs, encryption mechanisms and access control measures to ensure that the Personal Information held by us is secured;

5.1.4 all user-level passwords (e.g. email, web, desktop computer, etc.) must be changed at least every thirty (30) calendar days and cannot be identical to the previous ten (10) passwords;

5.1.5 user-level passwords must be a minimum length of eight (8) characters and must contain at least one uppercase letter, a numeric digit and a non-alphanumeric character (special character);

5.1.6 information retrievals and processing, for example of financial information relating to clients\customers, may only be performed by the relevant, authorised personnel in accordance with the applicable operational and regulatory requirements and procedures;

5.1.7 staff members will receive the requisite POPIA training to raise awareness of possible information security/data breach risks and compromises which may arise during the course of their work.

5.2 For a more comprehensive guideline of how we aim to ensure information security, please refer to our Information Security Policy.

## **6 CROSS-BORDER INFORMATION TRANSFERS**

Where Bidvest transfers Personal Information about a data subject to a company or any other entity outside of South Africa, it will ensure that –

6.1.1 the company receiving the information is subject to a law, binding corporate rules or a binding agreement which provides an adequate level of protection of your Personal Information; and/or

6.1.2 the data subject's consent is obtained if need be;

6.1.3 there is a contractual necessity/obligation to transfer the Personal Information; and/or

6.1.4 there exists legitimate ground(s) or bases for doing so.

## **7 RELATIONSHIP TO EXISTING POLICIES**

This Policy should be used in conjunction with other relevant Bidvest policies which include but are not limited to –

7.1 Data Breach Policy;

7.2 Data Classification Policy;

7.3 Data Classification Policy;

7.4 Data Privacy Policy;

7.5 Data Subject Access Request Policy and procedure

7.6 Website Privacy Policy.

## **8 POLICY REVISION**

This Policy is subject to review and amendment without prior notice. However, we undertake to ensure that any amendments hereto are communicated clearly and effectively, for the benefit of our employees and any other persons whom may be affected by this Policy.

## **ANNEXURE A – INTERPRETATION**

### **1 INTERPRETATION**

For the purposes of this Policy, the following terms will bear the meanings assigned to them –

- 1.1 **"Bidvest"** means Bidvest Commercial Products Holdings Proprietary Limited and all of its subsidiaries;
- 1.2 **"Data Subject"** means the natural or juristic person to whom Personal information relates;
- 1.3 **"Employees"** means any such person as defined in the Labour Relations Act 66 of 1995, under the employ of Bidvest, and any other such person who may conduct work for or on behalf of Bidvest on a once off or ongoing basis, as the case may be;
- 1.4 **"Share"** means an act of passing on content to and from individuals, groups and organisations using any medium, and "Sharing"/"Shared" have corresponding meanings.