

Prime Outsourcing (Pty) Ltd

T/A PRIME OUTSOURCING (PTY) LTD
REGISTRATION NUMBER: 2012/010408/07

ACCESS TO PERSONAL INFORMATION POLICY

REGULATION 4

PROTECTION OF PERSONAL INFORMATION ACT 2013

1. INTRODUCTION

Prime Outsourcing (Pty) Ltd seeks to provide accurate and timely Information regarding its activities to its Clients / Customers, Employees, Suppliers, Partners and Stakeholders and other interested parties.

The Policy reflects the various capacities in which Prime Outsourcing (Pty) Ltd operates, the nature of the Information it receives and prepares in connection with the diverse activities and the level of disclosure applicable to different types of Information and in particular Personal Information.

In determining whether any particular Personal Information is to be made available by Prime Outsourcing (Pty) Ltd as a routine matter and upon request Prime Outsourcing (Pty) Ltd first considers whether such Information falls within the scope of this Policy and if so, then determines whether there is any compelling reason not to disclose all or any part of such Information. In making the determination, Prime Outsourcing (Pty) Ltd considers whether the disclosure of Information is likely to cause harm to specific parties or interests that outweighs the benefit of disclosure or whether the Information contains and makes reference to Personal Information exemptions, below which are not exhaustive.

Prime Outsourcing (Pty) Ltd's Access to Personal Information Policy requires Prime Outsourcing (Pty) Ltd to establish and maintain appropriate Safeguards to respect the Personal Privacy of Data Subjects and protect the confidentiality of Personal Information about them.

Personal Information of Employees does not provide access to the following Information, except to the extent expressly permitted by Prime Outsourcing (Pty) Ltd's Personnel Policies, Procedures and Rules:

- i. Personal Information, including Personal Employment Records, Medical Information and Personal Communications (including e-mail) of the following individuals and their families: Chief Executive Officer of Prime Outsourcing (Pty) Ltd, Management, Officers, Employees and Consultants;
- ii. Information relating to Employee appointment and selection process;
- iii. Information relating to proceedings of Prime Outsourcing (Pty) Ltd's internal conflict Resolution mechanisms;
- iv. Information relating to investigations of allegations of Employee Misconduct and Personal Conflicts of Interest.

2. PERSONAL INFORMATION OF CUSTOMERS AND CLIENTS (FOR BOTH NATURAL PERSONS AND JURISTIC PERSONS)

Prime Outsourcing (Pty) Ltd does not provide access to the following Customer / Client Information, except permitted by the Customer / Client Policies, Procedures and Rules:

- i. Personal Information of Customers / Clients and their Employees;
- ii. Financial and Credit Information of Customers / Clients and their Employees.

3. PERSONAL INFORMATION OF SUPPLIERS AND THIRD PARTIES CLIENTS (FOR BOTH NATURAL PERSONS AND JURISTIC PERSONS)

Prime Outsourcing (Pty) Ltd does not provide access to the following Suppliers and Third Parties' Information, except permitted by the Supplier and Third Parties' Policies, Procedures and Rules:

- i. Personal Information of Suppliers and Third Parties and their Employees;
- ii. Financial and Credit Information of Suppliers and Third parties and their Employees.

4. INFORMATION HANDLING

Information, in electronic and physical formats, should be handled in accordance with the sensitivity, risk and classification of the Information:

- Ensure Confidentiality Agreements are in place before sharing data externally.
- When e-mailing sensitive files externally the files should be password protected.
- Check e-mail addresses prior to sending any files.
- Files should only be copied to removable storage when necessary and the storage should be encrypted.
- Use restricted access storage areas whenever possible.
- Data disposal should be done in accordance with the Document Destruction Policy.

5. ACCESS CONTROL POLICY

Access to Information and systems in the possession of, or under the control of Prime Outsourcing (Pty) Ltd must be provided based on a least privilege need to know basis.

All Prime Outsourcing (Pty) Ltd’s computers must be protected by approved password-based access control systems.

Multi-factor authentication for remote access to corporate and production networks by Employees, Administrators, and Third Parties shall be implemented where available.

The following rules must be maintained for managing user Access Rights:

- User registration: approving and /or physically giving Access Rights to users.
- Privilege management. Clear hierarchies must be determined for each system, and each hierarchy must be formally approved.
- User management. As above, each system must have clear procedures for approval and method of granting access to that system. Procedures must exist for each system for both joiners, movers and leavers, with audit trails.
- User access Rights are subject to periodic reviews.
- Inactive user accounts must be configured to automatically disable after 90 days.

6. PASSWORD POLICY

Users must be forced to change their passwords during the first log on, and at 60-day intervals.

Passwords shall not be displayed or transmitted in clear text and shall be suitably protected via approved cryptographic solutions.

Passwords shall be stored in an encrypted format.

A history of passwords shall be maintained to prevent the re-use of passwords.

A maximum of six successive login failures shall result in account lockout until an Administrator unlocks it.

Default accounts shall be disabled and/or default passwords associated with such accounts shall be changed.

7. CHANGES IN THIS POLICY

Prime Outsourcing (Pty) Ltd reserves the Right to amend, alter and terminate this Policy at any time.

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