

# **PROTECTION OF PERSONAL INFORMATION**

Set out below is the Privacy Policy of EBS Security. In so far as we hold records, and where applicable, we will abide by the same.

In so far as we may make use of security cameras or access control systems to improve the security of our members, we will require service providers who may collect and store that information to reasonably secure it and ensure that it is used only for its intended purpose. Where we collect and store the information ourselves, we will abide by the same principles as set out in the Privacy Policy below.

## **PRIVACY POLICY**

**OF**

## **EBS SECURITY (PTY) LTD**

**Prepared in accordance with the provisions of the Protection of Personal Information Act, no 4 of 2013**

### **INTRODUCTION**

The Protection of Personal Information (“POPI”) Act emanates from Section 14 of the Constitution of the Republic of South Africa, 1996, which section provides that everyone has the right to privacy, and it includes a right to protection against the unlawful collection, retention, dissemination and use of personal information.

The POPI Act has been promulgated to regulate, in harmony with the international standards, the processing of personal information by public and private bodies in a manner that gives effect to the right to privacy, subject to justifiable limitations that are aimed at protecting other rights and important interests.

EBS Security (“EBS”) is committed to protecting your privacy and the confidentiality of any personal information that you provide to us.

The purpose of this policy is to inform our clients about the type of personal information EBS collects and the ways in which it is collected, used, shared, protected and stored.

EBS Security reserves the right to change this policy from time to time.

#### **1. What is personal information**

The POPI Act defines personal information as “information relating to an identifiable, living, natural person and where it is applicable, an identifiable, existing juristic person”. Examples of personal information include, but are not limited to, names, addresses, contact numbers, email addresses, demographic information and financial information.

## **2. Scope of our Privacy Policy**

- To disclose how and when we obtain information for a specific purpose.
- To ensure that the information is relevant and up to date.
- To have reasonable security measures in place to protect the information.
- To only keep the necessary information and delete information no longer required.
- To allow you to obtain or view your information on request and update it.

## **3. How we obtain personal information**

We obtain and process your personal information based on information received from the client and information provided to us contractually.

The POPI Act provides that personal information must be collected:

- Directly from you
- From a public record
- From another source, where the collection of the information will not prejudice your legitimate interests
- From another source where the collection of the information is necessary:
  - To comply with an obligation imposed by law or
  - To maintain our legitimate interests or the legitimate interests of a third party to whom the information is supplied.

Similar principles apply to the use by us or the disclosure to a third party of personal information which we have obtained.

## **4. How we use your information**

We need to collect and use personal and other information in order to enable us to:

- Respond to your enquiry.
- Provide services as contracted.
- To investigate an incident.
- Comply with legal requirements or industry codes.
- Proceed with debt collection.
- Provide and distribute monthly reports.
- Communicate with you and inform you of new services and offerings.
- Ensure that our business offering meets your requirements.

## **5. Disclosure of information**

We may disclose your personal information to third parties on the following basis:

- Where we have your consent; or
- Where we are required to do so by law; or
- To our attorneys who are involved in legal collection matters effectively caused by your arrear account.
- To service providers who are involved in the delivery of services to you, where required by them to perform a service.
- Where required to protect your legitimate interests.

- When necessary for pursuing our legitimate interests or the legitimate interests of a third party to whom the information is supplied.

Whenever we appoint third parties to provide support services to us, we will, where reasonably practical, bind them to our Privacy Policy, when they require us to provide them with your personal information to perform such services.

We, as EBS, have required the following third parties:

- Contractors on our approved contractors list

to sign a declaration confirming that they will apply the same principles as set out in our Privacy Policy and the same required due care and diligence in protecting your personal information. This declaration which they sign, ensures that they acknowledge their obligation to similarly protect the privacy and regulate their use of your personal information.

We advise our clients, where reasonably possible, to ensure that similar third-party declarations are signed where service providers are appointed, who are not part of the group of service providers referred to above.

Our website may contain links to other websites of interest or value. While we try to link only to sites that share our high standards and respect for privacy, we are not responsible for the content, or the security or privacy practises employed by other sites. We recommend that you always read the privacy and security statements on such sites.

## **6. Information security**

EBS will apply the necessary due care and diligence to secure the content of the EBS Website and the information provided by and collected from users, and to preserve the privacy of your information. EBS undertakes to review security controls and related processes to ensure that your personal information remains secure.

In the event of your information being shared with third parties as provided for in paragraph 5 hereof, please bear in mind that EBS will not have any control over your personal information once its shared and will not be able to take responsibility for the security of that information thereafter. Please also bear in mind that no data transmitted over the internet, or information stored on a server which is accessible through the internet, can be guaranteed or fully secure.

We will not sell or lease your information to any third parties unless we have your permission to do so. We will not distribute your personal information to any third parties unless we have your permission to do so or are required to do so in order to:

- Perform our contractual obligations.
- Protect your legitimate interests, or
- Comply with one or more laws.

## **7. Correction of your personal information**

You may request us to:

- Correct or delete personal information in our possession or under our control that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully; or
- Destroy or delete personal information about you that we are no longer authorised to retain in terms of Section 14. Section 14 provides that we may retain your personal information where it is required by law, or for the performance of our functions or activities, or to comply with our contractual requirements.

Where applicable, personal information can be examined and updated by emailing us at [info@ebssecurity.co.za](mailto:info@ebssecurity.co.za) and we will provide you with your personal information which we have. If you believe that any of your information in our possession is incorrect, incomplete or should be deleted, please email the completed:

- objection to the processing of personal information form, attached as annexure 1, or
- deletion of personal information form, attached as annexure 2

to us at [info@ebssecurity.co.za](mailto:info@ebssecurity.co.za) and we will correct, update or delete the information, where required.

Your personal information will be destroyed once it is no longer necessary for achieving the purpose for which it was collected, provided that it is not required to be retained in terms of our contractual obligations or by law.

**FORM 1**  
**OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION IN TERMS**  
**OF SECTION 11(3) OF THE PROTECTION OF PERSONAL INFORMATION**  
**ACT, 2013 (ACT NO. 4 OF 2013)**

**REGULATIONS RELATING TO THE PROTECTION OF PERSONAL**  
**INFORMATION, 2018**  
 [Regulation 2]

*Note:*

1. *Affidavits or other documentary evidence as applicable in support of the objection may be attached*
2. *If the space provided for in the Form is inadequate, submit information as an Annexure to this Form and sign each page*
3. *Complete as is applicable*

<b>A</b>	<b>DETAILS OF DATA SUBJECT</b>
Name(s) and surname / registered name of data subject:	
Unique Identifier / Identity Number:	
Residential, postal or business address:	
	Code (    )
Contact number(s):	
Fax number / E-Mail address:	
<b>B</b>	<b>DETAILS OF RESPONSIBLE PARTY</b>
Name(s) and surname / Registered name of responsible party:	
Residential, postal or business address:	
	Code (    )
Contact number(s):	
Fax number / E-Mail address:	
<b>C</b>	<b>REASONS FOR OBJECTION IN TERMS OF SECTION 11(1)(d) TO (f) (Please provide details reasons for the objection)</b>


Signed at.....this.....Day of.....20.....

.....  
Signature of data subject / designated person

**FORM 2**

**REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION  
OR DESTROYING OR DELEGATION OF RECORD OF PERSONAL  
INFORMATION IN TERMS OF SECTION 24(1) OF THE PROTECTION OF  
PERSONAL INFORMATION ACT, 2013 (ACT NO.4 OF 2013)**

**REGULATIONS RELATING TO THE PROTECTION OF PERSONAL  
INFORMATION, 2018**

[Regulation 3]

**Note:**

1. Affidavits or other documentary evidence as applicable in support of the objection may be attached
2. If the space provided for in the Form is inadequate, submit information as an Annexure to this Form and sign each page
3. Complete as is applicable

Mark the appropriate box with an "X"

**Request for:**

Correction or deletion of the personal information about the data subject which is in possession or under the control of the responsible party

Destroying or deletion of a record of personal information about the data subject which is in possession or under the control of the responsible party and who is no longer authorised to retain the record of information

<b>A</b>	<b>DETAILS OF DATA SUBJECT</b>
Name(s) and surname / registered name of data subject:	
Unique Identifier / Identity Number:	
Residential, postal or business address:	
	Code (     )
Contact number(s):	
Fax number / E-Mail address:	
<b>B</b>	<b>DETAILS OF RESPONSIBLE PARTY</b>
Name(s) and surname / Registered name of responsible party:	
Residential, postal or business address:	

	Code (     )
Contact number(s):	
Fax number / E-Mail address:	
<b>C</b>	<b>INFORMATION TO BE CORRECTED/DELETED/DESTRUCTED/DESTROYED</b>
<b>D</b>	<b>REASONS FOR CORRECTION OR DELETION OF THE PERSONAL INFORMATION ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24(1)(a) WHICH IS IN POSSESSION OR UNDER THE CONTROL OF THE RESPONSIBLE PARTY; and/or REASONS FOR DESTRUCTION OR DELETION OF A RECORD OF PERSONAL INFORMATION ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24(1)(b) WHICH THE RESPONSIBLE PARTY IS NO LONGER AUTHORTISED TO RETAIN</b> <i>(Please provide detailed reasons for the request)</i>
Signed at.....this.....Day of.....20.....	
.....	
Signature of data subject / designated person	