

# Centracom Compliance – Protection of Personal Information Act 2013 (POPIA)

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In September 2019, Centracom formally appointed its internal Information Officer who would, together with a senior member of the management team, be responsible for creating the POPIA compliance framework, determine the actions required in order to comply and assume responsibility for implementation of all identified requirements.

In seeking compliance Centracom has:

- Completed an information security risk assessment and implemented actions to enhance the protection of the personal information we process. This has included physical, technical and administrative safeguards
- Created a number of internal policies referencing POPIA including a detailed Information Security Policy and Privacy policy, amongst others.
- Created and delivered POPIA awareness presentations and training to all staff and included this on the induction programme for all new staff take-ons. Additionally, provided all staff with POPIA quick reference guides and a simple and comprehensive interpretation of the entire Act together with practical examples of workplace 'do's' and 'don'ts' under the Act.
- Had staff sign Confidentiality Agreements in terms of the personal information they work with, highlighting their responsibilities in line with POPIA requirements and the consequences for them of non-compliance either by negligence or malfeasance on their part.
- Developed and documented processes for the reporting of data breaches and/or the receipt of complaints or requests for information
- Significantly reduced the amount of 'paper' around the office environment with digitalization of previous paper information and the off-site secure storage of files and documents under an arrangement with a secure document management provider.
- Reviewed existing access rights of all staff to certain information and limited this access on a 'need to know basis through the introduction of system or platform restrictions
- Reviewed our supplier and 3rd party service agreements and is currently in the process of amending all such agreements to include POPIA specific clauses relating to the processing and protection of personal information on our behalf, the safeguards we expect and our right to audit such safeguards.
- Had the internal Information Officer and POPIA representative on the senior management team, attend external training sessions on POPIA to ensure their knowledge expands in depth and remains current.
- Implemented a review of existing information retention strategies across defined information categories and in terms of legal, regulatory and fiduciary requirements

to ensure personal or confidential information is not retained for longer than is necessary under these dictates.

The actions above reflect a portion of the time and commitment we have expended, over the last year, in order to support the principles contained in the Protection of Personal Information 2013. We are confident that the POPIA compliance framework we instituted a year ago, and within which we continue to work, constitutes a more than reasonable assessment of compliance. The introduction of all policies, processes and POPIA compliance activities, has been overseen by Michael Aitken in his professional capacity as both Managing Director of Centracom and certified lawyer.

Our Information Officer will be happy to provide evidence of all such activities performed and supporting documentation, during a scheduled meeting at our offices should you so require.