



Zani Hugo
PPE, Uniforms & Medical Nationwide Distribution

Zani Distribution Industries Pty Ltd

REG NR: 2018/745283/07 | VAT NR: 4750284137

Nationwide Distribution from JHB & Durban (HO in George)

Email: zani@zdi.co.za

Phone & Whatsapp: 044 884 5786 / 079 597 0692

Website: zdi.co.za/

Price lists & catalogs - <https://zdi.co.za/zdi-catalogs-latest-price-lists/>

POPI Privacy Policy Statement

Respecting and protecting your Personal Information is very important to us. It is also a Constitutional right, legal, and good business practice requirement, which we regard highly.

In line with the requirements of the Protection of Personal Information Act, 4 of 2013 (the Act), we:

- Accept joint responsibility and accountability to responsibly manage and protect your Personal Information when providing you with sales and distribution services;
- Undertake to collect and access your Personal Information directly from you or from a third party with your prior and written approval while respecting your right to withdraw your consent for the processing of your Personal Information;
- Undertake to only collect and process Personal Information that is necessary for us to obtain a holistic view of your needs and objectives, allowing us to conduct a due diligence before concluding transactions with you.
- Undertake not to share your Personal Information with any third party, unless when required for the purpose of assisting you with the conclusion of a transaction or when required to do so by the law;
- Undertake to be open and transparent regarding the Personal Information being collected, the reason for and manner of collection of such information;
- Undertake to safeguard and protect your Personal Information in our possession through the necessary technological and operations processes;
- Undertake to update and correct your Personal Information kept on file; and
- Undertake not to retain Personal Information longer that is required by the relevant legislation.

We need to gather, process, and store your Personal Information for reasons:

- To conduct a due diligence;
- Affordability assessment to assist you in the conclusion of required business transactions requested;
- To maintain our relationship with you;
- To respond to your queries and provide assistance when required to do so;
- To confirm and verify your identity or to verify that you are an authorised user for security purposes;
- To assess and process claims and queries;
- For audit and record-keeping purposes; and
- In connection with possible requirements by the Information Regulator or other Government agencies allowed by law, legal proceedings, or court rulings.

We may need to share your Personal Information and/or utilise software or online platforms to enter and process your information for an application, claims, or business management purposes. This will only be done in strict adherence to the requirements of the Act.

Any additional information or concerns can be found and raised with the Information Regulator, who can be contacted as shared below, but please feel free to contact Zani Distribution Industries (Pty) Ltd first to discuss any questions or concerns you may have:

Website: <https://www.justice.gov.za/infoereg/>

Tel: 012 406 4818

Email: infoereg@justice.gov.za

Client Signature

Date



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PROTECTION OF PERSONAL INFORMATION ("POPI")

POPI POLICY STATEMENT AND MANUAL

This is of Protection of Personal, Information and the Retention of Documents for ZANI DISTRIBUTION INDUSTRIES (PTY) LTD and all its subsidiaries and divisions (hereinafter referred to as "ZANI DISTRIBUTION INDUSTRIES (PTY) LTD").

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Protection of personal information in terms of the Protection of Personal Information Act 4 of 2013

1 INTRODUCTION

ZANI DISTRIBUTION INDUSTRIES (PTY) LTD is a nationwide PPE sales and distribution company operating in South Africa. This requires ZANI DISTRIBUTION INDUSTRIES (PTY) LTD to collect, collate, store and disseminate personal information on a daily basis, obliging ZANI DISTRIBUTION INDUSTRIES (PTY) LTD to comply with the Protection of Personal Information Act 4 of 2013 ("POPI").

POPI requires ZANI DISTRIBUTION INDUSTRIES (PTY) LTD to inform their clients as to the manner in which their personal information is used, disclosed and destroyed. ZANI DISTRIBUTION INDUSTRIES (PTY) LTD is committed to protecting its client's privacy and ensuring that their personal information is used appropriately, transparently, securely and in accordance with applicable laws. This Policy sets out the manner in which ZANI DISTRIBUTION INDUSTRIES (PTY) LTD deals with their client's personal information as well as stipulates the purpose for which said information is used.

The Policy is made available on ZANI DISTRIBUTION INDUSTRIES (PTY) LTD website www.zdi.co.za and by request from the head office.

The Policy is drafted in conjunction with the National Credit Act 34 of 2005, and the Consumer Protection Act 68 of 2008.

2 BACKGROUND AND PURPOSE

What is the purpose of POPI?

The aim of POPI is to ensure the right of South African citizens to the privacy of personal information and to regulate all organisations that collect, store and disseminate personal information.

Personal information may only be processed if the process meets the conditions of the Act. There are eight distinct conditions which organisations need to meet to be acting lawfully:

- Accountability
- Processing limitation
- Purpose specification
- Use limitation
- Information quality
- Openness
- Security safeguards
- Individual/data subject participation

What is “personal information”?

Personal information means any information relating to an identifiable natural person (and existing juristic persons where applicable), including information relating to:

- Race, gender, sex, pregnancy, marital status, mental health, well-being, disability, religion, belief, culture, language and birth
- Education, medical, financial, criminal or employment
- Identity number, electronic and physical addresses, telephone numbers and on-line identifiers
- Biometric information
- Personal opinions, views or preferences
- Correspondence sent by a person implicitly or explicitly of a personal nature or confidential

An organisation may *not* process the personal information of a child (under 18) unless the processing:

- Is carried out with the consent of the legal guardian
- Is necessary to establish, exercise or defence of a right or obligation in law (?)
- Is necessary for historical, statistical or research purposes
- Is information that is deliberately been made public by the child with the consent of the guardian

What is processing personal information?

Processing means any operation or activity, or set of activities, by automatic means or otherwise, including:

- Collecting, receiving, recording, collating, storing, updating, modifying, retrieving or use
- Disseminating by means of transmission, distribution or any other means
- Merging, linking, restricting, erasing or destructing

of information.

Who must comply?

All public and private bodies must comply.

What does compliance mean?

a) *Accountability:*

Organisations must assign responsibility to ensure compliance with POPI to a suitable person.

Each organisation has an “information officer”. This will be the same person who has been appointed by the organisation as head in terms of the Promotion of Access to Information Act, i.e. the CEO or equivalent.

The information officer, together with an executive team/board, should decide on and record the POPI policy and procedure.

The information officer must appoint a “data controller” or a number of data controllers who decide

- the *purpose* of the data processing
- the *way* the personal information should be processed

The data controllers should be management who execute the POPI policy and procedure.

“Data processor/s” perform the processing administration/function (e.g. data capturing etc).

b) Processing limitation

Personal information may only be processed if it is:

- adequate, relevant and necessary for the purpose for which it is processed
- with the consent of the data subject
- necessary for the contract to which the data subject is party
- necessary for the protection of a legitimate interest of the data subject
- required by law
- necessary to pursue the legitimate interest of the organisation
- collected directly from the data subject, except in certain circumstances (e.g. in public domain or to do so would defeat the purpose for collecting and processing)

“Consent” must be:

- voluntary
- specific
- informed

Informed consent requires that the data subject understand:

- *what* information is being collected/processed
- *why* the information is being processed
- *how* the information is being processed

- where the information is being processed
- to whom the information is intended to be given

c) Purpose specification

The data subject must be made aware of the purpose for which the information is being collected ("identified purpose"). This is necessary for giving consent (see above).

d) Use limitation

Information/records may only be kept for as long as it is necessary to achieve the identified purpose. There are some statutory record keeping periods which may exceed this. After this *retention* period the responsible person must delete or destroy such information as soon as reasonably possible.

If the purpose changes (e.g. something else occurs that could use the same information again for this alternative purpose), it may be necessary to inform the data subject and get consent again.

e) Information quality

Information must be as *accurate* as possible, complete and updated if necessary.

Information must be available to the data subject to verify/object to the accuracy thereof.

f) Openness

The Organisation must take reasonable practical steps to ensure that the data subject is aware of what personal information is being collected, stored and used, whether or not collected directly from the data subject.

g) Security safeguards

The organisation must secure the integrity and confidentiality of personal information and must take appropriate technical/organisational measure to prevent:

- the loss of or damage to personal information
- the unlawful access to or processing of personal information

To do this, the organisation must:

- identify all reasonable foreseeable internal and external risks to personal information held
- establish and maintain appropriate reasonable safeguards against the risks

- monitor the safeguards and regularly verify safeguards are effective
- ensure safeguards are updated to respond to new risks or deficiencies in previous safeguards

The data controllers and data processors must operate under his/her authority from the information officer and treat all personal information as confidential. This should be in writing.

Where there are reasonable grounds for suspecting a breach of data security, the responsible person must notify the Regulator and the data subject (if known).

h) Data subject participation

Any person who can positively identify themselves is entitled to access their own personal information.

A data subject has the right to correct or amend any of their personal information that may be inaccurate, misleading or out of date.

What steps should be taken to comply?

- An audit should be conducted of the following:
 - *what* personal information is held?
 - *where* the personal information is being held?
 - *by whom* is the personal information being held?
- Establish what personal information is being collected in one place and being transferred to another.
- Review website and other privacy statement.
- Develop organisation wide standard data protection policies and protocols, and if in place already in place, review such policies and protocols.
- Review IT outsourcing contracts and arrangements.
- Review data collecting activities (completion of forms etc).
- Appoint an information officer for POPI and PAIA purposes.

Details of Information Officer and Head Office

The details of ZANI DISTRIBUTION INDUSTRIES (PTY) LTD'S Information Officer and

Head Office are as follows: Information Officer: **ZANI HUGO**

Telephone Number 044 – 884 5786

Email Address zani@zdi.co.za

Deputy Information Officer: **CECIL JONES**

Telephone Number 044 – 884 5786

Email address ceciljones@zdi.co.za

Head Office Details: 61 9TH Avenue, George, 6530

P.O. Box 4536, George, 6539

Telephone 044 – 884 5786

3 PERSONAL INFORMATION COLLECTED

Section 9 of POPI states that “Personal Information may only be processed if, given the purpose for which it is processed, it is adequate, relevant and not excessive.”

ZANI DISTRIBUTION INDUSTRIES (PTY) LTD collects and processes client's personal information pertaining to the client's PPE requirements and preferences, including financial obligations to ZANI. The type of information will depend on the need for which it is collected and will be processed for that purpose only. Whenever possible, ZANI DISTRIBUTION INDUSTRIES (PTY) LTD will inform the client as to the information required and the information deemed optional.

ZANI DISTRIBUTION INDUSTRIES (PTY) LTD also collects and processes the client's personal information for marketing purposes in order to ensure that our products and services remain relevant to our clients and potential clients.

ZANI DISTRIBUTION INDUSTRIES (PTY) LTD aims to have agreements in place with all product suppliers and third party service providers to ensure a mutual understanding with regard to the protection of the client's personal information. ZANI DISTRIBUTION INDUSTRIES (PTY) LTD suppliers will be subject to the same regulations as applicable to ZANI DISTRIBUTION INDUSTRIES (PTY) LTD.

With the client's consent, ZANI DISTRIBUTION INDUSTRIES (PTY) LTD may also supplement the information provided with information ZANI DISTRIBUTION INDUSTRIES (PTY) LTD receives from other providers in order to offer a more consistent and personalized experience in the client's interaction with ZANI DISTRIBUTION INDUSTRIES (PTY) LTD. For purposes of this Policy, clients include potential and existing clients.

4 THE USE OF PERSONAL INFORMATION

The Client's Personal Information will only be used for the purpose for which it was collected and as agreed. This may include:

- 4.1 Providing products or services to clients and to carry out the transactions requested;
- 4.2 Assessing and processing reservations and exchanges;
- 4.3 Confirming, verifying and updating client details;
- 4.4 For purposes of reservation and exchange history;
- 4.5 Conducting market or customer satisfaction research;
- 4.6 For audit and record keeping purposes;
- 4.7 In connection with legal proceedings;
- 4.8 Providing ZANI DISTRIBUTION INDUSTRIES (PTY) LTD services to clients, to render the services requested and to maintain and constantly improve the relationship;
- 4.9 Providing communication in respect of ZANI DISTRIBUTION INDUSTRIES (PTY) LTD and regulatory matters that may affect clients; and
- 4.10 In connection with and to comply with legal and regulatory requirements or when it is otherwise allowed by law.
- 4.11 According to section 10 of POPI, personal information may only be processed if certain conditions, listed below, are met along with supporting information for ZANI DISTRIBUTION INDUSTRIES (PTY) LTD processing of Personal Information:
 - The client's consents to the processing: - consent is obtained from clients during the introductory, appointment and needs analysis stage of the relationship;
 - The necessity of processing: in order to conduct an accurate analysis of the client's needs for purposes of amongst other credit limits, insurance requirements, etcetera.
 - Processing complies with an obligation imposed by law on ZANI DISTRIBUTION INDUSTRIES (PTY) LTD;

- The National Credit Act requires a Credit Provider's to conduct an affordability assessment;
- Processing protects a legitimate interest of the client
- Processing is necessary for pursuing the legitimate interests of ZANI DISTRIBUTION INDUSTRIES (PTY) LTD or of a third party to whom information is supplied — in order to provide ZANI DISTRIBUTION INDUSTRIES (PTY) LTD clients with products and or services both ZANI DISTRIBUTION INDUSTRIES (PTY) LTD and any of our product suppliers require certain personal information from the clients in order to make an informed decision on the unique and specific product and or service required.

5 DISCLOSURE OF PERSONAL INFORMATION

- 51 ZANI DISTRIBUTION INDUSTRIES (PTY) LTD may disclose a client's personal information to any of ZANI DISTRIBUTION INDUSTRIES (PTY) LTD subsidiaries, joint venture companies and or approved product supplier or third party service providers whose services or products clients elect to use. ZANI DISTRIBUTION INDUSTRIES (PTY) LTD has agreements in place to ensure compliance with confidentiality and privacy conditions.
- 52 ZANI DISTRIBUTION INDUSTRIES (PTY) LTD may also share client personal information with, and obtain information about clients from third parties for the reasons already discussed above.
- 53 ZANI DISTRIBUTION INDUSTRIES (PTY) LTD may also disclose a client's information where it has a duty or a right to disclose in terms of applicable legislation, the law, or where it may be deemed necessary in order to protect ZANI DISTRIBUTION INDUSTRIES (PTY) LTD rights.
- 54 All employees have a duty of confidentiality in relation to ZANI DISTRIBUTION INDUSTRIES (PTY) LTD and clients.
- 55 Information on clients: Our clients' right to confidentiality is protected in the Constitution and in terms of the Law. Information may be given to a 3rd party if the client has consented in writing to that person receiving the information.
- 56 ZANI DISTRIBUTION INDUSTRIES (PTY) LTD views any contravention of this policy very seriously and employees who are guilty of contravening the policy will be subject to disciplinary procedures, which may lead to the dismissal of any guilty party.

6 SAFEGUARDING PERSONAL INFORMATION

- 6.1 It is a requirement of POPI to adequately protect personal information. ZANI DISTRIBUTION INDUSTRIES (PTY) LTD will continuously review its security controls and processes to ensure that personal
- 6.2 ZANI DISTRIBUTION INDUSTRIES (PTY) LTD Information Officer is ZANI HUGO whose details are available below and who is responsible for the compliance with the conditions of the lawful processing of personal information and other provisions of POPI. He is assisted by CECIL JONES who will function as the companies Deputy Information Officer.

- 6.3 This policy has been put in place at ZANI DISTRIBUTION INDUSTRIES (PTY) LTD and training on this policy and the POPI Act has already taken place and will be conducted during 2020 by ZANI DISTRIBUTION INDUSTRIES (PTY) LTD.
- 6.4 Each new employee will be required to sign an Employment Contract containing relevant consent clauses for the use and storage of employee information, or any other action so required, in terms of POPI;
- 6.5 Every employee currently employed within ZANI DISTRIBUTION INDUSTRIES (PTY) LTD will be required to sign an addendum to their Employment Contracts containing relevant consent clauses for the use and storage of employee information, or any other action so required, in terms of POPI;
- 6.6 All ZANI DISTRIBUTION INDUSTRIES (PTY) LTD electronic files or data are backed and stored off site.
- 6.7 ZANI DISTRIBUTION INDUSTRIES (PTY) LTD product suppliers, insurers and other third-party service providers will be required to sign a service level agreement guaranteeing their commitment to the Protection of Personal Information; this is however an ongoing process that will be evaluated as needed.

7 CORRECTION OF PERSONAL INFORMATION

Clients have the right to access the personal information ZANI DISTRIBUTION INDUSTRIES (PTY) LTD holds about them. Clients also have the right to ask ZANI DISTRIBUTION INDUSTRIES (PTY) LTD to update, correct or delete their personal information on reasonable grounds. Once a client objects to the processing of their personal information, ZANI DISTRIBUTION INDUSTRIES (PTY) LTD may no longer process said personal information. ZANI DISTRIBUTION INDUSTRIES (PTY) LTD will take all reasonable steps to confirm its clients' identity before providing details of their personal information or making changes to their personal information.

8 AMENDMENTS TO THIS POLICY

Amendments to, or a review of this Policy, will take place on an ad hoc basis or at least once a year. Clients are advised to access ZANI DISTRIBUTION INDUSTRIES (PTY) LTD'S website periodically to keep abreast of any changes. Where material changes take place, clients will be notified directly or changes will be stipulated on ZANI DISTRIBUTION INDUSTRIES (PTY) LTD website.

9 ACCESS TO DOCUMENTS

All Company and client information must be dealt with in the strictest confidence and may only be disclosed, without fear of redress, in the following circumstances:

- 9.1 where disclosure is under compulsion of law;
- 9.2 where there is a duty to the public to disclose;

- 93 where the interests of the Company require disclosure; and
- 94 where disclosure is made with the express or implied consent of the client.

10 REQUESTS FOR ZANI DISTRIBUTION INDUSTRIES (PTY) LTD INFORMATION:

- 10.1 These are dealt with in terms of the Promotion of Access to Information Act, 2 of 2000 ("PAIA"), which gives effect to the constitutional right of access to information held by the State or any person (natural and juristic) that is required for the exercise or protection of rights. Private bodies, like ZANI DISTRIBUTION INDUSTRIES (PTY) LTD, must however refuse access to records if disclosure would constitute an action for breach of the duty of secrecy owed to a third party.
- 10.2 In terms hereof, requests must be made in writing on the prescribed form to the Information Officer in terms of PAIA. The requesting party has to state the reason for wanting the information and has to pay a prescribed fee.
- 10.3 ZANI DISTRIBUTION INDUSTRIES (PTY) LTD's manuals in terms of PAIA, which contains the prescribed forms and details of prescribed fees, is available on ZANI DISTRIBUTION INDUSTRIES (PTY) LTD website <http://www.zdi.co.za>.
- 10.4 Confidential company and/or business information of ZANI DISTRIBUTION INDUSTRIES (PTY) LTD may not be disclosed to third parties as this could constitute industrial espionage. The affairs of ZANI DISTRIBUTION INDUSTRIES (PTY) LTD must be kept strictly confidential at all times.

11 RETENTION OF DOCUMENTS

11.1 Hard Copy

The statutory periods for the retention of documents are as per the Law. These are available on request.

11.2 Electronic Storage

- 11.2.1 The internal procedure requires that electronic storage of information: important documents and information must be referred to and discussed with IT who will arrange for the indexing, storage and retrieval thereof. This will be done in conjunction with the departments concerned.
- 11.2.2 Scanned documents: If documents are scanned, the hard copy must be retained for as long as the information is used or for 1 year after the date of scanning, with the exception of documents pertaining to personnel. Any document containing information on the written particulars of an employee, including: employee's name and occupation, time worked by each employee, remuneration and date of birth of an employee under the age of 18 years; must be retained for a period of 3 years after termination of employment.

11.2.3 Section 51 of the Electronic Communications Act No 25 of 2005 requires that personal information and the purpose for which the data was collected must be kept by the person who electronically requests, collects, collates, processes or stores the information and a record of any third party to whom the information was disclosed must be retained for a period of 1 year or for as long as the information is used. It is also required that all personal information which has become obsolete must be destroyed.

12 DESTRUCTION OF DOCUMENTS

- 121 Documents may be destroyed after the termination of the retention period specified in terms of the Law. Registration will request departments to attend to the destruction of their documents and these requests shall be attended to as soon as possible.
- 122 Each department is responsible for attending to the destruction of its documents, which must be done on a regular basis. Files must be checked in order to make sure that they may be destroyed and also to ascertain if there are important original documents in the file. Original documents must be returned to the holder thereof, failing which, they should be retained by the Company pending such return.
- 123 After completion of the process in 6.2 above, the General Manager of the department shall, in writing, authorise the removal and destruction of the documents in the authorisation document. These records will be retained by Registration.
- 124 The documents are then made available for collection by the removers of the Company's documents, who also ensure that the documents are shredded before disposal. This also helps to ensure confidentiality of information.
- 125 Documents may also be stored off-site, in storage facilities approved by the Company.

DIRECTOR

30 JUNE 2021