

HEATHCOTE ENGINEERING CC

(REGISTRATION NUMBER 1990/022660/23)

PROTECTION OF PERSONAL INFORMATION POLICY AND MANUAL

**In terms of the Protection of Personal Information Act, Act 4 of 2013
And the Promotion of Access to Information Act, Act 2 of 2000**

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1. Introduction

1.1 Purpose of the Policy

The purpose of the policy is to outline Heathcote Engineering CC's commitment to compliance with the Protection of Personal Information Act (POPIA) and to establish the guidelines for protecting personal information in our CNC workshop.

2. Scope of the Policy

2.1 The policy applies to all employees, contractors and third parties involved in Heathcote Engineering's operations, and it covers the processing of personal information within the organization.

3. Definitions

3.1 Personal Information

Personal information refers to any data that can be used to identify an individual, including but not limited to names, contact information, identification numbers, and Processing includes any operation performed on personal information, such as collection, storage, retrieval, use, and disposal.

3.2 Processing

Processing includes any operation performed on personal information, such as collection, storage, retrieval, use, and disposal.

3.3 Data Subject

A data subject is the individual to whom the personal information pertains.

3.4 Consent

Consent is the voluntary and informed agreement of the data subject to the processing of their personal information for specific purposes.

3.5 Operator

An operator is a third party or organization that processes personal information on behalf of Heathcote Engineering.

4. Responsibilities

4.1 Information Officer

The Information Officer is responsible for overseeing the implementation and compliance of this policy, serving as the primary contact for data subjects, and liaising with regulatory authorities.

4.2 Deputy Information Officer

Management is responsible for ensuring that data protection practices are integrated into all aspects of our operations and for promoting a culture of data protection among employees.

4.3 Employees

All employees are responsible for understanding and adhering to this policy, as well as reporting any data protection concerns to the Data Protection Officer or management.

4.4 Contractors and Third Parties

Contractors and third parties working with Heathcote Engineering must comply with our data protection standards and guidelines when processing personal information on our behalf.

5. Collection and Processing of Personal Information

5.1 Legal Basis for Processing

Heathcote Engineering processes personal information based on the legitimate interests of providing our services to clients as well as with the explicit consent of data subjects when required.

5.2 Categories of Personal Information Collected

The categories of personal information we may collect include customer contract information, employee data, supplier details and financial records.

5.3 Purpose of Collection

We collect personal information to fulfill contracts, manage relationships with employees and suppliers, and comply with legal and regulatory requirements.

5.4 Consent

Data subjects' consent is obtained before processing their personal information, and they are informed of the specific purposes for which their data will be used.

5.5 Data Subject Rights

Data subjects have the right to access, rectify, erase, and object to the processing of their personal information, as well as the right to data portability. To exercise these rights, data subjects should contact Heathcote Engineering.

6. Data Security Measures

6.1 Data Security Measures

Heathcote Engineering implements robust security measures, including encryption, access controls, and regular security audits, to protect personal information from unauthorized access and breaches.

6.2 Data Breach Response Plan

In the event of a data breach, Heathcote Engineering will follow its Data Breach Response Plan, which includes notifying affected data subjects and relevant authorities as required by law.

6.3 Data Protection Impact Assessment (DPIA's)

Heathcote Engineering conducts DPIAs to identify and mitigate privacy risks when introducing new processes or technologies that involve the processing of personal information.

7. Retention and Destruction

7.1 Data Retention Periods

Personal information is retained for the duration necessary to fulfill the purpose for which it was collected, as well as any legal regulatory.

7.2 Secure Data Disposal

Heathcote Engineering ensures the secure disposal of personal information through methods such as shredding, permanent deletion, and the destruction of physical records.

7.3 Data Subject Rights

Data subjects may exercise their rights under POPIA by submitting requests to Heathcote Engineering. We will respond to such requests within the legally required timeframe.

8. Compliance

8.1 Training and Awareness

Heathcote Engineering provides ongoing training and awareness to ensure that all employees and relevant parties understand and adhere to data protection principles.

8.2 Audit and Monitoring

We conduct regular audits and monitoring to assess compliance with this policy and identify areas for improvement.

8.3 Reporting and Record-Keeping

Heathcote Engineering maintains records of data processing activities and reports any non-compliance or data breaches to relevant authorities as required by law.

9. Incident Reporting

9.1 Data Breach Reporting

If an employee or contractor becomes aware of a data breach, they must report it immediately to the Information or Deputy Information Office, who will follow the Data Breach Response Plan.

9.2 Complaint Handling

Data subjects may file complaints regarding the processing of their personal information, and Heathcote Engineering will investigate and respond to such complaints promptly.

10. Review and Amendment

10.1 Review of the Policy

The policy will be reviewed periodically to ensure it remains up-to-date and compliant with changes in POPIA and our business operations.

10.2 Amendments to the Policy

Amendments to this policy will be made as necessary, and all relevant stakeholders will be informed of any changes.

11. Information Officer Contact Details

11.1 Information Officer Details

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11.2 Deputy Information Officer Details

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12. Address

12.1 Physical Address

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