



Policy title:	POPI Policy	Revision date:	19 Dec 2018
Responsible Dept:	QMS	Version No.:	4
Version compiled by:	S Eksteen	Version approved by:	S Hewitt
Applicable to:	All	Pages:	3
Purpose:	To comply with The Protection Of Personal Information (POPI) Act 4 of 2013 in respect of the information it holds about any Person/Entity/Body/Individual/Company		
Last date audited:	NA	Policy No.:	LEG_001
Last audited by:	NA	Level:	BusCrit 2

## Protection of Personal Information Policy (POPI)

### 1 Introduction

Dole South Africa (Dole SA) is an international exporter of fresh fruit and acts as an agent between the supplier (grower) and receiver (market). Dole SA is obligated to comply with The Protection of Personal Information Act 4 of 2013.

### 2 Objective:

This policy sets the standard for suitable protection of personal information as required by The Protection of Personal Information Act 4 of 2013, as well as the purpose for which said information is used.

### 3 Information Officer:

Dole SA has appointed an Information Officer in terms of the Act and the responsibilities are as follows:

- I. The encouragement of compliance, by Dole SA, with the conditions for the lawful processing of personal information.
- II. Managing requests made to Dole SA pursuant to the Protection of Personal Information Act (POPI).
- III. Working with the Regulator in relation to investigations conducted pursuant to prior authorisation required to process certain information of this Act in relation to the business.
- IV. Ensuring compliance by Dole SA with the provisions of this Act. This is an ongoing responsibility that will include training of new staff and to update internal policies.

Any deviations from this policy or breach thereof or incidents that may relate to such a possibility must be reported to the Information Officer.

### 4 Scope:

This policy is applicable to Dole SA's Management, all employees and any Person/Entity/Body/Individual/Company ("the client") whose information is supplied or given to Dole SA.

#### 4.1 Agreement and Consent declaration:

Dole SA must have the consent of both Employee and Supplier before collecting and storing personal information.

- Employees need to sign a consent – contract clause

- Suppliers (Growers) - External service providers (Person/Entity/Body/Individual/Company) must sign a separate Agreement and Consent declaration,

whereby confirming commitment to this policy and will include assurance that security measures are in place when personal information is processed.

## 5 Control Collection and Processing of Personal Information

Each department in Dole SA has compiled a POPI Inventory of Documents Control as part of the QMS procedure 00004/TQM. By compiling this Inventory, Management illustrates its commitment to sufficiently protecting and using information in a manner that facilitates transparency around the following:

POPI REQUIREMENTS	00004/TQM DETAILS
What is the reason for collecting the personal information?	Procedure name and number
Usage - How and Why it is processed?	Quality records generated
Identify any personal information?	Personal Information? (Yes/No)
What is the Sensitivity of the information?	Sensitivity? (High/Low)
What is the format of the information?	"Format - (electronic / paper)"
Where is the information stored?	Record location
Who the personal information is shared with?	Access to record?
Who will monitor this information?	"Responsibility (for ensuring accurate record keeping)"
Archiving of the information?	"Retention time (according to Dole record retention policy)"
Disposal of the Information?	Disposal Trigger
	Disposal (Way of disposal)

## 6 Core principles

Dole SA is committed to processing personal information lawfully and to comply with the following principles:

- Dole SA will maintain and develop reasonable protective measures against risks such as loss, unauthorised access, destruction, use, alteration or revelation of personal information.
- **Accountability (section 8 of POPI) & Openness (sections 17 - 18 of POPI):** Dole SA upholds the requirements of the legislation on POPI and maintains an approach of transparency of operational procedures that controls collection and processing of personal information.
- Dole SA is committed to complying with all applicable regulatory requirements related to the collection and processing of personal information.
- **Processing Limitation (sections 9 – 12 of POPI) & Further Processing Limitation (section 15 of POPI):** Dole SA undertakes to collect personal information in a legal and reasonable way and to process the personal information obtained from clients only for the purpose for which it was obtained in the first place.
- Processing of personal information obtained from clients will not be undertaken in an insensitive or wrongful way that can intrude on the privacy of the client.
- **Data Subject Participation (sections 23 - 25 of POPI):** Employees or Suppliers can request certain personal information and may also be required to correct or delete personal information within the specifications of the POPI Act.
- Dole SA undertakes not to request or process information related to race, religion, medical situation, political preference, trade union membership, sexual certitude or criminal record. Dole SA will also not process information of juveniles.
- **Information Quality (section 16 of POPI):** Dole SA will ensure that accurate and sufficient information is on record of its clients and will be updated when necessary.

- Dole SA also undertakes not to provide any documentation to a third party or service provider without the consent of the client except where it is necessary for the proper execution of the service as expected by the client.
- **Purpose Specific (sections 13 – 14 of POPI):** Dole SA is compelled to keep effective record of personal information and undertakes not to retain information for a period longer than specified in the QMS document **00004/TQM**. Information will be disposed at the end of the retention period in such a way that it cannot be reconstructed.
- **Security Safeguards (sections 19 - 22 of POPI):** Dole SA will secure the integrity and confidentiality of personal information in its possession. Dole SA will provide the necessary security of data and keep it in accordance with prescribed legislation.

## 7 Availability and Revision:

The Policy is made available on the Dole SA company website <http://www.dolesa.co.za> and by request from the Information Officer or Communications Manager.

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This policy will continually be updated to comply with legislation, thereby ensuring that personal information will be secure.

**Changes to V3 to V4** – as per mail from SH: POPI -Policy V3 ( 7 Nov 2018) - Proposed changes, 19 Dec 2018