



340 Main Road, Bryanston,  
Johannesburg, Gauteng, South Africa  
Telephone: 010 0600777  
Registration Number: 2014/106853/07

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## PROTECTION OF PERSONAL INFORMATION ACT (POPIA)

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### Your privacy is important to us

The purpose of this document is to update you on our preparations and readiness in implementing The Protection of Personal Information Act, No.4 of 2013 (POPIA), which is effective on 01 July 2021. POPIA aims to protect the personal data of all South African data subjects (natural and juristic) and further outlines how institutions should safeguard and collect this information.

340 On Main respects your privacy and, as a responsible party in terms of POPIA, we are committed to keeping your personal data secure and confidential, whilst remaining transparent in the way in which we handle your data.

We encourage you to read this document as it is designed to help you understand how we process and protect your personal data.

### POPIA Readiness

As a Company, we have dedicated resources to prepare for the implementation of POPIA. Even though POPIA only comes into effect this year, we have always treated our clients' data with the utmost care and security.

Below we highlight some of the changes and reaffirmations, which 340 On Main has undertaken as part of its POPIA readiness project:

- 1. Collection, Processing and Transfer of Client Information**  
340 On Main has reviewed and updated its processes to ensure that it only collects information for a specified and lawful purpose and that the information collected is adequate, relevant, and not excessive for the stated purpose.
- 2. POPIA Outsourced Parties**  
We are updating the POPIA provisions in our contracts with outsourced third parties to further solidify data principals, expectations, and compliance. We are comfortable that the third parties we outsource functions to, have adequate processes and data security measures in line with POPIA.
- 3. Client Data Protection**  
Several information controls are in place internally to protect client data. These controls are in line with the requirements of POPIA.

*Directors: G.R. Hindle, I. Hindle*

*Professionals: C. Coole (Biokinetics PR 091 000 051 5558), W Deavall (Biokinetics PR 091 000 0565 164)*

These controls include:

- **Access controls** – access to systems follow a standard process whereby user accounts are only created if properly pre-approved. User accounts are disabled as soon as a staff member leaves. Access to critical systems, including systems that store client data, are periodically reviewed and all systems require a suitably complex password to authenticate the user before access to the system is granted.
- **Virus Management** – Anti-virus is deployed to all machines to limit the risk of viruses corrupting information or cyber criminals stealing information from our environment. All incoming emails are scanned for viruses before entering the environment.
- A number of Information Security Policies and Cyber Security controls are in place to provide additional controls over our information.

#### 4. Breaches and Reporting

A formal breach reporting process is in place and any incidents where client information has been compromised are and will continue to be reported to our Compliance team. All affected parties, including you as the client, will be notified of any incident.

Each incident will be thoroughly investigated and all key themes and risk issues identified are closed out to prevent any further reoccurrences.

In addition, any client may request access to and/or correct their information and/or object to the processing of their information by sending their request or objection to:

#### The Information Officer

[grahamh@santeretreat.co.za](mailto:grahamh@santeretreat.co.za)

340 on Main (Pty) Ltd  
Postnet Suite 97  
Private Bag X19  
Franschhoek  
7690

#### 5. Training and policy

Employees have received training on 340 On Main's Data Protection and Privacy Policy (the Policy) which aligns with POPIA. Employees are required to attest to the fact that they have read, understood, and comply with the Policy on an annual basis.

This creates awareness, expectation, and a culture of POPIA compliance and data protection principles.

Employees are required to receive:

- POPIA specific training;
- New joiner data protection training within 3 months of their start date;
- Annual refresher data protection training for all staff.
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### **We are here to help**

***If you require further information or have any questions on our approach to data protection, please feel free to contact us via email on [grahamh@santeretreat.co.za](mailto:grahamh@santeretreat.co.za)***

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