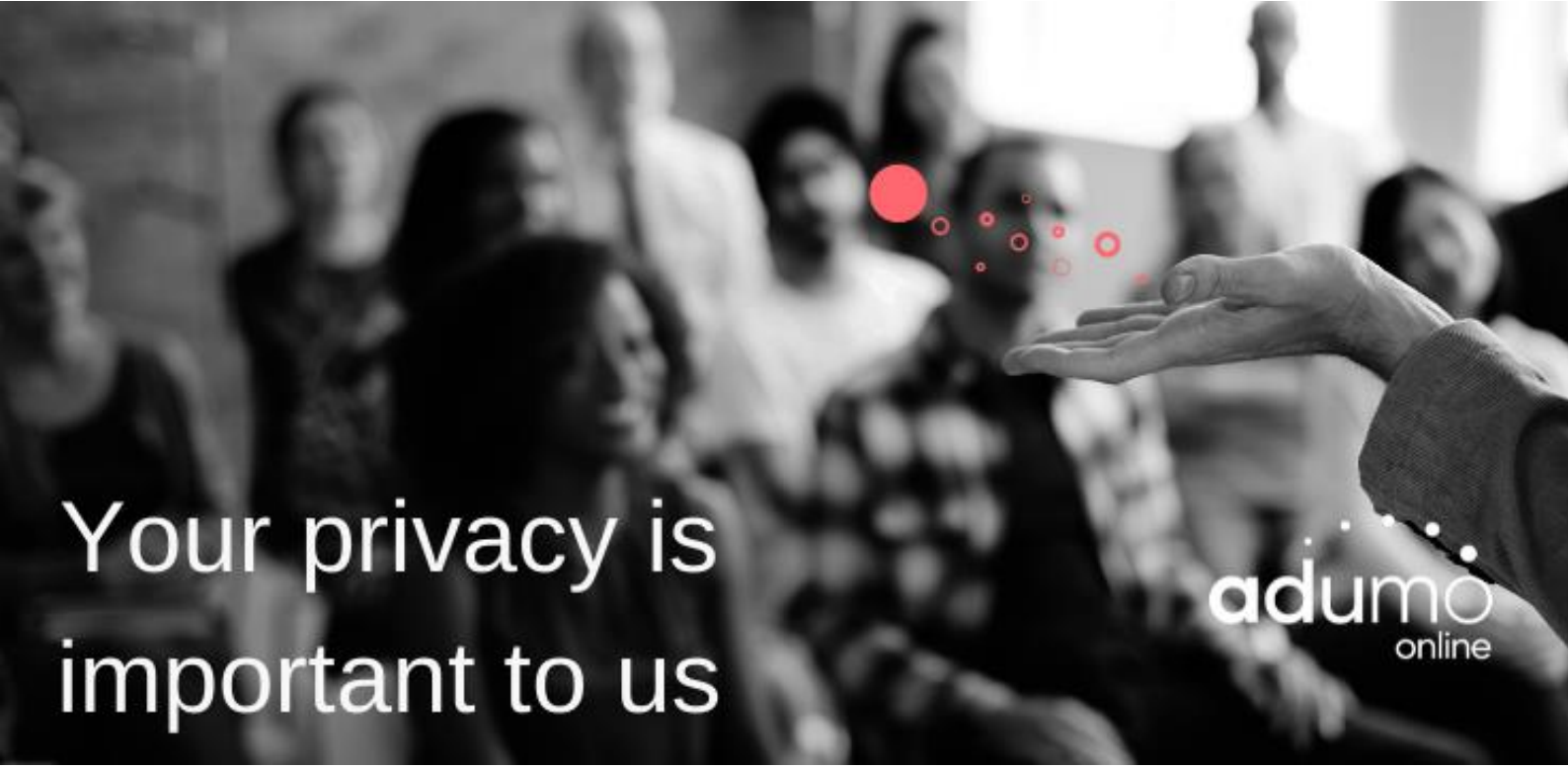


The purpose of this document is to update you on our preparations and readiness in implementing The Protection of Personal Information Act, No. 4 of 2013 (POPIA), which is effective on 1 July 2021. POPIA aims to protect the personal data of all South African data subjects (natural and juristic) and further outlines how institutions should safeguard and collect this information.

Adumo Online 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. Please also see the attached *Addendum* for your review and signature.

## POPIA Readiness

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 Adumo Online has undertaken as part of its POPIA readiness project.

### *1. Collection, Processing and Transfer of Client Information*

Adumo Online is reviewing 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.

Let us know if you wish to know more about what information we collect and how we process it.

### *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. In addition, data protection safeguards will be a part of the due diligence we perform on these third parties.

## *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. These controls include:

- Access controls – access to systems follow a standard process whereby user accounts are only created if approved by our Human Resources team and the relevant line manager. User accounts are disabled as soon as a staff member leaves Adumo Online. 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.
- Data Loss via Internet – By default, users don't have access to transfer any information via file transfer or social media sites. Only a limited number of approved individuals have access to do so after a risk assessment is performed, and their access is approved.
- 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. Details of these are available on request.

## *4. Breaches and Reporting*

All affected parties, including you as the client, will be notified of any incident. Each incident is thoroughly investigated, and all key themes and risk issues identified are closed out to prevent any future 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 on email at informationofficer@adumoonline.com

Adumo Online Pty Ltd

Unit 207 | Block 2 | Northgate Park | Cnr Section Street Platinum Dr | Brooklyn | Western Cape | 7405

## *5. Training and policy*

Employees have received awareness training on Adumo Online's POPI approach. This creates awareness, expectation, and a culture of POPIA compliance and data protection principles. Our business has always been PCI DSS Compliant, so privacy and protection of information has always been at the forefront of our approach.