



PROTECTION OF PERSONAL INFORMATION ACT (POPIA) POLICY

of

DUSTAR TECHNOLOGIES (PTY) LTD
COMPANY REGISTRATION NO. 2024/466637/07

This POPIA Policy ("**Policy**") applies to **DUSTAR TECHNOLOGIES (PTY) LTD** ("**the Company**").

This Policy makes reference to the Information Officer. The Information Officer has primary responsibility for:

- I. enforcing this Policy; and
- II. developing, implementing and enforcing any additional procedures, standards and processes, as he or she may deem necessary and appropriate, to effectuate this Policy.

The Company's Information Officers -

Full Name	Date Appointed	Email
Odino Mupondo (CTO)	Feb - 2025	Data@dustar.co.za
Julius Idana (CEO) - Deputy Information Officer	Feb - 2025	

DOCUMENT VERSION AND CHANGE CONTROL

VERSION	DATE	COMMENT/SUMMARY OF UPDATES
1	Feb - 2025	Founding policy document.

PREAMBLE

Dustar Technologies (Pty) Ltd is a technology services company that specialises in data



acquisition, data capturing, and workflow automation. In the course of providing these services The Company will collect and process various pieces of information which will include personal information from various sources.

We are committed to safeguarding the privacy and personal information of our clients, partners and employees. This policy details The Company's commitment to protecting such information and ensuring its lawful use.

1. CONTEXT AND BACKGROUND

This Policy covers the Company's compliance with and application of the Protection of Personal Information Act, 4 of 2013 ("**POPIA**"). The Company promotes the right to protection against unlawful processing of Personal Information and giving effect to the right to privacy as enshrined in section 14 of the Constitution of the Republic of South Africa.

2. DEFINITIONS

in this Policy, the following definitions apply:

- 2.1. "**Consent**" means any voluntary, specific and informed expression of will in terms of which permission is given for the processing of Personal Information.
- 2.2. "**Data Subject**" means the Person to whom Personal Information relates, and for purposes of this Policy.
- 2.3. "**De-identify**" means to delete any information that identifies the Data Subject, can be used or manipulated by a reasonably foreseeable method to identify the Data Subject, or can be linked by a reasonably foreseeable method to other information that identifies the Data Subject.
- 2.4. "**Deputy Information Officer**" means the Deputy Information Officer required in terms of section 56 of POPIA.
- 2.5. "**Information Officer**" means the Information Officer required in terms of section 55 of POPIA.
- 2.6. "**Information Regulator**" means the Information Regulator established in



terms of section 39 of POPIA.

- 2.7. **"Operator"** means a person who processes Personal Information for the Company in terms of a contract or mandate, without coming under the direct authority of the Company.
- 2.8. **"Person"** means a natural person or a juristic person.
- 2.9. **"Personal Information"** means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to:
- 2.9.1. information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;
 - 2.9.2. information relating to the education or the medical, financial, criminal or employment history of the person;
 - 2.9.3. any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
 - 2.9.4. the biometric information of the person;
 - 2.9.5. the personal opinions, views or preferences of the person;
 - 2.9.6. correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
 - 2.9.7. the views or opinions of another individual about the person;
 - 2.9.8. the name of the person if it appears with other Personal Information relating to the person or if the disclosure of the name itself would reveal information about the person;
 - 2.9.9. and includes "Special Personal Information" referred to in section 26 of the POPIA such as religion, race or ethnic origin, criminal record, trade union membership, health, medical records, or biometric information of a Data Subject.
- 2.10. **"POPIA"** means the Protection of Personal Information Act, 4 of 2013.
- 2.11. **"Privacy Notice"** means a privacy notice describes how your Personal



Information is used by the Company as a result of a person's engagement with the Company.

- 2.12. **"Processing"** means any operation or activity or any set of operations, whether by automatic means, concerning Personal Information, including:
- 2.12.1. the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;
 - 2.12.2. dissemination by means of transmission, distribution or making available in any other form; or
 - 2.12.3. merging, linking, as well as restriction, degradation, erasure or destruction of Personal Information;
- 2.13. **"Responsible Party"** means the Company as a private body, who alone or in conjunction with others, determines the purpose of and means for processing Personal Information.

3. PURPOSE

This Policy promotes the protection of Personal Information and aims to regulate, in harmony with regulatory standards, the processing of Personal Information by the Company, as well as promotion of the right to privacy and regulation of the manner in which the Company processes Personal Information, in accordance with the requirements of the POPIA.

4. PRINCIPLES

- 4.1. This Policy applies to all the Company's operations and activities in South Africa and to the extent legally required in other jurisdictions.
- 4.2. The Company processes Personal Information of the individuals (natural persons) and corporate entities (juristic persons, such as companies, close corporations and trusts) with whom it works in order to operate and carry out its operations and activities (collectively referred to as "Persons").
- 4.3. The Company regards the lawful and proper processing of Personal Information as crucial to successful service delivery and essential to maintaining confidence between the Company and those Persons who deal with it.



5. RIGHTS OF DATA SUBJECTS

The Company will ensure that it makes Data Subjects aware of their rights, as appropriate and specifically with regards to the following:

5.1. The right to access Personal Information

Data Subjects have the right to establish whether the Company holds Personal Information related to them, including the right to request access to that Personal Information.

5.2. The right to have Personal Information corrected or deleted

Data Subjects also have the right to ask the Company to update, correct or delete their Personal Information on reasonable grounds.

5.3. The right to object to the processing of Personal Information

Data Subjects have the right on reasonable grounds, to object to the processing of their Personal Information. The Company will consider such requests and the requirements of POPIA and may cease to process such Personal Information and may, subject to statutory and contractual record keeping requirements, also destroy the Personal Information.

5.4. The right to object to direct marketing

Data Subjects have the right to object to their Personal Information being used for the purposes of direct marketing by means of unsolicited electronic communications.

5.5. The right to complain to the Information Regulator

Data Subjects have the right to submit a complaint to the Information Regulator regarding infringements of any of their rights protected under POPIA and to institute



civil proceedings against alleged non-compliance with the protection of their Personal Information.

5.6. The right to be informed

Data Subjects have the right to be informed that their Personal Information is being collected by the Company and should also be notified in any situation where the Company reasonably believes that the Personal Information of Data Subjects has been accessed by unauthorised person/s.

6. GENERAL GUIDING PRINCIPLES

All employees and persons acting on behalf of the Company will be subject to the following guiding principles:

6.1. Accountability

Compliance failure could damage the reputation of the company and its shareholders. The Company could also be exposed to a civil claim for damages. The protection of Personal Information is therefore everybody's responsibility. The Company will take appropriate steps including disciplinary action against individuals who through intentional or negligent actions and/or omissions fail to comply with this Policy.

6.2. Processing limitation

The Company collects Personal Information through -

- I. **directly from Data subjects** (i.e. information provided directly by clients, partners or employees through communications, contracts or other forms of engagement);
- II. **automated technologies** (i.e. data collected through our website or services) and;
- III. **third party sources** (information obtained from third parties with the required



consent or as allowed by law) only as pertains to business requirements.

The type of information will depend on the need for which it is collected and will be processed for that purpose only. We will inform Data subjects as to what information is mandatory or deemed optional, as far as possible. Personal information will only be used for the purpose for which it was collected, intended and as agreed. This may include:

- Service delivery and operational efficiency
- Analytics for service improvement; and
- Compliance with regulatory requirements;

According to section 10 of POPIA, Personal Information may only be processed if the purpose for which it is processed, is adequate, relevant and not excessive. Certain conditions must be met for the Company to process Personal Information as in section 11 of POPIA. These are listed below:

- (a) Data Subjects consent to the processing - consent is obtained during early stages of the relationship;
- (b) Processing is necessary - Personal Information is required to facilitate the provision of services to the Data Subject or for the conclusion of a contract to which the Data Subject is a party;
- (c) The Company is under obligation by law;
- (d) The legitimate interest of the Data Subject is protected - it is in their best interest to provide the Personal Information; and
- (e) Processing is in the best interest of the Company - in order to provide our services to the Data Subject.

6.3. Further processing limitation



Personal Information will not be processed for a secondary purpose unless that processing is compatible with the original purpose. Where the secondary purpose is not compatible with the original purpose, the Company will first obtain additional consent from the Data subject.

6.4. Information quality

The Company will take reasonable steps to ensure that all Personal Information is complete, accurate and not misleading. Where Personal Information is collected from third parties, the Company will take reasonable steps to ensure that the information is correct by verifying the accuracy of the information directly with the Data Subject or by way of independent sources. The company will use reliable third-party data collection sources always.

6.5. Security safeguards

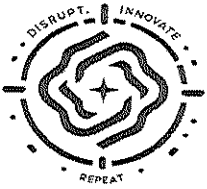
Section 19 of POPIA requires the adequate protection of Personal Information that is held by the Company. The Company will continuously review security controls and processes to prevent unauthorised access and use of Personal Information. These measures include but are not limited to working with trusted providers, ensuring cyber security software's are up to date and the use of firewalls and encryptions.

7. PRIVACY NOTICE

The Company has a Privacy Notice (<https://www.dustar.co.za>) which describes how Personal Information is processed by the Company as a result of a Person's engagement with the Company. This includes how the Personal Information is collected, how it is used and why it is used.

This POPIA Policy is effective as of [10 February 2025].

[End of Policy.]



EMPLOYEE ACKNOWLEDGMENT REGISTER - PROTECTION OF PERSONAL INFORMATION ACT (POPIA) POLICY

Company Name: Dustar Technologies (Pty) Ltd
Effective Date: [10 February 10, 2025]

As an employee of Dustar Technologies, I acknowledge that I have read, understood, and agree to comply with the company's Protection of Personal Information Act (POPIA) policy. I understand the importance of data protection and my responsibilities in ensuring the confidentiality, integrity, and lawful processing of personal information as per POPIA regulations.

- I further acknowledge that:
- I have been made aware of the company's POPIA policy and its implications for handling personal information.
- I understand that any misuse or unauthorized disclosure of personal information may result in disciplinary action.
- I agree to adhere to the security measures and confidentiality requirements outlined in the policy.
- I understand my duty to report any data breaches or security concerns to the Information Officer promptly.

Information Officer Authorisation

Name: Odino Mupondo

Signature: 

Date: 10/02/2025

Deputy Information Officer

Name: Julius Idana

Signature: 

Date: 10/02/2025

A register will be kept on file as proof of employee awareness and compliance with the company's data protection policy under POPIA.