



**Protection of Personal Information (POPI)  
EXTERNAL DATA PRIVACY POLICY**

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**1. DEFINITIONS**

**“biometrics”**: means a technique of personal identification that is based on physical, physiological or behavioural characterisation including blood typing, fingerprinting, DNA analysis, retinal scanning and voice recognition;

**“child”**: means a natural person under the age of 18 years who is not competent, without the assistance of a competent person, to take any action or decision in respect of any matter concerning him- or herself;

**“competent person”**: means any person who is competent to consent to any action or decision being taken in respect of any matter concerning a child;

**“data subject”**: means the person or entity to whom personal information relates and for the purposes of HONEY FASHION ACCESSORIES, this will include but not be limited to its clients, its employees, its associates, its service suppliers, industry associations, its directors and any other person or juristic person whose information is collected, processed or shared;

**“direct marketing”**: means to approach a data subject, either in person or by mail or electronic communication, for the direct or indirect purpose of –

- Promoting or offering to supply its services in the ordinary course of business of HONEY FASHION ACCESSORIES;
- Requesting the data subject to make a donation of any kind for any reason;

**“electronic communication”**: means any text, voice, sound or image message sent over an electronic communications network which is stored in the network or in the recipient’s terminal equipment until it is collected by the recipient;

**“filing system”**: means any structured set of personal information which in the case of HONEY FASHION ACCESSORIES consists of physical files kept in the offices of HONEY FASHION ACCESSORIES together with the data filed on the various software systems used;

**“HONEY FASHION ACCESSORIES”** for purposes of this Policy and for purposes of the operational documents related to this Policy will mean the company, Honey Fashion Accessories (Pty) Ltd, Registration Number 1998/010584/07 with registered address at the Corner Watt and Flemming Road, Meadowdale, Gauteng, 1614 and postal address as PO BOX 79710, Senderwood, Gauteng, 2145;

**“Information officer”**: of HONEY FASHION ACCESSORIES means

**“operator”**: means a person or organization who processes personal information for HONEY FASHION ACCESSORIES who for such purposes will be known as the responsible party in terms of a contract or mandate, without coming under the direct authority of that party;

**“person”**: means a natural person or a juristic person;

**“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:

- Information relating to the education or the medical, financial, criminal or employment history of the person; Any identifying number, symbol, e-mail address, telephone number, location information, online identifier or other particular assignment to the person;
- The biometric information of the person;
- The personal opinions, views or preferences of the person;
- Correspondence sent by the person that would reveal the contents of the original correspondence if the message is of a personal or confidential nature;
- The views or opinions of another individual about the person; and
- 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;

**“private body”**: means

- a natural person who carries or has carried on any trade, business or profession, but only in such capacity;
- a partnership which carries or has carried on any trade, business or profession; or
- any former or existing juristic person, but excludes a public body;

**“processing”**: means any operation or activity or any set of operations, whether or not by automatic means, concerning personal information, including –

- The collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;
- Dissemination by means of transmission, distribution or making available in any other form; or
- Merging, linking, as well as restriction, degradation, erasure or destruction of information;

**“Promotion of Access to Information Act”**: means the Promotion of Access to Information Act (PAIA), 2000 (Act No. 2 of 2000);

**“public record”**: means a record that is accessible in the public domain and which is in the possession of or under the control of a public body, whether or not it was created by that public body.

**“record”**: means any recorded information regardless of form or medium, including any of the following:

- Writing on any material;
- Information produced, recorded or stored by means of any tape-recorder, computer equipment, whether hardware or software or both, or other device, and any material subsequently derived from information so produced, recorded or stored;
- Label, marking or other writing that identifies or describes anything of which it forms part, or to which it is attached by any means;
- Book, map, plan, graph, or drawing;
- Photograph, film, negative, tape or other device in which one or more visual images are embodied so as to be capable, with or without the aid of some other equipment, of being reproduced; b) In the possession or under the control of a responsible party; and c) Regardless of when it came into existence;

**“Regulator”**: – means the Information Regulator established in terms of Section 39 of the POPIA;

**“responsible party”**: means a public or private body or any other person which, alone or in conjunction with others, determines the purpose of and means for processing personal information;

**“restriction”**: means to withhold from circulation, use or publication any personal information that forms part of a filing system, but not to delete or destroy such information;

**“special personal information”**: means personal information as referred to in Section 26 of the POPIA which includes 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;

**“this Act”**: means the Protection of Personal Information Act, No. 4 of 2013.

**“unique identifier”**: means any identifier that is assigned to a data subject and is used by a responsible party for the purposes of the operations of that responsible party and that uniquely identifies that data subject in relation to that responsible party.

## **2. INTRODUCTION**

HONEY FASHION ACCESSORIES is a company which distributes fashion accessories and jewelry throughout South Africa. The company is represented by a large number of sales consultants who make the sales and deal with the customers directly and these consultants all fall within teams led by Team Leaders. The Team Leaders of the various teams are obliged to utilize the online ordering and payment portal of the company.

In further recognizing the international risk of data breach and also to ensure that lawful conditions exist surrounding its data subject's information, the management and consultants of HONEY FASHION ACCESSORIES accept that all its South African based data subjects' Constitutional Right to Privacy is of utmost importance. HONEY FASHION ACCESSORIES further accept that its data subjects based in other parts of the world are entitled to equal rights to privacy in terms of Regulations applicable to such data subjects in the countries in which they are based.

HONEY FASHION ACCESSORIES are committed to the education of its data subjects in respect of their rights to privacy and will make all operational amendments necessary.

## **3. OBJECTIVE**

The objective of this Policy is to ensure adherence to the provisions within POPIA together with its Regulations aimed at protecting all HONEY FASHION ACCESSORIES's data subjects from harm by protecting personal information, adhering to the requirements of responsible handling of data subjects' information in terms of POPIA, to ensure that data subjects' Consent is obtained as provided for in POPIA, to ensure that data subjects' information is not unlawfully shared with third parties unless Consent for such sharing is obtained, to stop identity fraud and generally to protect privacy.

This Policy constitutes the EXTERNAL PRIVACY RULES and sets out the standard for suitable protection of personal information as required by POPIA.

## **4. POPIA CORE PRINCIPLES**

In its quest to ensure the protection of data subjects' privacy, HONEY FASHION ACCESSORIES fully commit as follows:

- 4.1. To continue developing and maintaining reasonable protective measures against the possibility of risks such as loss, unauthorised access, destruction, use, alteration or revelation of personal information.
- 4.2. To regulate the manner in which personal information may be processed, by establishing conditions, in harmony with international standards, that prescribe the minimum threshold requirements for the lawful processing of personal information;
- 4.3. To ensure that the requirements of the POPIA legislation are upheld within the organisation. In terms of sections 8, 17 and 18 of POPIA, HONEY FASHION ACCESSORIES confirm that it adheres to an approach of transparency of operational procedures that controls collection and processing of personal information and subscribe to a process of accountability and openness throughout its operation.
- 4.4. In terms of the requirements set out within sections 9, 10, 11, 12, 13 14 and 15 of POPI, to collect personal information in a lawful and reasonable way, for a specific reason and only if it is necessary for operations and to process the personal information obtained from clients and data subjects only for the purpose for which it was obtained in the first place.
- 4.5. Not to process personal information obtained from clients in an insensitive, derogative discriminatory or wrongful way that can intrude on the privacy of the client.
- 4.6. In terms of the provisions contained within sections 23 to 25 of POPIA, to allow all data subjects of HONEY FASHION ACCESSORIES to request access to certain personal information and may also request correction or deletion of personal information within the specifications of the POPIA and to this end, data subjects are referred to the **FORMS 1 & 2** hereto attached. Where possible, these forms will be digitized and made available to any of the data subjects of HONEY FASHION ACCESSORIES.
- 4.7. To not request or process information related to race, religion, medical situation, political preference, trade union membership, sexual certitude or criminal record unless this is lawfully required and unless the data subject has expressly consented. HONEY FASHION ACCESSORIES will also not process information of juveniles.

- 4.8. In terms of the provisions contained within section 16 of POPIA, to ensure that data subjects' information is recorded and retained accurately.
- 4.9. To not provide any documentation to a third party or service provider without the express consent of the data subject except where it is necessary for the proper execution of the service as expected by the data subject.
- 4.10. To keep effective record of personal information and undertakes not to retain information for a period longer than specified in the property industry's Code of Conduct.
- 4.11. In terms of sections 19 to 22 of POPIA, to secure the integrity and confidentiality of personal information in its possession. HONEY FASHION ACCESSORIES will provide the necessary security of data and keep it in accordance with prescribed legislation.

## **5. CONSENT**

When data subjects' information is collected, processed or shared by HONEY FASHION ACCESSORIES during the process of delivering the fashion items purchased by the data subject as well as processing the payment for such items, the company recognizes the obligations to explain the reasons for the collection of information from the particular data subject/s and to obtain the required Consents to process if necessary and where required the sharing of the information pursuant to such explanation.

When data subjects' information is collected, processed or shared by HONEY FASHION ACCESSORIES for any other reason than the original reason of it being collected, the specific Consent for such purpose must be obtained from the data subject.

If SPECIAL PERSONAL INFORMATION is collected, processed, shared and stored for any reason from any of HONEY FASHION ACCESSORIES' data subjects, specific Consent must first be obtained. The prohibition on collection and processing of special personal information does not apply if:-

- 5.1. Processing is carried out with the consent of the data subject;
- 5.2. Processing is necessary for the establishment, exercise or defense of a right or obligation in law;
- 5.3. Processing is for historical, statistical or research purposes.

HONEY FASHION ACCESSORIES have amended its standard documentation with references to the Act and will obtain all data subjects' general Consent in each transaction where necessary in order that data subjects are aware at all times of the reasons for the information being collected, how the information will be processed and for what the information will be used.

## **6. COLLECTION, PROCESSING AND SHARING OF INFORMATION**

HONEY FASHION ACCESSORIES collect and process personal information from its data subjects for a variety of reasons and in a variety of ways. The most pertinent reason for data collection, processing and sharing of the information relates to the orders placed by such data subjects and payment for such orders being processed.

The primary way of collection and processing of personal information is electronically. By submitting personal and special personal information details to HONEY FASHION ACCESSORIES, all data subjects acknowledge that:

- 6.1. Personal information collected by HONEY FASHION ACCESSORIES will be collected directly from the data subject, unless-
  - 6.1.1. The information is contained or derived from a public record or has deliberately been made public by the data subject;
  - 6.1.2. Collection of the information from another source would not prejudice a legitimate interest of the data subject;
  - 6.1.3. Collection of the information from another source is necessary -
    - 6.1.3.1. To avoid prejudice to the maintenance of the law by any public body, including the prevention, detection, investigation, prosecution and punishment of offences;
    - 6.1.3.2. To comply with an obligation imposed by law or to enforce legislation concerning the collection of revenue;
    - 6.1.3.3. For the conduct of proceedings in any court or tribunal that have commenced or are reasonably contemplated;
    - 6.1.3.4. In the interest of national security;
    - 6.1.3.5. To maintain the legitimate interests of HONEY FASHION ACCESSORIES or of a third party to whom the information is supplied;
    - 6.1.3.6. Compliance would prejudice a lawful purpose of the collection;
    - 6.1.3.7. Compliance is not reasonably practicable in the circumstances of the particular case.
  - 6.1.4. Personal information is collected for a specific, explicitly defined and lawful purpose related to a function or activity of HONEY FASHION ACCESSORIES;
- 6.2. Steps will be taken to ensure that the data subject is aware of the purpose of the collection of the information.

- 6.3. HONEY FASHION ACCESSORIES will take reasonably practicable steps to ensure that the personal information is complete, accurate, not misleading and updated where necessary, having regard to the purpose for which the personal information is collected and further processed.
- 6.4. Where personal information is collected from a data subject directly, HONEY FASHION ACCESSORIES will take reasonably practicable steps to ensure that the data subject is aware of: -
  - 6.4.1. The nature of the information being collected and where the information is not collected from the data subject, the source from which it is collected;
  - 6.4.2. The name and address of HONEY FASHION ACCESSORIES;
  - 6.4.3. The purpose for which the information is being collected;
  - 6.4.4. Whether or not the supply of the information by the data subject is voluntary or mandatory;
  - 6.4.5. The consequences of failure to provide the information;
  - 6.4.6. Any particular law authorizing or requiring the collection of the information.

## **7. STORAGE OF INFORMATION**

HONEY FASHION ACCESSORIES acknowledge the risks facing data subjects with the storage of personal and special personal information on the HONEY FASHION ACCESSORIES' software systems as well as filing copies of the physical information physically in an office. This is a particular issue within the company's structure since the company is represented by a large number of consultants who have the contact with the eventual customers and as such, each consultant will deal with his/her own customer information and store such information in their own way.

To ensure that the company's best attempts are made to minimize data subjects from suffering loss of personal information, misuse or unauthorized alteration of information, unauthorized access or disclosure of personal information generally, it will:

- 7.1. Store personal information in databases that have built-in safeguards and firewalls to ensure the privacy and confidentiality of your information.
- 7.2. Constantly monitor the latest internet developments to ensure that the systems evolve as required. HONEY FASHION ACCESSORIES test its systems regularly to ensure that our security mechanisms are up to date.
- 7.3. Continue to review its internal policies and third party agreements where necessary to ensure that these are also complying with the POPIA and Regulations in line with HONEY FASHION ACCESSORIES's Policy rules.

## **8. DISPOSAL OF DATA SUBJECTS' INFORMATION**

HONEY FASHION ACCESSORIES are responsible to ensure that necessary records and documents of their data subjects are adequately protected and maintained to ensure that records that are no longer needed or are of no value are disposed of at the proper time. These rules apply to all documents which are collected, processed or stored by HONEY FASHION ACCESSORIES and their consultants who represent the company and include but are not limited to documents in paper and electronic format, for example, e-mail, web and text files, PDF documents etc.

HONEY FASHION ACCESSORIES do not automatically discard or dispose of the telephone numbers and email addresses of data subjects with whom it has previously dealt as these are stored on cellphones and the system of HONEY FASHION ACCESSORIES but will do so on request by the data subject. Data subjects are entitled to request removal of their personal information with reference to **FORM 2** hereto attached and where possible, the option to submit this request will be digitized for ease of access.

Rules governing the secure disposal of personal information and in particular the devices on which these are stored are necessary in order to maintain data security and support compliance with this HONEY FASHION ACCESSORIES Policy. HONEY FASHION ACCESSORIES acknowledge that electronic devices and media can hold vast amounts of information, some of which can linger indefinitely. Data subjects, who interact with HONEY FASHION ACCESSORIES acknowledge the following disposal rules:

- 8.1. Under no circumstances will paper documents or removable media (CD's, DVD's, discs, etc.) containing personal or confidential information be simply binned or deposited in refuse tips.
- 8.2. HONEY FASHION ACCESSORIES undertake to ensure that all electrical waste, electronic equipment and data on disk drives be physically removed and destroyed in such a way that the data will by no means be able to be virtually retrievable.
- 8.3. HONEY FASHION ACCESSORIES will ensure that all paper documents that should be disposed of, be shredded locally and then be recycled.
- 8.4. In the event that a third party is used for data destruction purposes, the Information Officer will ensure that such third party will also comply with this policy and any other applicable legislation.
- 8.5. HONEY FASHION ACCESSORIES may suspend the destruction of any record or document due to pending or reasonably foreseeable litigation, audits, government investigations or similar proceedings. HONEY FASHION ACCESSORIES undertake to notify employees of applicable documents where the destruction has been suspended to which they have access to.

- 8.6. In the event that a document and/or information is no longer required to be stored in accordance with this policy and relevant legislation, it should be deleted and destroyed.
- 8.7. The Information Officer should be consulted where there is uncertainty regarding the retention and destruction of a document and/or information.

## **9. INTERNET AND CYBER TECHNOLOGY**

These clauses constitute a summary of the Internal HONEY FASHION ACCESSORIES Internet/IT/Cyber Security Policy applicable to all employees of the company and where relevant, the company's consultants.

### **9.1. Acceptable use of HONEY FASHION ACCESSORIES' Internet Facilities & standard Anti-Virus rules**

The repercussions of misuse of HONEY FASHION ACCESSORIES' systems can be severe. Potential damage includes, but is not limited to, malware infection (e.g. computer viruses), financial penalties for data leakage and lost productivity resulting from network downtime.

In order to ensure that HONEY FASHION ACCESSORIES' IT systems are not misused, everyone who uses or has access to HONEY FASHION ACCESSORIES' systems have received training and internal guidelines in order to meet the following five high-level IT Security requirements:

- 9.1.1. Information will be protected against any unauthorized access as far as possible;
- 9.1.2. Confidentiality of information will be assured as far as possible;
- 9.1.3. Integrity of information will be preserved as far as possible;
- 9.1.4. Availability of information for business processes will be maintained;
- 9.1.5. Compliance with applicable laws and regulations to which HONEY FASHION ACCESSORIES is subject will be ensured by the Information Officer as far as possible.

Every user of HONEY FASHION ACCESSORIES' IT systems takes responsible for exercising good judgment regarding reasonable personal use.

### **9.2. IT Access Control**

Management of HONEY FASHION ACCESSORIES undertake to ensure that logging into the IT system and software packages is password controlled and shall exercise all caution in allowing unauthorized access to the password. It is a further undertaking that the password/s shall be reviewable from time to time but in particular where GOOGLE based products are used and linked (such as Facebook, Whatsapp and GMAIL based domains).

### **9.3. HONEY FASHION ACCESSORIES' Email Rules**

HONEY FASHION ACCESSORIES acknowledge that most of its communications are conducted via email and instant messaging (IM). Given that email and IM may contain extremely sensitive and confidential information, the information involved must be appropriately protected. In addition, email and IM are potentially sources of spam, social engineering attacks and malware, so HONEY FASHION ACCESSORIES must be protected as completely as possible from these threats. The misuse of email and IM can pose many legal, privacy and security risks, so it is important for users to be aware of the appropriate use of electronic communications.

It is of use to note that all users of HONEY FASHION ACCESSORIES' email system are prohibited from using email to:

- 9.3.1. Send, receive, solicit, print, copy, or reply to text, images, or jokes that disparage others based on their race, religion, colour, gender, sex, sexual orientation, national origin, veteran status, disability, ancestry, or age.
- 9.3.2. Send, receive, solicit, print, copy, or reply to messages that are disparaging or defamatory.
- 9.3.3. Spread gossip, rumours, or innuendos about employees, clients, suppliers, or other outside parties.
- 9.3.4. Send, receive, solicit, print, copy, or reply to sexually oriented messages or images.
- 9.3.5. Send, receive, solicit, print, copy, or reply to messages or images that contain foul, obscene, disrespectful, or adult-oriented language.
- 9.3.6. Send, receive, solicit, print, copy, or reply to messages or images that are intended to alarm others, embarrass HONEY FASHION ACCESSORIES negatively impact productivity, or harm morale.

The purpose of these rules is to ensure that information sent or received via the HONEY FASHION ACCESSORIES' IT systems is appropriately protected, that these systems do not introduce undue security risks to HONEY FASHION ACCESSORIES and that users are made aware of what HONEY FASHION ACCESSORIES deem as acceptable and unacceptable use of its email and IM.

#### 9.4. **HONEY FASHION ACCESSORIES' Rules related to handheld devices**

Many users do not recognize that mobile devices represent a threat to IT and data security. As a result, they often do not apply the same level of security and data protection as they would on other devices such as desktop or laptop computers. The rules hereunder outline HONEY FASHION ACCESSORIES' requirements for safeguarding the physical and data security of mobile devices such as smartphones, tablets, and other mobile devices that PC's and Notebooks.

9.4.1. HONEY FASHION ACCESSORIES' users of handheld devices are expected to diligently protect their devices from loss and disclosure of private information belonging to or maintained by HONEY FASHION ACCESSORIES.

9.4.2. In the event of a security incident or if suspicion exists that the security of HONEY FASHION ACCESSORIES' system has been breached, the particular employee affected shall be obliged to notify the IT support and Information Officer immediately especially when a mobile device may have been lost or stolen.

#### 9.5. **Anti-virus rules**

9.5.1. Management of HONEY FASHION ACCESSORIES is responsible for creating procedures that ensure anti-virus software is run at regular intervals, and computers are verified as virus-free. Any activities with the intention to create and/or distribute malicious programs into HONEY FASHION ACCESSORIES' programs (e.g., viruses, worms, Trojan horses, e-mail bombs, etc.) are prohibited.

9.5.2. It is worth noting that users are discouraged from attempting to remove viruses themselves. If a virus infection is detected, users are expected to disconnect from HONEY FASHION ACCESSORIES' networks, stop using the infected computer immediately and notify the IT support.

9.5.3. It is further worth noting that HONEY FASHION ACCESSORIES' users are encouraged to be cautious of e-mail attachments from an unknown source as viruses are often hidden in attachments. If a virus is suspected the attachment must not be opened or forwarded and must be deleted immediately.

#### 9.6. **Physical access control**

All of HONEY FASHION ACCESSORIES' premises that include computers and other types of information technology resources will be safeguarded against unlawful and unauthorized physical intrusion, as well as fire, flood and other physical threats. This includes but is not limited to; security doors, key entry areas, external doors that are locked from closing until opening of the building, locked and/or barred windows, security cameras, registration of visitors at entrances, security guards, and fire protection.

#### 9.7. **Usage Data**

Usage Data is collected automatically when using the internet services of HONEY FASHION ACCESSORIES. Usage Data may include information such as data subjects' device's internet protocol address (e.g. IP address), browser type, browser version, details of the pages of HONEY FASHION ACCESSORIES' website that are visited by data subjects, the time and date of the website visit, the time spent on those pages, unique device identifiers and other diagnostic data. When data subjects access the website services of HONEY FASHION ACCESSORIES by or through a mobile device, HONEY FASHION ACCESSORIES may collect certain information automatically, including, but not limited to, the type of mobile device used by the data subject, unique ID, the IP address of the mobile device, the mobile operating system, the type of mobile Internet browser used, unique device identifiers and other diagnostic data. HONEY FASHION ACCESSORIES may also collect information that the user's browser sends whenever HONEY FASHION ACCESSORIES' website is visited.

#### 9.8. **Tracking Technologies and Cookies**

Cookies and similar tracking technologies are used to track the activity on HONEY FASHION ACCESSORIES' website and store certain information. Tracking technologies used are beacons, tags, and scripts to collect and track information and to improve and analyze the efficiency of the website. The technologies which may be used to track may include:

9.8.1. Cookies or Browser Cookies. A cookie is a small file which may be placed on a data subject's device. Data subjects can instruct their browser to refuse all Cookies or to indicate when a Cookie is being sent. However, if this function of HONEY FASHION ACCESSORIES' website is not accepted, data subjects may not be able to use some parts of the website. Unless the browser settings have been adjusted, HONEY FASHION ACCESSORIES' website may use Cookies.

9.8.2. Flash Cookies. Certain features of the website may use local stored objects (or Flash Cookies) to collect and store information about data subjects' preferences or activity on the website. Flash Cookies are not managed by the same browser settings as those used for Browser Cookies. For more information on how Flash Cookies can be deleted the following process can be followed: "Where can I change the settings for disabling, or deleting local shared objects?" available at <https://helpx.adobe.com/flashplayer/kb/disable-local-shared-objects>;

- 9.8.3. Web Beacons. Certain sections of the website and emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit HONEY FASHION ACCESSORIES for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of a certain section and verifying system and server integrity).
- 9.8.4. Cookies can be "Persistent" or "Session" Cookies. Persistent Cookies remain on data subjects' personal computer or mobile device even when offline, while Session Cookies are deleted as soon as data subjects' web browsers are closed.

## **10. THIRD PARTY OPERATORS**

HONEY FASHION ACCESSORIES recognize that, in conducting its business and ensuring that it supports its Team Leaders and consultants, it is necessary at times to share data subjects' personal and special personal information with third parties for specific reasons related to HONEY FASHION ACCESSORIES' business delivery. As referenced in clauses 5 and 6 above, HONEY FASHION ACCESSORIES will obtain the necessary Consent where required from the particular data subject.

HONEY FASHION ACCESSORIES shall moreover and where possible enter into an OPERATORS' AGREEMENT with the relevant third party with which HONEY FASHION ACCESSORIES shares data subjects' information for purposes of processing such information in order to ensure that the third party operator treats the personal information of HONEY FASHION ACCESSORIES' data subjects responsibly and in accordance with the provisions contained in the Act and Regulations thereto. HONEY FASHION ACCESSORIES shall, where possible request copies of the third party operators' POPIA Policy, rules, internet rules and details of the third party's Information Officer.

## **11. BANKING DETAILS**

It is a known fact that emails and other types of electronic communication are particular targets for email interceptions and in particular the interception of banking details for purposes of payment in respect of the transaction. HONEY FASHION ACCESSORIES' data subjects are open to financial damages and losses if emails are intercepted and banking or other financial details are fraudulently amended without the data subject's knowledge.

HONEY FASHION ACCESSORIES have implemented clear notifications within all its correspondences (emails and physical letters) warning data subjects of the risks of email hacking and interceptions. In the event that banking or other financial details are sent to data subjects or received from data subjects for purposes of payment or other financial reasons, the details will be confirmed with a telephone call and a follow up whatsapp where necessary. It is recorded that, in certain instances, data subjects' bank details are to be shared with relevant third parties but in such event, all care shall be taken to ensure encryption of emails.

## **12. DIRECT MARKETING**

HONEY FASHION ACCESSORIES are committed to not sharing data subjects' information with third parties for the sole purpose of such third party marketing to data subjects. In the event that any associated third party using the data subjects' information shared by HONEY FASHION ACCESSORIES with such third party in the fulfilment of its services, HONEY FASHION ACCESSORIES take no responsibility for any consequences suffered by the data subject which may have been caused by the third party's actions.

HONEY FASHION ACCESSORIES use social media for purposes of promoting its fashion accessories. The Data Privacy Policy rules will appear on such sites for any visitor to scrutinize.

HONEY FASHION ACCESSORIES also utilize large scale emails in order to promote its fashion accessories. These promotional emails are directed to data subjects who have previously ordered items or who have requested to be added to the promotional mailing list but in all such emails, a clear OPTING-OUT option is made available for data subjects to request removal of their details from the mailing list.

The company operates a website and an Application which can be downloaded via Android or Apple operated devices. The necessary pop-ups have been implemented with regards to information collection, storage and processing of such information and usage of such information for receipt of promotional emails or messages.

## **13. DATA CLASSIFICATION**

All of HONEY FASHION ACCESSORIES's employees and consultants share in the responsibility for ensuring that HONEY FASHION ACCESSORIES' information assets receive an appropriate level of protection as set out hereunder:

- 13.1. Managers of HONEY FASHION ACCESSORIES shall be responsible for assigning classifications to information according to the standard information classification system presented below.
- 13.2. Where practicable, the information category shall be embedded in the information itself.
- 13.3. All employees and consultants of HONEY FASHION ACCESSORIES shall be guided by the information category in their security-related handling of HONEY FASHION ACCESSORIES's information. All information of HONEY FASHION ACCESSORIES and all information entrusted to HONEY FASHION ACCESSORIES from third parties fall into one of three classifications in the table below, presented in order of increasing sensitivity.

<b>Information Description</b>	<b>Examples</b>	<b>Category</b>
Unclassified Public	Information is not confidential and can be made public without any implications for HONEY FASHION ACCESSORIES	Product brochures widely distributed ☐ Information widely available in the public domain, including publicly available web site areas of HONEY FASHION ACCESSORIES Sample downloads of HONEY FASHION ACCESSORIES' software that is for Sale ☐ Financial reports required by regulatory authorities ☐ Newsletters for external transmission
Proprietary	Information is restricted to management approved internal access and protected from external access. Unauthorized access could influence HONEY FASHION ACCESSORIES' operational effectiveness, cause an important financial loss, provide a significant gain to a competitor, or cause a major drop in customer confidence. Information integrity is vital.	Passwords and information on corporate security procedures Know-how used to process client information Standard Operating Procedures used in all parts of HONEY FASHION ACCESSORIES' activities All software codes developed by HONEY FASHION ACCESSORIES , whether used internally or sold to clients
Client Confidential Data	Information collected and used by HONEY FASHION ACCESSORIES in the conduct of its business to employ people, to log and fulfil client mandates, and to manage all aspects of corporate finance. Access to this information is very restricted within HONEY FASHION ACCESSORIES. The highest possible levels of integrity, confidentiality, and restricted availability are vital.	Salaries and other personnel data Accounting data and internal financial reports Confidential customer business data and confidential contracts Non-disclosure agreements with clients\vendors Company business plans Children's information

#### **14. RIGHTS OF THE DATA SUBJECT- FORMS 1 & 2 ATTACHED**

- 14.1. The data subject or competent person where the data subject is a child, may withdraw his, her or its consent to procure and process his, her or its personal information, at any time, providing that the lawfulness of the processing of the personal information before such withdrawal or the processing of personal information is not affected.
- 14.2. A data subject may object, at any time, to the processing of personal information–
  - In writing, on reasonable grounds relating to his, her or its particular situation, unless legislation provides for such processing; or
  - For purposes of direct marketing other than direct marketing by means of unsolicited electronic communications.
- 14.3. A data subject, having provided adequate proof of identity, has the right to –
  - Request HONEY FASHION ACCESSORIES to confirm, free of charge, whether or not it holds personal information about the data subject; and
  - Request from HONEY FASHION ACCESSORIES a record or a description of the personal information about the data subject held by it, including information about the identity of all third parties, or categories of third parties, who have, or have had, access to the information – within a reasonable time, at a prescribed fee as determined by the Information Officer, in a reasonable manner and format and in a form that is generally understandable.
- 14.4. A data subject may, in the prescribed manner, request HONEY FASHION ACCESSORIES to –
  - correct or delete personal information about the data subject in its possession or under its control that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully; or
  - destroy or delete a record of personal information about the data subject that HONEY FASHION ACCESSORIES is no longer authorised to retain.

- 14.5. Upon receipt of a request referred to in clause 14.4, HONEY FASHION ACCESSORIES will, as soon as reasonably practicable –
- correct the information;
  - destroy or delete the information;
  - provide the data subject, to his, her or its satisfaction, with credible evidence in support of the information; or
  - where an agreement cannot be reached between HONEY FASHION ACCESSORIES and the data subject, and if the data subject so requests, take such steps as are reasonable in the circumstances, to attach to the information in such a manner that it will always be read with the information, an indication that a correction of the information has been requested but has not been made.
- 14.6. HONEY FASHION ACCESSORIES will inform the data subject, who made a request as set out in clause 14.5, of the action taken as a result of the request.

## **15. COVID 19**

HONEY FASHION ACCESSORIES have implemented and continue to apply its Workplace Risk Assessment measures in line with accepted Occupational Health and Safety Guidelines issued by the Departments of Labour and Health and in terms of the Regulations and Guidelines to the Disaster Management Act. With reference to these assessment measures, HONEY FASHION ACCESSORIES are entitled to oblige employees, consultants and customers to complete a Covid 19 Risk Assessment form provided that the personal, medical and special personal information required to be completed are necessary and limited to the purposes of assessing the risk of Covid 19 exposure. HONEY FASHION ACCESSORIES may also, where required by statute, share the information with the Departments of Labour and Health especially in the event of someone testing positive and/or where a significant increase of risk exists in the workplace and offices.

With the implementation of the HONEY FASHION ACCESSORIES Workplace Vaccination program, further employee and other relevant data subjects' personal and medical information may be collected and processed by HONEY FASHION ACCESSORIES and may be shared with Regulated third parties and internally if the sharing of the information complies with the provisions for the HONEY FASHION ACCESSORIES' Vaccination program Policies.

## **16. INFORMATION OFFICER**

### **16.1. Appointed Information Officer:**

#### **INFORMATION OFFICER:**

**Contact details:**

**Email:**

**Postal Address:**

**Street Address:**

### **16.2. The general responsibilities of HONEY FASHION ACCESSORIES' Information Officer delegated include the following:**

- 16.2.1. The encouragement of compliance, by HONEY FASHION ACCESSORIES, with the conditions for the lawful processing of personal information;
- 16.2.2. Managing requests made to HONEY FASHION ACCESSORIES pursuant to POPIA;
- 16.2.3. Working with the Regulator in relation to investigations conducted pursuant to prior authorisation required to process certain information of POPIA in relation to the business.
- 16.2.4. Continuously perform data backups, store at least weekly backup offsite, and test those backups regularly for data integrity and reliability.
- 16.2.5. Review policy rules regularly, document the results, and update the policy as needed.
- 16.2.6. Continuously update information security policies and network diagrams.
- 16.2.7. Secure critical applications and data by patching known vulnerabilities with the latest fixes or software updates.
- 16.2.8. Perform continuous computer vulnerability assessments and audits.
- 16.2.9. The Information Officer may appoint any number of Deputy Information Officers as is necessary to perform the duties of the Information Officer as set out above. The Information Officer has control over every Deputy Information Officer(s) appointed.
- 16.2.10. The Information Officer may delegate, in writing, his/her power of duty conferred or imposed by this Act, to a Deputy Information Officer(s). In his/her decision to delegate power of duty, the Information Officer must give due consideration to the need to render HONEY FASHION ACCESSORIES as accessible as reasonably possible for requests of its records.
- 16.2.11. The Deputy Information Officer's duties must only be exercised or performed subject to any conditions set by the Information Officer. The delegation of power does not prohibit the Information Officer from performing these duties himself/herself. The Information Officer may at any time withdraw or amend, in writing, the delegation of power of duty.

16.2.12. Any right or privilege acquired, or any obligation or liability incurred as a result of the delegation of power, is not affected by any subsequent withdrawal or amendment of that delegation.

16.3. **The data breach responsibilities of HONEY FASHION ACCESSORIES' Information Officer include the following:**

16.3.1. Ascertain whether personal data was breached;

16.3.2. Assess the scope and impact by referring to the following:

16.3.2.1. Estimated number of data subjects whose personal data was possibly breached

16.3.2.2. Determine the possible types of personal data that were breached

16.3.2.3. List security measures that were already in place to prevent the breach from happening.

16.3.3. Once the risk of the breach is determined, the following parties need to be notified within 72 hours after being discovered:

16.3.3.1. The Information Regulator;

16.3.3.2. Any data subjects who have been affected by such data breach;

16.3.3.3. HONEY FASHION ACCESSORIES will only delay notification of the data subject if a public body responsible for the prevention, detection or investigation of offences or the Regulator determines that notification will impede a criminal investigation by the public body concerned.

16.3.3.4. The notification to a data subject will be in writing and communicated to the data subject in at least one of the following ways: a) Posted to the data subject's last known physical or postal address; or b) Sent by e-mail to the data subject's last known e-mail address; or c) Placed in a prominent position on the website of HONEY FASHION ACCESSORIES; or d) Published in the news media.

16.3.3.5. Communication should include the following:

- Contact details of Information Officer
- Details of the breach,
- Likely impact,
- Actions already in place, and those being initiated to minimise the impact of the data breach.
- Any further impact is being investigated (if required), and necessary actions to mitigate the impact are being taken.
- A description of the possible consequences of the security compromise;
- A description of the measures that HONEY FASHION ACCESSORIES intends to take or has taken to address the security compromise;
- A recommendation with regard to the measures to be taken by the data subject to mitigate the possible adverse effects of the security compromise; and
- If known to HONEY FASHION ACCESSORIES, the identity of the unauthorised person who may have accessed or acquired the personal information.

16.3.4. Review and monitor

16.3.4.1. Once the personal data breach has been contained, HONEY FASHION ACCESSORIES will conduct a review of existing measures in place, and explore the possible ways in which these measures can be strengthened to prevent a similar breach from reoccurring.

16.3.4.2. All such identified measures should be monitored to ensure that the measures are satisfactorily implemented.

## **17. AVAILABILITY AND REVISION**

A link to this Policy is made available on HONEY FASHION ACCESSORIES company website [www.honey.co.za](http://www.honey.co.za).

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

**FORM 1**

**OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION IN TERMS OF SECTION 11(3) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013) REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018**  
 [Regulation 2]

Note:

1. Affidavits or other documentary evidence as applicable in support of the objection may be attached.
2. If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.
3. Complete as is applicable.

A	DETAILS OF DATA SUBJECT
Name(s) and surname/ registered name of data subject:	
Unique Identifier/ Identity Number	
Residential, postal or business address:	
	Code (    )
Contact number(s):	
Fax number/ E-mail address:	
B	DETAILS OF RESPONSIBLE PARTY
Name(s) and surname/ Registered name of responsible party:	
Residential, postal or business address:	
	Code (    )
Contact number(s):	
Fax number/ E-mail address:	
C	REASONS FOR OBJECTION IN TERMS OF SECTION 11(1)(d) to (f) (Please provide detailed reasons for the objection)

Signed at ..... this ..... day of .....20.....

..... Signature of data subject/designated person

**FORM 2**

**REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION OR DESTROYING OR DELETION OF RECORD OF PERSONAL INFORMATION IN TERMS OF SECTION 24(1) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013) REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018**  
 [Regulation 3]

Note:

1. Affidavits or other documentary evidence as applicable in support of the request may be attached.
2. If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.
3. Complete as is applicable.

Mark the appropriate box with an "x".

**Request for:**

Correction or deletion of the personal information about the data subject which is in possession or under the control of the responsible party.

Destroying or deletion of a record of personal information about the data subject which is in possession or under the control of the responsible party and who is no longer authorised to retain the record of information.

A	DETAILS OF THE DATA SUBJECT
Name(s) and surname / registered name of data subject:	
Unique identifier / Identity Number:	
Residential, postal or business address:	
	Code (      )
Contact number(s):	
Fax number / E-mail address:	
B	DETAILS OF RESPONSIBLE PARTY
Name(s) and surname / registered name of responsible party:	
Residential, postal or business address:	
	Code (      )
Contact number(s):	
Fax number / E-mail address:	
C	INFORMATION TO BE CORRECTED / DELETED / DESTROYED / DESTROYED

<b>D</b>	<b>REASONS FOR *CORRECTION OR DELETION OF THE PERSONAL INFORMATION ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24(1)(a) WHICH IS IN POSSESSION OR UNDER THE CONTROL OF THE RESPONSIBLE PARTY ; and or</b> <b>REASONS FOR *DESTRUCTION OR DELETION OF A RECORD OF PERSONAL INFORMATION ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24(1)(b) WHICH THE RESPONSIBLE PARTY IS NO LONGER AUTHORISED TO RETAIN.</b> <i>(Please provide detailed reasons for the request)</i>

Signed at ..... this ..... day of .....20.....

.....  
*Signature of data subject/ designated person*

**FORM 3**

**APPLICATION FOR THE CONSENT OF A DATA SUBJECT FOR THE PROCESSING OF PERSONAL INFORMATION FOR THE PURPOSE OF DIRECT MARKETING IN TERMS OF SECTION 69(2) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO.**

**4 OF 2013) REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018 [Regulation 6]**

TO: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

FROM: *(Name of data subject)*  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Contact number(s): \_\_\_\_\_  
Fax number: \_\_\_\_\_  
E-mail address: \_\_\_\_\_  
*(Name, address and contact details of responsible party)*

Full names and designation of person signing on behalf of responsible party:  
\_\_\_\_\_

.....  
*Signature of designated person*

Date: \_\_\_\_\_

**PART B**

I, \_\_\_\_\_ *(full names of data subject)* hereby:



Give my consent.

To receive direct marketing of goods or services to be marketed by means of electronic communication.

**SPECIFY GOODS or SERVICES:**

**SPECIFY METHOD OF COMMUNICATION: FAX:**

E - MAIL:

SMS:

OTHERS – SPECIFY:

Signed at ..... this ..... day of .....20.....

.....*Signature of data subject*