



# Data Protection Policy

VH Fibre Optics (Pty) Ltd

	Name	Designation	Signature	Date
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## Amendment Schedule

Rev No	Date	Revision Description	Prepared By	Approved By

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*This document contains 8 pages*

## 1. Abbreviations and Terminology

Abbreviation / Terminology	Definition
VH Fibre Optics	VH Fibre Optics (Pty) Ltd
Board	Board of Directors of VH Fibre Optics
CEO	Chief Executive Officer
MD	Managing Director
Company	VH Fibre Optics (Pty) Ltd
Data Controller or Responsible Party ("Controller")	the person (or business) who determines the purposes for which (why), and the way in which(how), personal data is processed
Data Processor ("Processor")	The processor (operator in South Africa) is the person or organisation who processes the personal data on behalf of the data controller (responsible party in South Africa) in terms of a written contract or mandate without coming under their direct authority.
Data Subject	The person whose personal data is being processed
Information Officer	The Information Officer is the person appointed by the Company or subsidiary for ensuring that the organisation complies with POPI.
POPIA	Protection of Personal Information Act

## 2. Introduction

We respect the privacy of people, and we protect the personal data we process. We balance our need to process personal data for our activities with the legal requirements to protect it.

## 3. Purpose

This policy describes the principles governing our processing of personal data. It also records our compliance strategy regarding personal data.

## 4. Scope

This policy applies to all personal data processed during our business and to all persons employed or engaged by us who process personal data. This policy must be read in conjunction with our overarching Compliance Policy and adds specific elements regarding our data protection compliance strategy.

## 5. Data protection laws

We are committed to protecting and respecting the privacy of our data subjects in accordance with the local data protection laws applicable to the jurisdictions in which we operate. As such, we have chosen to adopt a global approach to data protection compliance. This involves an 80% focus on complying with those requirements that are common to most data protection laws globally, and a 20% focus on complying with those that are specific to our relevant jurisdictions.

The relevant local laws with which certain of our subsidiaries will comply with are:

- General Data Protection Regulation 2016/679 (European Union);
- Protection of Personal Information Act 4 Of 2013 (South Africa);
- Data Protection Act 13 of 2004 (Mauritius); and
- Any other Laws that become applicable from time to time.

Because of the international nature of our operations, we may be required to comply with other data protection laws not listed above and which may be issued in the future.

In applying the relevant data protection laws, we will ensure that we:

- enable data subject **rights**;
- adhere to our data protection **obligations** as controller or processor; and
- apply the data protection **principles**.

In terms of data subject rights, we will ensure that our data subjects can:

- **know** when and why we process their personal data;
- request **access** to their personal data that we process;
- **rectify** any personal data of theirs that is incorrect;
- **erase** their personal data from our systems, where required;
- **restrict** our processing of their personal data, where required;
- **object** to our processing of their personal data;
- **transfer** their personal data from us to another controller in a structured and accessible format;
- be protected from us making **automated decisions** about them.

In terms of our **obligations as controller**, we will ensure that we:

- implement appropriate and reasonable technical and organisational **measures** to protect personal data;
- control our processors through a written **contract**;
- keep **records** of our processing activities;
- **co-operate** with the relevant data protection authorities;
- conduct data protection impact **assessments**, where required;
- **consult** with the relevant data protection authorities, where required;

In terms of our **obligations as processor**, we will ensure that we:

- enter into a **contract** with the relevant controller;
- appoint **sub-processors** only with the controller's written authorisation;
- process personal data only on the **instructions** of the controller;
- keep **records** of our processing activities done on behalf of the controller;
- inform the relevant data protection authorities of **irregularities**, where required;

In terms of the data protection **principles**, we will ensure that we process personal data:

- lawfully, fairly and transparently;
- only for a **specific purpose** that is explicit and legitimate;
- only **as necessary** for that purpose;
- **accurately**, and is kept up to date;
- for **no longer** than necessary to achieve the purpose; and
- securely.

## 6. Codes and standards

We consider the following codes and standards as being binding on us:

- King IV (corporate governance)

## 7. Compliance strategy

This policy sets out our compliance strategy for data protection specifically. Our overarching compliance strategy is described in detail in our Compliance Policy.

Our compliance strategy is:

- **Reasonable compliance** – do what is reasonably practicable to comply with those aspects of data protection that apply to our business, under the applicable data protection law.

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We have identified the following areas as being key priorities in our compliance efforts:

- monitoring and applying our data protection activities consistently across our entities and jurisdictions;
- adopting compliance management software at a group level;
- adopting privacy by design and by default at a group level;
- managing our data processor relationships efficiently; and
- digitising our data processing activities.

#### **8. Governance of data protection**

We will appoint and maintain one Information Officer for each of our entities. The Information Officer is responsible for:

- promoting compliance with data protection law within the entity;
- ensuring awareness of data protection law within the entity;
- managing and responding to data subject access requests;
- managing and responding to data breaches or incidents;
- assisting the relevant data protection authorities with their investigations;
- developing, implementing, and monitoring the compliance framework within the entity

The Information Officer will report to the CEO/MD of each entity.

#### **9. Policy responsibility, administration, and annual review**

The information officer is responsible for overseeing data protection at each entity in the group. They are responsible for ensuring that the policy is effective and relevant. The contact information for the Information Officer of the Company is:

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Name	Email	Phone
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This policy will be reviewed once a year.