


DOCUMENT NAME: POPIA COMPLIANCE POLICY		
DOCUMENT TYPE: POLICIES & PROCEDURES		
APPROVAL DATE: 1 January 2026	APPROVED BY: KC / RA	
IMPLEMENTATION DATE: 1 January 2026	VERSION: 1.0	

POPIA COMPLIANCE POLICY

1. Purpose of the Policy

This Policy establishes the Company’s commitment to complying with the Protection of Personal Information Act, 4 of 2013 (“POPIA”). It sets out the principles, rules, and responsibilities governing the lawful processing, protection, and management of personal information within the Company. The Policy applies to all employees, contractors, operators, and third parties who process personal information on behalf of the Company.

2. Scope and Application

This Policy applies to:


- All personal information processed by the Company in any format (electronic, paper, audio, visual, or otherwise).
- All business units, departments, and employees.
- All operators, service providers, and third parties acting on behalf of the Company.
- All systems, applications, and platforms used to process personal information.

The Policy covers the full lifecycle of personal information, including collection, storage, use, sharing, retention, and destruction.

3. Definitions

For the purposes of this Policy:

- **Personal Information** means information relating to an identifiable, living natural person or existing juristic person.
- **Special Personal Information** includes sensitive categories such as health, biometrics, religion, and race.
- **Processing** means any operation involving personal information, including collection, storage, use, dissemination, and destruction.
- **Responsible Party** means the Company, which determines the purpose and means of processing.
- **Operator** means a third party that processes personal information on behalf of the Company.
- **Information Officer** means the individual appointed in terms of POPIA to oversee compliance.

DOCUMENT NAME: POPIA COMPLIANCE POLICY		
DOCUMENT TYPE: POLICIES & PROCEDURES		
APPROVAL DATE: 1 January 2026	APPROVED BY: KC / RA	
IMPLEMENTATION DATE: 1 January 2026	VERSION: 1.0	

4. POPIA Compliance Commitment

The Company is committed to:

- Processing personal information lawfully and in a manner that respects privacy.
- Implementing appropriate security safeguards to protect personal information.
- Ensuring transparency in how personal information is processed.
- Providing data subjects with access to their personal information and respecting their rights.
- Ensuring that operators and third parties comply with POPIA.
- Maintaining documentation and evidence of compliance.

5. POPIA's Eight Conditions for Lawful Processing

The Company adheres to the following conditions:

5.1 Accountability

The Company accepts responsibility for ensuring compliance with POPIA and has appointed an Information Officer to oversee implementation.

5.2 Processing Limitation

Personal information is collected:

- Lawfully and in a reasonable manner
- For specific, explicitly defined purposes
- With the knowledge or consent of the data subject where required
- Limited to what is necessary for operational and legal requirements


5.3 Purpose Specification

Personal information is collected for legitimate business purposes, including logistics operations, HR management, supplier management, financial administration, and security. Retention periods are defined in the Company's Retention Schedule.

5.4 Further Processing Limitation

Further processing is only permitted if:

- It is compatible with the original purpose

DOCUMENT NAME: POPIA COMPLIANCE POLICY		
DOCUMENT TYPE: POLICIES & PROCEDURES		
APPROVAL DATE: 1 January 2026	APPROVED BY: KC / RA	
IMPLEMENTATION DATE: 1 January 2026	VERSION: 1.0	

- Required by law
- Necessary for contractual performance
- Required for legal claims or regulatory compliance

5.5 Information Quality

The Company takes reasonable steps to ensure that personal information is:

- Accurate
- Complete
- Not misleading
- Updated where necessary

5.6 Openness

The Company maintains a PAIA/POPIA Manual and provides data subjects with information about how their personal information is processed.

5.7 Security Safeguards

The Company implements appropriate technical and organisational measures to protect personal information against:

- Loss
- Damage
- Unauthorised access
- Unlawful processing


Security measures are detailed in the Company's Security Safeguards Standard.

5.8 Data Subject Participation

Data subjects have the right to:

- Access their personal information
- Request correction or deletion
- Object to processing
- Withdraw consent (where applicable)

Requests are handled in accordance with the Data Subject Rights Procedure.

DOCUMENT NAME: POPIA COMPLIANCE POLICY		
DOCUMENT TYPE: POLICIES & PROCEDURES		
APPROVAL DATE: 1 January 2026	APPROVED BY: KC / RA	
IMPLEMENTATION DATE: 1 January 2026	VERSION: 1.0	

6. Roles and Responsibilities

6.1 Information Officer

The Information Officer is responsible for:

- Overseeing POPIA compliance
- Approving policies and procedures
- Managing data subject requests
- Reporting security compromises
- Liaising with the Information Regulator
- Ensuring training and awareness

6.2 Deputy Information Officer(s)

Deputies support the Information Officer and may be delegated specific responsibilities.

6.3 Employees

Employees must:

- Comply with this Policy and all POPIA procedures
- Protect personal information in their possession
- Report suspected breaches immediately
- Complete POPIA training

6.4 Operators and Third Parties


Operators must:

- Sign operator agreements
- Implement adequate security safeguards
- Process personal information only on the Company's instructions
- Report breaches immediately

7. Processing of Personal Information

The Company processes personal information for:

- Shipment processing, customs clearance, and logistics operations

DOCUMENT NAME: POPIA COMPLIANCE POLICY		
DOCUMENT TYPE: POLICIES & PROCEDURES		
APPROVAL DATE: 1 January 2026	APPROVED BY: KC / RA	
IMPLEMENTATION DATE: 1 January 2026	VERSION: 1.0	

- Client onboarding and account management
- Supplier onboarding and payment
- HR, payroll, and employment administration
- CCTV monitoring and access control
- IT system administration and security
- Financial and statutory reporting

Processing is documented in the Company's ROPA.

8. Security Safeguards

The Company implements layered security measures, including:


- Access controls and authentication
- Encryption and secure communication channels
- Secure servers and firewalls
- CCTV and physical access control
- Secure disposal of documents and devices
- Operator agreements with security obligations
- Monitoring and logging of system access

9. Data Subject Rights

The Company respects the rights of data subjects, including:

- Right of access
- Right to correction
- Right to deletion (where legally permissible)
- Right to object to processing
- Right to withdraw consent
- Right to lodge a complaint

Requests are processed in accordance with the Data Subject Rights Procedure.

DOCUMENT NAME: POPIA COMPLIANCE POLICY		
DOCUMENT TYPE: POLICIES & PROCEDURES		
APPROVAL DATE: 1 January 2026	APPROVED BY: KC / RA	
IMPLEMENTATION DATE: 1 January 2026	VERSION: 1.0	

10. Security Compromise and Breach Management

The Company maintains a Breach Response Procedure that outlines:

- Identification and containment of breaches
- Internal escalation
- Investigation and documentation
- Notification to the Information Regulator and affected data subjects
- Remedial actions

All employees must report suspected breaches immediately.

11. Operator Management

The Company ensures that all operators:

- Are vetted for POPIA compliance
- Sign operator agreements
- Implement adequate security safeguards
- Are monitored periodically

This is governed by the Operator Management Procedure.

12. Training and Awareness

The Company provides:


- POPIA induction training
- Annual refresher training
- Awareness campaigns
- Targeted training for high-risk roles

Training records are maintained for audit purposes.

13. Monitoring, Auditing, and Review

The Company conducts:

- Annual POPIA compliance reviews

DOCUMENT NAME: POPIA COMPLIANCE POLICY		
DOCUMENT TYPE: POLICIES & PROCEDURES		
APPROVAL DATE: 1 January 2026	APPROVED BY: KC / RA	
IMPLEMENTATION DATE: 1 January 2026	VERSION: 1.0	

- Internal audits using the POPIA Compliance Checklist
- Reviews of operator compliance
- Updates to policies and procedures as required

The Information Officer ensures continuous improvement.

14. Enforcement and Disciplinary Action


Non-compliance with this Policy may result in:

- Disciplinary action
- Revocation of system access
- Contract termination (for operators)
- Reporting to regulatory authorities

15. Policy Review

This Policy is reviewed annually or when:

- Legislation changes
- New systems or processes are introduced
- Risks or incidents indicate a need for revision

DOCUMENT NAME: POPIA COMPLIANCE POLICY		
DOCUMENT TYPE: POLICIES & PROCEDURES		
APPROVAL DATE: 1 January 2026	APPROVED BY: KC / RA	
IMPLEMENTATION DATE: 1 January 2026	VERSION: 1.0	

Revision History Table Template

Version	Date	Author	Reviewer/Approver	Description of Change
1.0		LA SMITH, HR CONSULTANT		Initial issue of document