

# PROTECTION OF PERSONAL INFORMATION (POPI) ACT POLICY

**Applicable to: Tetra Consortium (Pty) Ltd, Noltrix (Pty) Ltd, Noltrix Group (Pty) Ltd, Noltrix Solar (Pty) Ltd, Noltrix Solutions (Pty) Ltd, and Noltrix Training Academy (Pty) Ltd.**

Date of Implementation: 12 June 2025

Date of Next Review: 12 June 2026

## 1. INTRODUCTION AND PURPOSE

The Noltrix Group of Companies & Tetra Consortium (Pty) Ltd ("The Companies") are committed to protecting the privacy of individuals and ensuring that their personal information is processed lawfully, ethically, and securely.

The purpose of this policy is to outline our commitment to complying with the Protection of Personal Information Act 4 of 2013 ("POPIA") and to provide a framework for the responsible processing of personal information of our employees, customers, students, suppliers, and other data subjects.

This policy applies to all employees, contractors, and service providers of The Companies.

## 2. DEFINITIONS

- **"Data Subject"** means the person to whom personal information relates.
- **"Personal Information"** means information relating to an identifiable, living, natural person, and where applicable, an identifiable, existing juristic person, including but not limited to contact details, demographic information, financial information, and correspondence.
- **"Processing"** means any operation or activity concerning personal information, including its collection, use, storage, dissemination, modification, or destruction.
- **"Responsible Party"** means the entity that determines the purpose of and means for processing personal information. For this policy, The Companies are the Responsible Party.
- **"Information Officer"** means the person designated by The Companies to be responsible for ensuring compliance with POPIA.

## 3. THE 8 CONDITIONS FOR LAWFUL PROCESSING

The Companies are committed to adhering to the eight conditions for the lawful processing of personal information as set out in POPIA.

**1. Accountability:** The Companies take responsibility for and are accountable for complying with the conditions of lawful processing. Our designated Information Officer is responsible for overseeing this compliance.

**2. Processing Limitation:** Personal information will be collected directly from the data subject, unless otherwise permitted by law. Processing will be done lawfully and in a manner that does not infringe on the privacy of the data subject. We will only process information that is adequate, relevant, and not excessive for the purpose for which it is collected.

**3. Purpose Specification:** Personal information will be collected for a specific, explicitly defined, and lawful purpose related to a function or activity of The Companies. Data subjects will be made aware of the purpose for which their information is being collected.

**4. Further Processing Limitation:** Any further processing of personal information will be compatible with the original purpose of collection.

**5. Information Quality:** We will take reasonably practicable steps to ensure that personal information is complete, accurate, not misleading, and updated where necessary.

**6. Openness:** We will be transparent about our data processing activities. This policy, along with our PAIA Manual, outlines the types of information we process, why we process it, and who it is shared with.

**7. Security Safeguards:** The Companies are legally obliged to provide adequate protection for the personal information we hold and to prevent unauthorized access and use of personal information. We will, on an ongoing basis, review our security controls and processes to ensure that personal information remains secure.

**8. Data Subject Participation:** Data subjects have the right to access their personal information and to request the correction or deletion of their information if it is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, or obtained unlawfully.

## 4. INFORMATION OFFICER

<b>Information Officer:</b>	<b>Renier Wolfswinkel</b>
<b>Title:</b>	Chief Executive Officer (CEO)
<b>Email:</b>	info@noltrix.com
<b>Contact Number:</b>	082 622 2562
<b>Address:</b>	121 Melt Marais Street, Annlin, Pretoria, Gauteng, 0182

The Information Officer's responsibilities include, but are not limited to:

- Encouraging and ensuring compliance with POPIA.
- Dealing with requests for access to personal information.
- Working with the Information Regulator in relation to any investigations.
- Conducting personal information impact assessments to ensure that adequate measures and standards exist.

## 5. RIGHTS OF DATA SUBJECTS

Data Subjects have the following rights:

- To be notified that their personal information is being collected.
- To access their personal information.
- To request the correction, destruction, or deletion of their personal information.
- To object to the processing of their personal information.
- To not have their personal information processed for direct marketing without their consent.
- To lodge a complaint with the Information Regulator.

Requests to exercise these rights should be directed to the Information Officer.

## 6. INFORMATION SECURITY

We have implemented the following security measures to protect personal information:

- **Physical Security:** Controlled access to our premises and secure storage for physical records.
- **Technical Security:** Use of firewalls, anti-virus software, data encryption, and secure password policies.
- **Organisational Security:** Confidentiality agreements with employees and service providers, and data protection training.

## 7. DATA BREACH NOTIFICATION

Should a data breach occur where there are reasonable grounds to believe that the personal information of a data subject has been accessed or acquired by any unauthorized person, we will notify the Information Regulator and the affected data subject(s) as soon as reasonably possible.

## 8. DIRECT MARKETING

The Companies may process personal information for the purposes of direct marketing. All direct marketing communications will be conducted in accordance with the law and will include an option for the recipient to unsubscribe from future communications.

## 9. POLICY REVIEW

This policy will be reviewed annually or as required by changes in legislation to ensure its continued relevance and effectiveness.

## 10. QUERIES

Any questions or concerns regarding this policy or the processing of personal information by The Companies should be directed to the Information Officer.