

# GoMobile (Pty) Ltd

## Data Protection Policy

March 2021 | Version 1.0

### Scope:

All Employees, Contractors, Distribution Partners (Dealers) and Operators / Sub-operators

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

### 1. Purpose

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

### 2. Scope

This policy applies to all personal data processed in the course of our business and to all persons employed or engaged by us who process personal data.

### 3. 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 most relevant laws with which we will comply are:

- Protection of Personal Information Act 4 Of 2013 (South Africa);
- General Data Protection Regulation 2016/679 (European Union);

Because of the digital nature of our operations, we may be required to comply with other data protection laws not listed above [example California's CCPA]. We currently regard the risk of this to be low, and as such have chosen not to attempt to comply with these laws.

### 4. Data protection requirements

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 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;

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

- 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;
- object to our processing of their personal data.

## 5. Codes and standards

We take guidance from the following codes and standards:

- King IV (corporate governance)
- ISO 27001 (information security management)
- ISO 27701 (data privacy management)

## 6. Compliance strategy

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.

*And migrating in time to:*

- Absolute compliance** – do our best to comply absolutely with every aspect of the applicable data protection law.

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

- adopting privacy by design and by default;
- adjusting our operating and data-management procedures as necessary;
- managing our data sub-processor relationships efficiently.

## 7. Governance of data protection

We will appoint and maintain an Information Officer (IO).

Within our company the IO is responsible for:

- promoting compliance with data protection law
- ensuring awareness of data protection law
- 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

The IO will report to the company CEO.

## 8. Policy responsibility and administration

The IO is responsible for overseeing data protection at GoMobile and for ensuring that the policy is effective and relevant. Their contact information is:

Name	Email	Phone
Paul Marcellin	<a href="mailto:paul@magnitude4u.com">paul@magnitude4u.com</a>	010 447 1058

This policy will be reviewed once a year. The review information is listed below:

Date	Version	By whom	Description of amendments
01-03-2021	1.0	P Marcellin	Established