



M STEYN DESIGN & ENGINEERING (PTY) LTD T/A MC DESIGN AND CONTRACTING

Registration number 2005/039693/07

PROTECTION OF PERSONAL INFORMATION ACT, 4 OF 2013 (“POPIA” / “POPI ACT”)

PRIVACY POLICY

INTRODUCTION

1. MC Design and Contracting is committed to protecting the privacy of its clients, suppliers, affiliates and associates and to ensure that your personal information is collected and processed in a lawful and transparent manner.
2. The purpose of this policy is to explain how MC Design and Contracting obtain, use and disclose your personal information in accordance with the legislative requirements.

DEFINITIONS

3. The Definitions as set out in Section 1 of POPIA shall be applicable as if specifically incorporated herein.

COLLECTION AND PROCESSING OF INFORMATION

4. The collection and processing of personal information is for the purposes of:

- 4.1 Complying with legislative duties, responsibilities and obligations imposed by various laws in the Republic of South Africa applicable to the business and trade of MC Design and Contracting. These laws include, but are not limited to, the Income Tax Act, 58 of 1968, Value Added Tax Act, 89 of 1991; National Credit Act 34 of 2005; Companies Act, 71 of 2008 etc;
- 4.2 Conducting internal credit and criminal checks (where applicable);
- 4.3 To conduct stakeholder satisfaction research or statistical analysis.
- 4.4 Maintaining and updating our supplier and client database;
- 4.5 Auditing and record keeping;
- 4.6 Executing and performing our services in terms of any service level agreements and/or performance of a contract to which the data subject is a party;
- 4.7 To protect the interests of our clients and suppliers;
- 4.8 To ensure the proper performance of a public law duty by a public body;
- 4.9 Collecting the personal information is necessary for pursuing the legitimate interests of MC Design and Contracting or that of a third party to whom the information is supplied; and
- 4.10 For legal purposes.

DISCLOSURE OF INFORMATION

5. MC Design & Contracting may disclose personal information from a data subject to our service providers who are involved in the delivery of our products and services to you. Please note that this policy is applicable to all our suppliers, service providers, associates and affiliates and they are subjected hereto.

6. We may further disclose your personal information where we:
 - 6.1 Have a legal duty to do so in terms of the Laws of the Republic and/or in terms of industry codes; and
 - 6.2 Believe that it is necessary to protect our rights.

 - 6.3 Have to fulfil client requirements

INFORMATION SECURITY

7. MC Design & Contracting is legally obliged to provide adequate protection of personal information and to prevent unauthorised access and use of personal information. MC Design & Contracting is committed to, on an ongoing basis, review its security controls and systems to ensure that your personal information is secured.

8. To date, our security measures include:
 - 8.1 Physical security monitoring on our premises;

 - 8.2 Armed response and CCTV Monitoring;

 - 8.3 Computer and Network Security;

- 8.4 Restricted access to personal information and confidentiality policies and agreements;
- 8.5 Monitoring access and usage of private information;
- 8.6 Investigating and reacting to security incidents / breaches.

RIGHTS TO ACCESS YOUR INFORMATION AND CORRECTION OF YOUR INFORMATION

- 9. You have the right to request a copy or details of the personal information we hold about you. In this regard, you are referred to our manual in terms of the Promotion of Access to Information Act, 2 of 2000 (PAIA) *as amended*, which manual can be downloaded at www.mcdesign.co.za. Our manual sets out the procedures for requesting access to records and the applicable fee(s) payable.
- 10. You furthermore have the right to request MC Design and Contracting to update, correct or delete your personal information.
- 11. Please note that MC Design and Contracting reserves the right to request proof of your identification and or authority before any record is provided and our information is updated, corrected and or deleted.

RETENTION PERIODS

- 12. MC Design do not retain records of personal information any longer than is necessary for achieving the purposes for which the information was collected or subsequently processed. A archive retention period document is maintained (MAN 25) and personal records are destroyed within the required time frames, in a manner which prevents its reconstruction.

CONTACT

13. Should you have any queries pertaining to this policy, you are welcome to contact the following persons:

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- Pamela van Wyk (SHEQ Manager and Deputy Information Office)
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