

POLICY AND PROCEDURE TITLE	POPIA CLIENT / USER PRIVACY PROTOCOLS POLICY
POLICY AND PROCEDURE NUMBER	2025/1
IMPLEMENTATION DATE	March 2025

#### Document History

Rev No	Date	Section	Pages	Description	Approval
1	March 2025	All	All	Revision for implementation	KM

## 1. INTRODUCTION

The purpose of this policy is to advise the client / user (data subject) of Tower Group South Africa (Pty) Ltd t/a Tower Group (Pty) Ltd. Services, both electronic and otherwise. Why data is being collected, processed and what data is in focus as well as how it will be processed. Tower Group is committed to being fully compliant with the POPI Act as far as the utilization and disclosure of data subject personal information (PI) is concern.

Technical and operational measures have been put in place to protect our data subject privacy and Tower Group invites all data subjects and / or requesters to engage with its Information Officer (IO) in perspective of any matter related hereto.

[www.towergroup.co.za](http://www.towergroup.co.za)

Illovo, Sandton  
1<sup>st</sup> Floor,  
25 Rudd Road

011 750 1900

La Lucia, Umhlanga Ridge  
Ground Floor,  
5 Rydall Vale Crescent

031 267 4460

City Centre, Cape Town  
3<sup>rd</sup> Floor,  
Cnr Riebeeck & Long Street

021 405 2600



## 2. SCOPE OF APPLICATION

In the Promotion of Access to Information Act (PAIA) this policy applies to data subjects under the POPI Act in respect of requesters of records held by Tower Group. Personal Information (PI) applies to both, the natural and juristic persons. Our data subjects are invited to engage with Tower Group's Information Officer (IO) about any matters pertaining the POPI and PAIA, including but not limited to updating Personal Information (PI), deleting of PI. Complaints in respect of how PI is being processed and updating consent for electronic direct marketing. The Information Officer portal on the website facilitates these types of engagement.

## 3. PERSONAL INFORMATION (PI)

Personal information relates to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including but not limited to:

- Information relating to race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person
- Information related to education or the medical, financial, criminal or employment history of the person
- Biometric information of a person, the personal opinions, views, or preferences of the person
- Any correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence
- Views or opinions of another individual about the person
- The name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person

## 4. PURPOSE OF COLLECTING AND PROCESSING PERSONAL INFORMATION (PI)

Tower Group processes PI for various purposes including for:

- Engaging in various forms of recruitment
- Facilitation transactions with data subjects
- Complying with the provisions of statute and regulations
- Attending to the legitimate interest of data subjects
- Providing data subject information to Tower Group partners, in order to use data subject information to market their services to current clients and/or who have consented as envisaged in the POPI Act. Tower Group partners who are recipients of PI are business organisations who are permitted to use the information only for lawful sales, marketing, and engagement
- Confirm and verify data subject identity or to verify that they are authorised users for security purposes
- Conduct market or customer satisfaction research
- Audit and record keeping purposes
- In connection with legal proceedings



## 5. **LAWFUL BASIS**

In response of processing PI as mentioned above, Tower Group will adhere to the conditions for the lawful processing of PI, based on its desire to provide data subjects services in their best interest as well as a legitimate interest of Tower Group to achieve its business objectives.

## 6. **PERIOD OF HOLDING PERSONAL INFORMATION**

Tower Group endeavours to provide the most accurate information as possible to its stakeholders as well as data subjects. Tower Group seeks to verify the accuracy of its information as frequently and to remove information when it learns to be inaccurate.

Tower Group intend to process information that it has on data subjects for so long as it is accurate or until the data subject instructs Tower Group to refrain from process the information. In order to instruct Tower Group to refrain from collecting and/or processing PI, please contact our Information Officer.

Tower Group shall hold PI for such period as may be required in terms of the statutes such as the Companies Act and various labour laws.

## 7. **DATA SUBJECT RIGHTS**

Data subjects have the right to request that Tower Group provide them with access to their PI, to rectify or correct their PI, delete PI or restrict the processing of their PI. This includes refraining from sharing or providing it to any third party. Data subject also have the right to raise complaints with the Information Regulator. The afore-going rights may be subject to certain limitations pursuant to applicable law. In order to access any of these rights, contact our Information Officer.

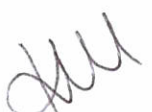
## 8. **SOURCES OF PERSONAL INFORMATION (PI)**

Tower Group gathers PI from several sources, which include directly from data subject, publicly available sources such as websites, social media, LinkedIn, commercial transactions with Tower Group. Referrals, prospects, partner agreements, training engagements, conferences. Given that PI can be extracted and/or obtained from several sources and consolidated into one CRM or other similar systems of record, it may be difficult or impossible to identify the exact source of a particular piece of information.

## 9. **CATEGORIES OF PERSONAL INFORMATION (PI) COLLECTED AND PROCESSED**

Tower Group collects information of data subjects who may be clients, client contacts, prospective clients, and prospective client contacts. Information is also collected on its employees and suppliers, as well as third parties that forms part of its scope of operations.

In respect of clients, client contacts, prospective clients and prospective client contacts Tower Group profiles business organisations and the contacts who work for the said organisations, it may have some or all of the following categories of PI on the data subjects, historical and/or current:



- Full Name
- ID Number
- Equity, Gender, Disability status
- Contact Details (email/mobile number)
- Date of Birth
- Position held and responsibilities
- Area of interest in respect of vacancies on offer
- Record of services used
- Email correspondence and attachments
- Organisation details
- Office address
- Office contact details
- Organisation email address
- Organisation and data subject on social media and URL's
- Other information that is available on public domain

Tower Group collect and process personal information mainly to contact data subjects for the purpose of understanding their requirements and delivering services accordingly Where possible, Tower Group will inform data subjects what information they are required to provide Tower Group and what information is optional, as well as the consequences of not providing the said information.

Website information that is being used may be collected using LinkedIn and other website information which allows Tower Group to collect standard contact information. Website usage information may also be collected using "cookies" which allows Tower Group to collect standard internet visitor usage information.

## 10. DISCLOSURE OF INFORMATION

Tower Group may disclose data subject's personal information to its service providers who are involved in the delivery of products or services data subjects. Tower Group have agreements in place to ensure that it complies with the privacy requirements as required by the POPI Act.

Tower Group may also disclose data subject Personal Information:

- Where it has a duty or a right to disclose in terms of law and/or industry codes
- Where it believes it is necessary to protect its rights

## 11. INFORMATION SECURITY

Tower Group is legally obliged to provide adequate systems, technical and operational protection for the PI that it holds and to prevent unauthorised access to as well as prohibited use of PI.

Tower Group will therefore on a regular basis review the security controls and related processes to ensure that the PI of the data subjects remains secure.

Tower group conducted an impact assessment across all of its functions and used the finds thereof to manage risk optimally as well as to provide iterative improvements on an ongoing basis.

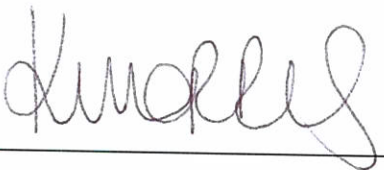
Tower Group's policies and procedures covers the following aspects:

- Physical security
- Computer and network security
- Access to personal information
- Secure communications
- Security in contracting out activities or functions
- Retention and disposal of information
- Acceptable usage of personal information
- Governance and regulatory issues
- Monitoring access and usage of private information
- Investigating and reacting to security incidents

Tower Group also ensures that it contacts with Operators as required by POPI and it requires appropriate security, privacy and confidentiality obligations of these operators in order to ensure that personal information (PI) is kept secure. The same protocols apply to any whom Tower Group may pass personal information on to for the purpose mentioned herein.

## 12. CONTACT OUR INFORMATION OFFICER

Information Officer: Kerry Morris  
Email: [kerrym@towergroup.co.za](mailto:kerrym@towergroup.co.za)  
Mobile: 082 395 0305  
Head Office: 1st Floor, 25 Rudd Rd, Illovo, Johannesburg, 2196



**Kerry Morris**

**Tower Group South Africa - Chief Executive Officer**

