



INFORMATION PRIVACY MANUAL

Bell Equipment Ltd







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INTRODUCTION

In May 2018, the European Union's General Data Protection Regulation (or GDPR) became enforceable for all Union Members and all persons, bodies, entities and organisations processing the personal information of citizens of the Member States, this framework continues to apply in the United Kingdom as the UK GDPR, together with the Data Protection Act 2018. In July 2020, the South African legislation, The Protection of Personal Information Act, 2013 (or POPIA) came into effect. The Protection of Personal Information Act is South Africa's equivalent of the EU GDPR. These data protection laws aim to protect the privacy interests of European and South African citizens and regulate the processing and use of personal information. This policy (read with other notices given to individual data subjects) is our notice in terms of Section 18 of POPIA.

The GDPR and POPIA regulations require data controllers to comply with the certain conditions for lawful processing of personal information. These conditions are briefly outlined below.

a) Lawfulness, Fairness and Transparency

Personal Information must be processed lawfully, fairly and in a transparent manner in relation to the Data Subject.

b) Purpose Limitation

Personal Information must be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.

c) Data Minimization

Personal Data must be adequate, relevant, and limited to what is necessary in relation to the purposes for which it is processed.

d) Accuracy

Personal Information must be accurate and, where necessary, kept up to date. Reasonable steps must be taken to ensure that the Personal Information, which is inaccurate, is erased or rectified in a reasonable manner.

e) Storage Period Limitation

Personal Information must be kept for no longer than is necessary for the purposes for which the Personal Information is processed.

f) Integrity and Confidentiality

Appropriate security, technical and organisational measures should be implemented in a manner that ensures the security of the Personal Information and the protection against accidental or unlawful destruction, loss, alteration, unauthorised access to or disclosure of the Personal Information.

g) Accountability

Data Controllers must be responsible for and be able to demonstrate compliance with the principles outlined above.

This Manual is likewise Bell Equipment's Policy that has been created to demonstrate the Company's compliance with the above conditions for the lawful processing of Personal Information, as well as to give effect to the rights of the data subjects from which we process Personal Information.

SCOPE OF THE MANUAL

Bell Equipment Ltd is a holding company of 2 European subsidiary companies based in France and Germany. Bell is also the holding company of a UK subsidiary, operates under a separate legal and regulatory framework from the EU subsidiaries. Bell further holds subsidiaries in Australia and the United States, each operating under their respective local laws and regulatory requirements. The Technical Information Security measures for the Bell Equipment Group are centrally controlled, implemented and maintained by the IT Services Department at the Group's head office in Richards Bay, South Africa. All European and UK subsidiary companies within the Bell Equipment Group are required to comply with GDPR, in cooperation with the Group's IT Services Department to ensure that Personal Information is processed, lawfully, fairly and in a transparent manner, giving effect to the rights of the Data Subjects concerned and maintaining the confidentiality, integrity and availability of the Information collected. Similarly all South African subsidiary companies within the Bell Equipment Group are required to comply with POPIA, in cooperation with the Group's IT Services Department to ensure that Personal Information is processed, lawfully, fairly and in a transparent manner, giving effect to the rights of the Data Subjects concerned and maintaining the confidentiality, integrity and availability of the Information collected.

DEFINITIONS

Consent	any voluntary, specific and informed expression of will in terms of which permission is given for the processing of personal information.
Data subject	the person to whom personal information relates.
De-identify	in relation to personal information of a data subject, means to delete any information that: <ul style="list-style-type: none"> a. identifies the data subject, b. can be used or manipulated by a reasonably foreseeable method to identify the data subject, or c. can be linked by a reasonably foreseeable method to other information that identifies the data subject.
Direct Marketing	to approach a data subject, either in person or by mail or electronic communication, for the direct or indirect purpose of: <ul style="list-style-type: none"> a. promoting or offering to supply, in the ordinary course of business, any goods or services to the data subject, or b. requesting the data subject to make a donation of any kind for any reason.
Electronic communication	any text, voice, sound or image message sent over an electronic communications network which is stored in the network or in the recipient's terminal equipment until it is collected by the recipient.
Filing system	any structured set of personal information, whether centralised, decentralised or dispersed on a functional or geographical basis, which is accessible according to specific criteria.



Information Officer	in relation to a private body means the head of a private body as contemplated in Section 1, of the Promotion of Access to Information Act.
Operator	a person who processes personal information for a responsible party in terms of a contract or mandate, without coming under the authority of that party.
Person	a natural person or a juristic person
Personal Information	information relating to an identifiable, living, natural person and where it is applicable, an identifiable, existing juristic person, including but not limited to: <ul style="list-style-type: none"> a. information relating to the 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, b. information relating to the education or the medical, financial, criminal or employment history of the person, c. any identifying number, symbol, email address, physical address, telephone number, location information, online identifier or other particular assignment to the person, d. the biometric information of the person, e. the personal opinions, views or preferences of the person, f. 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, g. the views or opinions of another individual about the person, and h. 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.
Private Body	means: <ul style="list-style-type: none"> a. a natural person who carries or has carried on any trade, business or profession, but only in such capacity, b. a partnership which carries or has carried on any trade, business or profession, or c. any form or existing juristic person but excludes a public body.
Processing	any operation or activity or any set of operations, whether or not by automatic means, concerning personal information, including: <ul style="list-style-type: none"> a. the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use; b. dissemination by means of transmission, distribution or making available in any other form; or c. merging, linking, as well as restriction, degradation, erasure or destruction of information
Record	any recorded information:



	<p>a. regardless of form or medium, including any of the following:</p> <ul style="list-style-type: none"> i. writing on any material, ii. information produced, recorded or stored by means of any tape-recorder, computer equipment, whether hardware or software or both, or other device, and any material subsequently derived from information so produced, recorded or stored, iii. label, marking or other writing that identifies or describes anything of which it forms part, or to which it is attached by any means, iv. book, map plan, graph or drawing, v. photograph, film, negative, tape or other device in which one or more visual images are embodied so as to be capable, with or without the aid of some other equipment, of being reproduced, <p>b. in the possession or under the control of a responsible party,</p> <p>c. whether or not it was created by a responsible party, and</p> <p>d. regardless of when it came into existence.</p>
Responsible Party	<p>a public or private body or any other person which, alone or in conjunction with others, determines the purpose of and means for processing personal information.</p>

THE COLLECTION OF PERSONAL INFORMATION

Bell Equipment Group incorporating all its subsidiary companies and inter-related companies (collectively referred to as the "Company"), processes personal information in terms of this policy when the Company acts as a responsible party (we decide why and how to process the personal information). We take privacy seriously.

This policy describes what personal information the Company processes, where it collects it, why it is processed and the legal basis on which the Company does so and generally, how the Company does so.

THE CATEGORIES OF PERSONAL INFORMATION COLLECTED BY THE COMPANY:

The Company collects personal information relating to the following categories of data subjects:

- Employee Information
- Customer Information
- Information of representatives of Dealers/Distributors that the Company contracts with
- Shareholders of the Company
- Information of representatives of Service Providers, third parties and Suppliers that the Company Contracts with ("collectively Service Providers")

THE PERSONAL INFORMATION COLLECTED:

Personal Information Collected in respect of Customers, Suppliers, Dealers/Distributors, Shareholders and Service Providers:

- Name and Surname
- Identity / Passport numbers
- Business address
- Business telephone and fax numbers
- Business email address
- Banking details
- Correspondence with and within the Company

Personal Information Collected in respect of Employees only:

- Personal Contact details such as name, title, address, telephone numbers, email addresses
- Identity Number/Social Security Number
- Date of birth
- Gender
- Copy of driving licence, passport, Identity Document, Marriage Certificate, Decree Absolute
- Marital status and dependants
- Next of kin, emergency contact number and death benefit nominee(s) information
- Bank Account Details, Payroll Records, Tax Administration Information
- Salary and Compensation history
- Annual, sick, maternity, paternity, and family responsibility leaves
- Information relating to pension and benefits
- Recruitment information (information included in your CV, cover letter as part of the application process)
- Copies of work permit or visa or immigration status, if applicable
- Full employment records (contract, terms and conditions of employment, job titles, work history, working hours, promotion, absences, attendances, training records, starting date and leaving date of employment, location of employment)
- Performance and appraisal information
- Disciplinary and grievance information
- Secondary employment information
- Access card records
- Information about your use of the Company's information and communication systems
- Photographs
- Injury at the workplace and third-party accident information
- Employee screening information
- Video Surveillance

THE PURPOSES FOR WHICH THE INFORMATION IS COLLECTED:

- The fulfilment of contractual obligations between the data subject and the Company or the Company and third parties;
- We require contact details to communicate with data subjects and with their consent, provide them marketing material in areas of their interest;
- Ascertaining the Identity of the data subject
- Communicating with the data subject
- Making a decision about recruitment of employees

- Determining the terms and conditions of employment for our employees
- Determining whether a prospective employee is legally entitled to work in the country
- Paying salaries and deducting tax and national insurance contributions
- Liaising with pension providers of employees
- Business management planning, including accounting and auditing
- Conducting performance reviews and compensation
- Assessing qualifications for a particular job, task or promotion
- Gathering evidence and any other steps relating to possible grievance or disciplinary matters and associated hearings
- Making decisions about an employee's continued employment
- Dealing with legal disputes
- Determining fitness of employees to work and complying with health and safety obligations
- To provide access to and monitor business and personal use of our information and communication systems
- To ensure network and information security and preventing access to our network and communication systems
- Ensuring employment equity
- Access control and security purposes
- Complying with legislated requirements

SPECIAL CATEGORIES OF PERSONAL INFORMATION

Although the processing of special categories of personal information is generally prohibited the Company may lawfully process such information where one or more of the following circumstances apply:

- Where you have granted us consent for the processing of your special personal information.
- The processing is necessary for the purposes of carrying out the Company's obligations and exercising your specific rights in the field of employment, labour law, and/or social security.
- The processing is necessary to protect your vital interests or those of another natural person where you are physically or legally incapable of giving consent.
- The processing is necessary for the purposes of preventative or occupational medicine, for the assessment of your working capacity and is carried out by a professional subject to a duty of confidentiality.

TYPES OF SPECIAL PERSONAL INFORMATION WE COLLECT FROM YOU

- Race or ethnicity
- Trade union membership
- Medical records collected at the on-site clinic, information about your health, including any medical condition.
- Biometric data

PURPOSES FOR WHICH WE COLLECT YOUR SPECIAL PERSONAL INFORMATION

The Company process special personal information only where it is necessary and lawful to do so, including for the following purposes:

- We may process information relating to leave of absence, which may relate to illness, to comply with employment and other laws.
- We may process information relating to your physical or mental health, disability or capacity to work where necessary to assess work-related requirements and protect health and safety in the workplace.
- We may process information about your race or ethnic origin to comply with legal obligations regarding employment equity.
- process your personal information relating to trade union membership for the purpose of administering union-related payroll deductions and to comply with labour law obligations.

STORAGE OF PERSONAL INFORMATION:

Information is stored in the following formats:

- Electronic documents (backed up on the network or cloud storage)
- Paper documents in a filing system
- In specific books designated by the Company
- Applications (backed up on the server or cloud)

THE PERIOD FOR WHICH THE INFORMATION IS STORED:

Personal information of representatives of the Dealers/Distributor, Suppliers, Service Providers, Shareholders and Customers are retained for as long as the relationship requires. Once a Dealer/Distributor, Supplier, Service Provider or Customer no longer wishes to conduct business with the Company, the information will be archived and no longer used by the Company and may be deleted at their request.

Where information is collected in accordance with labour law, the legislation usually specifies a retention period for employee records. Bell Equipment operations in various countries will be required to comply with the retention periods in their respective countries. Where there is no specific retention period, the company will follow industry best practices with regards to retention of employee personal information.

INFORMATION TRANSFERRED TO THIRD PARTIES:

- Employee information is transferred to tax authorities and other labour authorities in accordance with tax administration and labour regulations
- Certain employee information may be transferred to an accounting/payroll service provider
- Basic employee information such as name, surname, email address and job description are saved on the email client, used by the Bell Equipment Group and is accessible by all employees of the Bell Equipment Group with email access.
- Employee payroll information is transferred to the Group's Head Office in South Africa
- Customer Data is saved on the Group's CRM system and can be accessed by all employees of the Bell Equipment Group with access to the CRM system.

- Personal Information may be required to be transferred to third parties in terms of valid legislation.

CROSS-BORDER TRANSFERS OF EMPLOYEE PERSONAL INFORMATION

Personal Information collected from the Bell Equipment operations in Europe, Africa and North America is often shared with our head office in South Africa for purposes including regular reporting, analytic activities, data hosting and general administration activities. All personal information stored on the Bell Equipment Network is hosted by our head office in South Africa. Cross-border transfers of personal information take place in accordance with our Cross-border Transfer of Personal Information Policy, which ensures that personal information is adequately protected by our head office and the methods of transfer used by the sending party is secure. Information Security measures are addressed in further detail below.

ACCURACY OF INFORMATION

- Information collected from the data subject is verified by the data subject and data subjects are encouraged to inform the Company of changes in their personal information.

SECURITY MEASURES IMPLEMENTED BY THE COMPANY

OPERATIONAL MEASURES

PERSONS RESPONSIBLE FOR THE ENSURING OF THE PROTECTION OF PERSONAL INFORMATION

- **IT Operations Manager:** responsible for protecting the Company's information by designing, implementing and enforcing security controls and safeguards.
- **Information Security Analysts:** Monitor computer networks for security issues. Investigate security breaches and other cyber security incidents. Install security measures and operate software to protect systems and information infrastructure, including firewalls and data encryption programs.
- **Compliance Officers:** Develops, initiates, maintains, and revises policies and procedures for the Information Security, Business Continuity and Quality assurance operation of the IT Compliance Program and its related activities to prevent illegal or improper conduct.

TRAINING

The Company has developed a Cybersecurity Awareness Training Course for end-users throughout the Bell Equipment Group and general awareness training course on the protection of personal information.

IMPACT ASSESSMENTS

Effectiveness of security controls are measured annually during audit assessments.

POLICIES AND PROCEDURES

Various policies and procedures assist with regulating the manner in which information is processed, handled and stored as well how access to confidential information is limited and controlled. The Company has implemented the following Information Security Policies and procedures:

- Information Security Policy
- Acceptable Use Policy
- Information Classification Policy
- Information Transfer Policy
- Account Management Policy
- Bring Your Own Device Policy
- Clear Screen and Clear Desk Policy
- Disposal, Destruction and Data Retention Policy
- End-Point Security Policy
- Legislative Requirements Pertaining to Data Protection
- Cybersecurity and Compliance Awareness Training Policy
- Data Subject Access Request Procedure

DUTY OF CONFIDENTIALITY

Employees who have access to personal information processed by the Company are required to sign a non-disclosure agreement. Likewise, third parties who process personal information on the Company's behalf are required to conclude a Data Processing Agreement, stipulating how personal information should be processed, stored and handled, for the purpose of keeping personal information strictly private and confidential.

TECHNICAL AND PHYSICAL SECURITY MEASURES

FORMAT OF DATA

Personal Information is required to be stored in a password encrypted format and location in order to limit the accessibility of the information to authorised persons only. The Information Classification Policy stipulates how personal information should be handled.

ACCESS PROCEDURES

The Company follows an access control system for personal information stored on specific databases or software programmes, whereby access to certain information can be limited to authorised persons only, (i.e. Persons who require access to personal information in order to carry out employment duties). A manager would authorise an employee's access request based on his/her employment role. Access to the particular database or software programme is based on an authentication process. Once access to the information is no longer necessary for an employee to carry out their employment duties, the access will be relinquished.

Personal information stored in files on a computer are password protected and only transferred to authorised persons who require the information to carry out employment duties.

PHYSICAL ACCESS PROCEDURES

Access to the main data centres are limited via an access card clock-in system. Access is granted to those employees who require the access as a part of their employment duties.

DISPOSAL AND DESTRUCTION OF INFORMATION

Once information is no longer needed, it must be destroyed or disposed of as stipulated in the Disposal, Destruction and Data Retention Policy.

PHYSICAL SECURITY OF INFORMATION ASSETS

Users are required to ensure that their information assets are kept safe at all times in accordance with the Acceptable Use Policy.

MONITORING OF SECURITY THREATS

The Information Security Analyst is responsible for continually monitoring security threats posed to the Company, taking measures to prevent threats and alerting the Company of potential security breaches.

SECURITY FEATURES ON SOFTWARE, APPLICATIONS AND ASSETS

Some of the security features employed by the Company include:

- Firewalls
- Threat Prevention
- Next Gen Endpoint Protection
- File and removable media encryption
- Full Disk Encryption
- Authentication systems
- Virtual Private Network (VPN)

BREACH AND SECURITY INCIDENTS

The Company retains the responsibility to report any notification of security compromises as required by Section 22 of POPIA. The Company implements an IT Information Security Management Policy, Security Incident Management Plan and Data Breach Runbook regulating how security breaches should be handled. The Policy stipulates who is responsible for managing the incident, the measures which should be taken to prevent and minimize the occurrence of the incident, how the incident should be reported and who should be notified in the event of an incident. Incidents affecting the security of personal information must be reported to the relevant Supervisory Authority, within 72 hours, in accordance with the Contact with Authorities and Special Interest Groups Procedure.

INFORMATION VIA OUR WEBSITE AND SOCIAL MEDIA PLATFORMS

A data subject does not have to provide personal information to the Company when he/she visits the Company's website or communicates with us using a social media platform on which the Company has an account, but the data subject can do so by:

- sending an enquiry to us;
- subscribing to newsletters and marketing communication;
- registering for an event;
- applying for a job by emailing us or, where applicable, through our website.

If the data subject provides the Company with personal information using the Company's website or when the data subject communicates with us using our social media accounts, the Company sources that information from them, with their consent and will only use it for the purpose for which they provide it.

The data subject email enquiries are held on the Company's email server, by the addressee and by anyone in our business to whom the addressee refers his/her email for a response. The data subject subscription and registrations are held by our marketing personnel. Job applications are held by human resources personnel and to anyone who our human resources personnel refers the application for consideration.

The Company uses the personal information that the data subject provides to us through our website or when communicating with the Company using our social media accounts:

- for the purposes for which he/she provided it;
- to administer and improve our website;
- to improve our services;
- to communicate with us.

INFORMATION RELATING TO JOB APPLICATIONS

The Company processes the personal information relating to the job applicants including names, contact details (including phone numbers, email and other addresses), education and employment history, race, gender and any other personal information included in the job application (Applicant Information).

The Company sources most of the Applicant Information from the job applicant in person, by email or, where applicable, through our website. We may also source Applicant Information from recruitment agents and websites such as LinkedIn, from references, public records and licenced databases.

The Company processes Applicant Information to consider and deal with the job applications and so that we can contact applicants about possible job opportunities.

The legal basis on which the Company processes the Applicant Information is consent or our legitimate interests in recruiting employees for our business.

SUPPLIER INFORMATION

The Company processes personal information relating to potential actual suppliers of goods and services including names, identity, passport or registration numbers, contact information (including phone numbers, email and other addresses), VAT numbers, bank account details (Supplier Information).

The Company usually sources the supplier information directly from our potential or actual suppliers, but we may source it from quotations, adverts, references or other suppliers.

The Company processes supplier information in relation to the quotations we obtain and supply contracts we conclude in relation to our business and in providing our services to our clients. The legal basis on which the Company processes supplier information includes consent or concluding and performing contracts with suppliers or our legitimate interests in managing relationships and communicating with our suppliers, receiving, processing and paying supplier invoices, complying with applicable laws including tax laws, dealing with disputes and claims by and against us relating to any of our suppliers, including legal proceedings in any forum.

SHARING YOUR PERSONAL INFORMATION WITH OTHERS

The Company will not sell personal information to anyone.

When necessary, our trusted third-party operators process personal information for us. The Company contracts with our operators binding them to comply with applicable data privacy laws including GDPR and POPIA. Our contracts oblige our operators to process information only for the purposes and means of processing we prescribe.

The Company uses the following service providers to process personal information: hosting provider, web analysis service provider, providers of online platforms, IT programming and maintenance service providers (including website and email exchange), archiving and document storage service providers (electronic and hard copy), practice management system service providers, payroll service providers and data destruction service provider (physical files).

The Company discloses personal information to regulators and law enforcement agencies where required by law and where we reasonably believe disclosure is necessary to identify, contact or stop someone who may breach our privacy policy or who may cause harm to, or interfere with, our property, safety or interests or those of anyone else including other users of our website or our social media accounts.

The Company discloses personal information to underwriters and professional advisors when necessary, so that we can obtain or maintain insurance cover, manage risk, get their advice or to establish, exercise or defend our rights including in relation to claims by or against us in any legal proceedings in any forum and in any negotiation.

The Company discloses Employee information to medical schemes, retirement funds, group life underwriters and brokers for these schemes and funds for the purposes of making benefits available to our partners, employees, their families and beneficiaries.

OFFSHORE TRANSFERS

Where the data subject publishes information on the Company website or on the Company's social media accounts or where the data subject instructs the Company to use an online platform which transfers personal information offshore, the data subject consents to the transfer of their personal information to third parties in foreign countries and they acknowledge that the personal information may be available through the internet around the world. The Company cannot prevent unauthorised access to, misuse of, damage to, or destruction of, that personal information.

If the Company is obliged by law to use an online platform which may transfer personal information offshore, we do not control that online platform and the Company cannot prevent unauthorised access to, misuse of, damage to, or destruction of, that personal information.

Where the Company transfers personal information to countries which do not have an adequate level of data protection similar to POPIA's conditions for lawful processing and the transfer is not covered by Section 72(1)(b)(consent to transfer),(c)(transfer needed to perform a contract with the data subject or to take pre-concept steps, (d) (transfer needed to conclude or perform a contract in the data subject's interests) or (e) (the transfer is for the data subject's benefit and it's not reasonably practicable to obtain the data subject's consent) of POPIA, the Company will conclude contracts with third parties to whom the information is transferred binding them to process the data subject information to the standards required by POPIA and not transfer the information to any other country without similar protection.

If a Microsoft Teams meeting with the Company is recorded, that recording may be stored on Microsoft OneDrive which is backed up in the European Union. The GDPR laws which provide an adequate level of protection that upholds principles for reasonable processing of personal information substantially similar to the conditions for lawful processing applied by POPIA.

MANDATORY AND VOLUNTARY DISCLOSURE

Where the Company must collect and process personal information to comply with the law, we cannot provide services to the data subject unless he/she provides that information.

Except where providing personal information to the Company is required by law, our clients are free to volunteer personal information to us. If a client chooses not to provide personal information which we request to enable us to provide our services, this may restrict or prevent us from providing our services to that client.

PROTECTING PERSONNEL INFORMATION

The Company takes appropriate and reasonable technical and organisational steps to protect the data subject personal information against unauthorised access or disclosure.

The steps the Company takes includes physical and electronic access control, encryption, appropriate firewalls and malware and virus protection.

RIGHTS OF ACCESS, RECTIFICATION AND COMPLAINT

GDPR stipulates certain rights which should be made enforceable for data subjects. Data subjects have the right of access to a copy of their personal information records held by the Company and request that information be rectified or erased if incorrect or unnecessary. A data subject may also withdraw his/her consent to process his/her personal information and request that the Company stop processing his/her personal information.

DATA SUBJECT ACCESS REQUESTS

Subject to POPIA, GDPR and other laws, by completing and sending us the request form available on request from Diana.Mcilrath@bellegquipment.com, you may:

- ask to confirm, free of charge if the Company holds personal information about you,
 - for the prescribed fee, obtain a record or description of the personal information the Company holds and a list of third parties or the categories of third parties who hold it,
 - where the legal basis on which the Company processes your personal information is consent, you may withdraw your consent, but this will not affect the lawfulness of our processing before your withdrawal and even if you do withdraw your consent, the company can continue processing your information where there is another legal basis for that processing such as compliance with applicable laws,
 - if any of your personal information that we have processed is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, obtained unlawfully or if we are no longer authorised to retain that personal information, you may ask us to rectify, destroy or delete the personal information but we emphasize that despite your request, we may not destroy or delete personal information where we are entitled to continue processing it,
 - at any time on reasonable grounds and except where legislation provides for such processing, object to the processing of your personal information for the proper performance of a public law duty by a public body or to pursue your legitimate interests or to pursue our legitimate interests or those of a third party to whom the personal information is supplied,
 - at any time, object to the processing of personal information for direct marketing (other than direct marketing by means of unsolicited electronic communications),
 - if you feel that we have processed your personal information unlawfully, complain to the Information Regulator who can be contacted at:
 - JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
 - P.O. Box 31533, Braamfontein, Johannesburg, 2017, or
 - Complaints email: POPIAComplaints@infoeregulator.org.za
- or
- Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9F 5AF
 - Complaints email: accesscoinformation@ico.org.uk or icoaccessinformation@ico.org.uk
- or

- German Federal Commissioner for Data Protection and Freedom of Information (BfDI)
- Husarenstraße 30, 53117 Bonn, Germany, [4,5]
- Complaints email: poststelle@bfdi.bund.de

The Company must provide a response to data subjects requesting access to their data within 30 calendar days of receiving the Data Subject Access Request unless local legislation dictates otherwise.

An individual does not have the right to access information recorded about someone else, unless they are an authorised representative.

The Company is not required to respond to requests for information unless it is provided with sufficient details to enable the location of the information to be identified, and to satisfy itself as to the identity of the data subject making the request.

EXEMPTIONS

In principle, the Company will not normally disclose the following types of information in response to a Data Subject Access Request:

- Information about other people – A Data Subject Access Request may cover information which relates to an individual or individuals other than the data subject. Access to such data will not be granted unless the individuals involved consent to the disclosure of their data.
- Repeat requests – Where a similar or identical request in relation to the same data subject has previously been complied with within a reasonable time period and where there is no significant change in personal data held in relation to that data subject, any further request made within a six month period of the original request will be considered a repeat request, and the Company will not normally provide a further copy of the same data
- Publicly available information – The Company is not required to provide copies of documents which are already in the public domain.
- Opinions given in confidence or protected by copyright law – The Company does not have to disclose personal data held in relation to a data subject that is in the form of an opinion given in confidence or protected by copyright law.
- Privileged documents – Any privileged information held by Company need not be disclosed in response to a DSAR. In general, privileged information includes any document which is confidential (e.g. a direct communication between a client and his/her lawyer) and is created for the purpose of obtaining or giving legal advice.

SUBMITTING A REQUEST

In order to enable the Company to respond to the Data Subject Access Requests in a timely manner, the data subject should:

- Submit his/her request using a Data Subject Access Request Form, provided in Annex 1 below, and
- Provide the Company with sufficient information to validate his/her identity (to ensure that the person requesting the information is the data subject or his/her authorised person.)

Data Subject Requests must be made to the Company's Data Protection Officer, via the contact details provided in Annex 6 below.

DATA SUBJECT COMPLAINTS

In terms of Article 13 (2)(d) of the GDPR, the data subject must be informed of his/her right to lodge a complaint with the Supervisory Authority. Article 77 provides that every data subject shall have the right to lodge a complaint with the supervisory authority, in particular, in the Member State of his/her habitual residence, place of work, or of the alleged infringement. Contact details of the relevant supervisory authorities are included in Annex 3 below.

EFFECTIVITY OF THE MANUAL

This Manual shall be effective from July 2019; and shall remain in effect until otherwise repealed. This Manual must be annually reviewed for compliance with the relevant data protection laws and kept up to date by the Company.

An updated version of the policy will be updated on the Company website. Important changes to the policy will be communicated via email to all employees. A current version of the policy can be obtained at any time by emailing a request to:

Diana.Mcilrath@bellequipment.com



ANNEXURE A: NOTIFICATION OF A SECURITY COMPROMISE FORM (SCN1)

NOTIFICATION OF A SECURITY COMPROMISE IN TERMS OF SECTION 22 OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013)

Note:

1. Attach documents in support of the notification
2. Complete the form in full **as is applicable**
3. If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.

A	DETAILS OF RESPONSIBLE PARTY
Name(s) and Surname/Registered name of responsible party:	
Address:	
	Code:
Contact Number(s):	
E-mail Address:	
B	DETAILS OF THE INFORMATION OFFICER
Full names of Information Officer:	
Registration number of information Officer:	
Contact Number(s):	
E-mail address:	
C	DETAILS OF SECURITY COMPROMISE
Date of incident:	
Date incident reported to Information Regulator:	
Explanation for delay in notification to the Regulator, if applicable.	
Kindly tick applicable box ✓	
Type of security compromise	Loss of personal information: <input type="checkbox"/>
	Damage to personal information <input type="checkbox"/>
	Unauthorised destruction of personal information <input type="checkbox"/>
	Unlawful access to personal information <input type="checkbox"/>
	Unlawful processing of personal information <input type="checkbox"/>
	Other <input type="checkbox"/>



	If other, please explain _____	
Description of incident		
Kindly tick applicable box ✓		
Type of personal information compromised	Personal information of children <input type="checkbox"/> Unique Identifiers <input type="checkbox"/> Special Personal Information <input type="checkbox"/> Other <input type="checkbox"/>	
Number of data subjects affected		
Method of notification to affected data subjects	Mail to the data subject's last known physical or postal address, <input type="checkbox"/> Sent by email to the data subject's last known email address, <input type="checkbox"/> Placed in a prominent position on the website of the responsible party, <input type="checkbox"/> Published in the news media <input type="checkbox"/>	
Does the notification provide sufficient information to allow the data subject to take protective measures against the potential consequences of the compromise, including--	A description of the possible consequence of the security compromise, <input type="checkbox"/> A description of the measures that the responsible party intends to take or has taken to address the security compromise, <input type="checkbox"/> A recommendation with regard to the measures to be taken by the data subject to mitigate the possible adverse effects of the security compromise, <input type="checkbox"/> If known, the identity of the unauthorised person who may have accessed or acquired the personal information. <input type="checkbox"/>	
Status of the compromise	Confirmed: <input type="checkbox"/> Alleged: <input type="checkbox"/>	
D	DESCRIPTION OF THE MEASURES THAT THE RESPONSIBLE PARTY INTENDS TO TAKE OR HAS TAKEN TO ADDRESS THE SECURITY COMPROMISE AND TO PROTECT THE PERSONAL INFORMATION OF THE DATA SUBJECTS FROM FURTHER UNAUTHORISED ACCESS OR USE.	
E	DECLARATION	
I declare that the information contained herein is true, correct and accurate.		
Signed at _____ on this the _____ day of _____ 20____		
_____ SIGNATURE		
_____ NAME AND SURNAME		
_____ DESIGNATION		



ANNEXURE 1: DATA SUBJECT ACCESS REQUEST FORM

You have the right to request for personal data we may hold about you. This is known as a Data Subject Access Request ("DSAR"). A data subject is an individual who is the subject of the personal data. If you wish to make a DSAR, please complete this form and return to us by post or email to the information Officer at email address: - diana.mcilrath@bellequipment.com (PAIA - Regulation 7)

DATA SUBJECT'S PARTICULARS

Please enclose a copy of your Identity Document and proof of residential address with your request as proof of identity.

Full Name:	
Surname:	
Identity Number	
Physical Address;	
Postal Address:	
Telephone Number:	
Cellular Number:	

DETAILS OF THE REQUEST

Provide a detailed description of the information required:



CONFIRMATION OF IDENTITY OF DATA SUBJECT

_____, confirm on the ____ day of _____ 20__ that I am the Data Subject concerned, and the personal information requested is my personal information.

Signature

AUTHORISATION OF DATA SUBJECT'S REPRESENTATIVE (IF APPLICABLE)

I hereby grant _____ on the ____ day of _____ 20__, my permission to make a request for access to my personal information on my behalf.

Signature

PARTICULARS OF THE AUTHORISED REPRESENTATIVE (IF APPLICABLE)

Please enclose a copy of the Representative's Identity Document and proof of residential address with the request as proof of identity.

Full Name:	
Surname:	
Identity Number:	
Physical Address:	
Postal Address:	
Telephone Number:	
Cellular Number:	

I _____, confirm on the ____ day of _____ 20__ that I am the Data Subject's Representative.

Signature

We will make every effort to process your data subject access request as quickly as possible within 30 calendar days. However, if you have any queries whilst your request is being processed, please do not hesitate to contact us.

FEES



- A. A request for access to a record, other than a record containing personal information about yourself, will be processed only after a non-refundable request fee has been paid subject only to POPIA.
- B. You will be notified of the amount required to be paid as the request fee.
- C. The fee payable for access to a record depends on the form in which access is required and the reasonable time required to search for and prepare a record and any courier charges if you wish the record to be posted to you.
- D. If you qualify for an exemption of the payment of any fee, please state the reason for exemption below:

Reason	

FORM OF ACCESS TO RECORDS

If you are unable to read, listen or view the record in the form of access provided due to a disability, specify the disability and the required format below.

Disability	
Form in which record is required	

Mark the appropriate box with an X.

Note:

- E. Compliance with your request for access in the specified form may depend on the form in which the record is available.
- F. Access in the form with your request for access in the specified form may depend on the form in which the record is available.
- G. The fee payable for access to the record, if any will be determined partly by the form in which access is required.

1. For paper or electronic	
Document Copy of record	
Inspection of Record	
2. If record consists of visual images	
View Images	
Copy Images	
3. If record consists of recorded words or information which can be reproduced as a sound file	
Listen to soundtrack	
Transcription of soundtrack	
4. If record is stored on a computer or in an electronic or machine-readable format	
Printed copy of the record	



Printed copy of the information derived from the record	
Copy in computer readable format	

*If you requested a copy or transcription of a record (above), do you wish the copy or transcription to be posted to you?

Yes No

PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED

A. Indicate which right is to be exercised or protected

B. Explain why the record requested is required for the exercise or protection of the aforementioned right.

NOTICE OF DECISION REGARDING REQUEST FOR ACCESS

You will be notified in writing whether your request has been approved/denied. If you wish to be informed in another manner, please specify the manner and the necessary contact details below.

Signed at _____ this _____ day of _____ 20 _____

Name and Surname of Requester/Person on whose behalf request is made

Signature of Requester/ Person on whose behalf request is made

--



ANNEXURE 2: FORM 1 – OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION

OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION IN TERMS OF SECTION 11(3) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013, (ACT NO 4 OF 2013)

REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2017

[REGULATION 2(1)]

NOTE:

- Affidavits or other documentary evidence in support of the objection must be attached.
- If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.

○ Reference Number: _____

A	DETAILS OF DATA SUBJECT
Name(s) and Surname of data subject	
Residential, Postal or Business Address	
	Code()
Contact Number(s)	
Fax Number / Email address	
B	DETAILS OF RESPONSIBLE PARTY
Name(s) and Surname of responsible person (<i>if the responsible party is a natural person</i>):	
Residential, Postal or Business Address	
	Code()
Contact Number(s)	
Fax Number / Email address	
Name of public or private body (<i>if the responsible party is not a natural person</i>):	
Business Address:	
	Code ()
Contact Number(s)	
Fax Number	



Email Address	
C	REASON FOR OBJECTION (Please provide detailed reasons for the objection)

Signed at _____, this ____ day of _____ 20__ .

Signature of Data Subject(applicant)



ANNEX 3: FORM 2 – REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION OR DESTROYING OR DELETION OF RECORD

REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION OR DESTROYING OR DELETION OF RECORD OF PERSONAL INFORMATION IN TERMS SECTION 24(1) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013, (ACT NO 4 OF 2013)

(REGULATION 3(2))

NOTE:

- Affidavits or other documentary evidence in support of the request must be attached.
- If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.

○ Reference Number: _____

Mark the appropriate box with an "X"

Request for:

Correction or deletion of the personal information about the data subject which is in possession or under the control of the responsible party.

Destroying or deletion of a record of personal information about the data subject which is in possession or under the control of the responsible party and who is no longer authorised to retain the record of information.

A	DETAILS OF DATA SUBJECT
Surname	
Full names	
Identity Number	
Residential, Postal or Business Address	
	Code ()
Contact Number(s)	
Fax Number / Email address	
B	DETAILS OF RESPONSIBLE PARTY
Name and Surname of Responsible party (if the responsible party is a natural person):	
Residential, Postal or Business Address	
	Code ()
Contact Number(s)	



Fax Number / Email address	
Name of public or private body (if the responsible party is not a natural person)	
Business address:	
	Code ()
Contact number(s):	
Fax number / Email address	
C	REASONS FOR *CORRECTION OR DELETION OF THE PERSONAL INFORMATION ABOUT THE DATA SUBJECT /*DESTRUCTION OR DELETION OF A RECORD OF PERSONAL INFORMATION ABOUT THE DATA SUBJECT WHICH IS IN POSSESSION OR UNDER CONTROL OF THE RESPONSIBLE PARTY (Please provide detailed reasons for the request)

* Delete whichever is not applicable

Signed at _____, this ____ day of _____ 20__ .

Signature of Data Subject



ANNEX 4: FORM 3 – CONSENT OF A DATA SUBJECT FOR THE PROCESSING OF PERSONAL INFORMATION FOR THE PURPOSE OF DIRECT MARKETING

APPLICATION FOR THE CONSENT OF A DATA SUBJECT FOR THE PROCESSING OF PERSONAL INFORMATION FOR DIRECT MARKETING IN TERMS SECTION 69(2) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013, (ACT NO 4 OF 2013)

REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2017

[REGULATION 6]

A	DETAILS OF DATA SUBJECT
Surname	
Full names	
Residential, Postal or Business Address	
	Code ()
Contact Number(s)	
Fax Number / Email address	
B	DETAILS OF RESPONSIBLE PARTY
Name and Surname of Responsible party (if the responsible party is a natural person):	
Residential, Postal or Business Address	
	Code ()
Contact Number(s)	
Fax Number / Email address	

Dear Mr/Ms/Dr/Adv/Prof

Part A

1. In terms of section 69 of the Protection of Personal Information Act, 2013 (Act No. 4 of 2013), the processing of personal information of a data subject (the person to whom personal information relates) for the purpose of direct marketing by means of any form of electronic communication, including automatic calling machines, facsimile machines, SMSs or email is prohibited unless written consent to the processing is given by the data subject. You may only be approached once for your consent by this responsible party. After you have indicated your wishes in Part B, you are kindly requested to submit this Form either by post, facsimile or email to the address, facsimile number or email address as stated above.
2. "Processing means any operation or activity or any set of operations, whether or not by automatic means, concerning personal information, including:
 - a. The collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;
 - b. Dissemination by means of transmission, distribution or making available in any other form; or



- c. Merging, linking as well as restriction, degradation, erasure or destruction of information.
3. "Personal information" means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to:
- a. Information relating to the 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;
 - b. Information relating to the education or the medical, financial, criminal or employment history of the person;
 - c. Any identifying number, symbol, email address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
 - d. The biometric information of the person;
 - e. The personal opinions, views or preferences of the person;
 - f. Correspondence sent by the person that is implicitly or explicitly or a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
 - g. The views or opinions of another individual about the person; and
 - h. 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.

(Signature of person authorised by responsible party)

Full names and designation of person signing on behalf of responsible party:

Date:

Part B

I, _____ (full names) hereby:
 Consent to goods and services to be marketed by means of unsolicited electronic communication.

SPECIFY GOODS AND SERVICES:

SPECIFY METHOD OF COMMUNICATION:

FAX	
EMAIL	
SMS	
OTHERS – SPECIFY	

- Give my consent.
- Do not give my consent.

Signed at _____ this _____ day of _____ 20 _____

 Signature of Data Subject



ANNEX 5: FORM 5 – COMPLAINT REGARDING INTEREFENCE WITH THE PROTECTION OF PERSONAL INFORMATION/COMPLAINT

COMPLAINT REGARDING INTERFERENCE WITH THE PROTECTION OF PERSONAL INFORMATION/COMPLAINT REGARDING THE DETERMINATION OF AN ADJUDICATOR IN TERMS OF SECTION 74 OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013, (ACT NO 4 OF 2013)

REGULATIONS RELATING TO THE PERSONAL INFORMATION 2017

[REGULATION 7]

NOTE:

- Affidavits or other documentary evidence in support of the request must be attached.
- If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.

○ Reference Number: _____

Mark the appropriate box with an "X"

Complaint regarding:

Alleged interference with the protection of personal information

Determination of an adjudicator

PART I	ALLEGED INTERFERENCE WITH THE PROTECTION OF THE PERSONAL INFORMATION <i>[Section 74(1) of the Protection of Personal Information ACT, 2013, (ACT No. 4 of 2013)]</i>
A	PARTICULARS OF COMPLAINANT
Surname of complainant	
Full names of complainant	
Identity Number of complainant	
Residential, Postal or Business Address	
	Code ()
Contact Number(s)	
Fax Number / Email address	
B	PARTICULARS OF BODY/RESPONSIBLE PARTY INTERFERING WITH PERSONAL INFORMATION
Full names and surname of person interfering with personal information (if the responsible party is a natural person):	



Name of public or private body (if not a natural person)	
Residential (if applicable), Postal or Business Address	
	Code ()
Contact Number(s)	
Fax Number / Email address	
C	REASONS FOR COMPLAINT <i>(Please provide, detailed reasons for the complaint)</i>
PART II	GRIEVANCE REGARDING DETERMINATION OF ADJUDICATOR <i>(Section 74(2) of the Protection of Personal Information Act, 2013 (Act No. 4 of 2013))</i>
A	PARTICULARS OF COMPLAINANT
Surname of complainant	
Full names of complainant	
Identity Number of complainant	
Residential, Postal or Business Address	
	Code ()
Contact Number(s)	
Fax Number / Email address	
B	PARTICULARS OF ADJUDICATOR
Surname of adjudicator	
Full names of adjudicator	
Name and surname of responsible party <i>(if it is a public or private body)</i>	
Name and surname of responsible party <i>(if it is a public or private body)</i>	
Residential, Postal or Business Address	
	Code ()
Contact Number(s)	
Fax Number / Email address	



C	REASONS FOR COMPLAINT (<i>Please provide detailed reasons for the grievance</i>)

Signed at _____, this ____ day of _____ 20__ .

Signature of Complainant / person aggrieved

ANNEXURE 6: CONTACT DETAILS

CONTACT DETAILS OF THE RESPONSIBLE OFFICERS

South Africa

Group Company Secretary:

Diana McIlrath

Email: Diana.Mcilrath@bellequipment.com

Telephone: +27 (0)35 907 9111

Bell Equipment Deutschland GmbH

Hesse

Prof. Dr Alexander Roßnagel

Email: poststelle@datenschutz.hessen.de

Telephone: +49 611 1408-121

Postal address: Postfach, 65021, Wiesbaden

IT Operations Manager:

Mark Bell

Email: Mark.Bell@bellequipment.com

Telephone: +27 (0)11 966 4904

BELL EQUIPMENT LTD AND SUBSIDIARY COMPANIES

Southern Africa:

BECSA Holdings Limited

Bell Equipment Company South Africa (Pty) Limited (BECSA)

Bell Equipment Group Services (Pty) Limited (BEGS)

Bell Equipment Sales South Africa Limited (BESSA)

Bell Equipment SA Holdings Limited (BHL)

Bell Equipment Company Swaziland (Pty) Limited

K2017044733 (South Africa) (RF) Propriety Limited (BESSA BEE SPV)



Bell Equipment Foundation Trust (BEFT)

Bell Equipment Properties SA (Pty)Limited (BEP SA)

K2019577563 (South Africa) (RF) Proprietary Limited (BEE Manco)

Other Africa

Bell Equipment Company (Zambia) Limited

Bell PTA (Private) Limited

Europe:

Bell Equipment International SA

Bell France SAS

Bell Equipment UK Limited

Bell Equipment (Deutschland) GmbH

Bell Equipment Russland LLC (Dormant)

United States of America

Bell Equipment North America Inc

Australasia

Bell Equipment Australia (Pty) Limited

CONTACT DETAILS OF THE SUPERVISORY AUTHORITIES WHERE WE PROCESS PERSONAL INFORMATION

France

Commission Nationale de l'Informatique et des Libertés - CNIL

3 Place de Fontenoy

TSA 80715

75334 Paris Cedex 07

Tel. +33 (0)1 53 73 22 22

Contact form: <https://www.cnil.fr/fr/webform/nous-contacter>

Website: <http://www.cnil.fr/en>.

Germany

Der Bundesbeauftragte für den Datenschutz und die Informationsfreiheit

Husarenstraße 30

53117 Bonn

Tel. +49 (0)228 997799- 0

e-mail: poststelle@bfdibund.de

De-Mail: poststelle@bfdi.de-mail.de

Website: <http://www.bfdi.bund.de/>

United Kingdom

The Information Commissioner's Office

Wycliffe House, Water Lane

Wilmslow - Cheshire SK9 5AF

Tel. +44 1625 545 745

e-mail: international.team@ico.org.uk

Website: <https://ico.org.uk>

South Africa

Information Regulator

JD House, 27 Stiemens Street, Braamfontein, Johannesburg

Tel: 010 023 5200; 0800 017 160

Email: POPIAComplaints@info regulator.org.za

Website: Justice.gov.za