



MONARCH MARKETING

A DIVISION OF MONARCH TRAVEL GOODS (PTY) LTD

6 Falkirk Road
Ext. 12
Benoni
1501

P.O. Box 1240
Benoni
1500

Tel (011) 841-8800
Fax (011) 914-2329

MONARCH MARKETING (AND ITS SUBSIDIARIES) PRIVACY POLICY IN TERMS OF THE PROTECTION OF PERSONAL INFORMATION ACT, NO. 4 2013

SCOPE OF POLICY

This policy applies to the business of Monarch Marketing, its subsidiaries, based at the registered office. It applies to paid employees.

POLICY OPERATIONAL DATE	01 JULY 2021
POLICY PREPARED BY	VUYO SKAAL
DATE APPROVED BY INFORMATION OFFICER	8 JUNE 2021
NEXT POLICY REVIEW DATE	JULY 2022

TABLE OF CONTENTS

1. POLICY STATEMENT
2. OBJECTIVES
3. DEFINITIONS
4. COLLECTION OF PERSONAL INFORMATION
5. SAFEGUARDING OF PERSONAL INFORMATION AND CONSENT
6. DIRECT MARKETING
7. TRANSFER OF INFORMATION OUTSIDE SOUTH AFRICA
8. SURVAILLANCE SYSTEMS
9. SECURITY BREACHES
10. ACCESS AND CORRECTION OF PERSONAL INFORMATION
11. RETENTION OF RECORDS
12. AMENDMENTS TO THIS POLICY
13. REQUESTS FOR INFORMATION
14. WE WILL INFORM YOU ABOUT COMPROMISED INFORMATION
15. SAFEGUARDING OF PERSONAL INFORMATION AND CONSENT
16. PROTECTION OF PERSONAL INFORMATION ACT AND OTHER LAWS
17. GENERAL



MONARCH MARKETING

A DIVISION OF MONARCH TRAVEL GOODS (PTY) LTD

6 Falkirk Road
Ext. 12
Benoni
1501

P.O. Box 1240
Benoni
1500

Tel (011) 841-8800
Fax (011) 914-2329

1. POLICY STATEMENT

- 1.1. Monarch Marketing and its subsidiaries processes information of its employees, clients, sub-contractors, suppliers and other data subjects from time to time.

As such, it is obliged to comply with the Protection of Personal Information Act No 4 of 2013 ("POPI") as well as the Promotion of Access to Information Act No. 2 of 2000 ("PAIA").

- 1.2. In line with this, Monarch Marketing is committed to protecting its employees, clients, sub-contractors, suppliers and other data subjects` privacy and ensuring that their personal information is used appropriately, transparently, securely and in accordance with applicable laws.
- 1.3. This policy sets out the manner in which Monarch Marketing deals with such personal information and provides clarity on the general purpose for which the information is used, as well as how data subjects can participate in this process in relation to their personal information.
- 1.4. In addition to this policy, the company has also developed a manual and made it available as prescribed under the PAIA Act. Where parties / requesters for information disclosure in terms of this manual, internal measures have been developed together with adequate systems to process requests for information or access thereto.

2. OBJECTIVES

- 2.1. To ensure legislative compliance (POPI and PAIA Acts) in respect of all personal information that Monarch Marketing collects and process.
- 2.2. To inform employees and clients as to how their personal information is used, disclosed and destroyed.
- 2.3. To ensure that personal information is only used for the purpose for which it was collected.
- 2.4. To prevent unauthorised access and use of personal information.



MONARCH MARKETING

A DIVISION OF MONARCH TRAVEL GOODS (PTY) LTD

6 Falkirk Road
Ext. 12
Benoni
1501

P.O. Box 1240
Benoni
1500

Tel (011) 841-8800
Fax (011) 914-2329

3. DEFINITIONS

- 3.1. "Biometric information" means the physical, physiological or behavioural identification, including finger printing, amongst others.
- 3.2. "Processing" means:
 - 3.2.1. The collection, receipt, recording organisation, collation, storage, updating, modification, retrieval, alteration, consultation or use.
 - 3.2.2. Dissemination by means of transmission, distribution or making available in any form
 - 3.2.3. Merging, linking, erasure or destruction of information
- 3.3. "PAIA" means Promotion of Access to Information Act No. 2 of 2000
- 3.4. "POPI" means the Protection of Personal Information Act No. 4 of 2013
- 3.5. "Regulator" means the information Regulator established in terms of the POPI Act

4. COLLECTION OF PERSONAL INFORMATION

- 4.1. Monarch Marketing collects and processes various information pertaining to its employees, clients, sub-contractors and suppliers. The information collected is based on need and it will be processed for that need / purpose only. Whenever possible, Monarch Marketing will inform the relevant party of the information required (mandatory) and which information is deemed optional.
- 4.2. The employee, sub-contractor or client will be informed of the consequence/s of failing to provide such personal information and any prejudice which may be incurred due to non-disclosure. For instance, Monarch Marketing may not be able to employ an individual without certain personal information relating to that individual or the organisation may not be in a position to render



MONARCH MARKETING

A DIVISION OF MONARCH TRAVEL GOODS (PTY) LTD

6 Falkirk Road
Ext. 12
Benoni
1501

P.O. Box 1240
Benoni
1500

Tel (011) 841-8800
Fax (011) 914-2329

services to render services to clients in the absence of certain information which is required.

- 4.3. Monarch Marketing will process information in a manner that is lawful and reasonable i.e. will not infringe the privacy of the individual or company.
- 4.4. Where consent is required for the processing of information, such consent will be obtained.
- 4.5. Information will be processed under the following circumstances:
 - 4.5.1. When out actions for the conclusion or performance of a contract.
 - 4.5.2. When complying with an obligation imposed by law on the company
 - 4.5.3. For the protection of a legitimate interests of the company or as an authorised third party to whom the information is supplied
 - 4.5.4. Where necessary, for pursuing the legitimate interests of the company or an authorised third party to whom the information is supplied
- 4.6. Examples of information Monarch Marketing collects includes, but is not limited to:
 - 4.6.1. Information relating to the race, gender, sex, pregnancy, marital status, nationality, ethnic or social origin, colour, sexual orientation, age, physical or mental health, wellbeing, disability, religion, conscience, belief, culture, language and birth of an employee.
 - 4.6.2. Information relating to the education or medical, financial, criminal or employment history including disciplinary action of an employee.
 - 4.6.3. Banking and account information
 - 4.6.4. Contact information
 - 4.6.5. Trade Union membership and political persuasion



MONARCH MARKETING

A DIVISION OF MONARCH TRAVEL GOODS (PTY) LTD

6 Falkirk Road
Ext. 12
Benoni
1501

P.O. Box 1240
Benoni
1500

Tel (011) 841-8800
Fax (011) 914-2329

- 4.6.6. Any identified number, symbol, email address, telephone number, location information, online identifier or other particular assignment to the employee, sub-contractor or client.
- 4.6.7. The biometric information of the employee, client or data subject.
- 4.6.8. The personal opinions, views or preferences of an employee including performance appraisals or correspondence and the views or opinions of another individual about the person.
- 4.7. Monarch Marketing shall process special personal information without complying with the specific provisions of the POPI Act. Special information includes personal information concerning:
 - 4.7.1. The religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health, sex life or biometric information of a data subject; or
 - 4.7.2. The criminal behaviour of a data subject, where such information relates to the alleged commission by a data subject of any offence committed or the disposal of such proceedings.
- 4.8. Collection of an employee information:
 - 4.8.1. For the purposes of this Policy, employees include potential, past and existing employees of Monarch Marketing. Independent contractors are treated on the same basis where the collection of information is concerned.
 - 4.8.2. When appointing new employees / contractors, Monarch Marketing requires information, including, but not limited to that listed above, from prospective employees / contractors, in order to process the information on the system/s. Such information is reasonably necessary for the Company`s record purposes, as well as to ascertain if the prospective employee / contractor meets the requirements, for the position which is being appointed / contracted, and is suitable for appointment.
 - 4.8.3. Monarch Marketing will use and process such employee information, as set out below for including, but not limited to, its employment records and to make lawful decisions in respect of that employee and its business.



MONARCH MARKETING

A DIVISION OF MONARCH TRAVEL GOODS (PTY) LTD

6 Falkirk Road
Ext. 12
Benoni
1501

P.O. Box 1240
Benoni
1500

Tel (011) 841-8800
Fax (011) 914-2329

- 4.8.4. Use of employee information: Employees personal information will only be used for the purposes for which it was collected and intended. This includes, but is not limited to:
 - 4.8.4.1. Submissions to the Department of Employment and Labour
 - 4.8.4.2. Submissions to the Receiver of Revenue
 - 4.8.4.3. For audit and record keeping purposes
 - 4.8.4.4. In connection with legal proceedings
 - 4.8.4.5. In connection with and to comply with legal and regulatory requirements
 - 4.8.4.6. In connection with any administrative functions of the company
 - 4.8.4.7. Disciplinary action or any other action to address the employee`s conduct or capacity
 - 4.8.4.8. In respect of any employment benefits that the employee is entitled to.
 - 4.8.4.9. Pre- and post-employment checks and screening
 - 4.8.4.10. Any other relevant purpose to which the employee has been notified.
- 4.9. Collection of Clients/ Sub contractors/ Supplier`s information:
 - 4.9.1. For purposes of this Policy, Clients include potential, past and existing members and clients. Suppliers include all vendors with contract with Monarch Marketing, whether once off or recurring, in respect of products and services.
 - 4.9.2. Monarch Marketing collects and process its clients and supplier`s personal information, such as that mentioned hereunder. The type of information will depend on the need for which it is collected and will be processed for that purpose only. Further examples of personal information collected from clients include, but is not limited to:



MONARCH MARKETING

A DIVISION OF MONARCH TRAVEL GOODS (PTY) LTD

6 Falkirk Road
Ext. 12
Benoni
1501

P.O. Box 1240
Benoni
1500

Tel (011) 841-8800
Fax (011) 914-2329

4.9.2.1. The client, supplier, sub contractor`s identity number, name, surname, address, postal code

4.9.2.2. The client, supplier, sub contractor`s residential and postal address

4.9.2.3. Contact information

4.9.2.4. Banking details

4.9.2.5. Company registration number

4.9.2.6. Full name of the legal entity

4.9.2.7. Tax and / or VAT number

4.9.2.8. Details of the person responsible for the client`s / supplier`s account

4.10. Disclosure of personal information

4.10.1. Monarch Marketing may share employee`s , client, sub-contractor, supplier`s personal information with authorised third parties as well as obtain information from such third parties for the following, and not limited to reasons:

4.10.1.1. Sending accounts and communication in respect of services rendered

4.10.1.2. Referral to other service providers

4.10.1.3. Confirming, verifying and updating details

4.10.1.4. For auditing and record keeping purposes

4.10.1.5. In connection with legal proceedings

4.10.1.6. In connection with and to comply with legal and regulatory requirements or when it is otherwise allowed by law.

4.10.2. Monarch Marketing may also disclose employee`s , clients, sub-contractors, supplier`s information where there is a duty or a right to disclose in terms of applicable legislation, the law or where it may be



MONARCH MARKETING

A DIVISION OF MONARCH TRAVEL GOODS (PTY) LTD

6 Falkirk Road
Ext. 12
Benoni
1501

P.O. Box 1240
Benoni
1500

Tel (011) 841-8800
Fax (011) 914-2329

necessary to protect the rights of the organisation or it is in the interest of the data subject.

5. SAFEGUARDING OF PERSONAL INFORMATION AND CONSENT

- 5.1. MONARCH Marketing shall review its security controls and processes on a regular basis to ensure that personal information is secure.
- 5.2. It will take appropriate, reasonable technical and organisational measures to prevent loss or damage or unauthorised destruction of personal information, and unlawful access to or processing of personal information.
This will be achieved by:
 - 5.2.1. Identifying internal and external risks
 - 5.2.2. Establishing and maintaining appropriate safeguards
 - 5.2.3. Regularly verifying these safe guards and their implementation
 - 5.2.4. Updating the safeguards
 - 5.2.5. Implementing generally accepted information security practices and procedures
- 5.3. Monarch Marketing shall appoint an Information Officer and Deputy Information Officer who are responsible for compliance with the conditions of the lawful processing of personal information and other provisions of POPI.

INFORMATION OFFICER

NAME : Robert Treger (Director)
TEL : (011) 841 8800

DEPUTY INFORMATION OFFICER

NAME : Stephen Tilley, (Financial Manager)
TEL : (011) 841 8800



MONARCH MARKETING

A DIVISION OF MONARCH TRAVEL GOODS (PTY) LTD

6 Falkirk Road
Ext. 12
Benoni
1501

P.O. Box 1240
Benoni
1500

Tel (011) 841-8800
Fax (011) 914-2329

- 5.4. Specific responsibilities of the Information Officer and Deputy Information Officer include:
 - 5.4.1. Development, implementation, monitoring and maintenance of a compliance framework.
 - 5.4.2. The undertaking of a personal information impact assessment to ensure that adequate measures and standards exist in order to comply with the conditions for the lawful processing of personal information.
 - 5.4.3. The development, monitoring and maintenance of a manual, as well as the making available thereof, as prescribed in Section 51 of the Promotion of Access to Information Act, 2000 (Act No 2 of 2000)
 - 5.4.4. The development of internal measures, together with adequate systems to process requests for information or access thereto; and
 - 5.4.5. To ensure that the company staff awareness sessions are conducted regarding the provisions of the Act, regulations made in terms of the Act, codes of conduct, or information obtained from the Regulator.
- 5.5. Employment contracts/ addendums thereto, containing relevant consent clauses for the use and storage of employee information, or any other action so required, in terms of POPI are signed by every employee.
- 5.6. On an ongoing basis, all suppliers' insurers and other third-party service providers are required to sign a service level agreement guaranteeing their commitment to the Protection of Personal Information.
- 5.7. Consent to process client / sub-contractor / supplier information is obtained from clients/ sub-contractors / suppliers .

6. DIRECT MARKETING

- 6.1. The company shall ensure that:
 - 6.1.1. It does not process any personal information for the purpose of direct marketing unless the data subject has given its consent to the processing or is an existing customer.



MONARCH MARKETING

A DIVISION OF MONARCH TRAVEL GOODS (PTY) LTD

6 Falkirk Road
Ext. 12
Benoni
1501

P.O. Box 1240
Benoni
1500

Tel (011) 841-8800
Fax (011) 914-2329

- 6.1.2. It will only approach data subjects, whose consent is required and who have not previously withheld such consent, once in order to request the consent.

7. TRANSFER OF INFORMATION OUTSIDE OF SOUTH AFRICA

- 7.1. Monarch Marketing will not transfer personal information about a data subject to a third party who is in a foreign country unless one or more of the following apply:
 - 7.1.1. The third party is subject to a law, binding corporate rules or a binding agreement which provides an adequate level of protection of personal information and effectively upholds principles for reasonable processing of the information.
 - 7.1.2. The data subject consents to the transfer.
 - 7.1.3. The transfer is necessary for the performance of a contract between the data subject and the company
 - 7.1.4. The transfer is necessary for the conclusion or performance of a contract concluded in the interest of the data subject between the company and a third party; or
 - 7.1.5. The transfer is for the benefit of the data subject, and it is not reasonably practical to obtain the consent of the data subject to that transfer and if it were reasonably practical to obtain such consent, the data subject would be likely to give it.

8. SURVEILLANCE SYSTEMS

- 8.1. Video footage and / or voice / telephone calls that have been recorded, processed and stored via CCTV camera or other surveillance systems constitute personal information. As such Monarch Marketing will make all employees, clients, sub-contractors and suppliers or data subjects aware as to the use of CCTV / other surveillance on the premises.



MONARCH MARKETING

A DIVISION OF MONARCH TRAVEL GOODS (PTY) LTD

6 Falkirk Road
Ext. 12
Benoni
1501

P.O. Box 1240
Benoni
1500

Tel (011) 841-8800
Fax (011) 914-2329

9. SECURITY MEASURES

- 9.1. Should Monarch Marketing detect a security breach on any of its systems that contain personal information, it shall take the required steps to assess the nature and extent of the breach in order to ascertain if any information has been compromised.
- 9.2. Monarch Marketing shall notify the affected parties should it have reasons to believe that their information has been compromised. Such notification shall not only be made where the organisation can identify the data subject to which the information relates. Where it is not possible, it may be necessary to consider websites publication and whatever else the Information Regulator prescribes.
- 9.3. Notification will be provided in writing.
- 9.4. Monarch Marketing shall notify the Regulator of any breach and / or compromise to personal information in its possession and work closely with and comply with any recommendations issued by the Regulator.
- 9.5. The following will apply in this regard:
 - 9.5.1. The Information Officer will be responsible for overseeing the investigation.
 - 9.5.2. The Information Officer will be responsible for reporting to the Information Regulator within 3 working days, as far as reasonably practical of breach / compromise to personal information.
 - 9.5.3. The Information Officer will be responsible for reporting to the Data Subject / within 3 working days , as far as is reasonable and practical of a breach / compromise to personal information.
 - 9.5.4. The time frames above are guidelines and depending on the merits of the situation may require earlier or later reporting.

10. ACCESS AND CORRECTION OF PERSONAL INFORMATION

- 10.1. Employees have the right to request to access any personal information the company holds about them.



MONARCH MARKETING

A DIVISION OF MONARCH TRAVEL GOODS (PTY) LTD

6 Falkirk Road
Ext. 12
Benoni
1501

P.O. Box 1240
Benoni
1500

Tel (011) 841-8800
Fax (011) 914-2329

- 10.2. Employees have the right to request the company to update, correct or delete their personal information on reasonable grounds. Such requests shall be made to the Information Officer.
- 10.3. Where an employee objects to the processing of personal information, the company may no longer process said personal information.

11. RETENTION OF RECORDS

- 11.1. Monarch Marketing is obligated to retain certain information as prescribed by law. This includes but is not limited to the following:
 - 11.1.1. With regard to the Companies Act, No 71 of 2008 and the Companies Amendment Act No 3 of 2011, hard copies of the documents mentioned below must be retained for 7 years.
 - 11.1.2. Any documents, accounts, books, writing, records or other information that a company is required to keep in terms of the Act.
 - 11.1.3. Notice and minutes of all meetings, including resolutions adopted.
 - 11.1.4. Copies of annual financial statements required by the Act and copies of accounting records as required by the Act
 - 11.1.5. Basic Conditions of Employment Act No 75 of 1997, as amended, requires the organisation to keep the records relating to its staff for a period of no less than 3 years.

12. AMENDMENTS TO THIS POLICY

- 12.1. Amendments to this Policy will take place from time to time subject to the discretion of the company and pursuant to any changes in law.

13. REQUESTS FOR INFORMATION

- 13.1. The following documents shall constitute an addendum to this Policy:
 - 13.1.1. Objection to the processing of personal information



MONARCH MARKETING

A DIVISION OF MONARCH TRAVEL GOODS (PTY) LTD

6 Falkirk Road
Ext. 12
Benoni
1501

P.O. Box 1240
Benoni
1500

Tel (011) 841-8800
Fax (011) 914-2329

- 13.1.2. Request for correction or deletion of personal information or destruction of record of personal information
- 13.1.3. Request for data subject`s consent to process personal information
- 13.1.4. Submission of complaint
- 13.1.5. Request for information

14. WE WILL INFORM YOU ABOUT COMPROMISED INFORMATION

- 14.1. Although we cannot prevent all security threats, we have measures in place to minimise the threat to your privacy. We will let you know of any breaches which affect your personal information.
- 14.2. You have a right to lodge a complaint to the Information Regulator (infoereg@justice.gov.za) for any contravention of POPI.

15. THIRD PARTY WEBSITES

- 15.1.1. To the extent allowed by law, we are not responsible for the privacy practices of a third-party site to which there may be a link on the website, or for any claims, loss or damage arising from these.
- 15.1.2. We advise you to read the privacy policy of each site which you visit and to determine your privacy settings in accordance with your personal preferences.
- 15.1.3. We are not liable if you suffer losses or damages when visiting third party websites by following a link to that website from the Website. You accept that there may be risks when you use such third-party websites, and you do so at your own risk.



MONARCH MARKETING

A DIVISION OF MONARCH TRAVEL GOODS (PTY) LTD

6 Falkirk Road
Ext. 12
Benoni
1501

P.O. Box 1240
Benoni
1500

Tel (011) 841-8800
Fax (011) 914-2329

16. PROTECTION OF PERSONAL INFORMATION ACT AND OTHER LAWS

16.1. If this privacy notice or any provision in this privacy notice is regulated by or subject to POPI or other laws, it is not intended that any provision of this privacy notice contravenes any provision of POPI or such other laws.

Therefore, all provisions of this privacy notice must be treated as being qualified, to the extent necessary, to ensure that the provisions of POPI and such other laws are complied with.

16.2. No provision of this privacy notice:

- 16.2.1. Does or purports to limit or exempt us from any liability (including, without limitation, for any loss directly or indirectly attributable to our gross negligence or wilful default or that of any other person acting for or controlled by us) to the extent that the law does not allow such a limitation or exemption.
- 16.2.2. Requires you to assume risk or liability for the kind of liability or loss, to the extent that the law does not allow such an assumption of risk or liability.
- 16.2.3. Limits or excludes any warranties or obligations which are implied into this privacy notice by POPI (to the extent applicable), or other applicable laws or which we give under POPI (to the extent applicable), or other applicable laws, to the extent that the law does not allow them to be limited or excluded.



MONARCH MARKETING

A DIVISION OF MONARCH TRAVEL GOODS (PTY) LTD

6 Falkirk Road
Ext. 12
Benoni
1501

P.O. Box 1240
Benoni
1500

Tel (011) 841-8800
Fax (011) 914-2329

17. GENERAL

17.1. You agree that this privacy notice, our relationship and any dispute of whatsoever nature relating to or arising out of this privacy notice whether directly or indirectly, shall be governed by the laws of the Republic of South Africa without giving effect to any principle of conflict of laws.

You agree that we may, at any time, transfer, cede, delegate or assign any or all of our rights and obligations under this privacy notice without your consent.

We will notify you if we transfer, cede, delegate or assign any rights or obligations to a third party, but we do not have to notify you if we transfer, cede, delegate or assign any rights or obligations to any of our affiliates or to any person which acquires all or part of our business and/or assets.

We may also sub-contract our obligations without your consent and we do not have to notify you if we sub-contract any of our obligations.

Our failure to exercise or enforce any right or provision of this privacy notice shall not constitute a waiver of such right or provision. Each provision of this privacy notice, and each part of any provision, is removable and detachable from the others.

As far as the law allows, if any provision of this privacy notice, or part of a provision, is found by a court or authority of competent jurisdiction to be invalid, illegal or unenforceable (including, without limitation, because such provision is inconsistent with the laws of another jurisdiction), it must be treated as if it was not included in this privacy notice and the rest of this privacy notice will still be valid and enforceable.