

COR-POL-0084

Customer Data Protection Policy





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Version: 1.1

Status: Approved

Date: 2023-07-05

Owner: Head Legal

Document Information

DOCUMENT PURPOSE:

This policy describes how Q LINK processes, personal information.

SCOPE OF APPLICABILITY:

This policy is applicable to all Q LINK employees. Q LINK is a division of Q LINK Holdings (Pty) Ltd.

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Document Version Control

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1. INTRODUCTION

Q LINK respects and protects the privacy of data subjects by complying with data protection legislation governing the processing of data subjects' personal information.

2. PURPOSE

The purpose of a data privacy and protection policy is to protect personal and sensitive information from unauthorized access, use, disclosure, or destruction. It outlines how data is collected, processed, stored, and secured within an organization. The policy also provides guidelines to employees on how to handle sensitive information and ensures that the organization complies with privacy laws and regulations.

3. DOCUMENT DEFINITIONS

data subject means the person who personal information relates to;

personal information means information associated with you or another natural or juristic person (data subject) that can be used to identify you or that person; and

processing means doing anything with personal information including collecting, storing, disclosing, or combining it with other data.

4. Q LINK DATA PROTECTION POLICY STATEMENTS

4.1 Q LINK, collects personal information for specific, explicitly defined, and lawful purposes that include, without limitation:

- 4.1.1** providing its products and services including, the collection, disbursement and administration of various financial services related instalments and the processing of these collections through various channels including, but not limited to, various payrolls and via Bank collection facilities. Other services also relate to the administration of emolument attachment orders on behalf of various payrolls, membership administration related services and the development of financial service-related software for various companies. Q LINK renders these services as Operator to their clients in their capacities as Responsible parties in terms of the Act;
- 4.1.2** marketing its products and services to customers and prospective customers;
- 4.1.3** conducting affordability checks on their payroll deduction services as required by the various payrolls where these deductions are processed;
- 4.1.4** maintaining records of services provided to their clients;
- 4.1.5** enhancing communication with clients;
- 4.1.6** conducting research relating to the use of Q LINK products and services;
- 4.1.7** enabling Q LINK to monitor and address any queries relating to its processing of personal information as required by law and determined by Q LINK;



- 4.1.8 the employments of Data Subjects, including potential candidates who will not necessarily be appointed,
- 4.1.9 third party service providers who in turn provide services to Q LINK;
- 4.1.10 visitor information to comply with building safety obligations, to identify the people who are entering our premises and for health reasons.
- 4.1.11 photos and videos and related content to communicate with relevant parties regarding our events, meetings, conferences, products, partnerships and other relationships, on our websites, via our social media accounts, via press releases, and other corporate communications and marketing materials. In some cases, we may ask you to provide us with your email address;
- 4.1.12 cv/resumes and relevant information for recruitment to enable us to recruit the right people;
- 4.1.13 information relating to sourcing and procurement to set up the contractual terms with our suppliers, to pay for our suppliers' products or services, to perform recalls and to call warranties, to comply with accounting obligations applicable to us, to conduct demand planning and generally to facilitate the relationship with our suppliers; and
- 4.2 for any purposes ancillary to the purposes described in sub-sections 4.1.1 to 4.1.13.

5. LAWFULL PROCESSING OF PERSONAL INFORMATION

Q LINK:

- 5.1 is accountable for and processes personal information in compliance with the conditions and principles governing lawful processing;
- 5.2 develops written procedures and standards supporting this policy regulating the processing of personal information;
- 5.3 trains persons dealing with personal information to process the data lawfully as determined by the explicitly defined and lawful purpose for the collection of the personal information;
- 5.4 only collects personal information that is adequate, relevant and not excessive for the purpose of the collection and processing;
- 5.5 processes and uses personal information in accordance with the various agreements concluded with either our clients or the data subjects directly;
- 5.6 notifies data subjects that it collects information from, of the purpose of collection, and to whom the data subject's personal information may be provided, this includes the personal information as received from Responsible Parties to whom Q LINK;
- 5.7 notifies data subjects of their right to access their personal information and if it is incorrect to request that it is corrected or deleted;
- 5.8 only processes data subjects' special personal information (religious, philosophical and political beliefs, race, trade union membership, health or sex-life information, biometric



information) or children's personal information (a natural person under the age of 18) that it is authorised to, and in a manner that is compatible with the purpose for which it was collected;

- 5.9 requires that, where a data subject's consent is necessary for the processing of their personal information, the data subject grants consent by a clear affirmative action, freely given and providing an unambiguous indication of the data subject's consent, this includes the same requirement being enforced on Q LINK's clients where Q LINK processes personal information in the capacity as Operator;
- 5.10 establishes and maintains appropriate technical and organisational measures to safeguard the confidentiality and integrity of customer personal information communicated between by it to third parties;
- 5.11 only uses a data subject's personal information for the purpose of unsolicited electronic communication, or automatic decision-making, with the prior written consent of the data subject or the Responsible Party who in turn is required to have the authority from the data subject;
- 5.12 stops processing a data subject's personal information if the data subject objects unless it has a lawful justification to continue to process the information;
- 5.13 stops processing a data subject's personal information for the purpose of direct marketing as soon as reasonably practicable after the data subject has opted out; and
- 5.14 only communicates a data subject's personal information to a third party who processes personal information on behalf of Q LINK (operator acting on Q LINK's mandate but not under its direct control) if a Data Processing Agreement has been concluded with the operator;
- 5.15 retains a data subject's personal information for a period:
 - 5.15.1 required or authorised by law; or
 - 5.15.2 reasonably required by Q LINK for its business functions or activities required by agreement between Q LINK and a customer.
- 5.16 destroys, deletes or de-identifies personal information that is no longer necessary for the purpose that it was collected and processed;
- 5.17 only transfers personal information across borders:
 - 5.17.1 with the data subject's consent; or
 - 5.17.2 to a third party who is subject to laws, binding corporate rules or a binding agreement that protects the personal information in a substantially similar manner to POPIA; or
 - 5.17.3 the transfer is necessary for the conclusion or performance of a contract at the data subject's request or a contract in the interests of the data subject.



6. CONSEQUENCES OF REFUSAL TO PROVIDE PERSONAL INFORMATION

- 6.1 Should you not provide Q LINK with the Personal Data we request or if you ask that we cease processing your, or our clients Personal Data, the quality of our products or services may be affected or we would be in breach of one or more legal or contractual obligations applicable to us.
- 6.2 In some cases, if we are not allowed to process the Personal Data, this may result in us being required to cease to provide you with our products or services or to terminate our relationship with you.

7. POLICY RESPONSIBILITY

- 7.1 The governing body of Q LINK has appointed an Information Security Committee to oversee customer data protection at Q LINK.
- 7.2 The Information Security Committee requires that all Q LINK employees and third parties engaged by it process customers' personal information as required in this policy and procedures and standards developed to support this policy.

8. CONTACT INFORMATION

CONTACT INFORMATION	
Information Officer:	Jan Nel - Head of Information Security
E-mail address:	jan.nel@qlink.co.za

9. REVIEW AND AUDIT

- 9.1 The policy (and the procedures, standards and guidelines supporting the policy) is reviewed by the Q LINK Information Security Committee regularly, and at least once in each year.
- 9.2 Reviews and any revisions of the policy (and the procedures, standards and guidelines supporting the policy) will be recorded in an Approval and Revision History filed with this policy.
- 9.3 Compliance with this policy (and the procedures, standards and guidelines supporting the policy) is monitored and subject to audit.

** END OF POLICY **