



CROSS FIRE MANAGEMENT QMS

DISCLAIMER PROTECTION OF PERSONAL INFORMATION ACT

Document Number

CFM-QAM-POL-007

Owner

N. Chetty

Revision

Date

0

08/2022

Cross Fire Management (Pty) Ltd would like to welcome you to its website.

By viewing this website you hereby acknowledge that you have read and accepted the following Protection of Personal Information (POPI) disclaimer.

Cross Fire Management (Pty) Ltd shall take all reasonable measures to protect the personal information of users and for the purpose of this disclaimer “personal information” shall be defined as detailed in the Promotion of Access to Information Act, Act 2 of 2000 (“PAIA”) and the Protection of Personal Information Act, Act 4 of 2013 (“POPI”).

The PAIA and POPI Acts are available online at www.gov.za/documents/acts

1. The Processing of Personal Information

Cross Fire Management takes the privacy and protection of personal information very seriously and will only process personal information in accordance with the current South African privacy legislation. Accordingly, the relevant personal information privacy principles relating to the processing thereof (including, but not limited to, the collection, handling, transfer, sharing, correction, storage, archiving and deletion) will be applied to any personal information processed by Cross Fire Management.

2. The purpose of processing of personal information by Cross Fire Management

We process personal information for a variety of purposes, including but not limited to the following:

- to provide or manage any information, products and/or services requested by data subjects;
- to help us identify data subjects when they contact Cross Fire Management.
- to maintain client records;
- to maintain client equipment records;
- for recruitment purposes;
- for operational processes
- for employment purposes;



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- for travel purposes;
- for general administration, financial and tax purposes;
- for legal or contractual purposes;
- for health and safety purposes;
- to monitor access, secure and manage our premises and facilities;
- to transact with our suppliers and business partners, including Cross Fire Management partners;
- to help us improve the quality of our products and services;
- to help us detect and prevent fraud and money laundering;
- to help us recover debts;
- to carry out analysis and client profiling; and
- to identify other products and services which might be of interest to data subjects and to inform them about our products and services

3. Categories of data subjects and personal information processed by Cross Fire Management.

Categories of data subjects and personal information processed by Cross Fire Management include the following:

| CATEGORIES OF DATA SUBJECTS | PERSONAL INFORMATION PROCESSED |
|---|--|
| Clients and potential clients | Personal information |
| | Contracts and warranties |
| | Installation and equipment information |
| | Location information |
| | Information provided through CROSS FIRE MANAGEMENT My Account and any other Cross Fire Management system accessible by a client. |
| Cross Fire Management and installation partners | Personal information |
| | Contractor information |



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| | |
|-----------------------------|--|
| | Personal information of contractor employees |
| Suppliers | Personal information |
| | Personal information of supplier representatives |
| Employees | Personal information |
| | Medical information, including disability information where provided. |
| | Employee spousal I partner information |
| | Employee Pension and Provident Fund Information |
| | Employment contracts |
| | Employee performance records |
| | Payroll records |
| | Electronic access records |
| | Physical access records |
| | Surveillance records |
| | Health and safety records |
| | Training records |
| | Employment history |
| Time and attendance records | |
| Job applicants | Curriculum vitae and application forms |
| | Criminal checks |
| | Background checks |
| Children | Personal information |
| | Medical information |
| Visitors | Physical access records |
| | Personal Information |
| | Electronic access records and scans |
| | Surveillance records |



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4. Recipients or categories of recipients with whom personal information is shared

- We may share the personal information of our data subjects for any of the purposes outlined in Section 2, with the following:
- our other Cross Fire Management business partners in South Africa and in other countries;
- our carefully selected business partners who provide products and services under one of our brands; and
- our contractors and service providers who perform services on our behalf.

We do not share the personal information of our data subjects with any third parties, unless we have your explicit consent to do so and where:

- we are obliged to provide such information for legal or regulatory purposes;
- we are required to do so for purposes of existing or future legal proceedings.
- we are selling one or more of our businesses to someone to whom we may transfer our rights under any client agreement we have with you;
- we are involved in the prevention of fraud, loss, bribery or corruption;
- they perform services and process personal information on our behalf;
- this is required to provide or manage any information, products and/or services to data subjects; or
- needed to help us improve the quality of our products and services.

We will send our data subjects notifications or communications if we are obliged by law, or in terms of our contractual relationship with them.

We will only disclose personal information to government authorities if we are required to do so by law.

Our employees, authorised Cross Fire Management maintenance and repair providers and their employees, our agencies and our suppliers, are required to adhere to data privacy legislation.



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5. Information security measures to protect personal information

Reasonable technical and organisational measures have been implemented for the protection of personal information processed by Cross Fire Management and its operators. In terms of POPIA, operators are third parties that process personal information on behalf of Cross Fire Management.

We continuously implement and monitor technical and organisational security measures to protect the personal information we hold, against unauthorised access, as well as accidental or wilful manipulation, loss or destruction.

We will take steps to ensure that operators that process personal information on behalf of Cross Fire Management apply adequate safeguards as outlined above.

6. Trans-border flows of personal information

We will only transfer personal information across South African borders if the relevant business transactions or situation requires trans-border processing and will do so only in accordance with South African legislative requirements; or if the data subject consents to transfer of their personal information to third parties in foreign countries.

We will take steps to ensure that operators are bound by laws, binding corporate rules or binding agreements that provide an adequate level of protection and uphold principles for reasonable and lawful processing of personal information, in terms of POPIA.

We will take steps to ensure that operators that process personal information in jurisdictions outside of South Africa, apply adequate safeguards as outlined in Section