



# GOVERNANCE RISK COMPLIANCE

## HOSI POPIA POLICY

Version 01

**Prepared By: Johannes Sengwane**

**24 February 2026**

**1 APPROVAL**

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Compiled By: -



Johannes Sengwane

Date: - 24 February 2026

GRC Manager

Reviewed By:-



Koketso Molelemane  
HR Manager

Date:- 24 February 2026

Approved By: -



Nicol Mkhacana

Date:- 24 February 2026

Chief Executive Officer

## 2 ABBRIVATIONS DESCRIPTION

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Abbreviation	Description
POPIA	Protection of Personal Information Act, 2013
GRC	Governance, Risk and Compliance
EXCO	Executive Committee
DPO	Data Privacy Officer
ISO	Information Security Officer

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### 3 PURPOSE

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The purpose of this Policy is to ensure that Hosi Technologies processes personal information **lawfully, reasonably, and transparently** in accordance with the **Protection of Personal Information Act, 2013 (Act No. No. 4 of 2013) (POPIA)**.

This Policy is a **mandatory control instrument** within the Hosi Technologies **Governance, Risk, Compliance and Controls (GRCsC) Framework** and supports:

- CEO led governance and accountability.
- Enterprise risk management and legal compliance
- Protection of Hosi Technologies' reputation and client base
- Operational stability and service delivery quality
- Customer trust and sustainable business growth

### 4 SCOPE OF APPLICATION

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This Policy applies to: - Hosi Technologies (Pty) Ltd - All employees, contractors, consultants, and temporary staff - All personal information processed by Hosi Technologies, whether electronically or manually - Personal information processed via websites, intranet, extranet, client platforms, and third-party systems.

### 5 DEFINITIONS

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- **Personal Information:** Information relating to an identifiable, living natural person or juristic person.
- **Processing:** Any operation concerning personal information, including collection, storage, use, sharing, or destruction.
- **Data Subject:** The person to whom personal information relates.
- **Responsible Party:** Hosi Technologies.
- **Operator:** A third-party processing personal information on behalf of Hosi Technologies.
- **Information Officer:** The person appointed in terms of POPIA to ensure compliance.

### 6 POLICY STATEMENT

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Hosi Technologies are committed to: - Protecting personal information against unauthorized access, loss, damage, or disclosure - Processing personal information only for legitimate and lawful business purposes - Ensuring compliance

with POPIA and applicable contractual and regulatory obligations - Embedding privacy and data protection into governance, risk management, and operations.

## **7 CONDITIONS FOR LAWFUL PROCESSING**

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Hosi Technologies processes personal information in accordance with the eight POPIA conditions: -

### **5.1 Accountability**

Hosi Technologies is responsible for ensuring compliance with POPIA and this Policy.

### **5.2 Processing Limitation**

Personal information is processed lawfully and minimally, based on consent, contractual necessity, legal obligation, or legitimate interest.

### **5.3 Purpose Specification**

Personal information is collected for specific, explicitly defined, and lawful purposes.

### **5.4 Further Processing Limitation**

Further processing must be compatible with the original purpose of collection.

### **5.5 Information Quality**

Reasonable steps are taken to ensure personal information is accurate, complete, and up to date.

### **5.6 Openness**

Data subjects are informed of the collection and use of their personal information and their rights under POPIA.

### **5.7 Security Safeguards**

Appropriate technical and organisational measures are implemented to safeguard personal information.

### **5.8 Data Subject Participation**

Data subjects may access, correct, object to, or request deletion of their personal information.

## **8 CATEGORIES OF PERSONAL INFORMATION PROCESSED**

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Hosi Technologies may process: -

- Identification and contact information.
- Employment and HR-related information
- Client, supplier, and partner information
- System access, audit logs, and security records
- Website enquiries and communications
- Special personal information is processed only where legally permitted.

## **9 CONSENT MANAGEMENT**

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Where consent is required: - Consent must be voluntary, specific, informed, and explicit - Consent records must be retained - Data subjects may withdraw consent at any time.

## **10 OPERATORS AND THIRD PARTIES**

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- Operators may process personal information only under written agreement.
- Operators must implement adequate security safeguards.
- Hosi Technologies remains accountable for operator compliance.

## **11 CROSS-BORDER TRANSFERS**

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Personal information may be transferred outside South Africa only where: - Adequate protection is in place, or - The data subject has consented, or - Transfer is required by law or contract.

## **12 DATA RETENTION AND DESTRUCTION**

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Personal information is retained only for as long as necessary to fulfil the purpose for which it was collected or as required by law.

Secure destruction methods are applied once retention periods expire.

## **13 DATA SUBJECT RIGHTS**

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Data subjects have the right to: -

- Access their personal information.

- Request corrections or deletion.
- Object to processing - Withdraw consent.
- Lodge a complaint with the Information Regulator

## **14 12. SECURITY BREACH MANAGEMENT**

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All actual or suspected personal information breaches must be reported immediately.

Hosi Technologies will: - Investigate the breach - Notify affected data subjects and the Information Regulator where required - Implement corrective and preventive actions.

## **15 ROLES AND RESPONSIBILITIES**

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### **13.1 Office of the CEO**

- Provides executive oversight of privacy and POPIA compliance.
- Approves this Policy and material amendments.

### **13.2 Executive Committee (EXCO)**

- Oversees enterprise privacy risks and compliance.
- Ensures management accountability.

### **13.3 Information Officer**

- Oversees POPIA compliance
- Consults with the Information Regulator
- Manages data subject requests and breach notifications.

### **13.4 GRC Function**

- Maintains this Policy within the GRCCC Framework
- Monitors compliance and control effectiveness
- Provides independent assurance and reporting.

### **13.5 Management**

- Owns POPIA risks and controls within their portfolios.
- Ensures lawful processing of personal information.

### 13.6 Employees and Contractors

- Must comply with this Policy and supporting procedures.
- You must always protect personal information.
- Must report privacy incidents immediately.

## 16 AWARENESS AND TRAINING

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POPIA awareness training is mandatory for all employees and contractors and forms part of onboarding and annual refresher programmes.

## 17 NON-COMPLIANCE

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Failure to comply with this Policy may result in disciplinary action and legal consequences.

## 18 POLICY REVIEW

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This Policy is reviewed at least annually or upon significant legislative or operational change.