



PROTECTION OF PERSONAL INFORMATION ACT POLICY

Table of Contents

1. About EDS Systems	3
2. Definitions and Interpretations.....	3
3. Status and Amendments	4
4. The information we collect.....	4
5. How we use your information	4
6. Disclosure of information	5
7. Disclosure of information	5
8. Your rights: Access to information	6
9. Correction of your information.....	6
10. Raising concerns	6
11. Version Control	6

This Privacy policy statement forms part of EDS Systems (Pty Ltd) (“EDS Systems”) Website and Carbon Tax Tool Software terms and conditions. If you do not agree with any term of this privacy policy, you must cease your access of this Website and use of the Carbon Tax Tool Software immediately.

1. About EDS Systems

EDS Systems is an IT Development, Consulting and Management firm which provides electronic systems to various industries, for example Travel Booking Systems for Travel Agencies, Carbon Tax, Return on Investment (RoI), Agriculture, etc.

2. Definitions and Interpretations

“**Personal Information**” means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person including all information as defined in POPI.

EDS Systems also includes the following as personal and/or private/confidential information:

1. All addresses including residential, postal and email addresses.
2. Passports, IDs, visa information and work permits.
3. Company registration information.
4. Company Shareholder information.
5. Company invoice, procurement and proof of payment data.
6. Company financial information and statements.

“**POPI**” means the Protection of Personal Information Act, 2013.

“**Processing**” means the creation, generation, communication, storage, destruction of personal information as more fully defined in POPI.

“**Service**” means any carbon tax related service and calculator, including carbon foot printing service and calculator, offered through the proprietary cloud-based software by EDS Systems through the Website, from time to time, and a reference to Services shall mean any combination of such services as the context may indicate.

“**Software**” means the cloud based proprietary software through which EDS Systems offers the Services on the Website.

“**You**” or “**user**” means any person who accesses and browses the Website for any purpose and uses the Software.

“**Website**” means the website located at <http://www.eds.holdings> and all content found therein, including but not limited to any text, images, computer programs, software code, metadata, databases, graphic design elements and all other materials accessible through the website, but expressly excluding links to external third party websites.

3. Status and Amendments

This privacy policy sets out EDS systems' information gathering and dissemination practices in respect of the Website and Software and governs the processing of personal information provided to EDS Systems through your use of the Website and Software.

Please note that, due to legal and other developments, EDS Systems may amend these terms and conditions from time to time. The version of the terms and conditions effective for this privacy policy are indicated by the effective date incorporated in the title of this privacy policy. It is your duty to remain appraised of the current version of this privacy policy. The date indicated in the heading of this privacy policy is the effective date that governs the browsing and use of the Website and Software from that date until the next revision of this privacy policy becomes effective.

By continuing to browse or use the Website and Software after a revised privacy policy becomes effective constitutes your agreement to observe this privacy policy as may be revised.

4. The information we collect

1. We collect Personal Information for the purposes of evidence-based reporting, compliance regulation calculations and financial management services.
2. We also collect personal information of the registered user of the Website and Software.
3. All Personal Information required is uploaded to our secure, electronic online system.
4. All Personal Information is stored electronically.
5. No Personal Information is collected via our Website or social media, but rather only through the Software.
6. All Personal Information collected is deemed as Confidential and EDS Systems policies and procedures pertaining to the maintenance of confidentiality by all employees shall apply.

5. How we use your information

We will use all Personal Information only for the purposes for which it was collected, such purposes include:

1. To develop a database of contact information;
2. Regulation compliance reporting;
3. Regulation compliance taxation calculations;
4. Financial management reporting;
5. For audit and record keeping purposes.

EDS Systems will otherwise only process your Personal Information in a manner that is adequate, relevant and not excessive in the context of the purpose for which it is processed. We use your Personal Information, to fulfil any other purposes for which you provide your Personal Information, for any other purpose as described to you at the time your Personal Information is collected or for which your consent is given or for any other purpose in our

sole judgment to improve or enhance the Website and Software user experience or to improve our operations and obligations.

All data is stored for a maximum of five (5) years for legal and reporting purposes.

If Personal Information is released with your consent EDS Systems will retain a record of the information released, the third party to which it was released, the reason for the release and the date of release, for a period of 1 (one) year from the date on which it was last used.

6. Disclosure of information

We may disclose your Personal Information to our service providers who are involved in the delivery of products or services to you. We have agreements in place to ensure that they comply with EDS Systems privacy and confidentiality policies and as required by POPI.

We may also disclose your information:

1. Where we have a legal duty to do so;
2. Where we have a duty or a right to disclose in terms of law or industry codes;
3. Where we believe it is necessary to protect our rights;
4. Where we have your written authority to do so;
5. We may share some or all your Personal Information with any of our parent companies, subsidiaries, or other companies under common control with us.

In exceptional circumstances we may be required to disclose Personal Information, such as when there are grounds to believe that the disclosure is necessary to prevent a threat to life or health.

7. Disclosure of information

We are legally obliged to provide adequate protection for the Personal Information we hold and to stop unauthorized access and use of Personal Information. We will, on an on-going basis, continue to review our security controls and related processes to ensure that your Personal Information remains secure.

Our security policies and procedures cover:

1. Physical security measures to ensure that hard copy data is stored securely.
2. Computer and network security, including measures to limit the risk of cyber-attack(s).
3. The implementation of cyber-attack 'white-hat' or security hacks to ensure that our systems remain as secure as possible.
4. Access to personal information.
5. Security in contracting out activities or functions.
6. Retention and disposal of information.
7. Acceptable usage of personal information.
8. Governance and regulatory issues.
9. Monitoring access and usage of private information.
10. Investigating and reacting to security incidents.
11. Maintaining technology products to prevent unauthorised computer access.
12. Securely destroying your Personal Information when it's no longer needed for our record retention purposes.

When we contract with third parties, we impose appropriate security, privacy and confidentiality obligations on them to ensure that personal information that we remain responsible for, is kept secure.

We will ensure that anyone to whom we pass your Personal Information agrees to treat your information with the same level of protection as we are obliged to. You have the right to request the identity of all third parties who have access to your Personal Information.

8. Your rights: Access to information

You have the right to request a copy of the personal or private information we hold about you. To do this, simply contact us at the numbers/addresses as provided on our Website and specify what information you require. We will need a copy of your ID document or a letter from your company confirming your authorisation to access this information before providing details of your Personal Information.

Please note that any such access request may be subject to a payment of a legally allowable fee.

9. Correction of your information

You have the right to ask us to update or correct your Personal Information. We will require a copy of your ID document or a letter from your company confirming your authorisation to access this information before making changes to Personal Information we may hold about you/your company.

10. Raising concerns

If you believe this privacy policy has been breached, or suspect it may have been breached, in any way please contact the Company via email at admin@eds.holdings or via telephone on +27 11(0) 447 4683.

11. Version Control

Policy Reference:	EDSS_POPI_POL
Compiled By:	J Espin
Approved By:	W Adams
Effective Date:	29 May 2020
Document Version:	V2 – RN: Policy Formatted