

POPIA MANUAL

AUGUST 2025

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1. POPIA COMPLIANCE

MasterShred takes the right to privacy very seriously and will strive to safeguard all Data Subject's personal information to the best of our ability. This manual will be made available on the Company website in order to provide transparency and ensure best practices are always followed when dealing with personal information.

Terms used when discussing personal information:

Data Subject	Responsible Person	Operator	Processing
Person or company to whom the personal information relates	The person who determines the purpose of and the means of processing the PI.	Person who processes the PI for a responsible person i.t.o a contract	Anything to do with PI including collection, storage, modification destruction etc

2. GOVERNANCE STRUCTURE

Information Officer

The information officers' main role is to encourage compliance with POPI throughout the company and create a culture where the protection of privacy is considered in all levels of decision making. The IO must ensure that all private data held by the company is protected with both physical security measures as well as best practice behaviours.

Other responsibilities:

- Deal with requests made to the organisation in relation to POPI.
- Cooperate with the Regulator in relation to any investigations.
- Implement a compliance framework.
- Create a comprehensive POPIA manual.
- Update any policies and terms to consider POPI regulations.
- Ensure awareness training is given to all staff.
- Remain up to date with any important changes to legislation.

Contact Information:

All POPIA related queries or complaints can be directed to:

Information Officer: Ian Muller

Email Address: admin@mastershred.co.za

Prior Authorisation

MasterShred only processes unique identifiers as a responsible party for the reasons intended when we collected the information. We **do not** share any of this unique information with any 3rd parties for other reasons such as marketing or credit reporting.

1. Full names, ID numbers and address information is required on record for RICA purposes as required by ICASA.
2. Bank account numbers are required for debit order payment purposes only.
3. We do not collect or process unique information about children.

All customer registration forms will be updated with POPIA compliance information.

Internal Policies and Procedures

All MasterShred employees have signed the following documents:

- **POPIA Compliance Policies and Procedures.** This document details what is considered private information and what the acceptable processing procedures are when dealing with this information.
- **Document Shredding Security Policies & Procedures.** This document details the process when handling clients confidential documents.
- **Safe Working Procedure (SWP)** - Safe working procedures to ensure the safety of Master Confidential Document representatives and employees when using a paper shredder.
- **Risk Assessment- Key Operating Procedures** -

3. MARKETING COMMUNICATION

MasterShred will collect information so that we can contact you on occasion with MasterShred related marketing information.

Potential Customers

All marketing emailers provide an [unsubscribe link](#) should the recipient not wish to receive further promotions or marketing related communications.

Customers that do not wish to be contacted are automatically removed from our email list by our CRM software.

Information collected:

- Your full name
- E-mail address
- Telephone number
- Physical address

We **do not** collect sensitive data about our customers such as information about your religion, health, political beliefs, or sexual orientation.

We **do not** collect personal social media information.

Existing customers may be contacted to inform them about any network maintenance that will affect their services. They may also be contacted to update them about any finance related notices that will affect them such as price increases or debit order payment notices.

4. PRIVACY POLICY

COLLECTION OF INFORMATION

We may collect your personal information/data in the following ways:

- When you contact us, place orders with us or create an account.
- When you register for any events, workshops, or seminars.
- When you fill in any online forms or reply to any communication from us.
- When you subscribe to our newsletters and mailing lists.
- Third party sources such as business partners with whom we have joint marketing activities.

SHARING OF PERSONAL DATA

MasterShred respects the confidentiality of all our customers and will observe all privacy and information best practices in accordance with the applicable laws in South Africa, including the POPI Act. We undertake not to sell your personal information to third parties for commercial or marketing purposes. We will not share your personal data with any third party unless required by law:

- We may share your personal information in request to a competent authority or another

Responsible Party in accordance with, or required by any law, regulation, or legal process.

- We may share your personal data, if necessary, to comply with any judicial proceedings, court orders or government orders.
- We may disclose information to defend ourselves against any legal claims.

5. DATA SECURITY

Hard copy Information

MasterShred has aimed to become paperless since mid-2020. However, any hard copy quotes and registration forms are to be scanned and securely saved on Google Drive; the original documents should then be torn and placed in the shredding bins for shredding.

DIGITAL INFORMATION

MasterShred uses the Google Cloud and Sage Online Accounting Platforms to store our data. These platforms provide state of the art security.

IT /ELECTRONIC WASTE

All electronic waste is disposed of responsibly to both protect the environment from toxins as well as the privacy of the information stored on these devices. All electronic waste is sent to AST Recycling who provide us with a certificate of secure data destruction on completion. AST Recycling is POPIA Compliant.

AST Recycling
<https://astrecycling.co.za/>
Phone: 072 720 1507

Updates

We reserve the right to update this statement at any time. The most updated version will be available on our website.

ADDENDUM 1

POPIA COMPLIANCE – POLICIES AND PROCEDURES

- Gender, race and ethnic origin
- Photos, voice recordings, video footage
- Marital relationship and family relations
- Criminal record
- Private correspondence
- Religious or philosophical beliefs including personal and political opinions
- Employment history and salary information
- Financial information
- Education information
- Physical and mental health information including medical history
- Membership of organisations

Policies and Procedures:

1. All staff have signed company policy documents related to the handling of client documentation, IT usage, security, and confidentiality. All personal information is to be treated with the utmost confidentiality by MasterShred employees.
2. Any documents that have not been filed securely must be shredded.
3. All company, contact and address details, as well as any documents containing unique identifiers must be stored on Google Drive only.
5. No client information may be stored on personal flash drives or 3rd party communication platforms such as WhatsApp or private mail.
6. Passwords to the MasterShred domain are to be updated regularly and kept confidential.
7. No personal information may be passed on to any third party without prior approval from the Information Officer. The only exclusion to this is providing name and address MasterShred (Pty) Ltd values the right to privacy and will ensure all the necessary steps are taken to secure private data for our clients and suppliers. As an employee it is important that you understand your role in protecting this private information. Please familiarise yourself with the Protection of Personal Information Act (POPIA).

What is considered personal information:

"personal information means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person..." – below are some examples relevant to MasterShred:

- Identity or passport number
- Date of birth and age
- Phone numbers
- Email address
- Online messaging identities
- Physical address

details to upstream providers as this is required to deliver the service and this will be made clear in all registration documentation.

8. Unique identifiers such as ID numbers and bank account are never to be shared and access must be limited to the finance and projects departments for RICA compliance.

It is important to keep Privacy top of in mind when processing any information but especially when processing private or personal information.

Should you require any assistance or further explanation, please ask the Information and or Deputy information officer. A dedicated email address has been set up for all queries: popi@mastershred.co.za.

Please keep up to date with the Compliance Manual which will be available on the company website.

I Ian Muller hereby declare that I understand the importance of the POPI act
I understand my role in supporting MasterShred's compliance. I undertake to comply with
the policies and procedures as set out above.

Signed: 

Date: *1 Sept 2025*