

POPIA COMPLIANCE POLICY

Trinity Medical Supplies and Services cc

Revision Date: 22 April 2025

1. Purpose

This Policy sets out the framework by which Trinity Medical Supplies and Services cc ensures compliance with the Protection of Personal Information Act (Act No. 4 of 2013) ("POPIA"). The purpose of this Policy is to protect the personal information of all stakeholders, including customers, suppliers, employees, and other business partners, and to promote transparency in how such information is collected, processed, stored, and shared.

2. Scope

This Policy applies to all employees and representatives of Trinity Medical; all personal information collected and processed in the course of business activities; and all data storage and communication systems, whether physical or electronic.

3. Definitions

"Personal Information" means any information relating to an identifiable, living, natural person or juristic person. "Processing" includes collecting, recording, organizing, storing, updating, distributing, or erasing personal data. "Information Officer" means the individual appointed in terms of POPIA to oversee compliance and act as liaison with the Information Regulator.

4. Information Officer

The appointed Information Officer for Trinity Medical is:

Name: M. Hiscox

Position: Managing Member

Email: michele@trinitymedical.co.za

Telephone: +27 62 344 1987

Responsibilities:

- Ensuring compliance with POPIA.
- Developing, implementing, and monitoring this Policy.
- Handling all data access or correction requests.
- Reporting any data breaches to the Information Regulator.

5. Collection of Personal Information

Trinity Medical collects only the personal information necessary for lawful business purposes, including but not limited to customer and supplier contact details, business registration or VAT information, delivery addresses and order records, and employee identification and payroll information. Personal information is collected directly from the individual or authorized representative unless otherwise permitted by law.

6. Purpose of Data Processing

Personal information is processed for the following legitimate business purposes:

- To process and fulfil product orders.
- To manage customer accounts and supplier relationships.
- To comply with legal and regulatory requirements.
- To issue quotations, invoices, and statements.
- To communicate relevant business or product information.

7. Consent and Lawful Processing

All personal information is processed with the consent of the data subject, or as otherwise permitted by law. By providing information to Trinity Medical, customers, suppliers, and employees consent to the collection, processing, and storage of such information for legitimate business purposes.

8. Storage and Safeguarding of Information

Trinity Medical employs appropriate technical and organizational measures to secure personal information, including password-protected systems, restricted access to authorized personnel, locked storage for physical documents, and secure data backups. Personal information is retained only for as long as necessary or as required by law.

9. Disclosure of Information

Trinity Medical does not share personal information with third parties except where required by law, where necessary to deliver goods or services, or where consent has been granted. Any third parties used for processing data are required to comply with POPIA standards.

10. Data Subject Rights

Data subjects have the right to request access, correction, deletion, or withdrawal of consent related to their personal information. Requests must be made in writing to the Information Officer.

11. Data Breaches

In the event of unauthorized access, loss, or disclosure of personal information, the Information Officer will investigate immediately, notify affected data subjects and the Information Regulator within statutory time limits, and implement corrective actions.

12. Training and Awareness

All staff handling personal information will receive POPIA training on confidentiality, data protection, and internal breach procedures.

13. Review and Maintenance

This Policy shall be reviewed annually or when there are changes to applicable laws or business operations affecting data protection practices.

14. Compliance Declaration

By conducting business with Trinity Medical Supplies and Services cc, all stakeholders acknowledge that their personal information will be processed in accordance with this Policy and the requirements of POPIA.

Approved by:

M. Hiscox
Managing Member
Trinity Medical Supplies and Services cc
Date: 22 April 2025