



Privacy Policy

in terms of the
Protection of Personal Information Act
No. 4 2013 (RSA)

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Organisation	Tial Technologies
Scope of policy	This policy applies to the business of Tial Technologies wherever it is conducted but based at the registered office. It applies to paid Staff.
Policy operational date	01/12/2018
Policy prepared by	Dumisani Mtshali
Date approved by Information Officer	30/11/2018
Next policy review date	November 2024

Introduction

Purpose of policy	<p>The purpose of this policy is to enable Tial Technologies to:</p> <ul style="list-style-type: none"> · Comply with the law in respect of the personal information data it holds about individuals (Natural Persons i.e. Insured Individuals / Staff Members or Juristic Persons i.e. Companies / Suppliers, etc.); · Follow good practice; · Protect Tial Technologies' staff and other individuals (clients and suppliers); · Protect the organisation from the consequences of a breach of its responsibilities.
Personal information	This policy applies to information relating to identifiable individuals (natural or juristic persons), in terms of the Protection of Personal Information Act, 2013 (Hereinafter PoPI Act).
Policy statement	<p>Tial Technologies will:</p> <ul style="list-style-type: none"> · Comply with both the law and good practice; · Respect individuals' rights; · Be open and honest with individuals (natural or juristic persons) whose data is held; · Provide training and support for staff who handle personal data, so that they can act confidently and consistently.

	<p>Tial Technologies recognises that its first priority under the PoPI Act is to avoid causing harm to individuals. This means:</p> <ul style="list-style-type: none"> · Keeping information securely in the right hands, and · Retention of good quality information. <p>Secondly, the Act aims to ensure that the legitimate concerns of individuals (natural or juristic persons) about the ways in which their data may be used are taken into account. In addition to being open and transparent, Tial Technologies will seek to give individuals (natural or juristic persons) as much choice as is possible and reasonable over what data is held and how it is used.</p>
<p>Key risks</p>	<p>Tial Technologies has identified the following potential key risks, which this policy is designed to address:</p> <ul style="list-style-type: none"> · Breach of confidentiality (information being given out inappropriately); · Insufficient clarity about the range of uses to which data will be put — leading to Data Subjects being insufficiently informed; · Breach of security by allowing unauthorised access; · Harm to individuals if personal data is not up to date;
<p>Information officer responsibilities</p>	
<p>Scope</p>	<p>The scope of this aspect of the policy is defined by the provisions of the PoPI Act, Condition 1, and Chapter 5, Part B.</p>
<p>Information Officer Responsibilities</p>	<p>The Information Officer has the following responsibilities:</p> <ul style="list-style-type: none"> · Developing, publishing and maintaining a PoPI Policy that addresses all relevant provisions of the POPI Act, including but not limited to the following: · Reviewing the PoPI Act and periodic updates as published; · Ensuring that PoPI Act induction training takes place for all Staff; · Ensuring that periodic communication awareness on PoPI Act responsibilities takes place; · Ensuring that Privacy Notices for internal and external purposes are developed and published; · Handling data subject access requests; · Approving unusual or controversial disclosures of personal data; · Ensuring that appropriate policies and controls are in place to ensure the Information Quality of personal information; · Ensuring that appropriate Security Safeguards in line with the PoPI Act for personal information are in place;

	<ul style="list-style-type: none"> · Handling all aspects of relationship with the Regulator as foreseen in the PoPI Act; · Provide direction to any Deputy Information Officer if and when appointed.
Appointment	<p>The appointment of the Tial Technologies Information Officer will be authorised by the Designated Head/Director.</p> <p>Consideration will be given on an annual basis of the re-appointment or replacement of the Information Officer; the need for any Deputy to assist the Information Officer.</p>
Processing limitation	
Scope	The scope of this aspect of the policy is defined by the provisions of the PoPI Act, Condition 2.
Processing Limitation	Tial Technologies undertakes to comply with the PoPI Act, Conditions 2 in terms of processing limitation.
Forms of consent	Tial Technologies undertakes to gain written consent where appropriate via signed-off Staff Employment contracts, Tial/Client SLA contracts and/or consent forms; alternatively, a recording must be kept of verbal consent.
Nature of Personal Information	Tial Technologies has used various PoPI information sourced from the Internet, PoPI Seminars and subsequent internal workshops to identify all instances of personal information used within the Organisation.
Purpose specification	
Scope	The scope of this aspect of the policy is defined by the provisions of the PoPI Act, Condition 3.
Purpose specification	Tial Technologies undertakes to comply with the PoPI Act, Conditions 2 in terms of processing limitation.
Retention periods	<p>Tial Technologies has established retention periods for the following categories of data:</p> <ul style="list-style-type: none"> · Business Information – As long as required. · Administrative information – As long as required. · Fiscal information – 5 years. · Other information – As long as required.

Further processing limitation	
Scope	The scope of this aspect of the policy is defined by the provisions of the PoPI Act, Condition 4.
Further processing limitation	Tial Technologies undertakes to comply with the PoPI Act, Conditions 2 in terms of processing limitation, section 15.
Information quality	
Scope	<p>The scope of this aspect of the policy is defined by the provisions of the PoPI Act, Condition 5.</p> <p>Tial Technologies will comply with all of the aspects of Condition 5, section 16.</p>
Accuracy	<p>Tial Technologies will regularly review its procedures for ensuring that its records remain accurate and consistent and, in particular:</p> <ul style="list-style-type: none"> · Systems will be designed, where possible, to encourage and facilitate the entry of accurate data. · Data on any individual will be held in as few places as necessary, and all staff will be discouraged from establishing unnecessary additional data sets (i.e. copying Crystal Reports templates with data). · Effective procedures will be in place so that all relevant systems are updated when information about any individual changes. · Staff who keep more detailed information about individuals will be given additional guidance on accuracy in record keeping.
Updating	Tial Technologies will review all personal information processes and procedures on an annual basis in November of each year.
Archiving	<p>Archived electronic records of Tial Technologies are stored securely off site via Metrofile's service.</p> <p>Paper record archiving takes place through the use of Metrofile if paper shredding isn't an option.</p> <p>A certificate of destruction will be obtained from Metrofile for each batch of archived documents destroyed.</p>

Openness	
Scope	The scope of this aspect of the policy is defined by the provisions of the PoPI Act, Condition 6.
Openness	<p>In line with Conditions 6 and 8 of the Act, Tial Technologies is committed to ensuring that in principle Data Subjects are aware that their data is being processed and:</p> <ul style="list-style-type: none"> · for what purpose it is being processed; · how to exercise their rights in relation to the data.
Procedure	<p>Data Subjects will generally be informed in the following ways:</p> <ul style="list-style-type: none"> · Staff: through this policy · Customers and other interested parties: through the Tial Technologies Privacy Notice <p>Whenever data is collected, the number of mandatory fields will be kept to a minimum and Data Subjects will be informed which fields are mandatory and why.</p>
Security safeguards	
Scope	<p>The scope of this aspect of the policy is defined by the provisions of the PoPI Act, Condition 7, section 19 to 22.</p> <p>This section of the policy only addresses security issues relating to personal information. It does not cover the security of the building, business continuity or any other aspect of security.</p>
Specific risks	<p>Tial Technologies has identified the following risks:</p> <ul style="list-style-type: none"> · Staff with access to personal information could misuse it. · Staff may be tricked into giving away information, either about customers/members or colleagues, especially over the phone, through “social engineering”. · Access to information on SharePoint that was readily available to any staff with a PC/laptop and valid AD credentials has been limited to role/function. i.e. Next of kin details and Client environment login details. · Physical documents (CVs, contracts, invoices, banking details, etc.) with sensitive information could fall in the wrong hands if not always kept under lock and key when not in use.

	<ul style="list-style-type: none"> Electronic documents (i.e. HR communications, Client communications, etc.) with sensitive information could be accessed and/or edited by unauthorised persons if not sent out in a PDF format and password protected when necessary.
Setting security levels	<p>Access to information on Tial Technologies computer systems environment/s will be controlled by function.</p> <p>Tial Technologies identified the security levels by role/function required for each record held which contains Personal Information.</p>
Security measures	Tial Technologies will ensure that all necessary controls are in place in terms of access to personal information.
Business continuity	Tial Technologies will ensure that adequate steps are taken to provide business continuity in the event of an emergency.
Data subject participation	
Scope	The scope of this aspect of the policy is defined by the provisions of the PoPI Act, Condition 8, sections 23 to 25.
Responsibility	Any subject access requests will be handled by the POPI Act Information Officer in terms of Condition 8.
Procedure for making a request	<p>Subject access requests must be in writing. All staff are required to pass on anything that might be a subject access request to the PoPI Act Information Officer without delay.</p> <p>Requests for access to personal information will be handled in compliance with the PoPI Act.</p>
Provision for verifying identity	Where the individual making a subject access, the requestor is not personally, known to the PoPI Act Information Officer their identity will be verified before handing over any information.
Processing of special personal information	
Scope	The scope of this aspect of the policy is defined by the provisions of the PoPI Act, Part B, sections 26 to 33.
Processing of Special Personal Information	Tial Technologies has a policy of adhering to the process of Special Personal Information which relates to the religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life or biometric information of a data subject.

	<p>Special personal information includes criminal behavior relating to alleged offenses or proceedings dealing with alleged offenses.</p> <p>Unless a general authorisation, alternatively a specific authorisation relating to the different types of special personal information applies, a responsible party is prohibited from processing special personal information.</p>
Processing of Personal Information of Children	
Scope	The scope of this aspect of the policy is defined by the provisions of the PoPI Act, Part C, sections 34 and 35.
Processing of Personal Information of Children	<p>Tial Technologies has a policy of adhering to the process of Special Personal Information of children. This applies to under-18 individuals, so an age check is required for all personal information records.</p> <p>General authorisation concerning the personal information of children only applies where under-18s are involved.</p> <p>Tial Technologies has used various POPI information sourced from the Internet, PoPI Seminars and subsequent internal workshops to identify any records held that contain Personal Information of children.</p>
Prior authorisation	
Scope	The scope of this aspect of the policy is defined by the provisions of the PoPI Act, Chapter 6.
Prior Authorisation	Tial Technologies has the policy of adhering to the process of Prior Authorisation in terms of sections 57 to 59.
Direct Marketing, Directories and automated decision making	
Scope	The scope of this aspect of the policy is defined by the provisions of the PoPI Act, Chapter 8.
Direct Marketing, Directories and Automated Decision Making	Tial Technologies undertakes to comply with the PoPI Act Chapter 8, sections 69 to 71.
Opting in	Whenever data is first collected which might be used for any marketing purpose, this purpose will be made clear, and the Data Subject will be given a clear opportunity to opt in.

Sharing lists	<p>Tial Technologies doesn't have a policy of sharing lists (or carrying out joint or reciprocal mailings) whether occasional or on a tightly controlled basis.</p> <p>Tial Technologies undertakes to obtain external lists only where it can be guaranteed that the list is up to date and those on the list have been given an opportunity to opt-out.</p>
Electronic contact	Whenever e-mail addresses are collected, any future use for marketing will be identified, and the provision of the address made optional.
Trans-border information flows	
Scope	The scope of this aspect of the policy is defined by the provisions of the PoPI Act, Chapter 9.
Trans border information flows	<p>Tial Technologies will ensure that the PoPI Act Chapter 9, section 72 is fully complied with.</p> <p>Tial Technologies has used various PoPI information sourced from the Internet, PoPI Seminars and subsequent internal workshops to identify all instances of Trans border flows which contain Personal Information.</p> <p>Compliance with section 72 will be achieved through the use of the necessary contractual commitments from the relevant third parties.</p>
Staff training and acceptance of responsibilities	
Scope	The scope of this aspect of the policy is written in support of the provisions of the PoPI Act, Chapter 5, Part B.
Documentation	Information for staff is contained in this policy document and other materials made available by the Information Officer.
Induction	The Tial Technologies Information Officer will ensure that all staff who have access to any kind of personal information will have their responsibilities outlined during their induction procedures.
Continuing training	Tial Technologies will provide opportunities for staff to explore PoPI Act issues through training, team meetings, and supervision.

Procedure for staff signifying acceptance of policy	Tial Technologies will ensure that all staff sign acceptance of this policy once they have had a chance to understand the policy and their responsibilities in terms of the policy and the PoPI Act.
Policy review	
Responsibility	The Tial Technologies Information Officer is responsible for an annual review to be completed prior to the policy anniversary date.
Procedure	The Tial Technologies Information Officer will ensure relevant stakeholders are consulted as part of the annual review to be completed prior to the policy anniversary date.

APPENDIX A: TIAL TECHNOLOGIES CUSTOMER PRIVACY NOTICE

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1. Introduction

We respect the privacy of everyone who uses our services and visits our website. As a result, we would like to inform you regarding the way we would use your Personal Information. We recommend you read this Customer Privacy Notice and Consent so that you understand our approach towards the use of your Personal Information. By submitting your Personal Information to us, you will be treated as having given your permission – where necessary and appropriate – for disclosures referred to in this policy. By using our services and website, you acknowledge that you have reviewed the terms of this Customer Privacy Notice and Consent to Use of Personal Information (the “Customer Privacy Notice and Consent”) and agree that we may collect, use and transfer your Personal Information in accordance therewith.

If you do not agree with these terms, you may choose not to use our services or website. This Customer Privacy Notice and Consent forms part of our Services and Website Terms and Conditions of Use and such shall be governed by and construed in accordance with the laws of South Africa. This Notice explains how we obtain, use and disclose your personal information, as is required by the Protection of Personal Information Act, 2013 (POPI Act). At Tial Technologies we are committed to protecting your privacy and to ensure that your Personal Information is collected and used properly, lawfully and openly.

2. Who we are

Tial Technologies is a software development organization focusing on delivering software solutions for the insurance industry throughout the African continent in order to become the leading provider of insurance software solutions throughout the African continent, bringing innovation and support to each and every one of our clients in order to bring a digitally revolutionized system to the insurance industry.

We offer a system (and services) approved by all major insurers which includes superb support and is available anywhere. It caters for all lines of insurance, niche insurance, a business rules engine, private cloud enablement, MIS (Analytical, BI and functional reporting), and all major rating engines and has multiple insurer products ready to ship. We also have a web-based broker portal, a web portal for insureds to access policy and claim information and a Mobi-App for clients to access their policies from anywhere on their mobile devices.

The primary objective of Tial Technologies is to create customized insurance solutions for its clients, by effectively integrating technology and support services. Designed to meet the very specific insurance needs of our clients, Tial Technologies’ services are currently used for policy and claim administration by more than 100 of our clients and business partners across Southern Africa. Companies find our flagship system, SystemA, especially effective in managing and administering their policy and claim requirements.

Tial Technologies recognizes that ongoing technical and service innovation, training and support processes/procedures are essential to the successful implementation of our services. Tial Technologies is committed to providing its clients with the most comprehensive and professional service ensuring that our clients have made the right choice by listening to them and developing the partnerships we have with each and every one of those clients.

Our Company Values below support our Vision to bring a digitally revolutionized system to the insurance industry:

1. *Innovation* – We anticipate transformation and create ethical, forward-thinking solutions to overcome obstacles, delivering unique solutions to our clients.
2. *Passion* – We perform our roles with purpose, pride, a positive attitude and are committed to delivering high-quality products and services.
3. *Collaboration* – Through collaboration, we multiply our contribution. We engage, collaborate and partner with our clients and employees to achieve shared goals.
4. *Integrity* – Underpinning all our work, we think and act with integrity. We uphold our ethics and principles with every action and decision we make.
5. *Service Excellence* – We are dedicated to satisfying customer needs and honoring commitments that we have made to them.

3. The information we collect

3.1 Collection of personal information

We collect and process your Personal Information mainly to provide you with access to our services and products, to help us improve our offerings to you and for certain other purposes explained below. The type of information we collect will depend on the purpose for which it is collected and used. We will only collect information that we need for that purpose.

We collect information directly from you when you provide us with your personal details, for example when you purchase a product or service from us or when you submit inquiries to us or contact us. Where possible, we will inform you what information you are required to provide to us and what information is optional.

Examples of information we collect from you are:

- Name
- Address
- Email address
- Telephone/cell number
- User-generated content, posts and other content you submit to our web site and/or social media platforms.

We also collect information about you from other sources as explained below.

With your consent, we may also supplement the information that you provide to us with information we receive from other companies in our industry in order to offer you a more consistent and personalized experience in your interactions with Tial Technologies.

3.1.1 Collection of database information

As part of the services we offer, we will need to have access to your database information for various reasons ranging from setting up services, maintaining and enhancing services and troubleshooting service breakdowns as and when they occur.

3.1.2 Collection of non-personal information

We may automatically collect non-Personal Information about you such as the type of internet browsers you use or the website from which you linked to our website. We may also aggregate details that you have submitted to the site (for example, the products or services you are interested in). You cannot be identified from this information and it is only used to assist us in providing an effective service on our website. We may from time to time supply third parties with this non-personal or aggregated data for uses in connection with our website.

3.2 Cookies policy

We use the term “cookies” to refer to cookies and other similar technologies covered by the POPI Act on privacy in electronic communications.

3.2.1 What is a cookie?

Cookies are small data files that your browser places on your computer or device. Cookies help your browser navigate a website and the cookies themselves cannot collect any information stored on your computer or your files. When a server uses a web browser to read cookies, they can help a website deliver a more user-friendly service. To protect your privacy, your browser only gives a website access to the cookies it has already sent to you.

3.2.2 Why do we use cookies?

We use cookies to learn more about the way you interact with our content and help us to improve your experience when visiting our website. Cookies remember the type of browser you use and which additional browser software you have installed. They also remember your preferences, such as language and region, which remain as your default settings when you revisit the website. Cookies also allow you to rate pages and fill in comment forms. Some of the cookies we use are session cookies and only last until you close your browser, others are persistent cookies which are stored on your computer for longer.

3.2.3 How are third party cookies used?

For some of the functions within our websites we use third party suppliers, for example, when you visit a page with links to Facebook, Twitter, LinkedIn, etc. These links (and any other content from third party suppliers) may contain third party cookies and you may wish to consult the policies of these third party websites for information regarding their use of cookies.

3.2.4 How do I reject and delete cookies?

We will not use cookies to collect personally identifiable information about you. However, should you wish to do so, you can choose to reject or block the cookies set by the websites of any third party suppliers by changing your browser settings – see the Help function within your browser for further details. Please note that most browsers automatically accept cookies so if you do not wish cookies to be used you may need to actively delete or block the cookies.

You can also visit www.allaboutcookies.org for details on how to delete or reject cookies and for further information on cookies generally. For information on the use of cookies in mobile phone browsers and for details on how to reject or delete such cookies, please refer to your handset manual. Note, however, that if you reject the use of cookies you will still be able to visit our websites but some of the functions may not work correctly.

4. How we use your information

We will use your Personal and Non-Personal Information only for the purposes for which it was collected or agreed with you, for example:

- Setting up services.
- Maintaining and enhancing services.
- Troubleshooting service breakdowns as and when they occur.
- Collect information about the device you are using to view our website, such as your IP address or the type of Internet browser or operating system you are using, and link this to your Personal Information so as to ensure that the site presents the best web experience for you.
- Evaluate the use of the site, products and services
- For audit and record keeping purposes
- For market research purposes
- For monitoring and auditing website usage
- Help speed up your future activities and experience on the site.
- In connection with legal proceedings
- Make the site easier to use and to better tailor the site and our products to your interests and needs
- Offer you the opportunity to take part in competitions or promotions
- Personalise your website experience, as well as to evaluate (anonymously and in the aggregate) **statistics on website activity, such as what time you visited it, whether you've visited it before and what site referred you to it.**
- Suggest products or services (including those of relevant third parties) which we think may be of interest to you
- To assist with business development
- To carry out our obligations arising from any contracts entered into between you and us

- To conduct market or customer satisfaction research or for statistical analysis
- To confirm and verify your identity or to verify that you are an authorised customer for security Purposes
- To contact you regarding products and services which may be of interest to you, provided you have given us consent to do so or you have previously requested a product or service from us, and the communication is relevant or related to that prior request and made within any timeframes established by applicable laws.
- To notify you about changes to our services and products.
- To respond to your queries or comments.
- We will also use your Personal Information to comply with legal and regulatory requirements or industry codes to which we subscribe, or which apply to us, or when it is otherwise allowed by law.
- Where we collect Personal Information for a specific purpose, we will not keep it for longer than is necessary to fulfil that purpose, unless we must keep it for legitimate business or legal reasons. In order to protect information from accidental or malicious destruction, when we delete information from our services, we may not immediately delete residual copies from our servers or remove information from our backup systems.
- You can opt out of receiving communications from us at any time. Any direct marketing communications that we send to you will provide you with the information and means necessary to opt out.

5. Disclosure of personal information

We may disclose your Personal Information to our business partners (i.e. Dynaco – Broad spectrum business solutions, etc.) who are involved in the delivery of products or services to you. We have agreements in place to ensure that they comply with these privacy terms.

We may share your Personal Information with, and obtain information about you from:

- Third parties for the purposes listed above;
- Other companies in our industry when we believe it will enhance the services and products, we can offer to you, but only where you have not objected to such sharing;
- Other third parties from whom you have chosen to receive marketing information.

We may also disclose your information:

- Where we have a duty or a right to disclose in terms of law or industry codes;
- Where we believe it is necessary to protect our rights.

6. Personal information security

We are legally obliged to provide adequate protection for the Personal Information we hold and to stop unauthorised 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 is secure.

Our Tial Technologies' Employee Policies and Procedures cover:

- Acceptable usage of personal information;
- Access to personal information;
- Computer and network security;
- Governance and regulatory issues;
- Investigating and reacting to security incidents.
- Monitoring access and usage of personal information;
- Physical security;
- Retention and disposal of information;
- Secure communications;
- Security in contracting out activities or functions;

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.

7. Access to your personal information

You have the right to request a copy of the Personal Information we hold about you. To do this, simply contact us via your respective Account Manager or at the numbers/addresses listed on our home page and specify what information you would like. We will take all reasonable steps to confirm your identity before providing details of your personal information.

8. Correction of your personal information

You have the right to ask us to update, correct or delete your personal information. We will take all reasonable steps to confirm your identity before making changes to Personal Information we may hold about you. We would appreciate it if you would take the necessary steps to keep your Personal Information accurate and up-to-date by notifying us of any changes we need to be aware of.

9. Definition of personal information

According to the PoPI Act “Personal Information” means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person.

The PoPI Act, which has more specific examples if you need them, can be found at the following link: <https://www.gov.za/documents/protection-personal-information-act>

10. Changes to this notice

Please note that we may amend this notice from time to time. When such amendments take place an updated notice will be communicated to all of our clients.

11. How to contact us

If you have any queries about this notice or believe we have not adhered to it, or need further information about our privacy practices or wish to give or withdraw consent, exercise preferences or access or correct your personal information, please contact us via your standard communications channels (i.e. your respective Account Manager, etc.) or at the numbers/addresses listed on our website: www.tial.co.za

APPENDIX B: TIAL TECHNOLOGIES POLICY FOR OBTAINING CONSENT FROM CUSTOMERS / MEMBERS

Tial Technologies collects personal information from when you register with us for business purposes. We will only use this information to carry out the processes for the purpose for which you registered with us. We will protect your personal information in accordance with our Customer Privacy Notice and the provisions of the Protection of Personal Information Act, 2013 (South Africa). If you agree, we will use your information to send marketing information to you.

Tial Technologies will not share your personal information with external companies.

Personal information will be protected in accordance with the conditions contained in Protection of Personal Information Act, No 4 2013 (South Africa).

For more information explaining how we use your personal information, please see our Customer Privacy Notice.

The specific details of the Personal Information we process are contained in the Tial Technologies application form and in your databases used to provide our services.

APPENDIX C: TIAL TECHNOLOGIES POLICY FOR CONDITION FOR SPECIFIC PURPOSE

Tial Technologies will only collect personal information from you when the purpose for collection been explicitly defined and agreed. We undertake to ensure that as the data subject, you are aware of the purpose for collecting your personal information.

Where reasons for processing for further purposes arise, these will be explicitly defined and agreed.

For more information explaining how we use your personal information, please see our Customer Privacy Notice.

APPENDIX D: TIAL TECHNOLOGIES POLICY FOR ENSURING INFORMATION QUALITY

Tial Technologies will take reasonable steps to ensure that information is complete, accurate, not misleading and, where necessary, updated.

Tial Technologies will ensure that appropriate information security measures are established to ensure that personal information is protected in line with industry practices and standards.

For more information explaining how we use your personal information, please see our Customer Privacy Notice.

APPENDIX E: TIAL TECHNOLOGIES CONSENT NOTICE FOR NOTIFICATION TO DATA SUBJECT (POLICY)

Tial Technologies will ensure that you, as the data subject, are made aware of information being collected. If the data has not been collected directly from the data subject, the source of collection will be provided together with name and address of the party. The purpose of collection will be provided.

Information relating to the following will also be provided where relevant:

- Whether the supply of information by the data subject is voluntary or mandatory;
- The consequences of failing to provide information
- The legislation requiring the collection of information
- If information is to be transferred to another country, information relating to the laws that will protect the information.