



Accounting Solutions (Pty) Ltd

Unit 007A, Vineyards Square North, The Vineyards Office Estate, 99 Jip De Jager Ave,
BELLVILLE, 7530.

PostNet Suite #053, Private Bag x24, TYGERVALLEY, 7536.

Tel No (+27) 67 586 5479

Company registration number: 2014/015596/07

Protection of Personal Information Policy

Introduction

Firefly Accounting Solutions (Pty) Ltd ("FIREFLY") is committed to compliance with The Protection of Personal Information (POPI) Act which requires us to:

1. Obtain consent before collecting, processing, storing or sharing data;
2. Only collect data needed for legitimate purposes;
3. Use the information in a way that matches the purpose of collection;
4. Take reasonable security steps to protect the integrity of the information;
5. Store the information only as long as required by law;
6. Uphold data subjects' rights by providing access and corrections to information and
7. Create policies to notify the Information Regulator (South Africa) about processing activities.

Definition of Personal Information

- Data subject means the person to whom personal information relates (patient, Client, employee etc.)
- information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;
- information relating to the education or the medical, financial, criminal or employment history of the person;
- any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
- the biometric information of the person (including blood typing, fingerprinting, DNA analysis, retinal scanning and voice recognition);
- the personal opinions, views or preferences of the person;
- correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
- the views or opinions of another individual about the person; and



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- the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person.

Obligation to comply with the policy

- All employees and individuals directly associated with FIREFLY are responsible for adhering to this policy and for reporting any security breaches or incidents to the Information Officer (Managing Director).
- Compliance with the policy is a key obligation and requirement of employment or engagement with FIREFLY.
- Employees must read and familiarize themselves with the policy, and in the event of any uncertainty about the requirements or operation of the policy, consult with HR or management in order to obtain clarity.

Practical application by employees

- All client and employee information, however sourced, is considered to be highly confidential and must not be used, shared or even discussed outside of the legitimate purpose for which it has been obtained.
- Sharing, discussing and using patient, Client or employee information outside of the workplace is considered a serious offence and can lead to summary termination of employment.
- Personal information relating to clients must not ever be shared via WhatsApp or other social media platforms, this information is only to be emailed directly to the employee/s processing the data for intended purpose (quotes or invoicing).
- In the event that the Company email system is out of order and the necessity to share the personal information internally is urgent, employees may share the information via secure Dropbox link. In this case the employee sending the information may contact the relevant employee or group of employees via WhatsApp to notify them that the documentation has been uploaded to Dropbox.
- Personal employee information must not be shared via WhatsApp or other social media platforms without the written explicit permission of the employee whose information is to be shared.
- Documentation containing client information must be securely archived in the filing room at head office.



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- Every six months the volume of documents must be assessed by the Managing Director and excess shredded or returned to the client.

Direct marketing by means of unsolicited electronic communications

- The processing of personal information of a potential Client for the purpose of direct marketing by means of any form of electronic communication, including SMSs, WhatsApp or e-mail is prohibited unless the potential Client has given their consent to the processing or is already a Client of FIREFLY.
- Client information may only be used for the purpose of direct marketing of FIREFLY's own similar products or services.
- The Client must have been given a reasonable opportunity to object to use of their electronic details at the time when the information was collected and on each communication with the Client for the purpose of marketing if the Client has never refused such use.
- Any communication for the purpose of direct marketing must contain an address or other contact details to which the recipient may send a request that such communications cease.

Policy Principles

1. Accountability

- FIREFLY must take reasonable steps to ensure that personal information obtained from employees, work seekers and Clients is stored safely and securely.
- Personal information of employees includes, but is not limited to: CV's, Resumes, References, Qualifications, Integrity Checks, Identity Documents and any other personal information that may be obtained for legitimate business purposes.
- Personal information of Clients refers to tax and identifying information supplied to FIREFLY by clients when requesting quotations, in which case the client would have given their consent to the Firefly for their information to be used for this purpose.

2. Processing Limitation

- Personal information is obtained directly from employees, work seekers or their agents, patients, doctors and hospitals.



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- Once in FIREFLY possession personal information will only processed or released with the written consent of the person, except where required to do so by law, in which case the person will be informed beforehand.

3. Specific Purpose

- Personal information of employees and work seekers is processed and kept for the purposes of payroll and human resource management.
- Client information is obtained directly from the Client and their support staff and never from databases in any manner.

4. Limitation on Further Processing

- Personal information may not be processed further in a way that is incompatible with the purpose for which the information was collected initially.

5. Information Quality

- Employee and Client information must be maintained as complete, up to date and accurate at all times. This means that it may be necessary to request employees, from time to time, to update their information and confirm that it is still relevant.

6. Transparency/Openness

- Where personal information is collected from a source other than directly from an employee, work seeker or Client representative, FIREFLY is responsible for ensuring that the person is aware:
 - That their information is being collected;
 - Who is collecting their information by giving them our details;
 - Of the specific reason that you are collecting their information.

7. Security Safeguards

- FIREFLY must at all times employ technical and organisational measures to secure the integrity of personal information, and guard against the risk of loss, damage or destruction thereof.
- Personal information must also be protected against any unauthorised or unlawful access or processing.
- FIREFLY is committed to ensuring that information is only used for legitimate purposes with employee, work seeker or patient consent and only by authorised employees of the company.



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8. Participation of Data Subject

- Employees, work seekers and Clients are entitled to know particulars of their personal information held by FIREFLY, as well as the identity of any authorised employees of FIREFLY having access thereto and are also entitled to correct any information held by FIREFLY.

Approved By:



Annelie van Eeden
Managing Director

Date 19/03/2025



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Employee Declaration:

I have read the Protection of Personal Information Policy and would like to make a declaration as follows:

I understand the policy and undertake to abide by it and to not, at any time during or after my employment with FIREFLY, divulge any personal information of any individual that may be obtained by me during the course of my employment with FIREFLY.

I further declare that my personal employee data may be used for any statutory requirement of FIREFLY where this information might need to be divulged at the discretion of FIREFLY, but not for any intention other than legitimate business purposes.

Signature of employee: _____

Name of employee: _____

Date of signature: _____