

Data Privacy Policy and Data Subject Access Request (DSAR) Policy

1. Data Privacy Policy

Brunel Laboratoria (Pty) Ltd ("the Company") is committed to protecting the privacy of all individuals whose personal information it processes. This Data Privacy Policy sets out the principles and procedures the Company follows to ensure the privacy, confidentiality, and security of personal information in accordance with the Protection of Personal Information Act (POPIA), 2013.

1.1. Purpose

This policy outlines how the Company collects, uses, stores, and protects personal data of customers, employees, suppliers, and other stakeholders.

1.2. Scope

This policy applies to all employees, contractors, and third-parties who have access to personal data processed by the Company.

1.3. Personal Information Collected

We may collect personal information including, but not limited to:

- Full name
- Identity number or passport number
- Contact information
- Financial details
- Employment and education history

1.4. Lawful Processing of Personal Information

We will process personal data only if:

- The data subject consents to the processing;
- It is necessary to conclude or perform a contract;
- It is required by law; or
- It protects a legitimate interest.

1.5. Security Safeguards

We implement appropriate, reasonable technical and organisational measures to protect personal information against loss, theft, unauthorised access, disclosure, or destruction.

1.6. Rights of Data Subjects

Data subjects have the right to:

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- Access their personal data;
- Request correction or deletion;
- Object to processing;
- Lodge complaints with the Information Regulator.

1.7. Retention

Personal information will not be retained longer than necessary for the purposes for which it was collected unless retention is required by law.

1.8. Contact

To exercise rights or raise queries regarding personal data, contact our Information Officer at info@brunel.co.za.

2. Data Subject Access Request (DSAR) Policy

2.1. Purpose

This policy outlines the process by which data subjects can request access to, correction of, or deletion of their personal information held by the Company.

2.2. Scope

This policy applies to all DSAR's made to the Company by data subjects under POPIA.

2.3. Submission of a Request

Requests must be made in writing and submitted to the Information Officer via:

- E-mail: info@brunel.co.za;
- Post: PO Box 797, Wierda Park, Centurion, 0149;
- In person at: 1 Van Tonder Street, Sunderland Ridge, Centurion, 0157.

The request should include:

- Full name and ID number;
- Description of the information requested;
- Proof of identity.

2.4. Response Timeframes

We aim to respond to all DSAR's within 30 calendar days, as prescribed by POPIA. We may extend this period where necessary and will inform the data subject accordingly.

2.5. Grounds for Refusal

Access may be refused in terms of section 62 to 70 of POPIA where:

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- The request unreasonably affects the privacy of another person;
- Disclosure is prohibited by law or legal privilege;
- The information is used for research, historical or statistical purposes;
- The request is manifestly unfounded or excessive.

2.6. Fees

Reasonable fees may be charged for processing certain DSAR's, especially where large volumes of information are requested. The data subject will be informed of such fees in advance.

2.7. Contact

For any DSAR enquiries, contact:

- Information Officer: M. F. Venter;
- Deputy Information Officer: L. de Jonge;
- E-mail: info@brunel.co.za;
- Phone: 012 666 8994.

Registration Number: 1974/003981/07