

**PROTECTION OF PERSONAL INFORMATION ACT NO. 4 OF 2013
("POPIA")**

**COMPLIANCE FRAMEWORK
OF**

Company Name: ("the Company")	LIGHT-TECH MEDIA SOLUTIONS (PTY) LTD
Company Type:	Private company registered in accordance with the company laws of South Africa
Industry:	Advertising and Media Industry
Approximate Number of Staff:	1 individual
Company Registration No:	2022/224855/07
Registered or physical office address of the Company:	40 First Avenue West, Parktown North, Johannesburg, 2193
Description of the Company's service and/or product offering:	The Company operates an online media buying platform which aggregates and offers for rental the media inventory of media owners to advertising agencies.
Details of the Head of the Company: (Definition of "Information Officer" in section 1 of POPIA read with the definition of "Head" in section 1 of PAIA) ("our Information Officer")	Name: Lukhanyo Dyosopu Designation: Director Mobile No: +27-(0)63-133-4808 Email: lukhanyo@light-tech.co.za
Details of Deputy Information Officer:	Not appointed
Version:	5 September 2024

1. INTRODUCTION

- 1.1. The privacy of the Company, our staff, clients, service providers and suppliers, and any other third party (collectively “the Data Subjects”) with whom we conduct business or interact is very important to us which is why every effort is made by us to comply with the provisions of the Protection of Personal Information Act, 2013 (“POPIA”), its regulations (including GNR.1383 of 14 December 2018: Regulations Relating to the Protection of Personal Information - Government Gazette No. 42110) (“the POPIA Regulations”) read with the Promotion of Access to Information Act, 2000 (“PAIA”) and its regulations.
- 1.2. This Compliance Framework document sets out our privacy programme for the management of our receipt, collection, use, storage, transfer, processing and deletion of the personal information of Data Subjects in terms of POPIA (read with PAIA).

2. INFORMATION OFFICER REGISTRATION & ACKNOWLEDGEMENT

2.1. Registration of Information Officer:

We completed the prescribed eForm for registration of our Information Officer and submitted it via email to the Information Regulator’s office on 19 August 2024 (certificate attached marked Schedule 1).

2.2. Information Officer Acknowledgement

- 2.2.1 Our Information Officer fully understands and acknowledges their duties and responsibilities set out in sections 55 and 56 of POPIA, the POPIA and PAIA Regulations (extracts set out below):

POPIA

Section 55: Duties and Responsibilities of Information Officer

- (1) An information officer’s responsibilities include -
 - (a) the encouragement of compliance, by the body, with the conditions for the lawful processing of personal information;
 - (b) dealing with requests made to the body pursuant to this Act;
 - (c) working with the Regulator in relation to investigations conducted pursuant to Chapter 6 in relation to the body;
 - (d) otherwise ensuring compliance by the body with the provisions of this Act; and
 - (e) as may be prescribed.
- (2) Officers must take up their duties in terms of this Act only after the responsible party has registered them with the Regulator.

Section 56: Designation and Delegation of Deputy Information Officers

Each public and private body must make provision, in the manner prescribed in section 17 of the Promotion of Access to Information Act, with the necessary changes, for the designation of -

- (a) such a number of persons, if any, as deputy information officers as is necessary to perform the duties and responsibilities as set out in section 55 (1) of this Act; and
- (b) any power or duty conferred or imposed on an information officer by this Act to a deputy information officer of that public or private body.

POPIA Regulations (GRN. 1383 of 14 December 2018)

Regulation 4: Responsibilities of Information Officers

- (1) An information officer must, in addition to the responsibilities referred to in section 55 (1) of the Act (above), ensure that -
 - (a) a compliance framework is developed, implemented, monitored and maintained
 - (b) a personal information impact assessment is done to ensure that adequate measures and standards exist in order to comply with the conditions for the lawful processing of personal information;

- (c) a manual is developed, monitored, maintained and made available as prescribed in sections 14 and 51 of the Promotion of Access to Information Act, 2000 (Act No. 2 of 2000);
 - (d) internal measures are developed together with adequate systems to process requests for information or access thereto; and
 - (e) internal awareness sessions are conducted regarding the provisions of the Act, regulations made in terms of the Act, codes of conduct, or information obtained from the Regulator.
- (2) The information officer shall upon request by any person, provide copies of the manual to that person upon the payment of a fee to be determined by the Regulator from time to time.

PAIA Regulations (GRN. 757 of 27 August 2021)

3. Obligations of information officer

- (1) An information officer must have a copy of the guide, in at least two of the official languages, at his or her registered head office, for public inspection during normal office hours.
- (2) An information officer must make available, upon the written request of any person, on a form which corresponds substantially with Form 1 of Annexure A to the Regulations, the number of copies of the guide in the official languages, as requested.
- (3) An information officer may not charge a fee for:
 - (a) a copy of the guide made available in terms of subregulation (2); or
 - (b) inspection of a copy of the guide at the office of the information officer.

2.3. Our Information Officer has read the Guidance Note on Information Officers and Deputy Information Officers dated 1 April 2021 (available on the Information Regulator's website: <https://infoeregulator.org.za/wp-content/uploads/2020/07/InfoRegSA-GuidanceNote-IO-DIO-20210401.pdf>).

2.4. Our Information Officer shall at regular intervals (not less than once annually) visit the Information Regulators' website for statutory updates and additional practice guides (if any).

3. PERSONAL INFORMATION IMPACT ASSESSMENT [POPIA Regulation 4(1)(b) – GRN. 1383 of 14 December 2018]

- 3.1. We conducted a personal information impact assessment of our operations ("PIA") on 22 August 2024 (please refer to the copy attached marked Schedule 2) to ensure that adequate measures and standards exist in order to comply with the conditions for the lawful processing of personal information in terms of POPIA.
- 3.2. The PIA formed the basis of this Compliance Framework document and resulted in the creation of additional notices, policies and/or processes that have been implemented in relation to our processing and protection of personal information.
- 3.3. We undertake to conduct a personal information impact assessment each and every time there is a change in the way in which we operate or any third party acting on our behalf operates, and which has an impact on the manner in which the personal information in our possession or under our control is processed by us or the third parties.

4. INTERNAL AWARENESS & TRAINING

- 4.1. Our Information Officer and staff has completed POPIA and PAIA training by qualified attorneys.
- 4.2. The training of new staff members will be undertaken as soon as reasonably possible after their appointment.

- 4.3. Training schedules with details of attendees shall be kept and archived in terms of our human resource policies and processes.

5. EXTERNAL AND INTERNAL POLICY DOCUMENTATION

- 5.1. We have developed and published on our platform a Privacy Notice for Agencies, Media Owners, Suppliers and Service Providers.
- 5.2. We undertake to review the Privacy Notice regularly (at least once annually) and update it where necessary.

6. INTERNAL MEASURES FOR REQUESTS FOR ACCESS TO, CORRECTION, DESTRUCTION OR DELETION OF, PERSONAL INFORMATION

- 6.1. Our PAIA Manual and Privacy Notice for Agencies, Media Owners, Suppliers and Service Providers available on our platform describe the name and contact details of our Information Officer in order that any requests for access to, correction, destruction or deletion of, personal information may be adequately dealt with as required in terms of law.
- 6.2. A register of all information requests and related records shall be kept and maintained by us.

7. PROCEDURES FOR MAKING INFORMATION ELECTRONICALLY AVAILABLE

- 7.1. The document entitled "Procedures for Making Information Electronically Available" (dated March 2022) published by the Information Regulator on its website at <https://infoeregulator.org.za/> has been read and applied internally to the extent reasonably possible given the nature and size of our operations as well as the information technology systems utilised by us.

8. ASSURANCE PROVIDERS & REPORTING

- 8.1. We are supported by external experts (attorneys and IT service providers) who have assisted us with the development of our personal information management programme reflected in this Compliance Framework as well as the various training, policy and process documents described herein.
- 8.2. Our Information Officer shall monitor and report to the Company's board of directors regularly on personal information matters (including information requests and outcomes, policy updates, training schedules, legislative updates, impact assessments and outcomes, and security incidents) where necessary.
- 8.3. We procure the services of reputable information technology and other third-party service providers who have expertise in the management of personal information and its security. They too provide us with the support needed to meet our obligations in law to the Data Subjects.

9. PERSONAL INFORMATION SECURITY SAFEGUARDS

- 9.1. Our PAIA Manual and Notice described in clause 5.1 above set out the security measures taken by us to safeguard the personal information of the Data Subjects.

10. SECURITY INCIDENT PROCESS

- 10.1. We are aware of our duties in terms of POPIA and undertake to comply fully with them in relation to any security incident or breach that might occur in relation to the personal information in our possession or under our control.

11. PAIA COMPLIANCE PLAN

- 11.1. The time periods and intervals at which we intend monitoring and updating various aspects of our personal information management plan as set out in this Compliance Framework are summarised in a schedule attached hereto marked Schedule 3.

SCHEDULE 1

REGISTRATION OF INFORMATION OFFICER

(certificate attached)

SCHEDULE 2

PERSONAL INFORMATION IMPACT ASSESSMENT
(attached)

SCHEDULE 3**PAIA COMPLIANCE PLAN**

No:	Task:	Frequency:
1.	Keep abreast of latest developments by visiting the Information Regulator's website	Once annually (August)
2.	Review of PAIA Manual	Once annually (August)
3.	Review of all Policies	Once annually (August)
4.	Staff Training	Bi-annually (August) or, where necessary, as soon as possible after recruitment
5.	Review of Security Incident Process	Once annually (August) or during any incident, if necessary.
6.	Register any new Information Officer's Details with Information Regulator	As soon as possible after their appointment
7.	Update the Register of Personal Information Requests	Upon each and every request for access, correction, destruction or deletion of personal information
8.	Conduct Personal Information Impact Assessment	Prior to any change in IT infrastructure, process or procedure affecting personal information