



Data Privacy Policy

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Prepared by: Qmuzik Technologies Technologies (Pty) Ltd

Submitted to:

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1. Overview

Qmuzik Technologies (PTY) Ltd is committed to processing data in accordance with its responsibilities under the GDPR and POPIA act.

The purpose of the Protection of Personal Information Act (POPIA) is to protect people from harm by protecting their personal information. To stop their money being stolen, to stop their identity being stolen, and generally to protect their privacy, which is a fundamental human right.

To achieve this, the Protection of Personal Information Act sets conditions for when it is lawful for someone to process someone else's personal information.

Personal information should be:

- processed lawfully, fairly and in a transparent manner in relation to individuals;
- collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- accurate, kept up to date; with every reasonable step taken to ensure that personal data that is inaccurate is corrected; having regard to the purposes for which they are processed, are erased or rectified without delay;
- kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed.
- Personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the legislations in order to safeguard the rights and freedoms of individuals; and
- processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures."

2. General Provisions

- This policy applies to all personal data processed by Qmuzik Technologies (Pty) Ltd.
- The Responsible Persons shall take responsibility for Qmuzik Technologies (Pty) Ltd's ongoing compliance with this policy.
- This policy shall be reviewed as a minimum annually or as amendments need to be applied.

3. Lawful, fair and transparent processing and purposes

- Individuals have the right to access their personal data and any such requests made to the Company shall be dealt with in a timely manner.
- All data processed by the Company must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests (see ICO guidance for more information).
- The Company shall note the appropriate lawful basis in the Register of Systems.
- Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in the Company's systems.

4. Data Minimisation and Accuracy

- The Company shall ensure that personal data is adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- The Company shall take reasonable steps to ensure personal data is accurate.
- Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.

5. Archiving and Removal

- To ensure that personal data is kept for no longer than necessary, the Charity shall put in place an archiving policy for each area in which personal data is processed and review this process annually.
- The archiving policy shall consider what data should/must be retained, for how long, and why.

6. Security

- The Company shall ensure that personal data is stored securely using modern software that is kept-up-to-date.
- Where information is stored on other medium e.g. paper; this information will be stored securely including but not limited to a minimum of access control, lock-and-key with approved access only.
- Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- When personal data is deleted this should be done safely such that the data is irrecoverable.
- Appropriate back-up and disaster recovery solutions shall be in place.

7. Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, the Company shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the appropriate stakeholders and/or governing bodies.

8. Revision and version control

Version Number	Date	Description of Change	Changed By
1.0	2021/01/10	Creation	Tinus Kleingeld

9. Policy approval

The undersigned as duly authorised approves this policy for acceptance and implementation as part of:

- Qmuzik conditions of service.
- Issuing of user account and privileges

Name	Role	Signature
Jan Small	Managing Director	
Adriaan Voges	Executive Director	