

# Heritage Vault – Privacy Policy



HERITAGE VAULT

Pay it forward

October 2024 | Version 1.0

## 1. Purpose

Heritage Vault is committed to protecting the privacy of individuals who entrust us with their Personal Information, including our customers, Users, and business partners in accordance with expected codes of conduct, Privacy Regulations, and legal requirements.

This Privacy Policy (the “Policy”) identifies and describes the specific requirements to comply with Privacy Regulations, standards and laws related to Personal Information protection, and provides guidelines to ensure that from a legal, technical, and procedural perspective that Personal Information is managed compliantly.

## 2. Objectives

The objectives of this Policy are:

- To identify and define the principles for the protection of Personal Information.
- To define the roles and responsibilities of the Users of Personal Information.
- To align Personal Information protection practices at Heritage Vault, including policies and procedures, to regulatory, legal, and business requirements.

## 3. Scope

This Policy identifies the requirements related to compliant Personal Information management that is:

- Stored electronically or is available in hard copy.
- Held centrally in systems, applications, and databases used by Heritage Vault.
- Held locally in User workstations.

## 4. References

The following Privacy Regulations are relevant to this Privacy Policy:

- Data Protection Act 2018 (“UK GDPR”)
- Federal Act on Data Protection (“FADP”)
- General Data Protection Regulation (“GDPR”)
- Personal Information Protection and Electronic Documents Act (“PIPEDA”)
- Protection of Personal Information Act (“POPIA”)

The following documents are relevant to this Privacy Policy:

- Data Subject Request Procedure
- Privacy Breach Response Plan
- Privacy Impact Assessment (“PIA”) Procedure
- Privacy Notice
- Record of Processing Activities (“ROPA”)

## 5. Definitions

**Data Privacy Officer (“DPO”):** The individual designated at Heritage Vault to oversee its privacy strategy and compliance with relevant Privacy Regulations.

**Data Subject:** Any individual whose Personal Information is collected, processed, and stored by Heritage Vault.

**Data Subject Request:** Action taken by a Data Subject whereby they exercise their Personal Information rights.

**Heritage Vault:** For the purpose of this Policy, it refers to Heritage Vault Limited and its wholly owned affiliates and subsidiaries, including Heritage Vault (Pty) Ltd.

**Personal Information:** Any information that is, or can be related to, an individual. It refers to information directly related to an individual or information where combined data elements may identify, locate, contact, or make decisions about an individual.

**PIA Procedure:** Refers to the process that assists organizations in identifying and managing Personal Information protection risks arising from the implementation of new projects, systems, processes, strategies, policies, or business relationships, among others.

**Privacy Authority:** An independent public authority established by a government to monitor and enforce compliance with Privacy Regulations within a country. The primary role of a Privacy Authority is to protect the fundamental rights and freedoms of individuals concerning the processing of their Personal Information. In the European Union (“EU”), each Member State designates one or more Privacy Authorities to fulfill this function. In Canada, the Office of the Privacy Commissioner is responsible for overseeing federal Privacy Regulations. In South Africa, the Information Regulator is the designated Privacy Authority responsible for overseeing compliance with the POPIA.

**Privacy Regulations:** Laws in different regions of the world that dictate how Personal Information must be collected, processed, disclosed, stored, and protected to ensure that the rights and freedoms of individuals are not compromised.

**ROPA:** Document used to record all the Personal Information repositories, processing activities, and data elements used for Heritage Vault purposes.

**User:** For the purpose of this Policy, any employee, including third-party vendors, contractors, and consultants, that have access to Personal Information collected, processed, disclosed, transmitted, stored, retained, and protected by Heritage Vault.

## 6. Roles and Responsibilities

Role	Key Responsibilities
Executive Team	<ul style="list-style-type: none"> <li>Champions the implementation of policies, processes, and procedures that support Personal Information protection.</li> <li>Reviews and approves the required Personal Information protection policies, processes, and procedures.</li> <li>Prioritizes any Personal Information protection risks, issues, or requirements, including resource allocation where necessary.</li> </ul>
DPO	<ul style="list-style-type: none"> <li>Develops a culture of Personal Information protection throughout Heritage Vault.</li> <li>Serves as the point of contact with different Privacy Authorities and with the individuals that Heritage Vault holds the Personal Information of.</li> <li>Ensures that all Heritage Vault Users understand their individual responsibilities regarding the protection of Personal Information.</li> <li>Reinforces the implementation of privacy principles during the initiation phase of applications to ensure that Personal Information protection is a critical requirement to embed in the application development process.</li> </ul>
IT Support	<ul style="list-style-type: none"> <li>Provides technological tools and systems that comply with the requirements of Privacy Regulations.</li> <li>Implements security measures that protect Personal Information in Heritage Vault's custody.</li> </ul>
Users	<ul style="list-style-type: none"> <li>Understand and comply with the policies and procedures required to support Personal Information protection.</li> <li>Become advocates of Personal Information protection and keep it top-of-mind during their day-to-day activities.</li> </ul>

## 7. Personal Information Protection Principles

Heritage Vault has made the decision to align their Personal Information protection practices to the Personal Information principles established by the GDPR and POPIA to ensure compliance with this regulation and others around the globe.

These Personal Information protection principles are satisfied by the following practices that Heritage Vault has implemented:

GDPR	POPIA	Practices To Satisfy Requirements
Organizational Accountability	Accountability	<ul style="list-style-type: none"> <li>• A DPO shall be appointed to ensure that the adoption and enforcement of Personal Information protection practices at Heritage Vault takes place consistently.</li> <li>• This Policy shall be the source of guidance for the protection of Personal Information and shall be enforced by the DPO.</li> <li>• All Users shall be trained in Personal Information protection practices to ensure that they understand what the definition of Personal Information is and what their responsibilities are regarding the protection of Personal Information.</li> <li>• Third-party vendors that have access to Personal Information in Heritage Vault’s custody shall follow the requirements established under section <b>8. Third-Party Vendors</b>.</li> <li>• Heritage Vault shall implement a PIA Procedure to ensure that Personal Information protection practices are embedded at the early stages of any initiative at the Company.</li> </ul>
Lawfulness, Fairness, and Transparency	Openness  Data Subject Participation	<ul style="list-style-type: none"> <li>• Heritage Vault’s website shall display a Privacy Notice that explains how the collection, processing, disclosure, transmission, storage, retention, and protection of Personal Information is managed.</li> <li>• Individuals shall have access to the DPO’s contact information to pose questions or concerns about Heritage Vault’s Personal Information protection practices.</li> <li>• The disclosure of Personal Information within and outside of the Company shall be specific and limited to a ‘need to know’ basis. Disclosure shall be aligned with the documented disclosures in the ROPA.</li> <li>• Individuals shall be able to exercise rights over their Personal Information and Heritage Vault shall fulfill those</li> </ul>

		rights according to section <b>9. Personal Information Rights</b> .
Purpose Limitation	Purpose Specification  Further Processing Limitation	<ul style="list-style-type: none"> <li>Heritage Vault shall document a ROPA which records the processing purposes of Personal Information.</li> <li>Personal Information shall be processed according to the purposes identified in the ROPA and the Privacy Notice. If Personal Information needs to be processed in a different way than it was originally intended for, the DPO shall update the ROPA and the Privacy Notice.</li> </ul>
Data Minimization	Processing Limitation	<ul style="list-style-type: none"> <li>The implementation of a PIA Procedure shall ensure that only the minimum required Personal Information is processed to achieve Heritage Vault's business objectives.</li> </ul>
Accuracy	Information Quality	<ul style="list-style-type: none"> <li>In exercising their Personal Information rights, any individual whose Personal Information that Heritage Vault holds shall have the right to request Heritage Vault to make corrections or updates to their Personal Information.</li> <li>Heritage Vault shall ensure that Personal Information stored in their systems is kept up to date.</li> </ul>
Storage Limitation	Processing Limitation	<ul style="list-style-type: none"> <li>Personal Information shall only be stored for the period that it is necessary to satisfy business, regulatory, or legal requirements.</li> </ul>
Integrity and Confidentiality	Security Safeguards	<ul style="list-style-type: none"> <li>Heritage Vault shall implement technical and operational measures that ensure that Personal Information is appropriately protected.</li> <li>Users shall be trained to avoid, identify, and escalate incidents that may lead to a privacy breach.</li> </ul>

**8. Third-Party Vendors**

When Heritage Vault is required to disclose Personal Information to third-party vendors, the DPO, and any other User responsible for the third-party vendor relationship at Heritage Vault shall ensure that the following requirements are fulfilled:

- If a third-party vendor has access to Personal Information from individuals in the EU/UK/Switzerland, they shall have a valid data transfer mechanism such as standard contractual clauses if the data is going to be transferred outside of the EU/UK/Switzerland.
- Heritage Vault and the third-party vendor shall sign a Data Processing Agreement to ensure that the vendor commits to Personal Information protection practices that are in line with Privacy Regulations around the globe.

- Third-party vendors, contractors and consultants shall comply with established security requirements if they have access to Personal Information that Heritage Vault holds.
- Third-party vendors that do not fulfill Heritage Vault's established privacy and information security terms shall require approval from the DPO before executing a contract.

## 9. Personal Information Rights

Heritage Vault shall adopt a **Data Subject Request Procedure** that requires that:

- a) Data Subject Requests from Data Subjects shall be completed within 30 days.
- b) Data Subject Requests shall be funnelled to the right groups or individuals for immediate action.
- c) Personal Information of the Data Subject making the Data Subject Request shall only be shared with that Data Subject.
- d) Circumstances where the Data Subject Request cannot be honoured shall be identified and conveyed to the Data Subject or the Privacy Authority that may be involved in such Data Subject Request.

Refer to the **Data Subject Request Procedure** to manage any request related to Personal Information.

## 10. Privacy Breach Response Plan

Refer to the **Privacy Breach Response Plan** to follow the required procedure to identify, contain, assess, notify, document, and resolve a privacy breach.

## 11. PIA Procedure

Refer to the **PIA Procedure** to follow the procedure to identify and manage personal information protection risks associated with the implementation of new projects, systems, and processes.

## 12. Personal Information Protection Training & Awareness

The Users at Heritage Vault who have access to Personal Information shall have a clear understanding of Personal Information protection practices and what their individual responsibilities as employees are when managing Personal Information.

## 13. Revision History

Version No.	Description of Change(s)	Approved By	Date of Issue
1.0	Initial Draft		

