



SULCATAS LEATHER COMPANY (PTY) LTD

POPIA MANUAL

In terms of the Protection of Personal Information Act, 4 of 2013 ("POPIA")

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1. Introduction

1.1 Sulcatas Leather (Pty) Ltd, trading as phrenology ("the Company"), Sulcatas Leather Company (PTY) Ltd, collects, stores, and processes personal information in the course of operating its business and online services.

1.2 The Company is committed to complying with POPIA and safeguarding the rights of data subjects.

1.3 This Manual explains how Sulcatas Leather processes personal information, the principles it follows, and the responsibilities of staff, operators, and service providers.

2. Definitions

2.1 The following definitions adapted from POPIA will be used throughout this Manual.

Term	Definition
Biometrics	Technique of personal identification based on physical or behavioral traits (fingerprints, DNA, retina scans, voice, etc.).
Child	A natural person under the age of 18 years who is not legally competent to act without assistance.
Guardian	Any person legally competent to consent on



behalf of a child.

Consent	Any voluntary, specific, and informed expression of will in terms of which permission is given for the processing of Personal Information.
Data Subject	The person to whom personal information relates.
Operator	A person who processes personal information for a Responsible Party under contract, without coming under direct authority.
Personal Information	Information relating to an identifiable living person or, where applicable, a juristic person (e.g., name, contact details, ID number, opinions, biometric information, etc.).
Processing	Any operation concerning personal information, whether automated or not, including collection, storage, use, distribution, updating, and destruction.
Public Record	A record that is accessible in the public domain and under the control of a public body.
Responsible Party	Any public or private body that determines the purpose and means of processing personal information.

3. Purpose and Objectives

3.1 To outline how Sulcatas Leather handles personal information.

3.2 To ensure lawful, fair, and transparent processing.

3.3 To guide staff, contractors, and service providers in POPIA compliance.

4. Data Protection Principles

4.1 Sulcatas Leather will comply with the eight POPIA conditions, including lawful processing, relevance, accuracy, security, and respect for data subject rights.



Annexure A – Information Officer Details

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Annexure B – Informed Consent Form

A customized consent form adapted from the POPIA template, for clients/users to sign when sharing personal data.

SULCATAS LEATHER