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1. Introduction

Eltra Africa CC has a duty and responsibility to provide guidance to its employee's on the use of social media, which should be broadly understood for purposes of this policy to include blogs, wikis, microblogs, message boards, chat rooms, electronic newsletters, online forums, social media platforms, and other sites and services that permit users to share information with others in a similar manner as well as the company's procedural approach to Direct Marketing in terms of Section 69 of the Protection of Personal Information Act 4 of 2013.

2. Responsibilities and Authorities

Role	Responsibility	Frequency
Administrator(s)	Will grant, deny, or restrict access to any website, facility, and email size and network bandwidth and Regular review of logs generated from proxy server and mail server.	On-going / ad hoc
User	Shall identify themselves honestly, accurately, and completely when corresponding or participating in interactive activities and shall not send unsolicited mass electronic mail. Will not impersonate any user. Employees should not have any expectations of privacy as to his or her internet usage. Employees are not allowed to change the internet settings set by company name.	On – going
Senior Management	Senior management is responsible for establishing a culture of compliance, setting the direction for direct marketing efforts, and ensuring adherence to applicable laws and regulations.	On- going

Information Officer and Deputy Information Officer(s)	The Information Officer and Deputy Information Officer(s) are responsible for overseeing the implementation and compliance of this policy within the Company. They provide guidance, support, and address any concerns or issues related to direct marketing.	On- going
Employee Responsibilities	All employees and personnel engaged in direct marketing activities must familiarize themselves with this policy, follow the guidelines outlined herein, and obtain necessary consent before engaging in any direct marketing communication.	On- going

3. Social Media

- 3.1. The company recognises the disciplines of confidentiality, integrity and availability in Information Security Management are integral parts of its management function. The management of the company sees these as primary responsibilities and fundamental to the best business practice of adopting appropriate Information Security Controls.
- 3.2. The following principles apply to professional use of social media on behalf insert company name as well as personal use of social media when referencing the Company:
- 3.2.1. employees need to know and adhere to the Organisation's Code of Conduct, and other company policies when using social media in reference to the organization.
 - 3.2.2. employees should be aware that the organization may observe content and information made available by employees through social media. Employees should use their best judgement in posting material that is neither inappropriate nor harmful to the organization, is employees, or customers.
 - 3.2.3. employees should be aware that the organization may observe content and information made available by employees through social media. Employees should use their best judgements in posting material that is neither inappropriate nor harmful to the organization, its employees, or its customers.
 - 3.2.4. although not an exclusive list some specific examples of prohibited social media conduct include posting commentary, content, or images that are defamatory, pornographic, proprietary, harassing, or that can create a hostile environment.
 - 3.2.5. employees are not to publish, post or release any information that is considered confidential and not public. If there are any questions about what is considered confidential, employees are reminded to speak to your manager and/or consult the relevant policy.
 - 3.2.6. social media platform, blogs, and other types of online content may generate press and media attention which may result in legal questions which can/may implicate the Company. In such instances employees should notify their manager/relevant person in the Company.
 - 3.2.7. if employees encounter a situation while using social media that threatens to become antagonistic, employees should disengage from the dialogue in a polite manner and seek the advice of a supervisor.
 - 3.2.8. employees should get appropriate commission before referring to or posting images of current or former employees, vendors, or suppliers. Additionally, employees should get appropriate permission to use a third party's copyright, copyrighted material, trademarks, service marks or other intellectual assets.
 - 3.2.9. social media use should not interfere with employee's responsibilities and computer systems are to be used for business purposes only. When using computer systems, use of social media for business purposes is allowed (example Facebook, Twitter, Blogs, LinkedIn, Instagram etc, which list is not exhaustive)
 - 3.2.10. subject to applicable law, after hours online activity that violates the Company' code of conduct or any other company policy, may subject an employee to disciplinary action or termination.
 - 3.2.11. if employees publish content after hours that involves or subjects associated with the Company, a disclaimer should be used, such as this "The postings on this site are of my own and may not represent the Company's positions, strategies, or opinions".

3.2.12. it is highly recommended that employees keep the organization's related social media platforms separate from personal related accounts, if practical.

3.3. Bloggers must adhere to the Company's policies regarding the protection of confidential information and data security:

3.3.1. It is strictly prohibited to disclose, share, or discuss any confidential or proprietary information of the Company through blogging or any other form of online communication.

3.3.2. Bloggers, including employees, must not engage in blogging activities that involve discriminatory or harassing comments.

3.3.3. Discriminatory or harassing language, content, or comments are strictly prohibited, as they contradict the Company's commitment to maintaining a respectful and inclusive work environment.

3.3.4. Employees are prohibited from utilizing Company assets, including equipment, networks, and online platforms, for blogging purposes without the express written consent of management.

3.3.5. If granted permission, employees may use Company assets for blogging only for purposes that align with The Company's business objectives and are not in conflict with its interests.

3.3.6. Bloggers are required to comply with all applicable laws, regulations, and policies, including but not limited to copyright, intellectual assets, and data protection laws.

3.3.7. Bloggers must not infringe upon the rights of third parties, including the unauthorized use of copyrighted materials or the dissemination of defamatory content.

3.3.8. Bloggers are personally responsible for the content they post, including comments and opinions expressed.

4. Direct Marketing

4.1. Consent

The processing of personal information of a data subject for the purpose of direct marketing through electronic communication is prohibited unless:

- a. The data subject has given explicit consent, and
- b. The processing is in the client's best interest for existing clients/customers.

4.2. Approaching Data Subjects

The Company may approach a data subject for direct marketing purposes under the following conditions:

- a. Consent is required; and
- b. The data subject has not previously withheld consent.

Note: The Company may only attempt to obtain consent from a data subject once.

4.3. Obtaining Consent

Consent should be obtained through the following means:

- a. Opt-in on the Company's website
- b. Manual opt-in form
- c. In client contracts
- d. Written consent via a signed document or email.

4.4. Opt-in form / Consent Requirements

Each opt-in form must clearly state that the consent is for the purpose of direct marketing to the data subject. Without this statement, the Company cannot process the information for direct marketing purposes.

4.5. Processing Personal Information for Direct Marketing

Processing personal information for direct marketing purposes is allowed if:


- a. Contact details were obtained during a sale of a product or service.
- b. Marketing is for similar products within the client's best interest.
- c. Marketing is solely for the primary purpose of marketing.
- d. The client or data subject has not refused to receive communication or previously opted out.

4.6. Direct Marketing Message Requirements

All direct marketing communications must contain the following:

- a. Details and identity of the sender (or the person on whose behalf the communication has been sent).
- b. An address or contact details to request the cessation of such communication.
- c. Optionally, an opt-out button that directly links to the Company's CRM system.

5. Training and Awareness



The Company will provide training and awareness programs to educate employees and relevant stakeholders about this policy, applicable laws and regulations, and best practices for direct marketing and social media use in respect to the company. Training will be conducted periodically, and employees will be kept up to date with any changes or updates to the policy.

6. Enforcement

- 6.1. An employee found to have violated this any part of this policy may be subject to disciplinary action, up to and including termination of employment.
- 6.2. A violation of this policy by a temporary worker, contractor or vendor may result in the termination of their contract or assignment with the Company.

7. Document Control

Approved by	
Signature	
Effective Date	

8. Employee Consent and Acknowledgement

Please complete the receipt below and return it to the HR Department within one week of your first day of employment, or of receipt of this handbook.

Name	
Position	
Department	

- *I hereby confirm that I have received, thoroughly reviewed, comprehended, and fully accept the terms, provisions and obligations set forth in this Policy.*
- *Additionally, I pledge to remain vigilant in staying informed about any future updates or modifications to the content within this Policy.*

Signature	
Date	

