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P27_Privacy Information Management (PIMS) & Data Protection Policy

1. Purpose and Scope

ESCROWSURE is committed to protecting Personally Identifiable Information (PII) and complying with GDPR, POPIA, ISO/IEC 27701:2019 and ISO/IEC 27001:2022 requirements.
This policy establishes the framework for the management and protection of personal information within the ESCROWSURE Privacy Information Management System (PIMS).
This policy applies to all employees, contractors, third-party vendors, systems, and processes handling PII.

2. Privacy Governance Commitment

ESCROWSURE operates an integrated ISO-certified Information Security and Privacy Management System aligned to ISO/IEC 27001, ISO/IEC 27017, ISO/IEC 27018, ISO/IEC 27701 and ISO 9001.
Top management is committed to lawful, fair, transparent and secure processing of personal information.

3. Roles and Responsibilities

Data Protection Officer (DPO): Responsible for monitoring privacy compliance.
ISOMS Representative: Responsible for maintaining the PIMS.
Information Security Team: Responsible for technical and organisational controls.
Employees and Contractors: Responsible for complying with this policy and completing awareness training.

4. Controller and Processor Roles

ESCROWSURE generally operates as a Data Controller for limited corporate contact information.
Where contractually required, **ESCROW**SURE may act as a Data Processor during continuity verification or escrow activation activities.

5. Privacy Principles

ESCROWSURE commits to:

- Lawfulness, fairness and transparency
- Purpose limitation
- Data minimisation
- Accuracy
- Storage limitation
- Integrity and confidentiality
- Accountability

6. Lawful Basis for Processing

Personal information shall only be processed where a lawful basis exists, including:

- Performance of a contract
- Legitimate interests
- Compliance with legal obligations
- Consent where required

7. Data Subject Rights

ESCROWSURE supports:

- Right of access
- Right to rectification
- Right to erasure
- Right to restrict processing
- Right to object
- Right to data portability

8. Privacy Risk Management and DPIA

A risk-based approach shall be applied to processing activities involving PII.
DPIAs shall be conducted where elevated privacy risks exist.

9. Information Security Controls

Security controls include:

- Encryption
- MFA and access controls
- Logging and monitoring
- Incident response procedures
- Endpoint and network protection

10. Retention and Disposal

Personal information shall only be retained as long as necessary.
Secure deletion and sanitisation methods shall be applied.

11. Cross-Border Transfers

Cross-border transfers shall only occur where adequate safeguards exist.

12. Third-Party and Subprocessor Management

Third-party suppliers handling personal information shall be subject to due diligence and contractual privacy obligations.

13. Privacy Incident and Breach Management

All suspected or confirmed privacy incidents shall be managed under the Incident Response Plan.
Regulatory notifications shall occur within applicable legal timeframes.

14. Privacy by Design and Default

Privacy controls shall be integrated into systems and processes by design and by default.

15. Training and Awareness

All employees and contractors shall complete mandatory privacy and information security awareness training.

16. Monitoring and Continual Improvement

ESCROWSURE shall conduct regular audits, management reviews and continual improvement activities.

17. Contact Details

Data Protection Officer (DPO)
Email: info@escrowsure.co.za
Phone: +27 (0)21 852 9365

18. Approval and Review

This policy is reviewed annually or upon significant change.

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Anthony Watson
CEO
1 April 2026