

# HUAWEI CLOUD Compliance with South Africa POPIA

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## Notice

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Customers should at all times assess and confirm with their professional legal advisers that their use of cloud services are appropriate. They must also ensure that their use of the cloud service complies with South Africa's POPIA, as well as other data protection legislation applicable within South Africa when using HUAWEI CLOUD.

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# 1 Introduction

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## 1.1 Scope of Application

The reference information provided in this document applies to HUAWEI CLOUD and all its products and services.

## 1.2 Purpose of Publication

This document is intended to help customers understand HUAWEI CLOUD's business-related activities and South Africa's Protection of Personal Information Act (POPIA) requirements and HUAWEI CLOUD's measures to protect Personal Information security. In addition, it also explains how HUAWEI CLOUD can be used/set up to understand POPIA, and helps customers understand the different roles and considerations of customers and HUAWEI CLOUD in cloud service mode.

## 1.3 Basic Definition

- **Competent Person:** Any person who is legally competent to consent to any action or decision being taken in respect of any matter concerning a child.
- **Content Data:** Data processed during the use of HUAWEI CLOUD services, including but not limited to documents, software, images, audio and video files. (This definition is as per Huawei's Privacy Policy.)
- **Data Subject:** The person to whom Personal Information relates.
- **Operator:** A person who processes Personal Information for a Responsible Party in terms of a contract or mandate, without coming under the direct authority of that party.
- **Person:** A natural person or a juristic person.
- **Personal Information:** Information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person. (For a more detailed description of information that constitutes Personal Information, please see the definition of Personal Information as contained in POPIA.)

- **Processing, Process or Processed:** Any operation or activity or any set of operations, whether or not by automatic means, concerning Personal Information, including:
  - the collection, receipt, recording, organization, collation, storage, updating or modification, retrieval, alteration, consultation or use;
  - dissemination by means of transmission, distribution or making available in any other form; or
  - merging, linking, as well as restriction, degradation, erasure or destruction of information.
- **Responsible Party:** A public or private body or any other person which, alone or in conjunction with others, determines the purpose of and means for Processing Personal Information.

# 2 HUAWEI CLOUD Privacy Protection Strategy

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## 2.1 HUAWEI CLOUD Privacy Commitment

HUAWEI CLOUD has placed cyber security and privacy protection as top priorities. HUAWEI CLOUD has fully integrated cyber security and privacy protection measures into each cloud service, to provide customers with stable, reliable, secure, trustworthy and evolvable services while respecting and protecting customers' privacy.

HUAWEI CLOUD takes the necessary actions in order to comply with applicable global privacy protection laws and regulations. HUAWEI CLOUD sets up professional privacy protection teams, develops and optimizes processes, actively develops new technologies and continuously builds HUAWEI CLOUD privacy protection capabilities to achieve HUAWEI CLOUD's privacy protection objectives, which are to: safeguard strict service boundaries, protect customers' Personal Information security and to help customers implement privacy protection measures.

## 2.2 HUAWEI CLOUD Basic Privacy Protection Principles

- **Lawfulness, fairness and transparency:** HUAWEI CLOUD Processes Personal Information lawfully, fairly and in a transparent manner in relation to the Data Subject.
- **Purpose limitation:** HUAWEI CLOUD collects Personal Information for specified, explicit and legitimate purposes and will not further Process the Personal Information of a Data Subject in a manner that is incompatible with those purposes.
- **Data minimization:** When HUAWEI CLOUD Processes Personal Information, Personal Information shall be adequate, relevant and limited to what is necessary in relation to the purposes for which the Personal Information is Processed. Personal Information is anonymized or pseudonymized if possible to reduce the risk for Data Subjects.

- **Accuracy:** HUAWEI CLOUD ensures that Personal Information is accurate and, where necessary, kept up to date. Every reasonable step must be taken to ensure that Personal Information that is inaccurate, having regard to the purposes for which it is Processed, is erased or rectified without delay.
- **Storage limitation:** Personal Information is kept for no longer than is necessary for the purposes for which the Personal Information is Processed.
- **Integrity and confidentiality:** Taking into account the existing technical capabilities, implementation cost and the likelihood and severity of privacy risks, HUAWEI CLOUD Processes Personal Information in a manner that ensures appropriate security of the Personal Information, including protection against accidental or unlawful destruction, loss, damage, alteration or unauthorized access and disclosure by using appropriate technical and organizational measures.
- **Accountability:** HUAWEI CLOUD is responsible for and able to demonstrate compliance with the preceding principles.

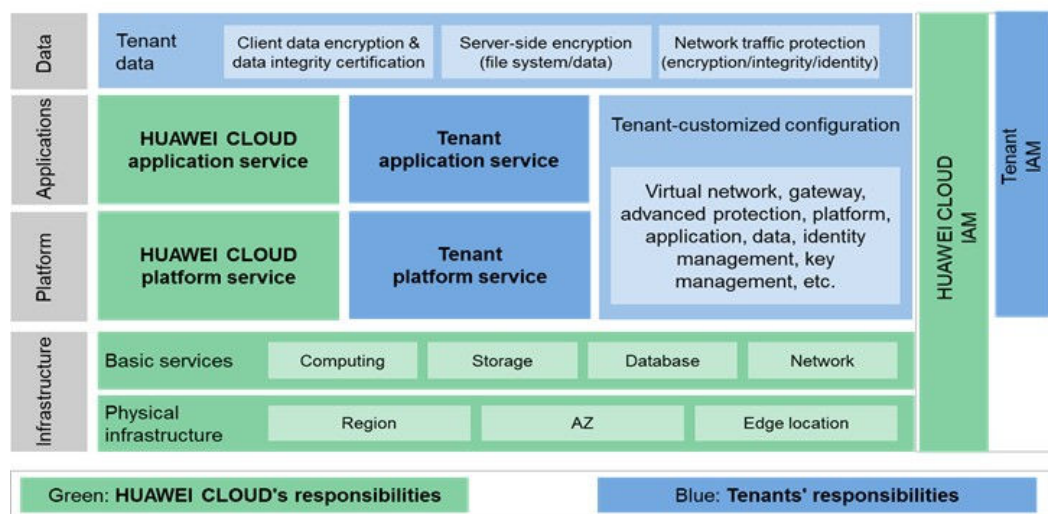
## 2.3 Privacy Protection Responsibilities

As a cloud service provider (CSP), HUAWEI CLOUD is responsible for the security of the cloud platform infrastructure in accordance with the agreement. HUAWEI CLOUD ensures that all business related activities comply with the requirements of applicable laws and regulations. HUAWEI CLOUD provides various privacy protection technologies to customers with the view on assisting customers to protect the privacy of their data based on their individual business requirements.

Customers have full control over their Content Data. They shall correctly and comprehensively be able to identify Personal Information on the cloud, select appropriate services and develop security and personal information protection policies to protect Personal Information. At the same time, customers can use HUAWEI CLOUD's variety of privacy protection services to enhance the protection of Personal Information.

The following figure is HUAWEI CLOUD's Responsibility Sharing Model. This model helps customers to better understand the responsibility of HUAWEI CLOUD in the field of privacy protection and the key points that customers need to pay attention to.



**Figure 2-1 Responsibility Sharing Model**

For details on the privacy protection responsibilities of both customers and HUAWEI CLOUD, please refer to the [White Paper for HUAWEI CLOUD Privacy Protection](#) released by HUAWEI CLOUD.

## 2.4 HUAWEI CLOUD Privacy Protection Related Certification

HUAWEI CLOUD complies with all local applicable privacy laws and regulations. HUAWEI CLOUD has a professional legal team, which closely monitors the updates of and amendments to laws and regulations, continuously tracks and analyzes global laws and regulations and ensures compliance with laws and regulations.

HUAWEI CLOUD's capabilities and achievements in privacy protection and Personal Information security have been widely recognized by third-party certifications around the globe. Up to now, HUAWEI CLOUD has obtained [certifications](#) from more than 10(ten) organizations in and outside of the People's Republic of China, including:

- **ISO 29151**

ISO 29151 is an international practical guide to the protection of personal identity information. The adoption of ISO 29151 confirms HUAWEI CLOUD's implementation of internationally recognized management measures for the entire lifecycle of Personal Information processing.

- **ISO 27701**

ISO 27701 specifies requirements for the establishment, implementation, maintenance and continuous improvement of a privacy-specific management system. The adoption of ISO 27701 demonstrates that HUAWEI CLOUD operates a sound system for Personal Information protection.

- **ISO 27018**

ISO 27018 is an international code of conduct that focuses on the protection of Personal Information in the cloud. The adoption of ISO 27018 indicates

that HUAWEI CLOUD has met the requirements of an internationally complete Personal Information protection and management system.

- **BS 10012**

BS10012 is the Personal Information management system standard issued by BSI. The BS10012 certification indicates that HUAWEI CLOUD offers a complete Personal Information protection system to ensure Personal Information security.

- **ISO 27001**

ISO 27001 is a widely used international standard that specifies requirements for information security management systems. This standard provides a method of periodic risk evaluation for assessing systems that manage company and customer information.

- **ISO 27017**

ISO 27017 is an international certification for cloud computing information security. The adoption of ISO 27017 indicates that HUAWEI CLOUD has achieved internationally recognized best practices in information security management.

- **SOC (audit)**

The SOC audit report is an independent audit report issued by a third-party audit institution based on the relevant guidelines developed by the American Institute of Certified Public Accountants (AICPA) for the system and internal control of outsourced service providers. At present, HUAWEI CLOUD has passed the audit of SOC2 Type 1 Privacy Principle in terms of privacy, which proves that HUAWEI CLOUD has reasonable control measures in terms of cloud management and technology.

- **ISO 20000**

ISO 20000 is an international recognized information technology service management system (SMS) standard. It specifies requirements for the service provider to plan, establish, implement, operate, monitor, review, maintain and improve a SMS to make sure CSPs can provide effective IT services to meet the requirements of customers and businesses.

- **ISO 22301**

ISO 22301 is an internationally recognized business continuity management system standard. ISO 22301 specifies requirements to plan, establish, implement, operate, monitor, review, maintain and continually improve a documented management system and also helps organizations to develop a comprehensive Business Continuity Plan (BCP) to effectively respond to disruptions so that entities can recover rapidly, keep core business running and minimize loss and recovery costs.

- **CSA STAR Gold Certification**

CSA STAR certification was developed by the Cloud Security Alliance (CSA) and the British Standards Institution (BSI), an authoritative standard development and preparation body as well as a worldwide certification service provider. This certification aims to increase trust and transparency in the cloud computing industry and enables cloud computing service providers to demonstrate their service maturity.

- **PCI DSS Certification**

Payment Card Industry Data Security Standard (PCI DSS) is the global card industry security standard, jointly established by five major international

payment brands: JCB International, American Express, Discover, MasterCard International and Visa Inc. It is the most authoritative as well as the strictest financial institution certification in the world.

HUAWEI CLOUD actively focuses on the release of authoritative privacy certification mechanisms in the industry and continuously raises higher requirements, optimizes its privacy protection system and increases and updates security and privacy certifications. In addition, HUAWEI CLOUD works closely with privacy protection associations to explore cutting-edge privacy protection information and technologies to build its sustainable, secure privacy protection environment.

# 3

## How HUAWEI CLOUD Meets POPIA Requirements

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### 3.1 South Africa POPIA Overview

The [Protection of Personal Information Act](#), No.4 of 2013 (POPIA) is the first piece of comprehensive data protection legislation in South Africa. POPIA, amongst other aims, aims to promote the protection of Personal Information Processed by public and private bodies, to introduce certain conditions so as to establish minimum requirements for the Processing of Personal Information and to provide for the rights of persons-regarding unsolicited electronic communications and automated decision making. Please refer to POPIA for further details regarding the aims and the purposes of the Act.

### 3.2 POPIA Conditions and HUAWEI CLOUD Related Practices

Providing quality service to customers has always been the goal of HUAWEI CLOUD. Based on an in-depth analysis of the South African POPIA's compliance requirements, HUAWEI CLOUD combines the understanding of customer's business needs with the process of serving customers and integrates HUAWEI CLOUD's rich practices and technical capabilities to provide customers with a variety of services that meets privacy protection requirements. This white paper will assist customers to understand the services provided by HUAWEI CLOUD with regard to privacy protection compliance according to the core conditions of POPIA.

HUAWEI CLOUD deeply understands the importance of customer's Content Data to the customer's business. HUAWEI CLOUD safeguards strict service boundaries, ensuring that data is owned and used only by customers and creates value for customers. In the process of using HUAWEI CLOUD, customers have full control over their Content Data.

- **The customer can determine where the content data is stored.**

HUAWEI CLOUD currently has data centers in multiple regions in the world including Asia, Europe, Africa and the Americas. The data centers in each

region are physically isolated. If customers have special needs for geographical location, they can choose different regions of HUAWEI CLOUD according to different needs. For example, if a customer in South Africa chooses a geographical site in South Africa, the customer's Content Data will be stored in the data center of South Africa. HUAWEI CLOUD will not transfer the customer's Content Data to other regions without the customer's explicit consent or adhering to the applicable legal requirements.

If there is a need to transfer customer Content Data containing Personal Information across borders and the customer needs HUAWEI CLOUD's assistance, the customer can contact and authorize HUAWEI CLOUD to transfer the said Content data across the borders specified by the customer, which will then be done in compliance with applicable laws.

- **The customer can determine the content data protection policy.**

By using different HUAWEI CLOUD services, customers can decide on whether their Content Data is encrypted, manage Content Data access and manage log auditing. Customers should consider and determine how to manage and protect Personal Information security and how to prevent a Personal Information breach. If a breach does occur, customers should notify the Data Subject as well as the Information Regulator without undue delay take any steps as required by applicable laws and regulations.

### 3.2.1 Accountability

As per Section 8 of POPIA:

The Responsible Party must ensure that the conditions set out in POPIA, and all the measures that give effect to such conditions, are complied with at the time of the determination of the purpose and means of the Processing and during the Processing itself.

#### Customer Considerations:

As customers have full control over the Personal Information they collected/ Process, the purpose and method of Processing the Personal Information will be determined by the respective customers. Customers should ensure compliance with the conditions for Processing Personal Information, as contained in POPIA, according to specific business characteristics and customers should take corresponding measures as required. Customers can also quickly and easily meet their privacy protection compliance requirements through HUAWEI CLOUD's privacy protection services and compliance scheme.

#### HUAWEI CLOUD Considerations:

HUAWEI CLOUD has established a privacy protection system to ensure the security of Personal Information. HUAWEI CLOUD uses strict and systematic management methods to ensure the implementation and continuous improvement of privacy protection policies and processes, complying with Personal Information Processing conditions set out in POPIA. HUAWEI CLOUD routinely carries out internal and external auditing activities and constantly verifies and improves the entire privacy protection system. HUAWEI CLOUD's accreditation in related fields at home, abroad as well as through passed audits, confirms that such emphasis on privacy protection achieves results. Customers can reach out to HUAWEI CLOUD through email and a hotline for further information about certification and reports.

## 3.2.2 Processing Limitation

As per Section 9~12 of POPIA:

- Lawfulness of Processing: Personal Information must be processed lawfully and in a reasonable manner that does not infringe the privacy of the Data Subject (Section 9).
- Minimality: Personal Information may only be Processed if, given the Purpose for which it is Processed, it is adequate, relevant and not excessive (Section 10).
- Consent, justification and objection: Personal Information may only be Processed if
  - the Data Subject or a Competent Person where the Data Subject is a child consents to the Processing;
  - Processing is necessary to carry out actions for the conclusion or performance of a contract to which the Data Subject is party;
  - Processing complies with an obligation imposed by law on the Responsible Party;
  - Processing protects a legitimate interest of the Data Subject;
  - Processing is necessary for the proper performance of a public law duty by a public body; or
  - Processing is necessary for pursuing the legitimate interests of the Responsible Party or of a third party to whom the information is supplied (Section 11).
- The Data Subject may withdraw consent for the Processing of his or her Personal Information at any time on the conditions set out in POPIA. A Data Subject will also, at any time, be allowed to object to the Processing of his or her Personal Information in accordance with POPIA.

Section 12 of POPIA deals with Collection directly from the Data Subject and states that Personal Information must be collected directly from the Data Subject unless such collection falls within certain exclusions (e.g. Data Subjects consent to the collection of information from another source. A list of the exclusions can be found in Section 12 of POPIA).

### Customer Considerations:

Customers have full control over their Content Data, act as Responsibility Parties and decide whether to use HUAWEI CLOUD services to Process Personal Information, for what purpose and with what Processing method. If customer Content Data in HUAWEI CLOUD contains Personal Information, customers should Process this information lawfully and ensure that the information that is Processed is adequate, relevant and not excessive, given the purpose for which the Personal Information is Processed. In addition, customers should only Process Personal Information after obtaining the consent of Data Subjects or under circumstances as stipulated in applicable laws and allow the Data Subject to withdraw consent or object to the Processing of his or her Personal Information at any time. When Processing the Personal Information of children and adolescents, customers should inform their parents or legal guardians and obtain their clear consent, or ensure that other exceptions stipulated under applicable laws for processing Personal Information of children and adolescents are met. Unless under specific

circumstances outlined in applicable laws, customers should only collect Personal Information directly from the Data Subject.

Customers can develop a corresponding control process and use the related services provided by HUAWEI CLOUD or self-developed capabilities to follow the Processing limitation condition.

For example, through the **Database Security Service (DBSS)** provided by HUAWEI CLOUD, customers can quickly identify Personal Information from the massive amounts of data they own and take relevant data protection measures. Based on the Personal Information identified, customers can analyze whether the Personal Information that has been collected is related to and is necessary for business purposes, whether the purpose of information collection has received the consent of Data Subjects and whether the Processing meets the requirements for the Processing of Personal Information. If there are any instances of non-compliance, corrective measures can be taken in time to avoid illegal risks.

## HUAWEI CLOUD Considerations:

HUAWEI CLOUD follows the basic privacy protection principle of lawfulness, fairness and transparency and always Processes Personal Information lawfully, fairly and in a transparent manner in relation to the Data Subject.

HUAWEI CLOUD will only Process the customer's Personal Information within the specified scope and only collect adequate, necessary and proper Personal Information. In the HUAWEI CLOUD product design phase, HUAWEI CLOUD will sort out all the Personal Information categories involved and conduct a Privacy Impact Assessment (PIA). The PIA includes HUAWEI CLOUD's processes of Processing Personal Information and corresponding measures of Personal Information protection to ensure that the Personal Information Processed by HUAWEI CLOUD products does not exceed that which is required to achieve the relevant purpose/s. In the operation and maintenance process, HUAWEI CLOUD will set different access rights to Personal Information based on staff roles, ensuring that staff can only access or use Personal Information necessary for their work.

HUAWEI CLOUD will only Process customer's Personal Information necessary for providing services. When Personal Information is to be Processed in offline marketing activities, a privacy notice is provided at a prominent position and a consent option is provided. HUAWEI CLOUD's products and services are primarily intended for those who are legally considered adults. Subject to the customer's consent, HUAWEI CLOUD may send marketing information to customers via email and provide corresponding mechanisms to allow customers to refuse, object or unsubscribe from such marketing information at any time.

HUAWEI CLOUD states the channels for Processing Personal Information and obtains customer consent. Only the following Personal Information will be Processed by HUAWEI:

- Personal Information submitted by customers to register user accounts in HUAWEI CLOUD official website.
- Personal Information provided when customers contact HUAWEI CLOUD, use products or services, or obtain support or help from HUAWEI CLOUD.

- Personal Information obtained and collected automatically by HUAWEI CLOUD when customers access and use HUAWEI CLOUD official website or services provided by the website.
- Personal Information that HUAWEI CLOUD legally obtains from business partners ("Partners" which join HUAWEI CLOUD Partner Network) or third parties. HUAWEI CLOUD may receive Personal Information of customers from publicly and commercially available sources as permitted by applicable laws and regulations.

The Personal Information collected by HUAWEI CLOUD does not include any special Personal Information as specified in POPIA, such as religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life or biometric information of a Data Subject. Further examples of information that constitutes special information can be found in Section 26 of POPIA.

For customer Content Data, HUAWEI CLOUD does not access customer Content Data unless authorized by the customer or in compliance with applicable local laws and regulations or binding orders from government agencies.

### 3.2.3 Purpose Specification

As per Section 13 of POPIA, Personal Information must be collected for a specific, explicitly defined and lawful purpose related to a function or activity of the Responsible Party, and Data Subjects shall be notified of the purpose. Records of Personal Information must not be retained any longer than is necessary for achieving the purpose for which the information was collected or subsequently processed save for certain circumstances as specified in POPIA (for example where a longer retention period is required by law or where the Personal Information is used for statistical or research purposes) as is directed by Section 14 of POPIA. A Responsible Party must destroy or delete a record of Personal Information or de-identify it as soon as reasonably practicable after the Responsible Party is no longer authorized to retain the record, as required by Section 14 of POPIA. The Responsible Party must restrict Processing of Personal Information in certain circumstances as set out in Section 14 of POPIA.

The provisions of Section 18 of POPIA should be taken note of with regard to the notification to the Data Subject when Personal Information is Processed.

### Customer Considerations:

Customers have full control over their Content Data and act as Responsibility Parties. Customers shall ensure that the Processing of Personal Information is based on specific, explicitly defined, lawful purposes and will be required to inform the Data Subject of the purpose for which the Personal Information is collected while also obtaining their consent. The products and services provided by HUAWEI CLOUD can help customers better meet the requirements for the purpose specification of Personal Information Processing.

For example, through HUAWEI CLOUD's [Convergent Video Cloud Service \(CVCS\)](#), customers can use the interface provided by HUAWEI CLOUD for signing and querying privacy statements to embed a function of agreeing or revoking privacy statements, recording related operation records and to inform their users of the Personal Information Processing policy. For cloud services related to



Personal Information Processing, customers can take corresponding privacy protection measures based on information relating to the categories, Processing, and storage modes of Personal Information provided by HUAWEI CLOUD in the product documentation. For customer Content Data containing Personal Information, the customer shall establish a corresponding retention mechanism to ensure that Personal Information is completely destroyed, deleted or de-identified when it is no longer needed for legal or commercial purposes and that it cannot be recovered.

### **HUAWEI CLOUD Considerations:**

For the customer's Personal Information, after obtaining a customer's consent or to the extent permitted by applicable laws, HUAWEI CLOUD collects the customer Personal Information necessary for the provision of services and HUAWEI CLOUD will notify the customer of the necessary information and details regarding the collection of Personal Information, as required by Section 18 of POPIA. HUAWEI CLOUD does not access customer Content Data, nor can it be aware of the original purpose for which it was collected. HUAWEI CLOUD adopts an automatic deletion mechanism. After a customer cancels their HUAWEI CLOUD account, their related Personal Information is automatically deleted by the system.

For customer Content Data, when the customer actively performs data deletion or deletes the data due to the expiration of the service, HUAWEI CLOUD strictly adheres to the data destruction standard and the customer agreement to clear stored customer data and guarantee it is not recoverable.

## **3.2.4 Further Processing Limitation**

As per Section 15 of POPIA, further Processing of Personal Information must be in accordance or compatible with the purpose for which it was collected.

### **Customer Considerations:**

Section 15(2) of POPIA sets out the factors which customers, in the position of Responsible Parties, must take into account when determining whether further Processing is compatible with the purpose of collection. These factors are that customers should assess the manner in which Personal Information was collected, the nature of the Personal Information collected, the consequences of the intended further Processing on the Data Subject, the relationship between the purpose of the intended further Processing of Personal Information and the purpose for which the information was originally collected and any contractual rights and obligations between the parties ensuring that any further Processing of Personal Information is consistent with the purpose that the Data Subject has been informed of at the time of initial collection.

### **HUAWEI CLOUD Considerations:**

HUAWEI CLOUD collects Personal Information for specified, explicit and legitimate purposes and will not further Process the Personal Information in a manner that is incompatible with those purposes. After obtaining consent of customers for collecting customer Personal Information necessary for providing services, HUAWEI CLOUD will only Process the customer's Personal Information within the specified scope.

### 3.2.5 Information Quality

As required by Section 16 of POPIA, a Responsible Party must take reasonably practicable steps to ensure that the Personal Information is complete, accurate, not misleading and updated where necessary.

#### Customer Considerations:

Customers have full control over their Content Data. If customer Content Data in HUAWEI CLOUD contains Personal Information, customers can select the data integrity protection function provided by HUAWEI CLOUD products or services or self-developed capabilities. For example, in the data storage phase, HUAWEI CLOUD provides data encryption (server encryption) in multiple services such as cloud hard disk, object storage, image service, relational database and uses high-intensity algorithms to encrypt stored data. The server encryption function integrates the [Data Encryption Workshop \(DEW\)](#). Customers can use DEW to centrally manage the key lifecycle and ensure the integrity of the data storage process. In the data usage phase, customers can adopt the [Identity and Access Management \(IAM\)](#) provided by HUAWEI CLOUD to take measures such as user management, identity authentication and fine-grained cloud resource access control to prevent unauthorized modifications to Content Data. During the data transmission phase, customers can ensure the integrity of the data transmission process through various encryption transmission mechanisms provided by HUAWEI CLOUD. For example, when a customer provides a website service through the Internet, HUAWEI CLOUD's certificate management service can be used to implement trusted authentication of the website and secure transmission based on the encryption protocol. For customer service hybrid cloud deployment and global deployment scenarios, customers can use [Cloud Connect \(CC\)](#) and other services provided by HUAWEI CLOUD. Customers can use HUAWEI CLOUD's various privacy protection services, such as the [Log Tank Service \(LTS\)](#), to keep records of the actions taken in respect of Personal Information and to protect their users' right to be informed.

#### HUAWEI CLOUD Considerations:

HUAWEI CLOUD ensures that the Personal Information of the customer is complete, accurate and not misleading and is updated as necessary. Based on the purposes of data Processing, HUAWEI CLOUD takes appropriate measures to ensure that inaccurate Personal Information is deleted or corrected in a timely manner. HUAWEI CLOUD adopts appropriate technical and organizational measures to protect Personal Information from accidental or illegal damage, loss, tampering, unauthorized access, or disclosure, with consideration to current technology capabilities, implementation costs, privacy risk levels and probabilities. For example, HUAWEI CLOUD checks the validity of data when customers input Personal Information and enhances the standardization and accuracy of data input. HUAWEI CLOUD also requires the entry of a verification code obtained through the email address or mobile phone number provided by the customer, in order to confirm the customer identity and verify the accuracy of the relevant contact information.

### 3.2.6 Openness

As per Section 17 of POPIA, a Responsible Party must maintain the documentation of all Processing operations under its responsibility as referred to in Section 14 of

POPIA or 51 of the [Promotion of Access to Information Act](#). Section 18 of POPIA directs that, if Personal Information is collected, the Responsible Party must take reasonably practicable steps to ensure that the Data Subject is aware of, amongst other essential details as stated in POPIA, the information that is being collected, the name and address of the Responsible Party and the purpose for which the information is being collected. (For a full list of the essential details that the Data Subject needs to be notified of, if a Responsible Party collects Personal Information, please see Section 18 of POPIA).

### Customer Considerations:

Customers have full control over their Content Data. If customer Content Data in HUAWEI CLOUD contains Personal Information, customers should maintain Processing operations records in respect of Personal Information Processed. Customers can use HUAWEI CLOUD's Log Tank Service (LTS) to keep records of the operation of Processing of Personal Information. Customers should ensure compliance with Section 18 of POPIA when collecting Personal Information of Data Subjects. For cloud services related to Personal Information Processing, customers can take corresponding privacy protection measures based on information relating to the categories, Processing, and storage modes of Personal Information provided by HUAWEI CLOUD in the product documentation.

### HUAWEI CLOUD Considerations:

In respect of customer Personal Information, HUAWEI CLOUD maintains an operation log record for access, insertion, modification and deletion of Personal Information.

Where the Personal Information of the customer is collected, HUAWEI CLOUD will notify the customer of the necessary information and details regarding the collection of Personal Information, as required by applicable laws. HUAWEI CLOUD only collects the Personal Information of the customers necessary to provide the services after obtaining the customer's consent.

For customer Content Data, HUAWEI CLOUD provides customers with a variety of services and relevant documentation to help customers understand HUAWEI CLOUD and how to use various services provided to meet openness requirements.

## 3.2.7 Security Safeguards

As per Section 19(1)(a) and (b) of POPIA, a Responsible Party must secure the integrity and confidentiality of Personal Information in its possession or under its control by taking appropriate, reasonable technical and organizational measures to prevent loss of, damage to or unauthorized destruction of Personal Information and unlawful access to or Processing of Personal Information. Section 20 of POPIA states that an Operator or anyone Processing Personal Information on behalf of a Responsible Party or an Operator must Process such information only with the knowledge or authorization of the Responsible Party and treat Personal Information which comes to their knowledge as confidential and must not disclose it, unless required by law or in the course of the proper performance of their duties. Section 21 of POPIA directs that a Responsible Party must, in terms of a written contract between the Responsible Party and the Operator, ensure that the Operator which Processes Personal Information for the Responsible Party establishes and maintains the security measures referred to in Section 19. Section

22 of POPIA states that where there are reasonable grounds to believe that the Personal Information of a Data Subject has been accessed or acquired by any unauthorized person, the Responsible Party must notify the Regulator and the Data Subject in accordance with and on the conditions stipulated in Section 22 of POPIA, while the Operator must notify the Responsibility Party, as determined by Section 21(2) of POPIA.

### Customer Considerations:

Customers have full control over their Content Data and should select appropriate services and establish security and Personal Information protection policies to ensure the integrity and confidentiality of Personal Information. Customers shall also perform security configuration/s based on business and privacy protection requirements, such as operating system configuration, network settings, security protection and database encryption policy configuration.

Customers will set appropriate access control policies and password policies to prevent unauthorized access. Customers can use multiple privacy protection services provided by HUAWEI CLOUD to meet the requirements of different security levels.

For details, please refer to [White Paper for HUAWEI CLOUD Data Security](#) released by HUAWEI CLOUD. Customers should notify the regulatory body and Data Subjects of the specific situation if any unauthorized access to Personal Information is discovered as is required by and in terms of the conditions stipulated in applicable laws.

### HUAWEI CLOUD Considerations:

For customer Personal Information, HUAWEI CLOUD uses a series of technologies to uphold the security of Personal Information. For example, policies are implemented based on the minimum permissions required by roles through identity authentication and access control technologies, preventing unauthorized manipulation of Personal Information; encryption technologies are widely used to encrypt customer Personal Information, ensuring data security during storage and transmission; HUAWEI CLOUD strives to identify potential security risks in a timely manner in order to quickly respond to and address issues through logging and auditing technology. If HUAWEI CLOUD discovers any unauthorized access to Personal Information, it will notify the relevant parties as required by and in terms of the conditions of POPIA.

For customer Content Data, HUAWEI CLOUD utilizes various data security technologies and related management and control measures, including identity authentication and access control, data transmission and storage encryption technologies and logging to uphold the security of HUAWEI CLOUD services.

## 3.2.8 Data Subject Participation

In terms of Section 23 of POPIA, a Data Subject, having provided adequate proof of identity, has the right to request a Responsible Party to confirm, free of charge, whether or not the Responsible Party holds Personal Information about the Data Subject and to request from a Responsible Party the record or a description of the Personal Information about the Data Subject held by the Responsible Party including information about the identity of all third parties, or categories of third

parties, who have, or have had access to the information as envisaged and in terms of the further provisions and conditions recorded in Section 23(b) of POPIA. Section 24 of POPIA states that a Data Subject may, in the prescribed manner, request a Responsible Party to correct or delete Personal Information about the Data Subject in its possession or under its control that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully or destroy or delete a record of Personal Information about the Data Subject that the Responsible Party is no longer authorized to retain in terms of Section 14 of POPIA.

### **Customer Considerations:**

Customers have full control over their Content Data. If customer Content Data in HUAWEI CLOUD contains Personal Information, the customer should establish a relevant mechanism and use the functions provided by HUAWEI CLOUD products and services or the capabilities built by itself to respond to the Data Subject's request for access to and correction of Personal Information.

For customer Content Data in HUAWEI CLOUD, customers should directly respond to the request of the Data Subject to access and correct his or her Personal Information.

### **HUAWEI CLOUD Considerations:**

HUAWEI CLOUD allows customers to exercise their right to access and correction of their Personal Information. Regarding the right of customers to access and correct Personal Information, HUAWEI CLOUD provides a dedicated channel to receive customer requests and is equipped with a professional team to respond to customer requests regarding their Personal Information and privacy protection. Upon receiving an appropriate request from a customer, processing will be completed within a specified time, with the result then given back to the customer. For more details related to request channels.

Regarding customer Content Data, if customers have any questions about the access requirements of their Data Subjects when using the HUAWEI CLOUD products, they should contact the HUAWEI CLOUD customer service team. For details, please refer to HUAWEI CLOUD official website.

# 4 Conclusion

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HUAWEI CLOUD always adheres to HUAWEI's "customer-centric" core values, fully understands the importance of customer Personal Information security and respects and protects customer privacy rights. HUAWEI CLOUD has industry-leading security and privacy protection technologies and provides customers with capabilities through cloud services and solutions to help customers cope with increasingly complex and open network environments and increasingly strict privacy protection laws and regulations.

To satisfy the requirements of applicable local privacy protection laws and regulations, HUAWEI CLOUD follows up on the updates to and amendments of relevant laws and regulations, converting new legal requirements into internal HUAWEI CLOUD regulations and optimizing internal processes to ensure that all activities carried out by HUAWEI CLOUD meet the requirements of applicable laws and regulations. HUAWEI CLOUD continuously develops and launches privacy protection related services and solutions that may help customers implement privacy protection laws and regulations in their region.

Compliance with applicable privacy protection laws and regulations is a long-term and multi-disciplinary activity. HUAWEI CLOUD is committed to continuously improving capabilities in the future in order to satisfy relevant laws and regulations and to build a secure and trustworthy cloud platform for customers.

# 5 Version History

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Data	Version	Description
2020-08-31	1.0	First release