



# Data Protection Compliance & Security Policy

**Protection of Personal Information Act (POPI Act)**

Version 2  
January 2023



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# Newsletter platform RocketMailer

## 1. Introduction

RocketMailer is a newsletter tool made up of two separate applications with distinct functionalities, and which operate in two different geographical locations. Below is the description of RocketMailer in South Africa.

Overall requirements for POPI Act compliance for RocketMailer is the same as for the other Rocketseed subsidiaries operating in South Africa and detailed in Section 4 of the full Data Protection Compliance & Security Policy (see Section 2 below).

## 2. POPI Act Statement

### 2.1. The Full Statement

The **Data Protection Compliance & Security Policy - Protection of Personal Information Act (POPI Act), Version 2, January 2023**, can be found on our [website](#), requested via email from your account manager, or by contacting our privacy team as in Section 3 below.

Upon commencing a contractual engagement with RocketMailer, data subjects have the right to request the full statement should they wish to. **Note:** the full statement also applies to Rocketseed email branding software and procedures surrounding the product, which differs in some elements from that of RocketMailer and must be read with caution.

### 2.2. Changes to this Policy

Material changes will be notified by email or through a revised policy on our website. The continued use of our services following the update means acceptance of RocketMailer's updated Data Protection Compliance & Security Policy.

## 3. Contact

RocketMailer can be contacted via the Group [Privacy Page](#) or compliance team [privacy@rocketseed.com](mailto:privacy@rocketseed.com), or by post for the appropriate address given on the Privacy Page.

Additionally, by submitting the Data Subject Request Form, also displayed on the Privacy Page.

## 4. Data RocketMailer Collects

### 4.1. RocketMailer as Responsible Party and Operator

RocketMailer is both a Responsible Party as well as Operator regarding Personal Information and collect personal information in the following ways.

- Directly from Client during the inception of the contractual service.
- Indirectly from Client when interacting with us electronically; e.g. browsing our website (including through mobile), filling out online forms, submitting requests for ticketing etc.
- Directly from other sources, such as public databases, data aggregators and third parties etc; e.g. LinkedIn.

### 4.2. Compliance

Through the application provider, RocketMailer is compliant with:

- The EU-General Data Protection Regulation 2016/679 (EU-GDPR) and UK-General Data Protection Regulation (UK-GDPR)
- The Protection of Personal Information Act, 4 of 2013 (POPIA)

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- The Consumer Protection Act, 68 of 2008 (CPA)
- Electronic Communications and Transactions Act 25 of 2002 (ECTA)

### 4.3. What RocketMailer does with the data

RocketMailer will keep information only for as long as needed, given the purpose for which it was collected, or as required by law (including tax legislation) and any other statutory obligations (including anti-money-laundering and counter-terrorism requirements).

Personal Information for processing purposes (e.g. emails, domain names) are purged from the system regularly to remove inactive/retired users. If data subject requests immediate removal, RocketMailer will oblige within the time limit set out in Data Protection Laws.

## 5. Server & Application Security

Through the tool platform provider, RocketMailer hosted servers are set up in AWS using a container orchestration system, ensuring high availability, scalability, and data security.

### 5.1. Server setup includes the following:

- **Cloudflare WAF Layer:** All requests pass through Cloudflare's Web Application firewall with security defences such as:
  - Protection from zero-day vulnerabilities
  - Core OWASP rules to block the top 10 attack techniques
  - Sensitive data detection alerts
  - DDOS Protection
- **AWS Shield**
  - AWS Shield's always-on detection and mitigation systems automatically scrub bad traffic to protect the application from infrastructure layer attacks, such as SYN floods, UDP floods, etc.
    - **Public Layer:** Consists of network load balancers
    - **Application Layer:** A private layer containing cluster management nodes
    - **Database Layer:** A private layer storing managed RDS instances.
- **Mail Transfer Agents (MTA):** for message transfers between computers.
- **Global Content Delivery Networks (CDN):** A network of servers that deliver webpages and email content to readers, depending on where they are in the world.

Other systems to increase security include:

- **Vault:** A Secrets Management System using secure AWS Key Management Service key to encrypt data at rest.
- **Containerisation:** An industry-standard Linux container isolation
- **Principle of Least Privilege**

### 5.2. Data Hosting

RocketMailer servers are managed Amazon RDS instances to store and manage data, and these reside in South Africa. In other words, personal information from South Africa is processed and stays within South Africa.

Amazon RDS handles routine database tasks such as provisioning, automatic software patching, backups, recovery, and failure detection, and offers scalability and high availability.

Data is both logically and physically separated.

### 5.3. Failover and business continuity

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RocketMailer infrastructure through provider is managed and provisioned using an Infrastructure as Code (IaC) methodology, enabling daily Full Data Backups and incremental backups every 15 minutes. These backups are automated, verified, encrypted, and are stored in the data centre and remotely, in a separate availability zone.

## 6. Access Control

### 6.1. Offices and Staff

Offices are secured through third-party office providers with front desk sign-in, CCTV, escorting, access keys and ID.

All staff, including employees and contractors, are vetted through agencies with thorough background checks (criminal records, eligibility to work at a specified location etc), references and with necessary documentations requested. All staff are moderated by their contracts and company handbooks, containing confidentiality and code of conduct policies, including handling equipment, data and security.

### 6.2. Servers and third party hosts

- Data Centre Security & Facility Access Rights
  - Restricted access to the data centre facility
  - Keypad access
  - Signs posted for restricted access to data centre
  - Unique access IDs for each employee
  - Employees are restricted to areas specified in their permissions
  - No generic IDs granted for vendors, maintenance, or others
  - Process for granting / revoking data centre access
  - Periodic reconciliation of staff with data centre access
- Tracking
  - Live monitoring of access
  - Physical access to data centres is logged, monitored, and retained
  - Written visitor log in restricted data-centre area
  - Camera placement at all door access points
  - Camera placement at aisles / cages
  - Dial and analogue, motion CCTV system
  - CCTV images are retained according to legal and compliance requirements