



# PAIA and POPIA Manual Version 1.1

October 2023

**Trive South Africa (Pty) Ltd**

**PAIA and POPIA Manual**

**Version 1.1**

**October 2023**

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## 1. Introduction

- 1.1. The Promotion of Access to Information Act, 2 of 2000 (hereinafter referred to as “**PAIA**”) gives effect to Section 32 of the Constitution of the Republic of South Africa, 1996 (hereinafter referred to as the “**Constitution**”), that provides for, *inter alia*, the right of Access to Information. This right may be exercised by any person subject to the procedural requirements and provisions set out in PAIA.
- 1.2. In order to give effect to the above-mentioned right, PAIA requires that Trive South Africa (Pty) Ltd (hereinafter referred to as “**Trive SA**”) draft and implement a Manual in terms of Section 51, which sets out the manner in which Trive SA is complying with the requirements set out in the Act, as well as the procedures to be followed by persons wishing to exercise their rights in terms of PAIA.
- 1.3. In addition to the above, the Protection of Personal Information Act, 4 of 2013 (hereinafter referred to as “**POPIA**”) provides for, *inter alia*, 8 Conditions for the lawful processing of Personal Information, which Trive SA undertakes to comply with in order to protect the Personal Information of our Data Subjects.
- 1.4. In order to give effect to the above-mentioned Conditions and ensure that we comply with POPIA as a whole, Trive SA is required to draft and implement a Manual that complies with the relevant Sections of both PAIA and POPIA, which Manual shall be made available to any Data Subjects that wish to exercise their rights as set out in these Acts.
- 1.5. Should a Data Subject wish to exercise a right in terms of either PAIA or POPIA, such right should be exercised by following the approved procedures as set out in this Manual.

## 2. Purpose

- 2.1. The purpose of this Manual is to:
  - 2.1.1. Provide details regarding the records and information of Trive SA that are available and accessible to Data Subjects once the requirements relating to access have been complied with;
  - 2.1.2. Set out the processes and procedures to be followed by Data Subjects wishing to exercise or protect a particular right and/or access certain information (including Personal Information as set out in POPIA), which information is subject to protection and/or non-disclosure; and

- 2.1.3. Provide an overview and guidance as to how Trive SA processes Personal Information in terms of PAIA and POPIA.

### 3. Availability of the Manual

- 3.1. This Manual is hereby made available in terms of PAIA and POPIA, and can be obtained:

- 3.1.1. From Trive SA's website: [www.trive.co.za](http://www.trive.co.za).

- 3.1.2. By contacting our Information Officer on the contact details provided below. Take note that a fee shall be levied in the event that copies of the Manual are required, which fees are set out in **Appendix 3**.

- 3.1.3. At our offices during normal business hours, at no cost.

### 4. Introduction to the Company and Type of Business

- 4.1. Note that this Manual only makes reference to Trive SA and does not include reference to any other companies.

- 4.2. **Name:** Trive South Africa (Pty) Ltd.

- 4.3. **Registration Number:** 2005/011130/07.

- 4.4. **FSP Number:** 27231.

- 4.5. **Type of Business and Client Overview:** Trive SA is an authorised Financial Services Provider registered with the Financial Sector Conduct Authority (hereinafter referred to as the "FSCA") and is authorised to provide Category I and Category II Financial Services. While Trive SA is authorised to provide both Advice and Intermediary Services, we mainly focus on providing Intermediary Services to our clients, with a focus on multi-asset investment products, including cash equities and CFDs.

### 5. Company Contact Details

- 5.1. Designated and Authorised Persons:

- 5.1.1. **Chief Executive Officer:** Travis Robson.

- 5.2. Contact Details:

5.2.1. **Business Address:** 4 Karen Street Office Park, Bryanston, Sandton, 2191.

5.2.2. **Postal Address:** 4 Karen Street Office Park, Bryanston, Sandton, 2191.

5.2.3. **Telephone Number:** +27 10 157 5045.

5.2.4. **Website:** [www.trive.co.za](http://www.trive.co.za).

5.3. Information and Deputy Information Officers:

5.3.1. **Information Officer:** Travis Robson.

5.3.2. **Email Address:** [travis.robson@trive.com](mailto:travis.robson@trive.com).

5.3.3. **Deputy Information Officer:** Marius Grobler.

5.3.4. **Email Address:** [marius.grobler@trive.com](mailto:marius.grobler@trive.com).

5.4. Compliance Officer:

5.4.1. **Compliance Officer:** Daniel van der Merwe.

5.4.2. **Email Address:** [daniel.vdmerwe@trive.com](mailto:daniel.vdmerwe@trive.com).

## 6. The South African Human Rights Commission Guide ("PAIA Guide")

6.1. PAIA grants a Requester access to certain records of a private body if such record is required for the exercise or protection of a particular right. If a public body lodges such a request, such public body must be acting in the public interest when doing so.

6.2. Requests in terms of PAIA shall be made in accordance with the prescribed procedures and at the prescribed rates provided for in terms of the relevant PAIA Regulations.

6.3. Requesters are referred to the Guide in terms of Section 10 of PAIA, which has been compiled by the South African Human Rights Commission. This Guide contains information on how to use and apply PAIA for the purposes of exercising one's rights as enshrined in the Constitution.

6.4. The PAIA Guide is available in all 11 (eleven) official languages of South Africa and can be obtained by contacting Trive SA and/or the Information Regulator.

### 6.5. Contact Details for the Information Regulator:

6.5.1. **Business Address:** JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001.

6.5.2. **Postal Address:** P.O. Box 31533, Braamfontein, Johannesburg, 2017.

6.5.3. **Email Address:** [enquiries@inforegulator.org.za](mailto:enquiries@inforegulator.org.za).

6.5.4. **Website:** [www.inforegulator.org.za](http://www.inforegulator.org.za).

## 7. Publication and Availability of Information and Records

### 7.1. Applicable Legislation:

7.1.1. The legislation applicable to Trive SA is contained in **Appendix 1** of this Manual. Trive SA may be required to obtain certain information and/or keep records in terms of this legislation and, depending on the relevant provisions, may also be required to make certain information and/or records publicly available, allow for the disclosure of certain information and/or records subject to certain conditions, and may be prevented from disclosing such information and/or records.

7.1.2. Trive SA shall therefore take into consideration all applicable legislation and requirements when dealing with a request made by a particular Requester, when exercising his/her rights in terms of PAIA and/or POPIA.

### 7.2. Available Records:

7.2.1. Examples of available Record Categories are contained in **Appendix 2** of this Manual. It should be noted that the inclusion of a particular category and/or examples of records does not mean that information and/or records falling within such categories shall automatically be made available to the Requester.

#### 7.2.2. **Records may be made available as follows:**

7.2.2.1. Freely and publicly (e.g., information and/or records that are available on Trive SA's public website).

7.2.2.2. Subject to copyright; and/or

7.2.2.3. Subject to limited disclosure.

- 7.2.3. Note that a Requester may only request information from Trive SA, as a private body, if the requested information is required for the exercise and/or protection of a particular right. Certain grounds for refusal to a request for information and/or a record may also be applicable as provided in paragraph 8.4 below.

## 8. Form of Request to Access Information and Records

### 8.1. Requester:

- 8.1.1. **Personal Requester:** A Personal Requester is a Requester who is seeking access to a record containing Personal Information about the Requester him/herself. Trive SA shall grant such a request subject to the applicable legislation.
- 8.1.2. **Other Requester:** Trive SA is not obliged to grant a request by any Requester other than a Personal Requester, unless such Requester satisfies the requirements for access to such record as set out in PAIA and/or POPIA.

### 8.2. Request for Access to Record Procedures:

#### 8.2.1. The procedure to be followed is as follows:

- 8.2.1.1. The Requester must complete and sign the relevant prescribed form contained in **Appendix 3** and make payment of the required fee (only in the case of an Other Requester).
- 8.2.1.2. The completed and signed form, together with proof of payment, must either be posted, submitted by hand, or emailed to the Information Officer at the prescribed email address set out herein above.
- 8.2.1.3. If the Requester is unable to complete the prescribed form due to illiteracy and/or disability, such Requester may make the request orally to the Information Officer.
- 8.2.1.4. If a request is submitted on behalf of another person, the Requester must submit proof of the capacity in which they are making the request, and of their authorisation to do so, to the Information Officer and the granting of such request shall depend on whether the Information Officer is satisfied with such capacity and/or authorisation.
- 8.2.1.5. All required information must be provided on the relevant form provided in **Appendix 3** and such information must be true, complete and correct, and must have sufficient particularity to enable the Information Officer to identify:

- 8.2.1.5.1. The identity of the Requester;
- 8.2.1.5.2. The contact details of the Requester;
- 8.2.1.5.3. The requested information and/or records; and
- 8.2.1.5.4. The form of access required by the Requester.
- 8.2.1.6. A Requester may only request access to a particular record in order to exercise and/or protect a right and, as such, must clearly state the nature of the right that is to be exercised and/or protected. The Requester is further required to provide an explanation as to why the requested record is required for the exercise and/or protection of such right.
- 8.2.1.7. Trive SA shall process a request to access a particular record within 30 (thirty) days of receipt of the form set out in **Appendix 3**, together with proof of payment if applicable, unless the Requester has provided exceptional reasons and/or circumstances, together with proof thereof if applicable, that would satisfy the Information Officer that the time period may not be complied with.
- 8.2.1.8. Trive SA shall inform the Requester in writing as to whether access has been granted or denied and shall provide the reasons for such decision.
- 8.2.1.9. If the Requester requires access to the records in another manner, the Requester must state the manner and particulars so required.

### 8.3. Fees Payable:

- 8.3.1. The applicable fees that are prescribed in terms of PAIA Regulations are as follows:
  - 8.3.1.1. A non-refundable prescribed request fee is payable upon submission of any request for access to any record before such request shall be processed.
  - 8.3.1.2. The above-mentioned fees do not apply if the request is for the personal records of the Requester. In such an instance, no fee shall be payable.
  - 8.3.1.3. If the preparation of the requested record requires more than the prescribed hours, a deposit shall be payable by the Requester of not more than 1 (one) third of the access fee which would be payable if the request were granted.
  - 8.3.1.4. A Requester may lodge an application with a Court against the tender/payment of the request fee and/or deposit.

8.3.1.5. Trive SA may withhold records until the prescribed fees have been paid by the Requester.

8.3.1.6. The prescribed fees are subject to confirmation by the Regulator in the Government Gazette and any applicable fees, or changes thereto, shall be disclosed to the Requester upfront.

8.3.1.7. A list of the current prescribed fees is set out in **Appendix 4**.

#### 8.4. Grounds for Refusal of a Request:

8.4.1. Chapter 4 of PAIA provides for several grounds on which a request for access to information may or must be refused.

8.4.2. These grounds include, but are not limited to:

8.4.2.1. Commercial information of a private body;

8.4.2.2. Public interests are not served;

8.4.2.3. The privacy and interests of other individuals are protected, where disclosure would be unreasonable;

8.4.2.4. The mandatory protection of commercial information of a third party/company which includes trade secrets, financial, commercial or technical information that may cause harm if disclosed and/or information that could disadvantage a third party/company in contractual/other negotiations and/or commercial competition and/or computer programs owned by a company protected by copyright and/or intellectual property laws;

8.4.2.5. The mandatory protection of certain confidential information of a third party where the disclosure thereof would breach a duty of confidence;

8.4.2.6. The mandatory protection of confidential information of a third party if such information is protected in terms of an agreement;

8.4.2.7. The mandatory protection of the safety of individuals and/or the protection of property;

8.4.2.8. After the commencement of legal proceedings, the mandatory protection of records that are privileged in such legal proceedings;

8.4.2.9. The mandatory protection of legal privileged documents;

8.4.2.10. Research information of a third party/company if disclosure thereof would put such research and/or researcher at a disadvantage; and/or

8.4.2.11. Requests for records that are clearly frivolous and/or vexatious, or which involve an unreasonable diversion of resources.

8.5. Information or Records Not Found:

8.5.1. In the event that information and/or records cannot be found by Trive SA despite reasonable and diligent searches, the Information Officer shall provide the Requester with a notice in the form of an affidavit setting out the measures taken to locate such information and/or records and Trive SA's inability to locate same.

8.6. Remedies Available to a Requester if Access is Refused:

8.6.1. The decision of our Information Officer shall be final, however, in the event that our Information Officer refuses a request for information and/or records, the Requester may apply to a Court for appropriate relief within 180 (one hundred and eighty) days of receiving such refusal, as provided in PAIA.

## 9. POPIA Guide and Processing of Personal Information by Trive SA

9.1. POPIA provides for certain minimum protection principles required for the lawful processing of Personal Information by Trive SA. A POPIA Guide, setting out how Personal Information shall be processed by Trive SA, is set out in **Appendix 5** of this Manual.

9.2. Objection to Process Personal Information:

9.2.1. A Data Subject that wishes to object to the processing of Personal Information in terms of POPIA must complete, sign, and submit to the Information Officer, the relevant form contained in **Appendix 6** of this Manual.

9.2.2. Affidavits and/or other documentary evidence may be submitted together with the relevant form in support of such objection.

9.3. Request for a) Correction or Deletion of Personal Information; or for b) Destruction or Deletion of a Record of Personal Information:

9.3.1. A Data Subject that wishes to submit a request to rectify, delete or destroy Personal Information in terms of POPIA must complete, sign, and submit to the Information Officer the relevant form contained in **Appendix 7** of this Manual.

- 9.3.2. A request for the correction or deletion of the Personal Information of a Data Subject must be addressed to our Information Officer.
- 9.3.3. Similarly, a request for the destruction or deletion of a record of Personal Information relating to a Data Subject must be addressed to our Information Officer.
- 9.3.4. Affidavits and/or other documentary evidence may be submitted together with the relevant form in support of such request.
- 9.4. Complaints in terms of POPIA:
  - 9.4.1. A Data Subject may submit a complaint to the Regulator in the prescribed manner and form, alleging interference with the protection of the Personal Information of such Data Subject.
  - 9.4.2. A Responsible Party and/or Data Subject may, in terms of POPIA, further submit a complaint to the Regulator in the prescribed manner and form if he/she feels aggrieved by the determination of an adjudicator.
  - 9.4.3. The contact details of the Information Regulator have already been set out herein above.

## Appendix 1 – Applicable Legislation

### THE LEGISLATION APPLICABLE TO TRIVE SA INCLUDES:

- Basic Conditions of Employment Act, 75 of 1997
- Companies Act, 71 of 2008
- Consumer Protection Act, 68 of 2008
- Collective Investment Schemes Control Act, 45 of 2002
- Employment Equity Act, 55 of 1998
- Financial Advisory and Intermediary Services Act, 37 of 2002
- Financial Institutions (Protection of Funds) Act, 28 of 2001
- Financial Intelligence Centre Act, 38 of 2001
- Financial Markets Act, 19 of 2012
- Financial Sector Regulation Act, 9 of 2017
- Financial Services Board Act, 97 of 1990
- Financial Services Ombud Schemes Act, 37 of 2004
- Income Tax Act, 95 of 1967
- Labour Relations Act, 66 of 1995
- Occupational Health and Safety Act, 85 of 1993
- Pension Funds Act, 24 of 1956
- Promotion of Access to Information Act, 2 of 2000
- Protection of Personal Information Act, 4 of 2013
- Skills Development Act, 97 of 1998
- Skills Development Levies Act, 9 of 1999
- Unemployment Contributions Act, 63 of 2001
- Value Added Tax Act, 89 of 1991

\*Note that although Trive SA endeavours to provide an updated list of applicable legislation, this list may not be complete or updated due to continuous changes in legislation. Kindly contact the Information Officer should you have any queries regarding the applicable legislation.

## Appendix 2 – Availability of Records

Except for public Records that may be available on our website, the following categories of records are available upon request in terms of PAIA. Kindly take note that certain grounds of refusal may be applicable as per paragraph 8.4 of this Manual.

| *RECORD CATEGORIES   | *EXAMPLES OF RECORDS  | AVAILABILITY  |
|--|---|---|
| <b>Public Affairs</b>  | <ul style="list-style-type: none"> <li>Media Releases,</li> <li>Brochures</li> <li>Public Company Information,</li> <li>Website Information</li> <li>Public policies and manuals</li> <li>Publications</li> <li>Articles</li> </ul>   | Freely available: <ul style="list-style-type: none"> <li>Publicly accessible</li> <li>On Trive SA website</li> </ul>  |
| <b>Secretarial, Corporate Governance, Legal and Compliance</b> | <ul style="list-style-type: none"> <li>Statutory Company Records</li> <li>Shareholder Agreements and certificates</li> <li>Corporate structure and associations Documents of Incorporation</li> <li>Shareholder/ Board/ Executive decisions</li> <li>Meeting minutes</li> <li>Business Agreements</li> <li>Intellectual Property</li> <li>Management Information</li> <li>Statutory Returns</li> <li>Company policies and manuals</li> <li>Compliance strategies</li> <li>Market information and strategies</li> <li>Business development strategies</li> </ul> | May not be disclosed: <ul style="list-style-type: none"> <li>Request after the commencement of criminal or civil procedure</li> <li>Legal privileged documents</li> <li>Likely to harm commercial and financial interests of parties</li> <li>Likely to breach confidentiality protection in terms of an agreement</li> <li>Commercial Information of Private Body</li> </ul> |
| <b>Financial</b>   | <ul style="list-style-type: none"> <li>Financial Statements and returns</li> <li>Client invoices and statements</li> <li>PAYE records</li> <li>Tax records</li> <li>Assets and liabilities</li> <li>Bank details and records</li> </ul>   | May not be disclosed: <ul style="list-style-type: none"> <li>Commercial Information of Private Body</li> </ul>  |
| <b>Human Recourses/ Employment</b>                             | <ul style="list-style-type: none"> <li>Employment records</li> <li>Staff agreements</li> <li>Training records</li> <li>Performance appraisals</li> </ul>  | May not be disclosed: <ul style="list-style-type: none"> <li>Commercial Information of Private Body</li> </ul>  |
| <b>Operations and Marketing</b>                                | <ul style="list-style-type: none"> <li>Client database</li> <li>Communications and correspondence</li> </ul>  | May not be disclosed <ul style="list-style-type: none"> <li>Commercial Information of Private Body</li> </ul>   |

|                               |   |  |
|-------------------------------|---|--|
|                               | <ul style="list-style-type: none"> <li>• Access control and security records</li> <li>• Research documents</li> <li>• Intellectual Property documents</li> <li>• Fees structures</li> <li>• Service providers</li> <li>• Services agreements</li> </ul>   |  |
| <b>Services</b>               | <ul style="list-style-type: none"> <li>• Compliance templates</li> <li>• Compliance training</li> <li>• Compliance advice and opinions</li> <li>• Compliance reviews</li> <li>• Compliance updates and notices</li> <li>• Client compliance reports</li> <li>• Compliance records</li> <li>• Emails and communications</li> </ul> | Limited disclosure to Clients: <ul style="list-style-type: none"> <li>• Record format containing information</li> <li>• subject to copyright</li> <li>• subject to Client agreement terms</li> </ul> |
| <b>Information Technology</b> | <ul style="list-style-type: none"> <li>• IT services agreements</li> <li>• IT licenses</li> <li>• IT systems and facilities</li> <li>• IT record keeping</li> <li>• Back-up and restore records</li> <li>• Compliance system</li> </ul>   | May not be disclosed: <ul style="list-style-type: none"> <li>• Commercial Information of Private Body</li> </ul>   |

\*Note that although Trive SA endeavours to provide a comprehensive list of record categories, such list may not be complete or updated due to constant changes in legislation or business operations. Kindly contact our Information Officer should you have any queries regarding Records.

### Appendix 3 – Request for Access to Record

The following proof must be submitted to the Information Officer together with the completed and signed Request for Access to Record Form below:

1. Proof of payment of fees (if applicable);
2. Certified copy of the Requester's identity document;
3. If requests are made on behalf of another person, proof of such authorisation must be attached to this form; and
4. Supporting documentation (only if applicable).

| REQUEST FOR ACCESS TO RECORD  |  |  |  |
|---|--|--|--|
| *Mark the applicable box with an "X"  |  |  |  |
| <b>Request is made in my own name</b>   |  | <b>Request is made on behalf of another person</b> |  |
| <b>1. PARTICULARS OF PERSON REQUESTING ACCESS TO INFORMATION</b>                              |  |  |  |
| <b>Full Names &amp; Surname:</b>  |  |  |  |
| <b>Identification Number:</b>   |  | <b>Cell phone no.</b>                              |  |
| <b>Other contact no:</b>  |  | <b>Fax no.</b>                                     |  |
| <b>Capacity in which request is made (when made on behalf of another person)</b>              |  |  |  |
| <b>Email address:</b>   |  |  |  |
| <b>Postal address:</b>  |  | <b>Postal code</b>                                 |  |
| <b>Street address:</b>  |  | <b>Postal code</b>                                 |  |
| <b>2. PARTICULARS OF PERSON ON WHOSE BEHALF THE REQUEST IS MADE</b>                           |  |  |  |
| *Only complete this section if a request for information is made on behalf of another person. |  |  |  |
| <b>Full Names &amp; Surname/<br/>Legal entity name:</b>                                       |  |  |  |
| <b>Identification Number:</b>   |  | <b>Cell phone no.</b>                              |  |
| <b>Other contact no:</b>  |  | <b>Fax no.</b>                                     |  |
| <b>Email address:</b>   |  |  |  |

## PAIA AND POPIA MANUAL

|  |  |                    |  |
|--|--|--------------------|--|
| <b>Postal address:</b>   |  | <b>Postal code</b> |  |
| <b>Street address:</b>   |  | <b>Postal code</b> |  |
| <b>3. PARTICULARS OF RECORD REQUESTED</b>  |  |                    |  |
| *Provide full particulars of the record to which access is requested, including the reference number if that is known to you, to enable the record to be located. (If the provided space is inadequate, please continue on a separate page and attach it to this form. All additional pages must be signed.) |  |                    |  |
| <b>Description of record or relevant part of the record:</b>   |  |                    |  |
| <b>Ref no. if available</b>  |  |                    |  |
| <b>Any further particulars of record</b>   |  |                    |  |
| <b>4. TYPE OF RECORD</b>   |  |                    |  |
| *Mark the applicable box with an "X"   |  |                    |  |
| <b>Records in written or printed form</b>  |  |                    |  |
| <b>Record comprises virtual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc.)</b>  |  |                    |  |
| <b>Record consists of recorded words or information which can be reproduced in sound</b>   |  |                    |  |
| <b>Record is held on a computer or in an electronic, or machine-readable form</b>  |  |                    |  |
| <b>5. FORM OF ACCESS</b>   |  |                    |  |
| *Mark the applicable box with an "X"   |  |                    |  |
| <b>Printed copy of record (including copies of any virtual images, transcriptions and information held on computer or in an electronic or machine-readable form)</b>   |  |                    |  |
| <b>Written or printed transcription of virtual images (this includes photographs, slides, video recordings, computer-generated images, sketches, etc.)</b>   |  |                    |  |
| <b>Transcription of soundtrack (written or printed document)</b>   |  |                    |  |
| <b>Copy of record on flash drive (including virtual images and soundtracks)</b>  |  |                    |  |
| <b>Copy of record on compact disc drive (including virtual images and soundtracks)</b>   |  |                    |  |
| <b>Copy of record saved on cloud storage server</b>  |  |                    |  |
| <b>6. MANNER OF ACCESS</b>   |  |                    |  |
| *Mark the applicable box with an "X"   |  |                    |  |
| <b>Personal inspection of record at registered address of public/private body (including listening to recorded words, information which can be reproduced in sound, or information held on computer or in an electronic or machine-readable form)</b>  |  |                    |  |
| <b>Postal services to postal address</b>   |  |                    |  |
| <b>Courier service to street address</b>   |  |                    |  |
| <b>Facsimile of information in written or printed format (including transcriptions)</b>  |  |                    |  |

|   |  |           |
|---|--|-----------|
| E-mail of information <i>(including soundtracks if possible)</i>  |  |           |
| Cloud share/file transfer   |  |           |
| Preferred language  |  |           |
| (Note that if the record is not available in the language you prefer, access may be granted in the language in which the record is available)   |  |           |
| <b>7. PARTICULARS OF RIGHT TO BE EXERCISED OR PROTECTED</b>   |  |           |
| *If the provided space is inadequate, please continue on a separate page and attach it to this Form. The requester must sign all the additional pages.  |  |           |
| Indicate which right is to be protected:  |  |           |
| Explain why the record requested is required for the exercise or protection of the aforementioned right:  |  |           |
| <b>8. FEES</b>  |  |           |
| *A request fee must be paid before the request will be considered.<br>*You will be notified of the amount of the access fee to be paid.<br>*The fee payable for access to a record depends on the form in which access is required and reasonable time required to search and prepare a Record.<br>*If you qualify for exemption of the payment of any fee, please state the reason for exemption |  |           |
| Reason:   |  |           |
| <b>9. NOTIFICATION OF OUTCOME OF REQUEST</b>  |  |           |
| You will be notified in writing whether your request has been approved or denied and if approved the costs relating to your request, if any.  |  |           |
| *Please indicate your preferred manner of correspondence with an "X":   |  |           |
| Postal address  |  | Facsimile |
| Electronic communication (please specify)   |  |           |
| <b>10. SIGNATURE</b>  |  |           |
| Signed at: _____ on this _____ day of _____ 20____  |  |           |
| _____<br>Signature of Requester/ person on whose behalf request is made   |  |           |

## Appendix 4 – Fees Payable

The following Fees are payable in respect of Private Bodies (other than personal requests) in terms of Part III of the PAIA Regulations published in the Government Gazette:

**“Public Body”** means – (a) any department of state or administration in the national or provincial sphere of government or any municipality in the local sphere of government; or (b) any other functionary or institution when exercising a power or performing a duty in terms of the Constitution or a provincial constitution; or ii. exercising a public power or performing a public function in terms of any legislation.

| FEES IN RESPECT OF PUBLIC BODIES |  |  |
|----------------------------------|--|--|
| 1.                               | The request fee payable by every requester   | R 100.00   |
| 2.                               | Photocopy of A4-size page  | R 1.50 per page or part thereof  |
| 3.                               | Printed copy of A4-size page   | R 1.50 per page or part thereof  |
| 4.                               | For a copy in a computer-readable form on:   |  |
|                                  | 4.1 Flash drive (to be provided by requestor)  | R 40.00  |
|                                  | 4.2 Compact disc   |  |
|                                  | - If provided by requestor   | R 40.00  |
|                                  | - If provided to requestor   | R 60.00  |
| 5.                               | For a transcription on visual images per A4-size page  | Service to be outsourced.<br>Will depend on quotation from Service Provider. |
| 6.                               | Copy of visual images  |  |
| 7.                               | Transcription of an audio record, per A4-size page   | R 24.00  |
| 8.                               | Copy of an audio record on:  |  |
|                                  | 8.1 Flash drive (to be provided by requestor)  | R 40.00  |
|                                  | 8.2 Compact disc   |  |
|                                  | - If provided by requestor   | R 40.00  |
|                                  | - If provided to requestor   | R 60.00  |
| 9.                               | To search for and prepare the record for disclosure for each hour or part of an hour, excluding the 1 <sup>st</sup> hour, reasonably required for such search and preparation. To not exceed a total cost of | R 300.00   |
| 10.                              | Deposit: If search exceeds 6 hours   | 1/3 <sup>rd</sup> of amount per request calculated in terms of items 2 to 8. |
| 11.                              | Postage, e-mail or any other electronic transfer   | Actual expense, if any.  |

**“Private Body”** means – (a) a natural person who carries or has carried on any trade, business or profession, but only in such capacity. (b) a partnership which carries or has carried on any

trade, business or profession; or (c) any former or existing juristic person but excludes a public body.

| <b>FEES IN RESPECT OF PRIVATE BODIES</b> |  |  |
|--|--|--|
| 1.                                       | The request fee payable by every requester   | R 140.00   |
| 2.                                       | Photocopy/ printed black & white copy of A4-size page  | R 2.00 per page or part thereof  |
| 3.                                       | Printed copy of A4-size page   | R 2.00 per page or part thereof  |
| 4.                                       | For a copy in a computer-readable form on:<br>4.3 Flash drive (to be provided by requestor)<br>4.4 Compact disc<br>- If provided by requestor<br>- If provided to requestor                                  | R 40.00<br>R 40.00<br>R 60.00  |
| 5.                                       | For a transcription on visual images per A4-size page  | Service to be outsourced. Will depend on quotation from Service Provider.    |
| 6.                                       | Copy of visual images  |  |
| 7.                                       | Transcription of an audio record, per A4-size page   | R 24.00  |
| 8.                                       | Copy of an audio record on:<br>8.3 Flash drive (to be provided by requestor)<br>8.4 Compact disc<br>- If provided by requestor<br>- If provided to requestor   | R 40.00<br>R 40.00<br>R 60.00  |
| 9.                                       | To search for and prepare the record for disclosure for each hour or part of an hour, excluding the 1 <sup>st</sup> hour, reasonably required for such search and preparation. To not exceed a total cost of | R 145.00<br>R 435.00   |
| 10.                                      | Deposit: If search exceeds 6 hours   | 1/3 <sup>rd</sup> of amount per request calculated in terms of items 2 to 8. |
| 11.                                      | Postage, e-mail or any other electronic transfer   | Actual expense, if any.  |

## Appendix 5 – POPIA Guide and Processing of Personal Information by Trive SA

### 1. Definitions:

- 1.1. **Data Subject:** means the person to whom the personal information relates.
- 1.2. **Responsible Party:** means the entity which determines the purpose of and means for processing Personal Information, e.g., Trive SA.
- 1.3. **Operator:** means the company or a person who processes personal information for a Responsible Party in terms of a contract or mandate, without coming under the direct authority of the Responsible Party.
- 1.4. **Personal Information:** means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to:
  - 1.4.1. information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;
  - 1.4.2. information relating to the education or the medical, financial, criminal or employment history of the person;
  - 1.4.3. any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
  - 1.4.4. the biometric information of the person;
  - 1.4.5. the personal opinions, views or preferences of the person;
  - 1.4.6. correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
  - 1.4.7. the views or opinions of another individual about the person; and
  - 1.4.8. the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person.
  - 1.4.9. Special Personal Information includes:

1.4.9.1. religious or political beliefs;

1.4.9.2. race or ethnic origin;

1.4.9.3. trade union membership;

1.4.9.4. political opinions;

1.4.9.5. health, sexual life; and

1.4.9.6. criminal behaviour.

1.5. **Processing:** means any operation or activity or any set of operations, whether or not by automatic means, concerning personal information, including:

1.5.1. the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;

1.5.2. dissemination by means of transmission, distribution or making available in any other form; or

1.5.3. merging, linking, as well as restriction, degradation, erasure or destruction of information.

1.6. **Direct Marketing:** means the use of personal information for the purposes of direct marketing by means of any form of electronic communication.

## 2. The 8 Protection Principles applicable to Trive SA

Trive SA is a Responsible Party in terms of POPIA and has Data Protection Policies and Procedures in place for the protection of all Personal Information. Trive SA has implemented the required controls and employs up to date technology to ensure the protection, confidentiality, integrity and availability of the Personal Information that it processes.

**The application of the 8 Protection Principles within Trive SA as a Responsible Party to ensure the protection of Personal Information is set out below:**

### 2.1. Accountability:

This principle contemplates the assigning of responsibility by Trive SA to oversee and ensure compliance with the POPIA requirements.

- 2.1.1. The Board has appointed an Information Officer (“**IO**”) and a Deputy Information Officer (“**DIO**”) who must register with the Information Regulator and who are responsible to implement and oversee POPIA within the Responsible Party.
- 2.1.2. The Responsible Party is responsible to audit the processes used to collect, record, store, disseminate and destroy Personal Information and, in particular, to ensure the integrity and safekeeping of Personal Information in possession or under control.
- 2.1.3. The Responsible Party must take steps to prevent the information being lost or damaged, or unlawfully processed or accessed.
- 2.1.4. The Responsible Party must ensure that staff is properly trained on a regular basis to ensure that they understand their responsibilities and the consequences of non-compliance with POPIA.

### 2.2. **Processing Limitation:**

Personal Information may only be processed by the Responsible Party:

- 2.2.1. if it is done lawfully;
- 2.2.2. in a manner that does not infringe upon the privacy of the Data Subject;
- 2.2.3. if adequate, relevant and not excessive given the purpose; and
- 2.2.4. if consent was obtained or was necessary. If consent was obtained from the Data Subject, then such consent must be voluntary and specific.

### 2.3. **Purpose Specification:**

- 2.3.1. Purpose Specification is important to determine the scope within which Personal Information may be processed by a Responsible Party.
- 2.3.2. The Responsible Party is required to:
  - 2.3.2.1. define the purpose of the Personal Information gathering and processing clearly;
  - 2.3.2.2. collect only the necessary information;
  - 2.3.2.3. indicate that it is collected for a specific, explicitly defined and lawful purpose; and
  - 2.3.2.4. be clear to whom the information is transferred.

2.3.3. Personal Information must be destroyed, deleted or 'de-identified' as soon as the purpose for collecting the information has been achieved. This requirement may be subject to other legislation such as FAIS and FICA with 5 (five) year record keeping requirements applicable to the financial services industry.

2.3.4. There are further restrictions on the transfer of Personal Information out of and into South Africa. The applicable restrictions will depend on the laws of the country to whom the data is transferred or from where the data is returned. The Responsible Party is required to assess the applicable laws.

### 2.4. **Further Processing Limitation:**

Once the Responsible Party has identified and obtained consent for specific, legitimate and explicitly defined purposes, then Personal Information cannot be processed contrary to the purpose for which it was collected. The processing of such Personal Information may only occur insofar as it is necessary for the fulfilment of the purpose. If information is received via a third party for further processing, then this further processing must be compatible with the purpose for which the data was initially collected, otherwise further consent must be obtained.

### 2.5. **Information Quality:**

The Responsible Party must ensure and maintain the quality of the Personal Information that it processes. It must therefore:

2.5.1. take reasonably practicable steps to ensure that the Personal Information is complete, accurate and updated; and

2.5.2. consider obtaining a warranty from Data Subjects to ensure that the Personal Information is correct and updated.

### 2.6. **Openness Required:**

2.6.1. The Responsible Party is required to notify the Information Regulator of the applicable data subject groups that the information is used for, e.g., financial services category. The Responsible Party has a duty to process Personal Information in a fair and transparent manner and must take steps to notify the Data Subject whose Personal information is being processed that such processing is being done together with the reasons therefor.

2.6.2. The Data Subject must be informed about the purpose and from what source his/her Personal Information was obtained:

2.6.2.1. the name and address of the company processing the Personal Information; and

2.6.2.2. whether the provisioning of the Personal Information is voluntary or mandatory.

### 2.7. Security Safeguards:

2.7.1. Personal Information should be kept secure against the risk of loss, unauthorised access, interference, modification, destruction or disclosure. The Responsible Party is required to secure the integrity of personal information by taking appropriate, reasonable technical and organisational measures to prevent loss, damage, unauthorised access and unlawful access or processing of Personal Information.

2.7.2. The Responsible Party must take all reasonable measures to:

2.7.2.1. Identify all reasonably foreseeable internal and external risks;

2.7.2.2. Establish and maintain appropriate safeguards against the risks;

2.7.2.3. Regularly verify that the safeguards are adequately implemented; and

2.7.2.4. Ensure the safeguards are continually updated in response to new risks or deficiencies in previously implemented safeguards.

2.7.3. The Responsible Party must oversee an Operator who processes data on his/her behalf. The Responsible Party must be aware of the following:

2.7.3.1. The Operator must treat information confidentially;

2.7.3.2. The Responsible Party must ensure that the operator establishes and maintains appropriate security safeguards;

2.7.3.3. All processing by an operator must be governed by a written contract; and

2.7.3.4. In the event of security breaches, the Responsible Party must notify the Regulator and the data subject.

### 2.8. Participation:

POPIA allows for Data Subjects to make certain requests, free of charge, to organisations that hold their Personal Information. Data Subjects may request access to, or records of, their Personal Information and/or request the correction or deletion of any Personal Information held by it. Data Subjects may also request that inaccurate, misleading or outdated Personal Information be updated and have the right to know the identity of all third parties that have had access to their information.

### 3. Exclusions

POPIA protection does not apply to the following information:

#### 3.1. The processing of personal information:

3.1.1. in the course of a purely personal or household activity;

3.1.2. that has been de-identified to the extent that it cannot be re-identified again;

3.1.3. by or on behalf of a public body —

3.1.3.1. which involves national security, including activities that are aimed at assisting in the identification of the financing of terrorist and related activities, defense or public safety; or

3.1.3.2. the purpose of which is the prevention, detection, including assistance in the identification of the proceeds of unlawful activities and the combating of money laundering activities, investigation or proof of offences, the prosecution of offenders or the execution of sentences or security measures, to the extent that adequate safeguards have been established in legislation for the protection of such personal information;

3.1.4. by the Cabinet and its committees or the Executive Council of a province; or

3.1.5. relating to the judicial functions of a court referred to in section 166 of the Constitution of the Republic of South Africa, 1996.

3.2. **“Terrorist and related activities”** for purposes of subsection (1)(c), means those activities referred to in section 4 of the Protection of Constitutional Democracy against Terrorist and Related Activities Act, 2004 (Act No. 33 of 2004).

3.3. Data Subject consent is not required, in instances where it would prejudice a lawful purpose or the information is publicly available.

### 4. Processing of Personal Information within Trive SA

Trive SA is processing the Personal Information of its Data Subjects as follows:

|   |  |  |
|---|--|--|
| <b>Purpose of processing:</b>   | <ul style="list-style-type: none"> <li>• Rendering of financial services to clients;</li> <li>• Provisioning of value-added services to clients;</li> <li>• Marketing of services to potential clients;</li> <li>• Proposals to Clients on service offerings;</li> <li>• Maintain accounts and records;</li> <li>• Support and manage employees;</li> <li>• Crime detection, prevention, investigation and prosecution;</li> <li>• Assessment and processing of claims.</li> </ul> | <ul style="list-style-type: none"> <li>• Fraud prevention &amp; detection;</li> <li>• Market research and statistical analysis;</li> <li>• Compliance with regulatory requirements;</li> <li>• Due diligence assessments;</li> <li>• Client relationship management;</li> <li>• Purposes expressly agreed or authorized by the Client or Employees;</li> <li>• Purposes notified to the Client or Employees.</li> </ul>  |
| <b>Data subject categories:</b><br><br><b>Includes Natural and Juristic</b> | <u>Includes Natural persons and Legal entities:</u> <ul style="list-style-type: none"> <li>• Clients and their clients;</li> <li>• Shareholders;</li> <li>• Board members;</li> <li>• Directors;</li> <li>• Employees;</li> <li>• Consultants;</li> <li>• Complainants;</li> <li>• Enquirers;</li> <li>• Trustees;</li> <li>• Employers and employees of other organisations.</li> </ul>   | <ul style="list-style-type: none"> <li>• Associated companies;</li> <li>• Holding companies and Subsidiary Companies in the group;</li> <li>• External companies / contractors;</li> <li>• Suppliers and service providers;</li> <li>• Clients and their members / policyholders / subscribers;</li> <li>• Individuals captured by CCTV images / video;</li> <li>• Individuals who have indicated an interest in financial products;</li> <li>• Regulators.</li> </ul> |
| <b>Types/ classes of information processed</b>                              | <ul style="list-style-type: none"> <li>• Personal details;</li> <li>• Business activities;</li> <li>• Financial Products;</li> <li>• Compliance records;</li> <li>• Business operations;</li> <li>• Compliance assessment outcomes;</li> <li>• Opinions;</li> <li>• Communications;</li> <li>• Personal views / preferences</li> <li>• Family details.</li> </ul>  | <ul style="list-style-type: none"> <li>• Education &amp; employment details;</li> <li>• Visual images of individuals captured on CCTV;</li> <li>• Financial details;</li> <li>• Racial / ethnic origin;</li> <li>• Trade union membership;</li> <li>• Offences / alleged offences;</li> <li>• Religious or other beliefs;</li> <li>• Physical / mental health details;</li> <li>• Criminal proceedings, outcomes &amp; sentences.</li> </ul>                           |
| <b>Who the information may be shared with</b>                               | <p>Its sometimes necessary to share Personal Information with individuals and/or with other organisations. Where this is necessary, Trive SA is required to comply with all aspects of POPIA. The following are types of organisations Trive SA – may need to share some of the Personal Information it</p>  | <ul style="list-style-type: none"> <li>• Claimants / beneficiaries;</li> <li>• Claims investigators;</li> <li>• Suppliers and service providers;</li> <li>• Industry bodies;</li> <li>• Ombudsman;</li> <li>• Legal Advisors, Compliance Officers, advocates or attorneys;</li> <li>• Auditors;</li> </ul>   |

|   |  |  |
|---|--|--|
|   | <p>processes. Only where it is necessary or required Personal Information may be shared with:</p> <ul style="list-style-type: none"> <li>• Associates / Representatives of the person whose Personal Information we are processing;</li> <li>• Employment and recruitment agencies;</li> <li>• Financial organisations;</li> <li>• Credit reference agencies;</li> <li>• Healthcare, social and welfare organisations;</li> <li>• Healthcare professionals;</li> <li>• Regulatory authorities;</li> <li>• Police / courts where necessary;</li> <li>• Business associates.</li> </ul>  | <ul style="list-style-type: none"> <li>• Tax Consultants;</li> <li>• IT Services Providers;</li> <li>• Debt collection and tracing agencies;</li> <li>• Other companies associated with the FSP;</li> <li>• Holding Companies or subsidiary companies in the group;</li> <li>• Persons making an enquiry / complaint;</li> <li>• Private investigators;</li> <li>• Educators and examining bodies;</li> <li>• Pension fund administrators;</li> <li>• Trade unions;</li> <li>• Security organisations.</li> </ul>  |
| <b>Cross border flows of Personal Information</b> | <p>It may be necessary to share Personal Information of Data Subjects with third parties in other countries subject to compliance with POPIA. This will only be done if one of the following requirements are met:</p> <ul style="list-style-type: none"> <li>• the third party who is the recipient of the information is subject to a law, binding corporate rules or binding agreement which provide an adequate level of protection that – <ul style="list-style-type: none"> <li>• effectively upholds principles for reasonable processing of the information that are substantially similar to the conditions for the lawful processing of personal information relating to a data subject who is a natural person and, where applicable, a juristic person, as set out in POPIA; and</li> <li>• includes provisions, that are substantially similar to this section, relating to the further transfer of personal information from the recipient to third parties who are in a foreign country;</li> </ul> </li> </ul> | <ul style="list-style-type: none"> <li>• the Data Subject consents to the transfer;</li> <li>• the transfer is necessary for the performance of a contract between the data subject and the company in question, or for the implementation of pre-contractual measures taken in response to the data subject's request;</li> <li>• the transfer is necessary for the conclusion or performance of a contract concluded in the interest of the data subject between the company in question and a third party; or</li> <li>• the transfer is for the benefit of the Data Subject, and— <ul style="list-style-type: none"> <li>• it is not reasonably practicable to obtain the consent of the data subject to that transfer; and</li> <li>• if it were reasonably practicable to obtain such consent, the Data Subject would be likely to give it.</li> </ul> </li> </ul> |
| <b>Information Security</b>                       | <ul style="list-style-type: none"> <li>• Access control to Data to prevent unauthorised access by individuals;</li> </ul>  | <ul style="list-style-type: none"> <li>• Transmission control to enable the verification and tracing of locations with required</li> </ul>   |

|                                    |   |
|------------------------------------|---|
| <b>measures in respect of Data</b> | <ul style="list-style-type: none"> <li>• Media control to prevent unauthorised manipulation by Media;</li> <li>• Data memory control to prevent unauthorised alteration of Data;</li> <li>• User control to ensure measures to prevent unauthorised disclosure and access by unauthorised persons;</li> <li>• Access control to only allow certain authorised individuals access to Data.</li> </ul> <p>permissions/ authorisation to which Data are transferred;</p> <ul style="list-style-type: none"> <li>• Transport control to prevent Data from being read, altered or intercepted by unauthorised persons;</li> <li>• Organisation control to ensure compliance with POPIA and this Manual.</li> </ul> |
|------------------------------------|---|

## 5. Operator Responsibilities when Processing Personal Information for a Responsible Party

### 5.1. Duties of an Operator

#### 5.1.1. All Information processed by an Operator must be treated in the following manner:

- 5.1.1.1. The Responsible Party must be aware of the Operator's processing;
- 5.1.1.2. The Operator must treat information confidentially;
- 5.1.1.3. The Responsible Party must ensure that the Operator establishes and maintains appropriate security safeguards;
- 5.1.1.4. In the event of security breaches, the Operator via the Responsible Party must notify the Regulator and the data subject; and
- 5.1.1.5. The processing by an Operator must be governed by a written contract between the Responsible Party and the Operator.

#### 5.1.2. The contents of the contract between Operator and Responsible Party must detail at least the following:

- 5.1.2.1. the legitimate grounds for collecting and using Personal Data collected;
- 5.1.2.2. the lawful purpose for which data are being collected;
- 5.1.2.3. the limit of processing and prohibiting of further processing;
- 5.1.2.4. the extent of information that is required to prevent any excessive information collection;

- 5.1.2.5. the information retention periods and requirements applicable together with destruction processes and procedures;
- 5.1.2.6. The right of individuals to request such information and query the use thereof; and
- 5.1.2.7. The security measures required to prevent the unauthorised or unlawful processing of Personal Data or access to Personal Data, including accidental loss or destruction or damage to Personal Data.

### 6. Dealing with Special Personal Information

If an objection is received from a Data Subject to process the Special Information, then this information may not be supplied to third parties without the Data Subject's consent.

- 6.1. **Religious or Philosophical Beliefs** processing may take place by spiritual or religious organisations & institutions, provided that the information concerns data subjects belonging to such organisations; if it is necessary to achieve their aims and principles; or to protect the spiritual welfare of the data subjects.
- 6.2. **Race** processing may be carried out to identify Data Subjects when this is essential and to comply with laws or measures designed to protect or advance persons disadvantaged by unfair discrimination.
- 6.3. **Trade Union Membership** processing may take place by a trade union to which the data subject belongs, or the trade union federation to which the trade union belongs, if the processing is necessary to achieve the aims of the trade union/trade union federation.
- 6.4. **Political Persuasion** processing may take place by an institution founded on political principles if such processing is necessary to achieve the aims or principles of the institution.
- 6.5. **Health or Sexual Life** processing must be confidential and may take place by:
  - 6.5.1. Medical practitioners, healthcare institutions;
  - 6.5.2. Insurance companies, medical aid scheme providers;
  - 6.5.3. Schools;
  - 6.5.4. Institutions of probation, child protection or guardianship; and
  - 6.5.5. Pension funds and employers if processing is necessary for:

- 6.5.5.1. Implementation of laws/pension regulations; and/or
- 6.5.5.2. Re-integration/support for workers or persons entitled to benefit in connection with sickness/work incapacity.
- 6.6. **Criminal Behaviour** processing may take place by:
  - 6.6.1. Bodies charged by law with applying criminal law;
  - 6.6.2. Responsible parties who have obtained the information in accordance with the law; and
  - 6.6.3. Responsible Parties who process the information for their own lawful purposes to assess an application by a Data Subject in order to take a decision about or provide a service to that data subject to protect their legitimate interests in relation to criminal offences.
- 6.7. **General Exemptions:** the Regulator may authorise processing of any information, which will not be in breach of POPIA, if the public interest includes:
  - 6.7.1. the legitimate interests of State security;
  - 6.7.2. the prevention, detection and prosecution of offences;
  - 6.7.3. important economic and financial interests of the State or a public body; and
  - 6.7.4. historical, statistical or research activity.

## 7. Direct Marketing or Advertising by means of Unsolicited Electronic Communications

- 7.1. Direct marketing or advertising is prohibited unless the Responsible Party has obtained consent, or the target of the marketing is already a customer. The Responsible Party may only approach a person to obtain consent once, provided they have not previously withheld such consent, and may only use the information for the initial purpose for which it was obtained.
- 7.2. Any communication for the purpose of direct marketing must contain:
  - 7.2.1. Details of the identity of the sender; and
  - 7.2.2. The address or other contact details to which the recipient may send a request to opt-out.

## Appendix 6 – Objection to Process Personal Information Form

The following proof must be submitted together with the completed and signed Objection to Process Personal Information Form to the Information Officer:

- Certified copy of the Requester's identity document; and
- Affidavit and supporting documentation (only if applicable).

| <b>1. DETAILS OF DATA SUBJECT</b>  |  |
|--|--|
| <b>Name(s) and surname/ registered name of data subject:</b>   |  |
| <b>Unique Identifier/ Identity Number</b>  |  |
| <b>Residential, postal or business address:</b>  |  |
| <b>Contact number(s):</b>  |  |
| <b>Fax number / E-mail address:</b>  |  |
| <b>2. DETAILS OF RESPONSIBLE PARTY</b>   |  |
| <b>Name(s) and surname/ registered name of data subject:</b>   |  |
| <b>Residential, postal or business address:</b>  |  |
| <b>Contact number(s):</b>  |  |
| <b>Fax number / E-mail address:</b>  |  |
| <b>3. PROVIDE DETAILED REASONS FOR:<br/>THE OBJECTION TO PROCESS PERSONAL INFORMATION IN TERMS OF<br/>SECTION 11(1)(d) to (f) OF POPIA</b> |  |

|  |
|--|
|  |
| Signed at: _____ on this _____ day of _____ 20__   |
| Signature of Data Subject/ Designated Person _____ |

## Appendix 7 – Request Form for a) Correction or Deletion of Personal Information; or b) Destruction or Deletion of a Record of Personal Information

The following proof must be submitted together with the completed and signed Form to the Information Officer:

- Certified copy of the Requester’s identity document; and
- Affidavit and supporting documentation (only if applicable)

|  |                          |
|--|--------------------------|
| <b>Mark the applicable Request below with an “X”:</b>  |                          |
| <b>1. REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION</b>   | <input type="checkbox"/> |
| <b>2. REQUEST FOR DESTRUCTION OR DELETION OF A RECORD OF PERSONAL INFORMATION</b>  | <input type="checkbox"/> |
| <b>1. DETAILS OF DATA SUBJECT</b>  |                          |
| <b>Name(s) and surname/ registered name of Data Subject:</b>   |                          |
| <b>Unique Identifier/ Identity Number</b>  |                          |
| <b>Residential, postal or business address:</b>  |                          |
| <b>Contact number(s):</b>  |                          |
| <b>Fax number / E-mail address:</b>  |                          |
| <b>2. DETAILS OF RESPONSIBLE PARTY</b>   |                          |
| <b>Name(s) and surname/ registered name of data subject:</b>   |                          |
| <b>Residential, postal or business address:</b>  |                          |
| <b>Contact number(s):</b>  |                          |
| <b>Fax number / E-mail address:</b>  |                          |
| <b>3. PROVIDE DETAILED REASONS FOR:</b>  |                          |
| <b>1. CORRECTION OR DELETION OF THE PERSONAL INFORMATION ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24(1)(a) OF POPIA, THAT IS IN POSSESSION OR UNDER CONTROL OF THE RESPONSIBLE PARTY;</b><br><b>OR</b><br><b>2. DESTRUCTION OR DELETION OF A RECORD OF PERSONAL INFORMATION ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24(1)(b) OF POPIA, WHICH THE RESPONSIBLE PARTY IS NO LONGER AUTHORISED TO RETAIN.</b> |                          |

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|   |
| Signed at: _____ on this _____ day of _____ 20____<br><br>_____<br>Signature of Data Subject/ Designated Person |