



AFRIZAN

PEOPLE INTELLIGENCE

AFRIZAN PEOPLE INTELLIGENCE (PTY) LTD

FSP: 55157

PROTECTION OF PERSONAL INFORMATION

(POPIA) POLICY

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1. **Scope**

This policy intends to set out principles in relation to POPIA and is applicable across Afrizan People Intelligence and to all Employees, including Afrizan People Intelligence Representatives, Consultants, Service providers, Stakeholders, Members of the Board and Concessions, where the exchange of Personal Information is warranted. The policy also applies to the processing of Personal Information entered in a record by making use of Automated or Non-Automated means.

2. **Introduction**

Afrizan People Intelligence is a well-established Financial Service Provider offering services of:

1. Long- Term Insurance
2. Short-term Insurance
3. Investments
4. Pension Fund Benefits

3. **Objective & what the document is about**

To provide guidance on how Afrizan People Intelligence must comply with the obligations created by the Protection of Personal Information Act 4 of 2013.

To set out POPIA conditions and other POPIA compliance requirements and clarify key responsibilities and obligations of the various role players within Afrizan People Intelligence.

This Policy explains how Afrizan People Intelligence obtains, uses and discloses personal information, in accordance with the requirements of the Protection of Personal Information Act 4 of 2013 ("POPIA"). Afrizan People Intelligence is committed to protecting the privacy of all data subjects, and to ensure that their personal information is collected and used properly, lawfully and transparently. This Policy will also form the basis of the privacy notice that Afrizan People Intelligence discloses to all its data subjects as part of its compliance with POPIA.

4. Definitions and Abbreviations

4.1 Definition

ACT

Protection of Personal Information Act 4 of 2013.

Conditions

Conditions of Lawful Processing stipulated in Chapter 3 of the Act.

Constitution

Constitution of the Republic of South Africa 1996.

Data Subject

Means the person to whom the Personal Information relates. This includes (Customers, Employees, Suppliers, Contractors, Vendors, Third parties and Stakeholders).

De-identification

Is the process used to prevent a Person's Identity from being connected with information.

Employee

An officially appointed person to Afrizan People Intelligence, irrespective of the duration or nature of their appointment - Permanent or Temporary.

Information Officer

The designated Employee within Afrizan People Intelligence responsible to ensure that Afrizan People Intelligence complies with POPI Act; the role is prescribed in the Act.

Information Regulator

The Information Regulator (South Africa) is an independent body established in terms of Section 39 of the Protection of Personal Information Act 4 of 2013. The Information Regulator is responsible for protecting data subjects against harm and to ensure that their Personal Information is protected by responsible parties.

Organisation

Afrizan People Intelligence is a financial advisory practice providing services as detailed in the introductory section.

Operator

Means 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.

Process

Means any Operational activity concerning Personal Information including the (Collection, Organisation, Storage, Modification, Communication and Destruction) of information.

POPIA

Protection of Personal Information Act 4 of 2013.

Personal Information

Means Information relating to the identifiable, living, Natural Person and where it is applicable, and identifiable Juristic Person, including but not limited to –

- information relating to the (Race, Gender, Sex, Pregnancy, Marital Status, Nationality, Ethnic, or Social conscience, Belief, Culture, Language and Birth of a person).
- information relating to the (Education or the Medical, Financial, Criminal or Employment history) of the person.
- any identifying (Number, Symbol, E-mail address, Physical address, Telephone number, Location information, Online identifier or other assignment) to the person.
- the Biometric information of a person.
- the personal (Opinions, Views or Preferences) of the person.
- the Views or Opinions of another individual about the person.
- 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; and
- the Name of the person if it appears with other Personal Information relating thereto.

Record

Means any Recorded Information in whatever form in possession or under the control of Afrizan People Intelligence.

3.2 Abbreviations Abbreviation	Description
POPIA	Protection of Personal Information Act
PAIA	Promotion of Access to Information Act
PI	Personal Information
GDPR	General Data Protection Regulation
IO	Information Officer

5. Policy General

The Right of Privacy is enshrined in the South African Constitution which expressly states that everyone has important right the right to privacy. The POPI Act is aimed at facilitating the Protection of this right. This policy establishes measures and standards for the Protection and Lawful processing of Personal Information within Afrizan People Intelligence and provides principles regarding the right of individuals to privacy and to reasonable safeguarding of their Personal Information.

Afrizan People Intelligence shall comply with both the Law and Good Practice, respect individuals' rights to privacy, be Open and Honest with Individuals whose data is held, provide Training and Support for Staff who handle Personal Data, so that they can act confidently and consistently protect Personal Information and keeping information securely.

5.1 Main Principles of Conduct

5.1.1 Eight Conditions of POPIA ACT

POPIA places a responsibility on Afrizan People Intelligence to promote the lawful processing of Personal Information and its Service providers who act on behalf of Afrizan People Intelligence.

POPIA consists of **Eight conditions** which are adopted by Afrizan People Intelligence as principles guiding Afrizan People Intelligence to comply with the obligations created by the POPIA. The conditions are as follows:

- **Condition 1 – Accountability**

Afrizan People Intelligence is Accountable and Responsible for Personal Information in its possession at an Organisational level and shall comply with all the 8 POPIA conditions. Each employee is responsible for complying with POPIA, POPIA Policy and POPIA Procedure as they process Personal Information in their different Departments.

- **Condition 2 - Processing Limitation**

Afrizan People Intelligence shall ensure that the processing of any Personal Information is done in accordance with the relevant legislation without infringing on the data subjects right to privacy.

Afrizan People Intelligence shall ensure that Personal Information is only processed if the reasons given for the processing are adequate, legitimate, relevant and not excessive. Personal Information shall be processed for the purpose it was collected for and not for a different purpose unless in accordance with exceptions in the Act.

- **Condition 3 - Specific Purpose**

Afrizan People Intelligence shall only collect Personal Information for a specific purpose which is explicitly and limit the processing to the specific purpose it was collected for. Afrizan People Intelligence must ensure, in collecting the information, that the data subject is aware of the purpose for which the information is being collected.

- **Condition 4 - Further Processing Limitation**

Further processing of any Personal Information must be compatible with the purpose for which it was initially collected for.

- **Condition 5 - Information Quality**

Afrizan People Intelligence shall take reasonable steps to ensure that the Personal Information it processes, and stores is complete, accurate, not misleading and kept up to date where necessary.

- **Condition 6 - Openness**

Afrizan People Intelligence must maintain the documentation of all processing operations under its responsibility. The purpose of this condition is to ensure transparency and fairness in the processing of Personal Information.

Afrizan People Intelligence shall ensure that the data subject is aware of the reasons for which his/her Personal Information is processed and inform data subjects of any breaches relating to the

Data Subject Personal Information.

• **Condition 7 - Security Safeguards**

Afrizan People Intelligence shall secure the integrity and confidentiality of Personal Information in its possession through the implementation of appropriate measures to prevent; the loss, damage and unauthorised destruction of Personal Information; and unlawful access which leads to processing of Personal Information without the consent of the data subject.

Relevant experts will guide Afrizan People Intelligence in terms of what are the appropriate IT security technologies to ensure safeguarding and protection of automated Personal Information and educate Employees on protecting and securing automated processing of Personal Information.

Afrizan People Intelligence shall also ensure that it has Written Agreements with all Operators processing Personal Information on its behalf. These Agreements will need to outline the Operators measures to ensure the protection of Personal Information in their possession.

Afrizan People Intelligence shall establish and implement processes or mechanisms to notify a data subject and the Information Regulator where there are reasonable grounds to believe that the Personal Information of a data subject has been accessed or acquired by any unauthorised person.

• **Condition 8 - Data Subject Participation**

Afrizan People Intelligence shall establish mechanisms and processes to provide data subjects with the opportunity to request, correct, delete or destroy their Personal Information insofar as requests have been done in the prescribed manner and where possible and justifiable.

5.1.2 Personal Information Life Cycle & Processing

Processing includes any activity concerning Personal Information. When Employees or Representatives of Afrizan People Intelligence:

- *Collects Personal Information.*
- *Use Personal Information.*
- *Share Personal Information.*
- *Transfer Personal Information.*
- *Store Personal Information; and*
- *Destroy Personal Information.*

shall do so in accordance with compliance requirements of **POPIA Act, Protection of Personal Information (POPIA) Policy – I010 002P and Protection of Personal Information (POPIA) Procedure - I010 002M.**

5.1.2.1 What type of personal information do we collect?

The type of information we collect at Afrizan People Intelligence will depend on the purpose for which it is collected and used. We will only collect information that we need for a specific, explicitly defined, and lawful purpose. When personal information is collected, we will indicate the purpose for the collection.

Personal information collected by Afrizan People Intelligence may include a data subject's Full names, contact details, birth date, identity number, gender, employment details & history, bank account details, Payslip, Company registration number, Company name and contact details.

5.1.2.2 How do we collect personal information?

Afrizan People Intelligence collects information either directly from the data subject, or through third parties some who are Operators. The source from which personal information was or is to be obtained, if not directly from the data subject, will be disclosed.

For example, if Human Resource is recruiting for certain positions, advertisements can be sent through other service providers like LinkedIn, Indeed, Gumtree etc. Afrizan People Intelligence can also decide to create a direct link on its website to process personal information relating to recruitment. A direct email address can also be utilized whereby the HR manager will oversee the processing, reception and flow of received personal information.

5.1.2.3 A detailed flow on the collection of personal information:

Afrizan People Intelligence processes information for natural and juristic persons. The information collected includes:

Processed Personal Information
Driver's License
Applicant's ID Copy
Proof of Address
Bank Confirmation Letter
Bank Statement
CIPC Certificate
Completed & Signed application form

After processing these documents, the department archives them on a CRM system called Fleet Domain. Only staff members have access to the client-related documents archived in this system.

5.1.2.4 Supply of personal information is mandatory

Due to the nature of the business of Afrizan People Intelligence the provision of the respective required personal information by all data subjects is mandatory. Where a data subject does not want to provide the required personal information, Afrizan People Intelligence will not be able to contract with the data subject as desired.

5.1.2.5 The collection of personal information will be limited, and the quality and integrity of the data will be maintained

The personal information collected from data subjects will be limited to only such personal information that is essential for the purpose for which it is required. Afrizan People Intelligence will always ensure that the personal information collected is:

- a) adequate and sufficient to fulfil the purpose for which it is required;
- b) relevant to the purpose for which it is required; and
- c) limited to only what is required for the purpose.

Afrizan People Intelligence will ensure that the quality of all personal information is maintained by taking reasonable steps to ensure that personal information is free of error, not misleading in any way, and updated as regularly as practically possible.

5.1.2.6 Use of personal information

Personal information will be used for the purposes it was collected for.

5.1.2.7 Sharing of personal information

Afrizan People Intelligence will only share the data subject's personal information with third parties if the data subject has consented to such disclosure, or where POPIA provides for another lawful basis for such processing. If consent has been obtained, Afrizan People Intelligence may share personal information of the data subject with third parties who are involved in the delivery of services to Afrizan People Intelligence or the data subject. Afrizan People Intelligence has agreements in place with all such third parties to ensure that they comply with POPIA.

Where Afrizan People Intelligence discloses personal information to any third party, the third party will

be obliged to use that personal information only for the reasons and purposes it was disclosed to them. Afrizan People Intelligence may also be obliged to disclose the personal information of the data subject, to the extent that it is required to do so by law; in connection with any legal proceedings or prospective legal proceedings; or for the purposes of protecting the interests of clients, for example in the pursuit of fraud prevention or to give effect to an agreement Management of service providers with whom personal information is shared

Afrizan People Intelligence has a Services Provider Policy or Service Level Agreements and an Outsourcing Policy. Afrizan People Intelligence will ensure that it complies with the applicable policies when sharing personal information with third parties. In addition to the requirements of these policies, Afrizan People Intelligence will also ensure:

- a) Privacy risks relating to these service providers are assessed before engaging with vendors.
- b) Standard data protection clauses signed off by the legal department are included in the agreement of these service providers;
- c) Privacy risks relating to these service providers are assessed before engaging with vendors; and
- d) That appropriate annual privacy audits are performed on these service providers to ensure that they comply with POPIA and the terms of the agreement.

5.1.2.8 Securing personal information

Afrizan People Intelligence is committed to providing appropriate and reasonable protection of the confidentiality, integrity and availability of the personal information we hold that will prevent unauthorized access to and use of the personal information, or the loss of or unauthorised destruction of personal information of all our data subjects. Afrizan People Intelligence will, on an on-going basis, continue to review our security controls and related processes to ensure that the personal information of data subjects remains secure.

Afrizan People Intelligence security policies and procedures cover:

- a) Physical security.
- b) Computer and network security.
- c) Access to personal information.
- d) Secure communications.
- e) Security in outsourcing any activities or functions.

- f) Retention and destruction of information.
- g) Governance and regulatory matters.
- h) Monitoring access and usage of private information.
- i) Investigating and reacting to security incidents.
- j) The adoption of international standards and best practices where practical and appropriate; and
- k) The performance of periodic assessments as well as when there are environmental changes to ensure the appropriateness and reasonability of security measures.

When Afrizan People Intelligence contracts with third parties, it imposes appropriate security, privacy and confidentiality obligations on them to ensure that the personal information that we remain responsible for is kept secure. However, this does not take away Afrizan People Intelligence Responsible Party status.

Afrizan People Intelligence will ensure that anyone to whom we pass personal information agrees to treat the information with the same level of protection as it does its own information.

Should Afrizan People Intelligence at its own discretion wish to transfer the personal information of data subjects across the borders of the Republic of South Africa, it will ensure that any service provider used in the transfer of the personal information is bound by contract to the principles of this Policy, and that the country to which the personal information is transferred has privacy protection laws that provide protection to data subjects substantially similar to POPIA.

5.1.2.9 Retention of personal information

Included in the Data Governance Framework of Afrizan People Intelligence is a policy on data retention. The Data Retention, Archiving and Destruction Policy provides that data, including personal information, will be retained as follows after the cancellation or termination of all contracts with a data subject:

- a) For as long as may be required by any other law of the Republic of South Africa that apply to Afrizan People Intelligence; and
- b) For a further period in excess of the periods that are referred to in (a) above but not exceeding a total period of 20 years.

Afrizan People Intelligence will ensure strict compliance with the Data Retention, Archiving and

Destruction Policy, and at the end of the retention period, personal information will be destroyed or disposed of in a manner which prevents its reconstruction in an intelligible form

5.1.2.10 Right to access and rectify personal information collected

A data subject can request to review his or her personal information contained in Afrizan People Intelligence' records at any time to correct or update the information. All requests will be at no cost to the data subject.

Afrizan People Intelligence will develop a procedure manual for these requests, and such manual will also make provision for the restriction of further processing in case of a dispute by a data subject. If the purpose for which the personal information of the data subject was initially requested does not exist anymore. Afrizan People Intelligence can decline a request to delete information from its records if legislation requires continued retention thereof or if it has been de-identified or otherwise safeguarded to be used for statistical, historical or research purposes.

5.1.2.11 Privacy Risk Management

Afrizan People Intelligence has a Risk Management Framework. The management of privacy risk will be conducted in accordance with this framework. The Information Officer will assess the internal and external privacy risks before and during a processing activity and record these risks appropriately in the risk registers of Afrizan People Intelligence.

The Information Officer will ensure that a personal information impact assessment is documented for all processing activities, and that this assessment will identify the following:

- a) Nature of privacy risks identified.
- b) Likelihood of damage or harm should the identified risks materialize.
- c) Severity and potential impact of damage or harm to the data subject should the risks materialize.
- d) The inherent risk rating before consideration of the effect of controls in place.
- e) The controls in place to mitigate the privacy risks.
- f) The residual risk, considering the mitigating effect of documented controls.

5.1.2.12 Direct Marketing

Afrizan People Intelligence will never use any form of electronic communication, including automatic calling machines, facsimile machines, SMSs or e-mails for purposes of direct marketing to any data subject, unless the data subject has provided consent for this purpose.

Where consent is obtained from the data subject, Afrizan People Intelligence will ensure that it is voluntary, specific and well informed. Afrizan People Intelligence will further ensure that the consent can be withdrawn by the data subject at any time and will immediately act on any request to withdraw consent for direct marketing.

Afrizan People Intelligence will always limit attempts to obtain consent for direct marketing to one attempt per data subject.

Afrizan People Intelligence will ensure that we are always in a position to demonstrate proof of the consent provided by the data subject on request.

Any form of direct marketing will always contain an easy-to-use method for the data subject to opt out of receiving future direct marketing messages.

5.1.3 Additional Rights and Obligation not grouped under the 8 POPIA conditions:

- Processing of special Personal Information.
- Processing of Children's Personal Information.
- Direct Marketing.
- Processing subject to prior Authorisation.
- Profiling of data subjects based on the automated processing of Personal Information.
- Transfer of Personal Information to other Countries.
- Notification to the Regulator.
- Assessments.
- Information Notices.
- Enforcement Notices and Administrative fines.

Afrizan People Intelligence shall take proper measures and controls to ensure compliance with these obligations. The Protection of Personal Information (POPIA) Procedure - I010 002M will provide guidance in terms of how to implement these additional obligations.

5.1.4 Information Officer

Afrizan People Intelligence has an obligatory task to appoint an Information Officer in terms of

section 55 of the Act. The Information Officer after the effective date has been announced may only take up her/his duties in terms of the Act after Afrizan People Intelligence has Registered him/her with the Information Regulator.

The CEO of every responsible party as defined in POPIA will be the default Information Officer as required by POPIA. A CEO may appoint another person within Afrizan People Intelligence as Information Officer by way of written delegation. The Information Officer may further appoint one or more Deputy Information Officers in writing.

POPIA Champion will be appointed in Afrizan People Intelligence as the department management & oversight officials to assist the Information Officer with compliance to POPIA.

Afrizan People Intelligence has undertaken to register Elvira Paola Riccardi as the Information Officer. This follows the prescription of the Act which requires the CEO or a person with the highest authority in the business to be registered as the Information Officer.

5.1.4.1 The duties and responsibilities of the Information Officer at Afrizan People Intelligence include, amongst others:

- a) To ensure that she is duly registered with the office of the Information Regulator as the Information Officer.
- b) To ensure and encourage compliance with the requirements of POPIA.
- c) To deal with any POPIA related requests made to Afrizan People Intelligence.
- d) To co-operate with the office of the Information Regulator in relation to investigations conducted pursuant to Chapter 6 of POPIA in relation to Afrizan People Intelligence.
- e) To ensure that:
 - i. A privacy compliance framework is developed, implemented, monitored and maintained.
 - ii. A personal information impact assessment is done to ensure that adequate measures and standards exist in order to comply with the conditions for the lawful processing of personal information.
 - iii. A manual is developed, monitored, maintained and made available as prescribed in sections 14 and 51 of PAIA, as amended.
 - iv. Internal measures are developed together with adequate systems to process requests for

information or access thereto.

- v. Internal awareness sessions are conducted regarding the provisions of POPIA, regulations made in terms of POPIA, codes of conduct, or information obtained from the Regulator.

5.1.4.2 Copies of the PAIA manual are provided to any person, upon request. The duties and responsibilities of the Deputy Information Officers include, amongst others:

- i. To own, maintain and monitor compliance with this Policy.
- ii. Report periodically to the Information Officer and the Board on the posture of the data privacy framework.
- iii. To lead the development of training and awareness materials, with support from other departments and support functions.
- iv. To oversee the delivery of training and deployment of awareness sessions.
- v. To be easily accessible to all employees.
- vi. To maintain all the documentation required by the POPIA which will amongst others include documenting:
 - The purpose of processing applicable personal information.
 - The categories of data subjects on which personal information is processed.
 - The categories of personal information that is processed.
 - Any possible recipients of personal information.
 - Whether personal information is transferred cross-border and the safeguards put into place for the data transferred.
 - A general description of security measures in place in relation to personal information being processed.
- vii. To develop in-depth knowledge of the data processing activities within Afrizan People Intelligence.
- viii. To provide advice on projects which have privacy considerations and oversee Privacy Impact Assessments.
- ix. To perform, with the support of the Information Officer and the internal audit function, regular audits

to determine compliance to this Policy and POPIA; and

x. To ensure consistency in the deployment of the data privacy framework across Afrizan People Intelligence.

5.1.4.3 The duties and responsibilities of the POPIA Champions include, amongst others:

- a) To enforce and monitor compliance with this Policy within their respective departments and branches, this will ensure that privacy is embedded in the day-to-day activities of Afrizan People Intelligence.
- b) To deploy and assist in the training and awareness of employees, representatives and independent service providers regarding this Policy.
- c) To develop in-depth knowledge of the data processing activities of their respective departments/ branches/ functions to ensure that Afrizan People Intelligence has an accurate view of what personal information is being processed.
- d) To provide advice on projects which have privacy considerations and assist the Information Officer and Deputy Information Officers in documenting Privacy Impact Assessments.
- e) To assist the Information Officer and Deputy Information Officers during personal data breaches and data subject requests.
- f) To assist the Information Officer and Deputy Information Officers during privacy audits.
- g) To consult with the Information Officer and/or Deputy Information Officers on relevant privacy matters.
- h) To report to the Information Officer and Deputy Information Officers on a quarterly basis on the privacy posture of their respective departments.

5.1.5 POPIA Cyber Security Training and Awareness

Afrizan People Intelligence will ensure that all staff members are trained on how to process Personal Information in accordance with the Act. The information Officer shall be responsible for providing or arranging such training and general awareness.

As mentioned above, Afrizan People Intelligence shall further appoint a POPIA Champion to assist

with implementation of POPIA in the Company.

Training forms part of the ongoing compliance programme conducted in Afrizan People Intelligence. POPIA Cyber security training is required as compulsory training to be completed by all employees. As part of the POPIA management programme, there is a specific focus on training, awareness as well as communication that will cover data privacy and data security. Privacy and cyber security training will be held at least once a year.

The POPIA Champion is Elvira Paola Riccardi.

5.1.6 General Data Protection Regulation

Considering the variety of services offered within Afrizan People Intelligence, we are determined to comply with the GDPR. This policy is aimed at developing monitoring controls to minimize the risks associated with the breach of GDPR.

5.2 Key Outcomes of Principles

- Organisational Compliance with the POPIA Act.
- Protection of Personal Information within Afrizan People Intelligence.
- Promotion of a privacy culture.
- A coordinated POPIA Champions
- Enhanced Personal Information Security safeguards.

6 Process for Monitoring

The effective implementation and monitoring of this Protection of Personal Information (POPIA) Policy shall be done by the Information Officer and/or Deputy Information Officer. Internal audits shall be conducted by Elvira Paola Riccardi with assistance from an external Compliance Officer, Thanzi Matsheketsheke accordingly to determine conformance and implementation. This policy shall be reviewed accordingly to reflect on the changes or regulatory requirement in order to ensure that it is relevant and current to Afrizan People Intelligence.

MONITORING CONTROLS	PURPOSE	RESPONSIBLE PERSON	FREQUENCY
Internal Audit	Providing the Board and Executives with an independent oversight regarding conformance & compliance to this policy.	Elvira Paola Riccardi with assistance from an external Compliance Officer, Thanzi Matsheketsheke	Planned Intervals
POPIA Compliance Check-ins	Providing the Board and Executives with detailed departmental progress regarding conformance & compliance to this policy	Elvira Paola Riccardi	Planned Intervals
Refresher Training	Arranging POPIA refresher training to keep the employees updated with POPIA regulations	External Compliance Officer: Thanzi Matsheketsheke	Annually

7 Accountability and Responsibilities

The overall accountability for development and implementation of this procedure lies with the Information Officer, however, he only does so in terms of management and oversight. Therefore, every person within Afrizan People Intelligence has a duty to assist in the development and implementation of POPIA procedures and compliance.

8 Verification

This policy shall be verified in accordance with Afrizan People Intelligence Verification Policy or Board review.

9 Non-Conformance Reporting

One of the Information Officer's responsibilities is to encourage Afrizan People Intelligence team and employees to comply with the conditions for the lawful processing of personal information, however, the Afrizan People Intelligence board of directors is ultimately responsible to ensure compliance

with POPIA. Accordingly, non-compliance with this Policy may lead to disciplinary action, dismissal or cancellation of agreements. Any deviation from this policy shall be identified and registered with corrective and preventative measures for continual improvement in accordance with Afrizan People Intelligence' Non-Conformance Policy or Disciplinary policy held by the Human Resource Department.

10 Related Policy Document

- Protection of Personal Information (POPIA) Procedure
- Document Control Procedure
- Record Keeping Requirements
- Procedure Code of Ethics
- Employee Manual
- Anti-Corruption Management Plan
- Disciplinary Policy
- Supply Chain Management Procedures Manual
- Third-Party Agreement
- Information Security Policy
- Data Classification Policy
- Interdepartmental Data Sharing Policy
- Data Retention, Archiving and Destruction Policy
- Data Loss Prevention Policy
- Critical Services Provider Policy
- Risk Management Policy
- Outsourcing Policy

11 Related Legislation and Standard

Promotion of Access to Information Act No. 2 of 2000.

Protection of Personal information Act No. 4 of 2013.

Quality Management System ISO 900.

12 Change Control & Updating of this policy

This policy shall only be changed with the authorisation of the Information Officer, Elvira Paola Riccardi.

Afrizan People Intelligence will update this Policy annually or as and when applicable legislation changes. An updated version of this Policy may be requested from the Information Officer of Afrizan People Intelligence.

13 Acceptance of the POPIA Policy

This Protection of Personal Information Act (POPIA) is accepted as an Internal Policy of Afrizan People Intelligence. It is accepted on behalf of the Board of Directors by the Representative of Afrizan People Intelligence on the below date. This Policy is accepted as the only POPIA Act within Afrizan People Intelligence.

- **ACCEPTANCE DATE:**
- **ACCEPTED ON BEHALF OF THE COMPANY BY:**
- **POSITION OF ACCEPTING INDIVIDUAL:**
- **SIGNATURE:**