

DIGITAL SOLUTIONS GROUP PAIA & POPIA MANUAL

29 JUNE 2021

THIS MANUAL WAS PREPARED IN ACCORDANCE WITH SECTION 14 OF THE PROMOTION OF ACCESS TO INFORMATION ACT, 2000 ("PAIA") AND TO ADDRESS THE REQUIREMENTS OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 ("POPIA")

Table of Contents

1. The Act	1
2. Key Definitions.....	2
3. Introduction	3
4. Information Officer and Deputy Information Officers.....	3
5. Personal Information that we Collect.....	4
6. Access to Records & Procedure for Requesting Access to Information.....	5
7. Processing of Personal Information	6
8. Retention of Personal Information.....	6
9. Your Duties and Rights Regarding the Personal Information we Have About You.	7
10. Grounds for Refusal of Record Supply/ Removal	8
11. How to Contact DSG.....	8
FORM A – Information Request.....	8

1. The Act

The promotion of Access to Information Act, 2000, as amended, (the "Act") gives grants a requester access to records of a private body, if the record is required for the exercise or protection of any rights. If a public body lodges a request, the public body must be acting in the public interest. This manual informs requestors of procedural and other requirements which a request must meet as prescribed by the Act, and further incorporates or addresses the requirements of the Protection of Personal Information Act, 2013 ("POPIA").

2. Key Definitions

"Data subject" means the natural or juristic person to whom personal information relates, such as an individual member, policyholder or an entity that provides DSG with products or services;

"De-identify" in relation to personal information of a data subject, means to delete any information that— a) identifies the data subject; b) can be used or manipulated by a reasonably foreseeable method to identify the data subject; or c) can be linked by a reasonably foreseeable method to other information that identifies the data subject, and "de-identified" has a corresponding meaning;

"Filing system" means any structured set of personal information, whether centralised, decentralised or dispersed on a functional or geographical basis, which is accessible according to specific criteria;

"Information Officer" means the head of a private body once appointed the information officer must be registered with the South African Information Regulator established under POPIA prior to performing his or her duties. Deputy Information Officers can also be appointed to assist the information officer;

"Deputy Information Officer" means the person to whom any power or duty conferred or imposed on an Information Officer in terms of POPIA has been delegated;

"Information Regulator" means the Regulator established in terms of Section 39 of POPIA; "Operator" means a person processing personal information for a responsible party in terms of a contract or mandate, without coming under the direct authority of that party e.g. a third party service provider that has contracted with DSG to shred documents containing personal information.

"Processing" means any operation or activity or any set of operations, whether by automatic means or not, concerning personal information, including a) the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use; b) dissemination by means of transmission, distribution or making available in any other form; or products and legal matters relating to those products; or c) merging, linking, as well as restriction, degradation, erasure or destruction of information.

"Record" means any recorded information a) regardless of form or medium, including any of the following;

- (i) writing of any material;
- (ii) information produced, recorded or stored by means of any tape recorder, computer equipment, whether hardware or software or both, or other device, and any material subsequently derived from information so produced, recorded or stored;
- (iii) label, marking or other writing that identifies or describes anything of which it forms part, or to which it is attached by any means; (iv) book, map, plan, graph or drawing; photograph, film, negative, tape or other device in which one or more visual images are embodied to be capable, with or without the aid of some other equipment, of being reproduced; in the possession or under the control of a responsible party;

b) whether or not it was created by a responsible party and c) regardless of when it came into existence.

“Responsible party” means a public or private body or any other person which, alone or in conjunction with others determines the purpose of and means for processing personal information. “Person” means a natural person or a juristic person;

“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—

- a. information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, wellbeing, disability, religion, conscience, belief, culture, language and birth of the person;
- b. information relating to the education or the medical, financial, criminal or employment history of the person;
- c. any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other assignment to the person;
- d. the biometric information of the person;
- e. the personal opinions, views or preferences of the person; f. 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; e.g. the views or opinions of another individual about the person and; h. 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.

“Special personal information” means personal information concerning - the religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life or biometric information of a data subject; or the criminal behaviour of a data subject to the extent that such information relates to the alleged commission by a data subject of any offence; or any proceedings in respect of any offence allegedly committed by a data subject or the disposal of such proceedings.

Our aim is to handle personal information responsibly, balancing the benefits of activities such as fulfilment of the contractual relationship, research, data analytics with our other commitments, including reliability, transparency and non-discrimination.

This Privacy Standard describes how we handle personal information that we collect through:

The DSG website, the software applications made available by us for use on or through computers, mobile devices or other Internet-connected devices (the Apps), our social media pages; and Other means (for example, telephone calls, emails and other communications with us, as well as from claim investigators, medical professionals, witnesses or other third parties involved in our business dealings with you).

3. Introduction

Digital Solutions Group (DSG) is the parent company for the following:

- 3.1 **Customer Experience Group (CXG)**
- 3.2 **Digitalmall**
- 3.3 **Digital Resilience**
- 3.4 **MVNE**

Each of which provide a differentiated and specialised service.

4. Information Officer and Deputy Information Officers

The designated Information Officer and Deputy Officers per organisation (as detailed in Clause 3) are as follows:

Company	CXG & Digital Mall	MVNE	Digital Resilience
Information Officer	Shantal Naidoo	Jason Harmsen	Brandon Meszaros
Deputy Information Officer	Lisa Basson	Thendo Mahlangu	Yaron Assabi
Email:	<u>Compliance@dsg.co.za</u>		

5. Personal Information that we Collect

5.1 Customer Information

- First Name
- Surname
- Contact Number
- Email Address
- Complaint Information
- Physical Address (Where-by delivery service is required)
- Telephone Recordings - This includes but is not limited to recordings of telephone calls to our representatives and call centres.

5.2 Data Categories & Personal Information

Data Category	Personal Information Processed
Natural Persons (DSG Employees)	Names; contact details; physical and postal addresses; date of birth; ID number; Passport number; Tax related information; nationality; gender; confidential correspondence
Juristic Persons / Entities	Names of contact persons; Name of Legal Entity; Physical and Postal address and contact details; Financial information; Registration Number; Founding documents; Tax related information; authorised signatories, beneficiaries, ultimate beneficial owners
Contracted Service Providers	Names of contact persons; Name of Legal Entity; Physical and Postal address and contact details; Financial information; Registration Number; Founding documents; Tax related information; authorised signatories, beneficiaries, ultimate beneficial owners
Employees / Board & Council Members	Members Gender; Marital Status; Ethnicity; Age; Home Language, Education information; Financial Information; Employment History; ID number; Physical and Postal address; Contact details; Opinions, Criminal behaviour; Well-being.

5.3 Access to any of these records need to follow a formal request procedure, as detailed in Clause 8.

6. Access to Records & Procedure for Requesting Access to Information

6.1 Records held by DSG may be accessed on request only once the requirements for request for access have been met. A requester in terms of the Act means:

- i) Any person making a request to access the record; or a person acting on behalf of the person referred to in subparagraph (i).
- ii) The Act distinguishes between two types of requesters, however this Manual includes a third type of a requester:
 - a) **Personal Requester** A personal requester is a requester who is seeking access to a record containing personal information. Subject to the provisions of the Act and applicable law, DSG will provide the requested information, or give access to any record regarding the requested personal information. The prescribed fee for reproduction of the information requested may be charged as prescribed in the Act.
 - b) **Other Requester** This requester (other than a personal requester) is entitled to request access to information pertaining to third parties. However, DSG is not obliged to grant access prior to the requester fulfilling the requirements for access in terms of the Act and any other applicable law. The prescribed fee for reproduction of the information requested may be charged.

8.2 Procedure: A requester must comply with all the procedural requirements contained in the Act relating to a request for access to a record. To request information, attached **Form A** must be completed and sent to compliance@dsg.co.za.

DSG will process a request within the required time as prescribed in the Act, unless the requestor has stated special reasons which would satisfy the Information Officer or his/her Deputy that circumstances dictate that this time period not be complied with.

If an individual is unable to complete the prescribed form because of illiteracy or disability, such a person may make the request orally to the Information Officer or her Deputy and/or should a requester require the assistance of the Information officer or her Deputy in obtaining any record, such assistance will be provided by the Information Officer or Deputy.

Once the request is received, the Information Officer and/or the Deputy Information Officer will verify the identity of data subject prior to handing out /disclosing any personal information.

If you have any queries about our use of your Personal Information you can email: compliance@dsg.co.za.

When requesting information, please provide sufficient detail to enable DSG to identify:

- The record(s) requested;
- The requester (and if an agent is lodging the request, proof of capacity);
- The form of access required
- The postal address or fax number of the requester in the Republic;
- If the requester wishes to be informed of the decision in any manner (in addition to written) the manner and particulars thereof
- The right which the requester is seeking to exercise or protect with an explanation of the reason the record is required to exercise or protect the right

7. Processing of Personal Information

7.1 DSG uses the Personal Information under its care in the following ways:

- i) Staff administration,
- ii) Complying with tax laws and other applicable laws
- iii) Provide improved quality, training and security (for example, with respect to recorded or monitored phone calls to our contact numbers);
- iv) Communicate with you and others as part of our business;
- v) Enable us to deliver goods, documents or notices to you;
- vi) Develop, test and improve our products and services for you;
- vii) Carry out market research and analysis, including satisfaction surveys;
- viii) Personalise your experience on online platforms by presenting information and advertisements tailored for you;
- ix) Resolve complaints, and handle requests for data access or correction;
- x) Fulfil reporting requirements and information requests;
- xi) Comply with applicable laws and regulatory obligations (including laws, directives, sanctions and rules outside your country of residence), such as those relating to anti-money laundering and anti-terrorism; comply with legal process; and respond to requests from public and governmental authorities (including those outside your country of residence).

7.2 Recipient Categories and Processing of Personal Information

DSG may supply the Personal Information to service providers who render the following services:

- i) Storing of Data
- ii) Conducting Due Diligence Checks
- iii) Administration Assistance

7.3 General Description of Information Security Measures

We will take appropriate and reasonable technical, physical, legal and organisational measures, which are consistent with applicable privacy and data security laws. This includes the following:

- Keeping our systems secure (such as monitoring access and usage);
- Storing our records securely;
- Controlling the access to our buildings, systems and/or records;
- Safely destroying or deleting records.

Unfortunately, no data transmission over the Internet or data storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any personal information you might have with us has been compromised), please immediately notify us at compliance@dsg.co.za.

When we provide personal information to a service provider, the service provider will be selected carefully and required to use appropriate measures to protect the confidentiality and security of the Personal Information.

8. Retention of Personal Information

We take reasonable steps to ensure that the personal information we process is reliable for its intended use, and as accurate and complete as is necessary to carry out the purposes described in this Privacy Standard. We will retain personal information for the period necessary to fulfil the purposes outlined in this Privacy Standard unless a longer retention period is required or permitted by other applicable law.

We will keep your personal information for as long as:

- The law requires us to keep it;
 - A contract between you and DSG requires us to keep it;
 - You have consented to us keeping it;
- We are required to keep it to achieve the purposes listed in this privacy standard;
- We require it for statistical or research purposes, we will then de-identify the personal information where necessary; and/or
 - We require it for our lawful business purposes.

We may keep your personal information even if you no longer have a relationship with us, if the law permits.

9. Your Duties and Rights Regarding the Personal Information we Have About You.

You must provide proof of identity when enforcing the rights below.

You have the right to request access to the personal information we have about you by contacting us. This includes requesting:

- Confirmation that we hold your personal information;
- A copy or description of the record containing your personal information; and
- The identity or categories of third parties who have had access to your personal information.

We will attend to requests for access to personal information within a reasonable time. You may be required to pay a reasonable fee to receive copies or descriptions of records, or information about, third parties. We will inform you of the fee, if applicable, before attending to your request.

Please note that the law may limit your right to access information. You have the right to request us to correct or delete the personal information we have about you if it is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, obtained unlawfully, or if we are no longer authorised to keep it, under certain circumstances. You must inform us of your request in writing. It may take up to 30 business days for the change to reflect on our systems.

A specific agreement that you have entered into with us may determine how you must change your personal information provided at the time when you entered into the specific agreement.

Please adhere to these requirements. If the law requires us to keep the personal information, it will not be deleted upon your request. The deletion of certain personal information may lead to the termination of your business relationship with us.

Where you have provided your consent for the processing of your personal information, you may withdraw your consent. If you withdraw your consent, we will explain the consequences to you. We may proceed to process your personal information, even if you have withdrawn your consent, if the law permits or requires it.

It may take up to 30 business days for the change to reflect on our systems. During this time, we may still process your personal information. The withdrawal of your consent may lead to the termination of your business relationship with us.

9.1 If DSG has searched for a record and it is believed that the record either does not exist or cannot be found, the requester will be notified by way of an affidavit or affirmation. This will include the steps that were taken to try to locate the record.

10. Grounds for Refusal of Record Supply/ Removal

Grounds for refusal The Information Officer or Deputy may refuse a request for information for the following reasons:

- (i) Where the disclosure would amount to an unreasonable disclosure of personal information;
- (ii) Where the disclosure would amount to disclosure of the trade secrets of a third party;
- (iii) Where the disclosure would lead to a revelation of financial, commercial, scientific or technical information of a third party;
- (iv) Where such information was supplied in confidence by a third party;
- (v) Where the disclosure would breach the duty of confidence owed to a third party; (f) Where the disclosure would endanger the life or physical safety of an individual; (g) If the disclosure is prohibited under the Criminal Procedure Act;
- (vi) If the disclosure is privileged under legal proceedings or research conducted by or on behalf of a third party;
- (vii) Where the disclosure would compromise the investigation where proceedings are pending.

11. How to Contact DSG

If you have any queries about this notice; you need further information about our privacy practices; wish to withdraw consent; exercise preferences or access or correct your personal information, please contact us at compliance@dsg.co.za.

FORM A – Information Request

Please complete and submit, the below information and send to compliance@dsg.co.za

First name:
Surname:
Contact number:
Record requested:
Any additional information:
Copy of your ID: