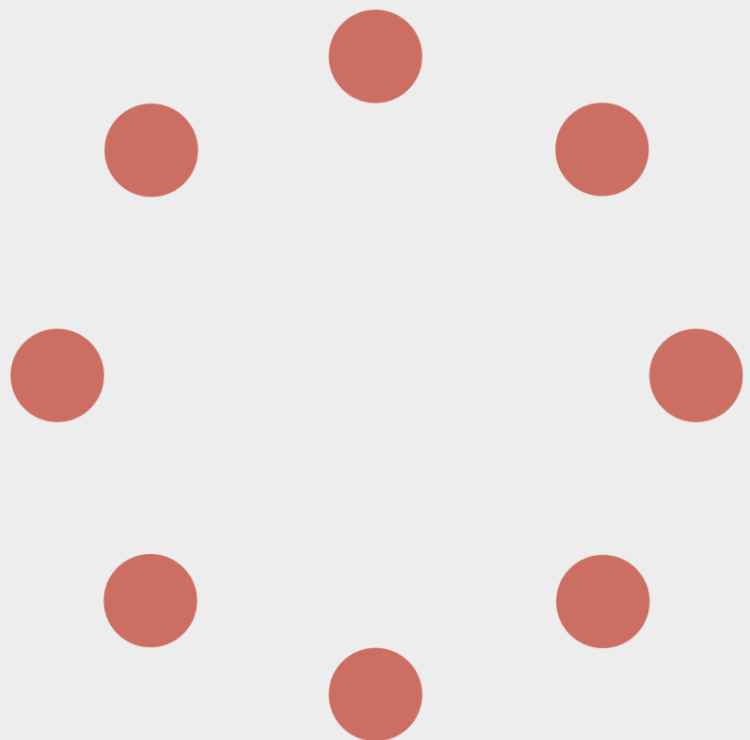




Policy

27four Group  
Protection of Personal  
Information Act



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## Policy Governance and Approval

Policy Owner	Head of Compliance Function
Approval Committee	Group Risk Committee
Date last reviewed and approved	May 2021

## 1. Definitions

<b>Biometrics</b>	means a technique of personal identification that is based on physical, physiological or behavioural characterisation including blood typing, fingerprinting, DNA analysis, retinal scanning and voice recognition
<b>Child</b>	means a natural person under the age of 18 years who is not legally competent, without the assistance of a competent person, to take any action or decision in respect of any matter concerning him or herself
<b>Competent person</b>	means any person who is legally competent to consent to any action or decision being taken in respect of any matter concerning a child
<b>Consent</b>	means any voluntary, specific and informed expression of will in terms of which permission is given for the processing of personal information
<b>Data subject</b>	means the person to whom personal information relates
<b>Direct marketing</b>	means to approach a data subject, either in person or by mail or electronic communication, for the direct or indirect purpose of - (a) promoting or offering to supply, in the ordinary course of business, any goods or services to the data subject; or (b) requesting the data subject to make a donation of any kind for any reason
<b>Electronic communication</b>	means any text, voice, sound or image message sent over an electronic communications network which is stored in the network or in the recipient's terminal equipment until it is collected by the recipient
<b>Operator</b>	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
<b>PAIA</b>	Promotion of Access to Information Act, 2 of 2000
<b>Personal information</b>	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, well-being, 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 particular 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; (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.

<b>POPIA</b>	means the Protection of Personal Information Act 4 of 2013
<b>Procedure</b>	means a statement or number of statements, contained in a separate yet linked document, the effect of which is to prescribe those things that must be done or omitted in order to ensure adherence with this policy and POPIA
<b>Processing</b>	means any operation or activity or any set of operations, whether or not by automatic means, 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 merging, linking, as well as restriction, degradation, erasure or destruction of information.
<b>Responsible party</b>	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
<b>Restriction</b>	means to withhold from circulation, use or publication any personal information that forms part of a filing system, but not to delete or destroy such information

## 2. Policy purpose and scope

### 2.1 Policy purpose

The purpose of the 27four Group (“27four”) POPIA Group Policy (“Policy”) is to govern and manage the actions 27four takes to protect the right to privacy of data subjects. It is used to direct, monitor and continuously improve compliance with the conditions for lawfully processing personal information.

### 2.2 Policy scope

This policy applies to the 27four Group which includes the following entities:

- 27four Holdings (Pty) Ltd (2011/001661/07)
- 27four Life Limited (2004/014436/06)
- 27four Wealth (Pty) Ltd (2013/121530/07)
- 27four Investment Managers (Pty) Ltd (2007/006556/07)
- 27four Collective Investments (RF) Ltd (2015/291620/07)
- All references to “27four” in this policy refer to the 27four Group.

## 3. Principles regarding personal information processing

### 3.1 Accountability

- 27four acknowledges that, as a Responsible Party, it must ensure compliance with the relevant regulations. The Information Officer has been designated with this responsibility.

### 3.2 Processing limitation

- 27four will ensure that personal information being processed is based on one or more of the following lawful basis:
  - Consent: the data subject or competent person where the data subject is a child has given clear consent for 27four to process the personal information for a specific purpose
  - Contract: processing is necessary to carry out actions for the conclusion or performance of a contract to which the data subject is party
  - Legal obligation: processing complies with an obligation imposed by law on 27four
  - Legitimate interest of data subject: processing protects a legitimate interest of the data subject
  - Responsible party and third party legitimate interests: processing is necessary for the legitimate interests of a third party or of 27four.
- 27four will utilise the Personal Information Risk and Impact Assessment Questionnaire to identify and record appropriate lawful basis for all personal information.
- Where special personal information is processed, 27four shall obtain authorisation for processing this type of information.

### 3.3 Purpose specification

- Collection for specific purpose
  - Personal Information collected is limited and relevant in relation to the specific purpose for which it is processed.
  - Data subjects will be provided with the purpose of the collection of their information before collection.
- Retention Policy
  - Retention period
    - 27four deems the default retention period for Personal Information to be 5 (five) years, in the absence of any documented information or requirement by specific regulation. The default retention period of 5 (five) years will commence at the date of the termination of the business relationship.
- Protection of Personal Information during the retention period
- 27four will ensure that retained Personal Information, stored in electronic format, is protected against unauthorised access or loss. All procedures and systems utilized in the electronic storage of Personal Information will be accessible, within a reasonable time period, during the retention period. The responsibility for the storage and protection of Personal Information is that of the Information Officer.
- Personal Information destruction
  - 27four will review all its stored Personal Information regularly in order to decide

whether to destroy or delete any Personal Information. Personal Information deletion or destruction will only be applicable once the purpose for which the documents or electronic records were collected and stored, is no longer applicable.

- The Personal Information Retention Schedule in the Personal Information Risk and Impact Assessment Questionnaire, will also describe how Personal Information is to be disposed of. 27four agrees that the destruction of Personal Information may be dealt with internally or externally but that it remains responsible for such destruction.
- 27four will ensure that appropriate controls are in place to prevent the permanent loss of Personal Information as a result of unintentional, negligent or malicious actions.
- Routine destruction of Personal Information
  - 27four will routinely destroy the following Personal Information unless the Personal Information is subject to a legal proceeding or regulatory investigation:
    - i. Documents such as application forms, letters and e-mail messages;
    - ii. Address lists and distribution lists, and;
    - iii. Copies of documents, snapshot printouts or any extract from any Personal Information database of the Company.
- Destruction process
  - The Information Officer will ensure that all documents retained are classified as either low- or high-risk documents.
  - High risk documents will contain information that is confidential and include documents which contain Personal Information. These documents will be destroyed by way of shredding or electronic deletion.
  - Low risk documents do not contain any Personal or proprietary Information, and include Company published documents. These documents will also be shredded and may be disposed of without an audit trail.

#### **3.4 Further processing limitation**

- Personal Information may only be processed for the purpose for which it was collected under specific conditions.

#### **3.5 Information quality**

- All Personal Information collected will be complete and accurate and 27four will take reasonable steps to ensure that inaccurate data is corrected in a timely manner.

### **3.6 Openness**

- 27four will Process Personal Information in a transparent manner.

### **3.7 Security safeguards**

- 27four will ensure that Personal Information is processed securely and will use appropriate information technology measures to protect Personal Information against accidental or unlawful destruction, loss, amendment or unauthorized access. Notification of any data breaches will occur timeously.

### **3.8 Data Subject participation**

- Data Subjects will be allowed to access their Personal Information and may request the correction or deletion of that information.
- A data subject may object to the processing of his or her personal information where there are legitimate grounds related to his or her specific personal situation.
- Requests for information about access to, correction or deletion of personal data or an objection may be made by the data subject or a competent person in writing to the information officer.
- Contact details of the Information Officer, where data subjects can send their requests are provided to data subjects before collecting their personal information.
- Before complying with any request or objection, 27four shall satisfy itself of the identity of the person making the request or objection. The individual is required to identify him or herself in an appropriate manner. Requests and objections from competent persons for children shall be evaluated against the best interests of the child.

## **4. Information protection processes**

### **4.1 Communication to Data Subjects**

- 27four is responsible for communicating to Data Subjects which types of Personal Information is collected, the purposes of the Processing of the Personal Information, the Processing methods, the Data Subjects' rights and the retention periods. The Information Officer will ensure that the Data Subjects are notified when Personal Information is shared with third parties.
- The Information Officer will authorise which Personal Information is Processed.
- 27four will perform a Personal Information Risk and Impact Assessment for each Personal Information Processing activity.

#### **4.2 Data Subject's consents**

- The Information Officer will be responsible for retaining the records of the Data Subject's consents regarding the Processing of Personal Information. In addition, the Information Officer will ensure that any request to correct, change or destroy Personal Information is dealt with within a reasonable time frame and keep records thereof. 27four will ensure that any consents given by the Data Subjects are voluntary, specific and an informed expression of will.

#### **4.3 Personal Information collection**

- 27four will attempt to collect the minimum amount of Personal Information possible. If any Personal Information is collected from a third party, the Information Officer will ensure that the information is collected lawfully.

#### **4.4 Data Subject's access rights**

- The Information Officer will ensure that Data Subjects are provided with reasonable access to their Personal Information. 27four will further ensure that its Data Subjects can update, correct, delete or transfer their Personal Information if required.

#### **4.5 Personal Information transferability**

- Data Subjects have the right to receive a copy of their Personal Information provided to 27four. The Information Officer will ensure that the Data Subject's Personal Information can be transmitted to another party if so required and will ensure that such requests are processed timeously.

#### **4.6 Third-party disclosures**

- In instances where 27four utilizes third parties to Process Personal Information, the Information Officer will ensure that the third parties have adequate security measures in place to safeguard Personal Information.

#### **4.7 Right to delete or destroy Personal Information**

- 27four will ensure that Personal Information of the Data Subject can be deleted or destroyed upon the Data Subject's request. Personal Information destruction will occur as soon as reasonably practical after the request has been made.

#### **4.8 Privacy Policy**



- A Privacy Policy will be available to Data Subjects and will be written in clear, plain language. The Privacy Policy will be made available through 27four’s website and will include details of how Personal Information is Processed.
- The Privacy Policy will also include the name and contact details of 27four’s Information Officer, the nature of Personal Information that is collected, the purpose for its collection and the rights of the Data Subject.

#### **4.9 Security measures**

- The storage and transfer of Personal Information will occur in a secure environment. 27four will ensure that a risk assessment is completed in order to identify all reasonably foreseeable internal and external risks to Personal Information under its control. Technical measures will be utilised to secure Personal Information, and such measures may consist of De-identification (anonymization) or Encryption. The Company will ensure that the Information Regulator is notified of any data breaches as soon as reasonably possible, and will also notify all Data Subjects affected by such breaches.

### **5. Processing of special personal information**

#### **5.1 27four will not process information regarding a data subject in respect of;**

- the religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life or biometric information;
- processing the information for the purpose direct marketing by means of any form of electronic communication, including automatic calling machines, facsimile machines, SMSs or email;
- the criminal behaviour of a data subject to the extent that such information relates to-
  - i. the alleged commission by a data subject of any offence; or
  - ii. any proceedings in respect of any offence allegedly committed by a data subject or the disposal of such proceedings, unless the data subject has authorised such processing or unless otherwise required by law.

#### **5.2 27four shall not process data regarding children unless authorised by such children’s guardian or otherwise as required by law.**

#### **5.3 27four shall not make automated decisions that have a legal or similarly significant**

### **effect on data subjects unless the decision:**

- i. Is authorised by law;
- ii. Is based on the data subject's explicit consent; or
- iii. Is necessary for entering into or performance of a contract between an organisation and the data subject.

## **6. Clean desk policy**

The objective of the clean desk policy is to establish minimum requirements to ensure that personal and confidential information is protected in locked areas and out of site.

### **6.1 Working in the Office**

- Employees are required to protect all personal or confidential information in their workspace at the end of the working day and when they are absent from their workspace for a prolonged period of time. This includes electronic and physical hardcopy information.
- Whiteboards containing personal or confidential information are erased after use.
- Employees are encouraged to consider scanning paper items and filing them electronically.
- Desktops/laptops are to be locked when left unattended.
- Portable devices such as laptops and tablets that stay overnight in the office to be turned off and stored out of sight.

### **6.2 Working away from the office**

- Confidential information and personal information on data subjects should only be taken home if absolutely necessary.
- Where an employee accesses and prints company files on a home computer or is using personal Wi-Fi connection, all computer security software must be up-to-date and effective.

## **7. Information officer**

### **7.1 Appointment**

- The Information Officer shall be the Group Compliance Officer. The Group Compliance Officer may appoint Deputy Information Officers to assist with the performance of his/her duties.

### **7.2 Responsibilities of the Information Officer**

- Maintaining the necessary documentation for 27four to comply with POPIA;
- Providing guidance to all the employees of 27four regarding their obligations in terms of POPIA when Processing Personal Information;
- Monitoring compliance by 27four and its employees with POPIA and all other relevant regulations, and timeously informing all stakeholders of 27four of any changes in POPIA or the relevant regulations;
- Acting as a single point of contact to all employees of 27four, Data Subjects and Regulators in terms of POPIA;
- Ensuring awareness and training is available to all employees of 27four involved in the Processing of Personal Information;
- Developing all processes and procedures for the reporting of Personal Information breaches;
- Monitoring compliance with 27four's POPIA Policy and any other internal policy documents related to POPIA;
- Creating and maintaining registers of the Processing of Personal Information and
- Advising 27four on privacy notices to Data Subjects.

## **8. Policy ownership, review and approval**

This Policy is owned by Group Compliance Control Function, who is responsible for updating the Policy. This Policy will be reviewed and approved on a periodic basis by the Group Audit & Risk Committee to ensure that the Policy is relevant and reflects the current business strategy and agreed risk of exposure. The Policy will be submitted to the Board for subsequent noting. This Policy must be approved by the 27four Board and the Boards of the entities within 27four.

## **9. Non-compliance**

Compliance with this Policy is mandatory for all 27four employees and non-compliance with the Policy could result in disciplinary action and possible dismissal.

## **10. Implementation**

The Executive Committee of each entity, within the 27four Group structure, are responsible for adherence to and implementation of this Policy in their business and operational areas.

## **11. Appendices**

Document Control

Version	Date	Author	Summary of changes
0.1	May 2021	Kobus Botha / Gugu Silokwane	Initial drafting