

**OUTSOURCED
COMPLIANCE SERVICES
(PTY) LTD**



POPI POLICY



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INTRODUCTION

The Protection of Personal Information Act No 4 of 2013 (“the Act”) is aimed at giving effect to the constitutional right to privacy by safeguarding personal information and regulates how personal information must be processed. Outsourced Compliance Services (Pty) Limited herein referred to as “OCS” regards the lawful and correct treatment of personal information as important to the achievement of its business objectives. It is OCS’s intention to protect an individual’s personal information from being prejudiced in any way and this policy is consistent with the privacy laws applicable in South Africa.

This POPI Policy explains how OCS will obtain, use and disclose personal information, as is required by the Protection of Personal Information Act (the Act). This policy sets out:

- Who We Are
- Personal Information
- Use Of Information
- Security & Disclosure
- Correction Of Information
- Contact Information
- Updates To This Policy

DEFINITIONS

“Data Subject or Individual/ Client” means the person to whom personal information relates;

“Direct Marketing” means to approach a data subject, either in person or by mail or electronic communication, for the direct or indirect purpose of—

- promoting or offering to supply, in the ordinary course of business, any goods or services to the data subject; or
- requesting the data subject to make a donation of any kind for any reason;

“Information Officer” of, or in relation to, a—

- public body means an information officer or deputy information officer as contemplated in terms of section 1 or 17 of The Act; or
- private body means the head of a private body as contemplated in section 1, of the Promotion of Access to Information Act;

“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—

- 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;
- 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 particular assignment to the person;
- the biometric information of the person;
- the personal opinions, views or preferences of 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;
- the views or opinions of another individual about the person; and
- 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;

“Processing” means any operation or activity or any set of operations, whether or not by automatic means, concerning personal information, including—

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

- 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;

WHO WE ARE

Outsourced Compliance Services (Pty) Ltd is a Financial Sector Conduct Authority (FSCA) approved Category 1, 2 and 2A external Compliance Practice.

OCS are members of the Association of Certified Anti-Money Laundering Specialists (ACAMS) and the Compliance Institute of Southern Africa (CISA).

PERSONAL INFORMATION

Personal information is only collected and processed when an individual knowingly and voluntarily consents to such collection and submits the necessary information. Personal Information may be required to provide an individual with further services or to answer any requests or enquiries relating to the services provided by OCS.

OCS collects, records, stores, disseminates, and destroys the personal information provided by a natural/juristic person, to provide client services as per <http://www.outsourcedcompliance.co.za/>. The type of information will depend on the need for which it is collected and will be processed for that purpose only. Whenever possible, OCS will inform the individual as to the information required and the information deemed optional.

Examples of personal information we collect include, but is not limited to:

- Description of the individual's business, assets; financial information, tax number, banking details, etc.
- The individual's Identity number, name, surname, postal and physical address, postal code, marital status, and number of dependents;
- Any other information required by OCS in order to provide the individual with necessary services.

USE OF INFORMATION

OCS needs to collect and process personal or other information for the purposes of:

- Confirming and verifying an individual's identity;
- For the detection and prevention of fraud, crime, money laundering or other malpractice;
- Verifying qualifications;
- Verifying bank account details;
- For audit and record keeping purposes;
- Inform an individual of services;
- To comply with legal and regulatory requirements;
- To share information with service providers with whom OCS has a business agreement to process such information on OCS's behalf or to those who render services to OCS.
- To comply with auditing and record-keeping requirements.

Personal information that an individual submits is used only for the purpose for which it was intended. Copies of correspondence that may contain personal information, is stored in archives for record-keeping and back-up purposes only. Processing is limited to OCS client's instructions.

OCS may engage with other organisations to provide support services. Third Parties are obliged to respect the confidentiality of any personal information held by OCS. Service Level agreements are in place with third parties to ensure that all service providers adhere with confidentiality and privacy terms. OCS may disclose an individual's information where there is a duty or right to disclose the individual's information in terms of applicable legislation, or where it is necessary to protect OCS's legal rights.

SECURITY & DISCLOSURE

OCS strives to ensure the security, integrity and privacy of personal information submitted. OCS will review and update its security measures in accordance with future legislation and technological advances. Unfortunately, no data transmission over the Internet can be guaranteed to be totally secure, however, OCS will endeavour to take all reasonable steps to protect the personal information, which an individual submits to OCS.



In instances where OCS contracts with third parties, OCS will impose the appropriate security, privacy, and confidentiality obligations to ensure that personal information is kept secure. OCS employees are obliged to respect the confidentiality of any personal information held by OCS. All employees are required to sign an employment contract which includes a confidentiality clause.

OCS will always set the highest standards to ensure the integrity of systems and will on an ongoing basis, continue to review security controls and related processes in order to ensure that any personal information remains secure.

OCS will not reveal any personal information to anyone unless:

- It is compelled to comply with legal and regulatory requirements or when it is otherwise allowed by law;
- It is in the public interest;
- OCS needs to do so to protect their rights.

OCS recognises the importance of protecting the privacy of information that is collected about individuals. OCS will not be held liable for the loss, destruction, or disclosure of an individual's personal information due to a force majeure event.

CORRECTION OF INFORMATION

OCS endeavours to take all reasonable steps to keep secure any information which they hold about an individual, and to keep this information accurate and up to date. Should an individual object to the processing of their personal information, OCS may no longer process said personal information.

If at any time, an individual discovers that information gathered about them is incorrect, they may contact OCS to have the information corrected. An individual may do this by contacting OCS on the company contact details listed below and requesting the correction or deletion of any information held by OCS. OCS will take all reasonable steps to confirm an individual's identity before providing details of their personal information or making changes to their personal information.



CONTACT INFORMATION

Any questions relating to OCS's POPI Policy or the treatment of an individual's personal data may be addressed to the contact details below:

Information officer: Johan van Zyl

Telephone number: 011 568 0925

Physical address: JHB: Unit A30, Innovation Worx, c/o 16th and Scale End Road, Halfway House, Midrand, Johannesburg, 1685
CT address: The Launch Pad, 180 Lancaster Road, Gordon's Bay, Western Cape, South Africa, 7140

Email address: info@outsourcedcompliance.co.za

Website: <http://www.outsourcedcompliance.co.za/>

UPDATING THIS POLICY

Amendments to, or a review of this Policy, will take place on an ad hoc basis or in relation to any regulatory and/ or legislative changes. Individuals are advised to access OCS'S website on a periodic basis to keep abreast of any changes. Should any material changes take place, individual's will be notified directly, or changes will be stipulated on OCS's website.