

POPIA POLICY
2022

PROTECTION OF PERSONAL INFORMATION POLICY 2022

FSP NAME	PINNACLE MARKETING (PTY) LTD
FSP NUMBER	15017
VERSION	VERSION 1 - 2022

INDEX	PAGE
INTRODUCTION	2
DEFINITIONS	3
CONTROL MEASURES	4
PURPOSE	4
DATA SUBJECT RIGHTS	5
GUIDING PRINCIPLES	6
ROLES AND RESPONSIBILITIES	8
AUDITING	12
REQUEST TO ACCESS PERSONAL INFORMATION PROCEDURES	13
POPIA COMPLAINT PROCEDURES	13
NON-COMPLIANCE	14
ADOPTION	14
ANNEXURES	
A. PERSONAL INFORMATION REQUEST FORM	15
B. POPIA COMPLAINT FORM	16

INTRODUCTION

The right to privacy is an integral human right recognised and protected in the South African Constitution and the Protection of Personal Information Act 4 of 2013.

The Protection of Personal Information Act 4 of 2013, which has recently come into full effect, aims to promote the protection of privacy through providing guiding principles that are intended to be applied to the processing of personal information in a context-sensitive manner.

A person's right to privacy entails having control over his/her personal information and being able to conduct his/her affairs relatively free from unwanted intrusion.

Through the provision of high quality financial products and services, Pinnacle Marketing (Pty) Ltd is necessarily involved in the collection, use and disclosure of certain aspects of the personal information of our valued clients, employees and other stakeholders. Given the importance of privacy, Pinnacle Marketing (Pty) Ltd is fully committed to effectively manage the personal information of all clients, employees and other relevant stakeholders in the highest regard and in accordance with legislative provisions.

DEFINITIONS

PERSONAL INFORMATION

Personal information is any information that can be used to reveal a person's identity. Personal information relates to an identifiable, living, natural person, and where applicable, an identifiable, existing juristic person, including but not limited to information concerning:

- Race, gender, sex, pregnancy, marital status, national or ethnic origin, colour, sexual orientation, age, physical or mental health, disability, religion, 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, email 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.

DATA SUBJECT

This refers to the natural or juristic person to whom personal information relates, such as an individual client or supplier.

RESPONSIBLE PARTY

The responsible party is the entity that needs the personal information for a particular reason and determines the purpose of and means for processing the personal information. In this case, Pinnacle Marketing (Pty) Ltd is the responsible party.

PROCESSING

The act of processing information includes any activity or any set of operations, whether or not by automatic means, concerning personal information and includes:

- The collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;
- Dissemination by means of transmission, distribution or making available in any other form; or
- Merging, linking, as well as any restriction, degradation, erasure or destruction of information.

CONSENT

This refers to any voluntary, specific and informed expression of will in terms of which permission is given for the processing of personal information.

CONTROL MEASURES

In order to effectively control the risks associated with the Protection of Personal Information Act 4 of 2013, the Compliance Function of Pinnacle Marketing (Pty) Ltd has established a Regulatory Risk and Compliance Framework, and implemented control measures that will provide reasonable assurance that Pinnacle Marketing (Pty) Ltd.'s obligations are met and that non-compliance is prevented, detected and corrected.

The below broad control measures are also periodically evaluated and tested to ensure their continuing effectiveness:

CONTROL	RESPONSIBLE PERSON	FREQUENCY
POLICY REVIEW	Ruark Jewell	Annually
INFORMATION OFFICER APPOINTMENT	Ruark Jewell	Annually
AUDITING	Ruark Jewell	Quarterly
AWARENESS TRAINING	Ruark Jewell	Annually

PURPOSE

Pinnacle Marketing (Pty) Ltd.'s POPIA Policy and its guiding principles apply to:

- Top Management;
- All departments, branches, business units and divisions of the organisation;
- All employees, interns and volunteers; and
- All contractors, suppliers and other persons acting on behalf of Pinnacle Marketing (Pty) Ltd.

Pinnacle Marketing (Pty) Ltd.'s POPIA Policy's guiding principles find application in all situations and must be read in conjunction with the Act itself, as well as our PAIA (Promotion to Access of Information Act 2 of 2000) Policy.

The legal duty to comply with the Protection of Personal Information Act 4 of 2013 is activated in any and all situations where there is:

- A processing of personal information that is entered into a record by or for a responsible party who is domiciled in the Republic of South Africa.

Please note that the Act does not apply in situations where the processing of personal information:

- Is concluded in the course of purely personal or household activities; or
- Where the personal information has been de-identified.

DATA SUBJECT RIGHTS

Where appropriate, Pinnacle Marketing (Pty) Ltd will ensure that our valued clients, employees and relevant stakeholders are made aware of the rights conferred upon them as data subjects and we will also ensure that we comply with all data subject rights.

The data subject rights are as follows:

RIGHT TO ACCESS	The data subject has the right to establish whether Pinnacle Marketing (Pty) Ltd holds personal information related to him/her or it, including the right to request access to that personal information. Data subjects are advised to complete the Personal Information Request Form listed in the Annexures.
RIGHT TO HAVE PERSONAL INFORMATION CORRECTED OR DELETED	The data subject has the right to request, where required, that his/her or its personal information be corrected or deleted where Pinnacle Marketing (Pty) Ltd is no longer authorised to retain the personal information.
RIGHT TO OBJECT TO THE PROCESSING OF PERSONAL INFORMATION	The data subject has the right, on reasonable grounds, to object to the processing of his/her or its personal information. In such circumstances, Pinnacle Marketing (Pty) Ltd will give due consideration to the request and the requirements of the POPIA legislation. Pinnacle Marketing (Pty) Ltd may cease to use or disclose the data subject's personal information and may, subject to any statutory and contractual record keeping requirements, also approve the destruction of the personal information.
RIGHT TO OBJECT TO DIRECT MARKETING	The data subject has the right to object to the processing of his/her or its personal information for purposes of direct marketing by means of unsolicited electronic communications.
RIGHT TO COMPLAINT TO THE INFORMATION REGULATOR	The data subject has the right to submit a complaint to the Information Regulator regarding an alleged infringement of any of the rights protected under POPIA and to institute civil proceedings regarding the alleged non-compliance with the protection of his/her or its personal information. Data subjects are advised to complete the POPI Complaint Form listed in the Annexures in order for our Information Officer to assist data subjects with any POPIA related complaints.
RIGHT TO BE INFORMED	The data subject has the right to be notified that his/her or its personal information is being collected by Pinnacle Marketing (Pty) Ltd. The data subject also has the right to be notified in any situation where Pinnacle Marketing (Pty) Ltd has reasonable grounds to believe that the personal information of the data subject has been accessed or acquired by an unauthorised person

GUIDING PRINCIPLES

All of our Team Members and those acting on behalf of Pinnacle Marketing (Pty) Ltd are at all times subject to, and must act in accordance with the following guiding principles:

ACCOUNTABILITY

Failing to comply with POPIA legislation could potentially damage Pinnacle Marketing (Pty) Ltd.'s reputation or expose Pinnacle Marketing (Pty) Ltd to a civil claim for damages. The protection of personal information is therefore our entire Team's responsibility.

Pinnacle Marketing (Pty) Ltd will ensure that the provisions of POPIA and the guiding principles outlined in this Policy are complied with through the encouragement of desired behaviour.

However Pinnacle Marketing (Pty) Ltd will take appropriate sanctions, which may include disciplinary action, against those individuals who through their intentional or negligent actions and/or omissions, fail to comply with the principles and responsibilities outlined in this policy.

PROCESS LIMITATION

Pinnacle Marketing (Pty) Ltd will ensure that personal information under its control is processed:

- In a fair, lawful and non-excessive manner;
- Only with the informed consent of the data subject; and
- Only for a specifically defined purpose.

Pinnacle Marketing (Pty) Ltd will inform the data subject of the reasons for the collecting of his/her or its personal information and obtain written consent prior to processing personal information.

Alternatively, where services or transactions are concluded over the telephone or electronic video feed, Pinnacle Marketing (Pty) Ltd will maintain a voice recording of the stated purpose for collecting the personal information followed by the data subject's subsequent consent.

Pinnacle Marketing (Pty) Ltd will under no circumstances distribute or share personal information between separate legal entities, associated organisations or with any individuals that are not directly involved with facilitating the purpose for which the information was originally collected.

Where applicable, the data subject must be informed of the possibility that their personal information will be shared with other aspects of Pinnacle Marketing (Pty) Ltd.'s business and be provided with the reasons for doing so.

PURPOSE SPECIFICATION

Pinnacle Marketing (Pty) Ltd will process personal information only for specific, explicitly defined and legitimate reasons and will inform data subjects of these reasons prior to collecting or recording the data subject's personal information. This will be done in a transparent manner with all data subjects.

FURTHER PROCESSING LIMITATION

Personal information will not be processed for a secondary purpose unless that processing is compatible with the original purpose.

Therefore, where Pinnacle Marketing (Pty) Ltd seeks to process personal information it holds for a purpose other than the original purpose for which it was originally collected, and where this secondary purpose is not compatible with the original purpose, our Team will first obtain additional consent from the data subject.

INFORMATION QUALITY

Pinnacle Marketing (Pty) Ltd will take reasonable steps to ensure that all personal information collected is complete, accurate and not misleading. The more important it is that the personal information be accurate, the greater the effort our Team will put into ensuring its accuracy.

Where personal information is collected or received from third parties, Pinnacle Marketing (Pty) Ltd will take reasonable steps to confirm that the information is correct by verifying the accuracy of the information directly from the data subject or by way of independent sources.

OPEN COMMUNICATION

Pinnacle Marketing (Pty) Ltd has taken reasonable steps to ensure that data subjects are notified (and at all times aware) that their personal information is being collected including the purpose for which it is being collected and processed.

Pinnacle Marketing (Pty) Ltd has established and maintains a “contact us” facility, for instance via our website or through our electronic helpdesk, for data subjects to:

- Enquire whether Pinnacle Marketing (Pty) Ltd holds related personal information;
- Request access to related personal information;
- Request Pinnacle Marketing (Pty) Ltd to update or correct related personal information; or
- Make a complaint concerning the processing of personal information.

SECURITY SAFEGUARDS

Pinnacle Marketing (Pty) Ltd manages the security of its filing systems to ensure that personal information is adequately protected. To this end, security controls have been implemented in order to minimise the risk of loss, unauthorised access, disclosure, interference, modification or destruction.

Security measures have been applied in a context-sensitive manner. For example, the more sensitive the personal information, such as banking information, the greater the security required.

Pinnacle Marketing (Pty) Ltd will continuously review its security controls which will include regular testing of protocols and measures put in place to combat cyber-attacks on Pinnacle Marketing (Pty) Ltd.'s IT network as well as ensure that all paper and electronic records comprising of personal information are securely stored and made accessible only to authorised individuals.

All new Team Members will be required to sign employment contracts containing contractual terms for the use and storage of employee information. Confidentiality clauses will also be included to reduce the risk of unauthorised disclosures of personal information for which Pinnacle Marketing (Pty) Ltd is responsible.

All existing Team Members have signed an addendum to their employment contracts containing the relevant consent and confidentiality clauses.

Pinnacle Marketing (Pty) Ltd. has service level agreements in place with all operators and third party service providers, where both parties pledge their mutual commitment to POPIA and the lawful processing of any personal information pursuant to the agreement.

DATA SUBJECT PARTICIPATION

A data subject may request the correction or deletion of his/her or its personal information held by Pinnacle Marketing (Pty) Ltd and we will ensure that there is a facility for data subjects who want to request the correction or deletion of their personal information.

Where applicable, Pinnacle Marketing (Pty) Ltd will include a link to unsubscribe from any of its electronic newsletters or related marketing activities.

ROLES AND RESPONSIBILITIES

TOP MANAGEMENT

Pinnacle Marketing (Pty) Ltd.'s Top Management cannot delegate accountability and is ultimately answerable for ensuring that Pinnacle Marketing (Pty) Ltd meets its legal obligations in terms of POPIA.

Top Management may however delegate some of its responsibilities in terms of POPIA to Senior Management and other capable individuals.

Top Management is responsible for ensuring that:

- Pinnacle Marketing (Pty) Ltd appoints an Information Officer, and where needed, a Deputy Information Officer;
- All persons responsible for the processing of personal information on behalf of Pinnacle Marketing (Pty) Ltd:
 - Are appropriately trained and supervised to do so;
 - Understand that they are contractually obligated to protect the personal information they come into contact with; and
 - Are aware that a wilful or negligent breach of this Policy's processes and procedures may lead to disciplinary action being taken against them.
- Data subjects who want to make enquiries about their personal information are made aware of the procedure that needs to be followed should they wish to do so.
- The scheduling of a periodic POPIA Audit in order to accurately assess and review the ways in which Pinnacle Marketing (Pty) Ltd collects, holds, uses, shares, discloses, destroys and processes personal information.

INFORMATION OFFICER

Pinnacle Marketing (Pty) Ltd has appointed an Information Officer and if required, will appoint a Deputy Information Officer to assist the Information Officer:

FULL NAME	Ruark Jewell
DESIGNATION	Compliance Manager
TEL	021 879 1119
EMAIL	compliance@pinnaclemarketing.co.za

The Information Officer is responsible for ensuring compliance with POPIA by ensuring the following:

- Taking steps to ensure the organisation’s reasonable compliance with the provisions of POPIA.
- Keeping Top Management updated about the organisation’s information protection responsibilities under POPIA. For instance, in the case of a security breach, the Information Officer must inform and advise Top Management of their obligations pursuant to POPIA.
- Continually analysing privacy regulations and aligning the organisation’s personal information processing procedures accordingly. This will include reviewing the organisation’s information protection procedures and related policies.
- Ensure that POPIA audits are scheduled and conducted on a regular basis.
- Ensure that Pinnacle Marketing (Pty) Ltd makes it convenient for data subjects who want to update their personal information or submit a POPIA related complaint to the organisation, to do so. For instance, maintaining a “contact us” facility on the organisation’s website.
- Approving any contracts entered into with operators, new Team Members and other third parties which may have an impact on the personal information held by the organisation. This will include overseeing the amendment of the organisation’s employment contracts and other service level agreements.
- Encouraging compliance with the conditions required for the lawful processing of personal information.
- Ensure that Team Members and other persons acting on behalf of the organisation are fully aware of the risks associated with the processing of personal information and that they remain informed about the organisations security controls.
- Organising and overseeing the awareness training of Team Members and other individuals involved in the processing of personal information on behalf of the organisation.
- Addressing Team Member POPIA related queries.
- Addressing all POPIA related requests and complaints made by our data subjects.
- Working with the Information Regulator in relation to any ongoing investigations. The Information Officer will therefore act as the contact point for the Information Regulator on issues relating to the processing of personal information and will consult with the Information Regulator where appropriate, with regard to any other matter.

Consideration will be given on an annual basis to the re-appointment or replacement of the Information Officer and if required, the re-appointment or replacement of any Deputy Information Officers.

Please also note that the appointment of the Information Officer may be withdrawn or amended at any time.

TEAM MEMBERS AND OTHERS WORKING ON BEHALF OF PINNACLE MARKETING (PTY) LTD

Our Team and other persons acting on behalf of Pinnacle Marketing (Pty) Ltd will, during the course of the performance of their services, gain access to and become acquainted with the personal information of certain clients, suppliers and other Team Members.

Team Members and other persons acting on behalf of Pinnacle Marketing (Pty) Ltd are required to treat personal information as a confidential business asset and to respect the privacy of data subjects and they may not directly or indirectly, utilise, disclose or make public in any manner to any person or third party, either within Pinnacle Marketing (Pty) Ltd or externally, any personal information, unless such information is already publically known or the disclosure is required in order for the Team Member or person to perform his/her duties.

Team Members and other persons acting on behalf of Pinnacle Marketing (Pty) Ltd must request assistance from their line manager or the Information Officer if they are unsure about any aspects related to the protection of a data subject's personal information.

Our Team and others acting on behalf of Pinnacle Marketing (Pty) Ltd will only process personal information where:

- The data subject, or a competent person where the data subject is a child, consents to the processing;
- The processing is required to carry out actions for the conclusion or performance of a contract to which the data subject is a party of;
- The processing complies with an obligation imposed by law on the responsible party;
- The processing protects a legitimate interest of the data subject;
- The processing is required for pursuing the legitimate interests of Pinnacle Marketing (Pty) Ltd or of a third party to whom the information is supplied.

Furthermore, personal information will only be processed where the data subject:

- Clearly understands why and for what purpose his/her or its personal information is being collected; and
- Has granted Pinnacle Marketing (Pty) Ltd with explicit written or verbally recorded consent to process his/her or its personal information.

Our Team and other persons acting on behalf of Pinnacle Marketing (Pty) Ltd will consequently, prior to processing any personal information obtain a specific and informed expression of will from the data subject, in terms of which permission is given for the processing of personal information.

Informed consent is therefore when the data subject clearly understands for what purpose his/her or its personal information is needed and who it will be shared with.

Consent can be obtained in written form which includes any appropriate electronic medium that is accurately and readily reducible to printed form. Alternatively, Pinnacle Marketing (Pty) Ltd will keep a voice recording of the data subject's consent in instance where transactions are concluded telephonically or via electronic video feed.

Consent to process a data subject's personal information will be obtained directly from the data subject, except where:

- The personal information has been made public;
- Where valid consent has been given to a third party; or
- The information is required for effective law enforcement.

Team Members and other persons acting on behalf of Pinnacle Marketing (Pty) Ltd will under no circumstances:

- Process or have access to personal information where such processing or access is not a requirement to perform their respective work-related tasks or duties;
- Save copies of personal information directly to their own private computers, laptops or other mobile devices. All personal information must be accessed and updated from Pinnacle Marketing (Pty) Ltd.'s central database or a dedicated server;
- Share personal information informally. In particular, personal information should never be sent by email, as this form of communication is not secure. Where access to personal information is required, this may be requested from the relevant line manager or the Information Officer; and
- Transfer personal information outside of South Africa without the express permission of the Information Officer.

Team Members and other persons acting on behalf of Pinnacle Marketing (Pty) Ltd are responsible for:

- Keeping all personal information that they come into contact with secure, by taking sensible precautions and following the guidelines outlined with this policy;
- Ensuring that personal information is held in as few places as required. No unnecessary additional records, filing systems and data sets should therefore be created;
- Ensuring that personal information is encrypted prior to sending or sharing the information electronically. The IT manager will assist employees and where required, other persons acting on behalf of Pinnacle Marketing (Pty) Ltd, with the sending or sharing of personal information to or with authorised external persons;
- Ensuring that all computers, laptops and devices that store personal information are password protected and never left unattended. Passwords must be changed regularly and may not be shared with unauthorised persons;
- Ensuring that their computer screens and other devices are switched off or locked when not in use or when away from their desks;
- Ensuring that where personal information is stored on removable storage drives, that these are kept locked away securely when not being used;
- Ensuring that where personal information is stored on paper, that such hard copy records are kept in a secure place where unauthorised people cannot access it;
- Ensuring that where personal information has been printed out, that the paper printouts are not left unattended where unauthorised individuals could see or copy them, for example, close to the printer;
- Taking reasonable steps to ensure that personal information is kept accurate and up to date. Where a data subject's information is found to be out of date, authorisation must first be obtained from the relevant line manager or the Information Officer to update the information accordingly;
- Taking reasonable steps to ensure that personal information is stored only for as long as it is needed or required in terms of the purpose for which it was originally collected. Where personal information is no longer required,

authorisation must first be obtained from the relevant line manager or the Information Officer to delete or dispose of the personal information in the appropriate manner; and

- Undergoing POPIA awareness training from time to time.

Where an employee or a person acting on behalf of Pinnacle Marketing (Pty) Ltd becomes aware or suspicious of any security breach such as unauthorised access, interference, modification, destruction or the unsanctioned disclosure of personal information, he/she must immediately report this event or suspicion to the Information Officer.

AUDITING

Our Information Officer will schedule periodic POPIA Audits.

The purpose of these audits are to:

- Identify the processes used to collect, record, store, disseminate and destroy personal information;
- Determine the flow of personal information throughout Pinnacle Marketing (Pty) Ltd and to other associated organisations;
- Redefine the purpose for gathering and processing personal information;
- Ensure that the processing parameters are still adequately limited;
- Ensure that new data subjects are made aware of the processing of their personal information;
- Re-establish the rationale for any further processing where information is received via a third party;
- Verify the quality and security of personal information;
- Monitor the extent of compliance with POPIA and this Policy; and
- Monitor the effectiveness of internal controls established to manage Pinnacle Marketing (Pty) Ltd.'s POPIA related risks.

In performing the POPIA Audit, the Information Officer will liaise with Senior Management in order to identify areas within Pinnacle Marketing (Pty) Ltd.'s operations that are most vulnerable or susceptible to the lawful processing of personal information.

The Information Officer will be permitted direct access to and have demonstrable support from Senior Management and Top Management in performing his/her duties.

REQUEST TO ACCESS PERSONAL INFORMATION PROCEDURES

Data subjects have the right to:

- Request what personal information Pinnacle Marketing (Pty) Ltd holds about them and why;
- Request access to their personal information; and
- Be informed how to keep their personal information up to date.

Access to information requests can be made via telephone or email, addressed to the Information Officer:

FULL NAME	Ruark Jewell
TEL	021 879 1119
EMAIL	compliance@pinnaclemarketing.co.za

The Information Officer will provide the data subject with a Personal Information Request Form to complete (Listed in the Annexures).

Once completed and returned, the Information Officer will verify the identity of the data subject prior to handing over any personal information.

All requests will be processed and considered against Pinnacle Marketing (Pty) Ltd.'s PAIA Policy and the Information Officer will process all requests within a reasonable time.

POPIA COMPLAINT PROCEDURES

Data subjects have the right to complain in instances where any of their rights under POPIA have been infringed upon. Pinnacle Marketing (Pty) Ltd takes all complaints very seriously and will address all POPIA related complaints in accordance with the following procedure:

- POPI complaints must be submitted to Pinnacle Marketing (Pty) Ltd in writing. Where so required, the Information Officer will provide the data subject with a POPIA Complaint Form;
- Where the complaint has been received by any person other than the Information Officer, that person will ensure that the full details of the complaint reach the Information Officer within one working day;
- The Information Officer will provide the complainant with a written acknowledgement of receipt of the complaint within 2 working days;
- The Information Officer will carefully consider the complaint and address the complainant's concerns in an amicable manner. In considering the complaint, the Information Officer will endeavour to resolve the complaint in a fair manner and in accordance with the principles outlined in the Act;
- The Information Officer must also determine whether the complaint relates to an error or breach of confidentiality that has occurred and which may have wider impact on Pinnacle Marketing (Pty) Ltd.'s data subjects;
- Where the Information Officer has reason to believe that the personal information of data subjects has been accessed or acquired by an unauthorised person, the Information Officer will consult with Top Management where after the affected data subjects and the Information Regulator will be informed of this breach;
- The Information Officer will revert to the complainant with a proposed solution with the option of escalating the complaint to Pinnacle Marketing (Pty) Ltd.'s Top Management within 7 days of receipt of the complaint. In all

instances, Pinnacle Marketing (Pty) Ltd will provide reasons for any decisions taken and communicate any anticipated deviations from the specified timelines.

- The Information Officer's response to the data subject may comprise any of the following:
 1. A suggested remedy for the complaint;
 2. A dismissal of the complaint and the reasons as to why it was dismissed; or
 3. An apology (if applicable) and any disciplinary action that has been taken against any employees involved.
- Where the data subject is not satisfied with the Information Officer's suggested remedies, the data subject has the right to complain to the Information Regulator; and
- The Information Officer will review the complaints process to assess the effectiveness of the procedure on a periodic basis and to improve where it is found wanting. The reason for any complaints will also be reviewed to ensure the avoidance of occurrences giving rise to POPIA related complaints.

All POPIA related complaints can be made via telephone or email, addressed to the Information Officer:

FULL NAME	Ruark Jewell
TEL	021 879 1119
EMAIL	compliance@pinnaclemarketing.co.za

NON-COMPLIANCE

Where a POPIA complaint or a POPIA infringement investigation has been finalised, Pinnacle Marketing (Pty) Ltd may recommend any appropriate administrative, legal and/or disciplinary action to be taken against any Team Member reasonably suspected of being implicated in any non-compliant activity within this Policy.

In the case of ignorance or minor negligence, Pinnacle Marketing (Pty) Ltd will undertake to provide further awareness training to the employee.

Any gross negligence or the wilful mismanagement of personal information will be considered as a serious form of misconduct for which Pinnacle Marketing (Pty) Ltd may summarily dismiss the employee. Disciplinary procedures will commence where there is sufficient evidence to support an employee's gross negligence.

Examples of immediate actions that may be taken subsequent to an investigation include:

- A recommendation to commence with disciplinary action;
- A referral to appropriate law enforcement agencies for criminal investigation; or
- Recovery of funds and assets in order to limit any prejudice or damages caused.

ADOPTION

The below confirms acknowledgement by the Compliance Function of Pinnacle Marketing (Pty) Ltd that the above POPIA Policy 2021 has been fully adopted and incorporated into the business at an organisation-wide level.

NAME	Ruark Jewell
DESIGNATION	Compliance Manager
DATE	31/03/2022

ANNEXURE A

PERSONAL INFORMATION REQUEST FORM

PLEASE SUBMIT THE COMPLETED FORM TO THE INFORMATION OFFICER

FULL NAME	Ruark Jewell
TEL	021 879 1119
EMAIL	compliance@pinnaclemarketing.co.za

Please be aware that we may require you to provide proof of identification prior to processing your request.

There may also be a reasonable charge for providing copies of the information requested as per PAIA.

A. PARTICULARS OF DATA SUBJECT

FULL NAME	
ID NUMBER	
POSTAL ADDRESS	
TEL	
EMAIL	

B. REQUEST

I REQUEST PINNACLE MARKETING (PTY) LTD TO:

a) Inform me whether it holds any of my personal information	<input type="checkbox"/>
b) Provide me with a record or description of my personal information	<input type="checkbox"/>
Correct or update my personal information	<input type="checkbox"/>
Destroy or delete a record of my personal information	<input type="checkbox"/>

C. INSTRUCTIONS

D. SIGNATURE

SIGNATURE	
DATE	

ANNEXURE B

POPIA COMPLAINT FORM

Pinnacle Marketing (Pty) Ltd is committed to safeguarding your privacy and the confidentiality of your personal information as per the Protection of Personal Information Act 4 of 2013.

PLEASE SUBMIT THE COMPLETED FORM TO THE INFORMATION OFFICER

FULL NAME	Ruark Jewell
TEL	021 879 1119
EMAIL	compliance@pinnaclemarketing.co.za

Where we are unable to resolve your complaint to your satisfaction, you have the right to submit a complaint to the Information Regulator:

POSTAL ADDRESS	PO Box 31533 Braamfontein, JHB, 2017
EMAIL	Complaints.IR@justice.gov.za
WEBSITE	https://www.justice.gov.za/inforeg/contact.html

A. PARTICULARS OF DATA SUBJECT

FULL NAME	
ID NUMBER	
POSTAL ADDRESS	
TEL	
EMAIL	

B. DETAILS OF COMPLAINT

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C. DESIRED OUTCOME

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D. SIGNATURE

SIGNATURE	
DATE	