



PIONEERING OPPORTUNITY

## PROTECTION OF PERSONAL INFORMATION ACT POLICY

("Policy")

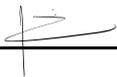
Version	4	
Reviewed By	Portia Feeke and Leat Sacharowitz	Date: 1 November 2021
Approved By	Jeffrey Miller	
Publishing Date	1 November 2021	
Last Review Date	January 2021	
Frequency of Review	Annually	
Next Review Date	1 November 2022	
Policy Owner	Grovest Ltd ("Grovest")	
Responsible Business Unit	Grovest Compliance	

## POLICY STATEMENT

- This Policy forms part of the business processes and procedures.
- The Board of Directors, it's employees, volunteers, contractors, suppliers and any other persons acting on behalf of Grovest are required to familiarise themselves with the Policy's requirements and undertake to comply with the stated Policy.
- Risk owners and control owners are responsible for overseeing and maintaining control over the Policy.

## POLICY ADOPTION

By signing this document, I authorise the Policy owner's approval and adoption of the processes and procedures outlined herein.

Name & Surname	Jeffrey Miller
Capacity	Key Individual
Signature	
Date	01 November 2021

**TABLE OF CONTENTS**

INTRODUCTION.....3

1. DEFINITIONS.....3

2. POLICY PURPOSE .....5

3. POLICY APPLICATION.....6

4. RIGHTS OF DATA SUBJECTS.....6

4.1 The Right to Access Personal Information.....6

4.2 The Right to have Personal Information Corrected or Deleted.....6

4.3 The Right to Object to the Processing of Personal Information.....7

4.4 The Right to Object to Direct Marketing .....7

4.5 The Right to Complain to the Information Officer.....7

4.6 The Right to Complain to the Information Regulator.....7

4.7 The Right to be Informed.....7

5. GENERAL GUIDING PRINCIPLES .....8

5.1 Accountability.....8

5.2 Processing Limitation.....8

5.3 Purpose Specification .....8

5.4 Further Processing Limitation.....8

5.5 Information Quality .....8

5.6 Open Communication.....9

5.7 Security Safeguards .....9

5.8 Data Subject Participation .....9

7. SPECIFIC DUTIES AND RESPONSIBILITIES .....9

7.1 Board of Directors.....10

7.2 Information Officer .....10

7.3 IT Manager – Outsourced to Siyaya-Phambili Technology Solutions (“Siyaya”) .....11

7.4 Marketing Manager .....11

7.5 Employees and other Persons acting on behalf of Grovest.....11

8. POPIA AUDIT .....11

9. REQUEST TO ACCESS PERSONAL INFORMATION PROCEDURE.....12

10. POPIA COMPLAINTS PROCEDURE.....12

11. DISCIPLINARY ACTION.....13

ANNEXURE A: PERSONAL INFORMATION REQUEST FORM.....14

ANNEXURE B: POPIA COMPLAINT FORM .....15

ANNEXURE C: POPIA NOTICE AND CONSENT FORM .....16

## INTRODUCTION

The right to privacy is an integral human right recognised by Section 14 of the South African Constitution and protected in terms of the Protection of Personal Information Act 4 of 2013 (“POPIA”).

POPIA 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.

Through the provision of quality services, Grovest is necessarily involved in the collection, use and disclosure of certain aspects of the personal information of clients, employees and other stakeholders.

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

Given the importance of privacy, Grovest is committed to effectively manage personal information in accordance with the provisions of POPIA.

## 1. DEFINITIONS

### 1.1 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 (such as a FSP), 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, tax, 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.

### 1.2 Data Subject

This refers to the natural or juristic person to whom personal information relates, such as an individual client or third-party supplier, i.e. a “FSP”.

### 1.3 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, Grovest is the Responsible Party.

### 1.4 Operator

An 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. For example, a third-party service provider that has contracted with Grovest to shred documents containing Personal Information.

### 1.5 Information Officer

The information officer is responsible for ensuring Grovest's compliance with POPIA.

Where no information officer is appointed, the head, CEO or MD will be responsible for performing the information officer's duties.

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.

### 1.6 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, 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.

### 1.7 Record

Means any recorded information, regardless of form or medium, including:

- Writing on any material;
- 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;
- Label, marking or other writing that identifies or describes anything of which it forms part, or to which it is attached by any means;
- Book, map, plan, graph or drawing;
- Photograph, film, negative, tape or other device in which one or more visual images are embodied so as to be capable, with or without the aid of some other equipment, of being reproduced.

### 1.8 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.

## 1.9 Unique Identifier

Means any identifier that is assigned to a Data Subject and is used by a Responsible Party for the purposes of the operations of that Responsible Party and that uniquely identifies that Data Subject in relation to that Responsible Party.

## 1.10 De-Identify

This means to delete any information that identifies a Data Subject or which can be used by a reasonably foreseeable method to identify, or when linked to other information, that identifies the Data Subject.

## 1.11 Re-Identify

In relation to Personal Information of a Data Subject, means to resurrect any information that has been de-identified that identifies the Data Subject, or can be used or manipulated by a reasonably foreseeable method to identify the Data Subject.

## 1.12 Consent

Means any voluntary, specific and informed expression of will in terms of which permission is given for the processing of Personal Information.

## 1.13 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 services to the Data Subject; or
- Requesting the Data Subject to make a donation of any kind for any reason.

## 1.14 Biometrics

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.

## 2. POLICY PURPOSE

This purpose of this Policy is to protect Grovest from the compliance risks associated with POPIA which includes:

- Breaches of confidentiality. For instance, Grovest could suffer loss in revenue where it is found that the Personal Information of Data Subjects has been shared or have been disclosed inappropriately.
- Failing to offer choice. For instance, all Data Subjects should be free to choose how and for what purpose Grovest uses its/their Personal Information.
- Reputational damage. For instance, Grovest could suffer a decline in shareholder value following an adverse event such as a computer hacker deleting the Personal Information held by Grovest.

This Policy demonstrates Grovest's commitment to protecting the privacy rights of Data Subjects in the following manner:

- Through stating desired behaviour and directing compliance with the provisions of POPIA and best practice.
- By cultivating an organisational culture that recognises privacy as a valuable human right.
- By developing and implementing internal controls for the purpose of managing the compliance risk associated with POPIA.

- By creating business practices that will provide reasonable assurance that the rights of Data Subjects are protected and balanced with the legitimate business needs of Grovest.
- By assigning specific duties and responsibilities to control owners, including the appointment of an Information Officer and where necessary, Deputy Information Officers in order to protect the interests of Grovest and Data Subjects.
- By raising awareness through training and providing guidance to individuals who process Personal Information so that they can act confidently and consistently.

### 3. POLICY APPLICATION

This Policy and its guiding principles applies to:

- The Board of Directors
- All branches, business units and divisions of Grovest
- All employees and volunteers
- All contractors, suppliers and other persons acting on behalf of Grovest

The Policy's guiding principles find application in all situations and must be read in conjunction with the Promotion of Access to Information Act, No 2 of 2000.

The legal duty to comply with POPIA's provisions is activated in any situation where there is:

- A **Processing** of.....
- .....**Personal Information**.....
- .....entered into a **Record**.....
- .....by or for a **responsible person**.....
- .....who is **domiciled** in South Africa.

POPIA 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.

### 4. RIGHTS OF DATA SUBJECTS

Where appropriate, Grovest will ensure that its clients are made aware of the rights conferred upon them as Data Subjects.

Grovest will ensure that it gives effect to the following rights.

#### 4.1 The Right to Access Personal Information

Grovest recognises that Data Subject has the right to establish whether Grovest holds Personal Information related to him, her or including the right to request access to that Personal Information.

An example of a "Personal Information Request Form", which form can be found, as a link [Annexure A](#).

#### 4.2 The Right to have Personal Information Corrected or Deleted

The Data Subject has the right to request, where necessary, that his, her or its Personal Information must be corrected or deleted where Grovest is no longer authorised to retain the Personal Information.

### 4.3 The 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, Grovest will give due consideration to the request and the requirements of POPIA. Grovest 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.

### 4.4 The 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.

### 4.5 The Right to Complain to the Information Officer

If for any reason you think that your Personal information is not processed in the correct manner, or that your Personal Information is being used for a purpose other than that for what it was originally intended, you can contact Grovest's Information Officer. You can request access to the information we hold about you through the process outlined in below at any time and if you think that we have outdated information, request that we update it or correct it accordingly.

Our Information Officer's Contact Details	
Name	Jeffrey Miller
Contact Number	+2711 262 6433
Email Address:	popia@grovest.co.za

#### Our details:

Grovest (Pty) Ltd  
Pinmill Office Park, Building 2  
164 Katherine Street  
Sandton  
2196

#### Complaints and objections

You have the right to –

- Request that we confirm, free of charge, whether or not we hold personal information about you;
- Request that we provide you with a description of the personal information we hold about you, and to explain why and how it is being processed, Link to [Annexure A](#)
- Request that we consider your objections to the processing of your personal information, Link to [Annexure B](#); and Lodge a complaint with the Information Regulator, Link to [Annexure B](#)).

### 4.6 The Right to Complain 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.

An example of a "POPIA Complaint Form" can be found as a link [Annexure B](#).

### 4.7 The Right to be Informed

The Data Subject also has the right to be notified in any situation where Grovest has reasonable grounds to believe that the Personal Information of the Data Subject has been accessed or acquired by an unauthorised person.

## 5. GENERAL GUIDING PRINCIPLES

All employees and persons acting on behalf of Grovest will at all times be subject to, and act in accordance with, the following guiding principles:

### 5.1 Accountability

Failing to comply with POPIA could potentially damage Grovest's reputation or expose Grovest to a civil claim for damages. The protection of Personal Information is therefore everybody's responsibility.

Grovest 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, Grovest 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.

### 5.2 Processing Limitation

Grovest will ensure that Personal Information under its control is processed:

- in a fair, lawful and non-excessive manner, and
- for the specific purpose.

Grovest will under no circumstances distribute or share Personal Information between separate legal entities, associated companies (such as subsidiary companies) 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 may be informed of the possibility that their Personal Information may be shared with other aspects of Grovest's business.

Should you require information regarding new products or developments that may be of interest to you, and should you not already have subscribed to our database and/or be an investor or client of Grovest, kindly fill in "POPIA Notice and Consent Form"], as a link [Annexure C](#).

### 5.3 Purpose Specification

All of Grovest's business units and operations must be informed by the principle of transparency.

Grovest will process Personal Information only for specific, explicitly defined reasons. Grovest will inform Data Subjects of these reasons prior to collecting or recording the Data Subject's Personal Information.

### 5.4 Further Processing Limitation

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

Therefore, where Grovest 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, Grovest will first obtain additional Consent from the Data Subject.

### 5.5 Information Quality

Grovest 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 Grovest will put into ensuring its' accuracy.

Where Personal Information is collected or received from third parties, Grovest will take reasonable steps to confirm that the information is correct by verifying the accuracy of the information directly with the Data Subject or by way of independent sources.

## 5.6 Open Communication

Grovest will take reasonable steps to ensure that Data Subjects are notified (are always aware) that their Personal Information is being collected including the purpose for which it is being collected and processed.

Grovest will ensure that it establishes and maintains a “contact us” facility, for instance via its website or through an electronic helpdesk, for Data Subjects who want to:

- Enquire whether Grovest holds related Personal Information, or
- Request access to related Personal Information, or
- Request Grovest to update or correct related Personal Information, or
- Make a complaint concerning the Processing of Personal Information.

## 5.7 Security Safeguards

Grovest will manage the security of its Filing System to ensure that Personal Information is adequately protected. To this end, security controls will be implemented in order to minimise the risk of loss, unauthorised access, disclosure, interference, modification or destruction.

Security measures also need to be applied in a context-sensitive manner. For example, the more sensitive the Personal Information, such as shareholder information, banking details and/or credit card details (if applicable), the greater the security required.

Grovest will continuously review its security controls which will include regular testing of protocols and measures put in place to combat cyber-attacks on Grovest’s IT network.

Grovest will ensure that all paper and electronic Records comprising Personal Information are securely stored and made accessible only to authorised individuals.

All new employees 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 Grovest is responsible.

The Operators and third-party service providers will be required to enter into service level agreements with Grovest where both parties pledge their mutual commitment to POPIA and the lawful Processing of any Personal Information pursuant to the agreements.

## 5.8 Data Subject Participation

A Data Subject may request the correction or deletion of his, her or its Personal Information held by Grovest having regard to the legislative context.

Grovest will ensure that it provides a facility for Data Subjects who want to request the correction or deletion of their Personal Information.

Where applicable, Grovest will include a link to unsubscribe from any of its electronic newsletters or related marketing activities.

## 7. SPECIFIC DUTIES AND RESPONSIBILITIES

## 7.1 Board of Directors

The Board of Directors cannot delegate its accountability and is ultimately answerable for ensuring that Grovest meets its legal obligations in terms of POPIA.

Grovest may however delegate some of its responsibilities in terms of POPIA to management or other capable individuals.

The Board of Directors is responsible for ensuring that:

- Grovest appoints an Information Officer.
- All persons responsible for the Processing of Personal Information on behalf of Grovest:
  - 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 enquires 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 Grovest collects, holds, uses, shares, discloses, destroys and processes Personal Information.

## 7.2 Information Officer

Grovest's Information Officer is responsible for:

- Taking steps to ensure Grovest's reasonable compliance with the provision of POPIA.
- Keeping the Board of Directors updated about Grovest's information protection responsibilities under POPIA. For instance, in the case of a security breach, the Information Officer must inform and advise the governing body of their obligations pursuant to POPIA.
- Continually analysing privacy regulations and aligning them with Grovest's Personal Information Processing procedures. This will include reviewing Grovest's information protection procedures and related policies.
- Ensuring that POPIA Audits are scheduled and conducted on a regular basis.
- Ensuring that Grovest makes it convenient for Data Subjects who want to update their Personal Information or submit POPIA related complaints to Grovest. For instance, maintaining a "contact us" facility on Grovest's website.
- Approving any contracts entered into with Operators, employees and other third parties which may have an impact on the Personal Information held by Grovest. This will include overseeing the amendment of Grovest's new employment contracts and other new service level agreements.
- Encouraging compliance with the conditions required for the lawful Processing of Personal Information.
- Ensuring that employees and other persons acting on behalf of Grovest are fully aware of the risks associated with the Processing of Personal Information and that they remain informed about Grovest's security controls.
- Organising and overseeing the awareness training of employees and other individuals involved in the Processing of Personal Information on behalf of Grovest.
- Addressing employees' POPIA related questions.
- Addressing all POPIA related requests and complaints made by Grovest's 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 authority on issues relating to the Processing of Personal Information and will consult with the Information Regulator where appropriate, with regard to any other matter.

### **7.3 IT Manager – Outsourced to Siyaya-Phambili Technology Solutions (“Siyaya”)**

Siyaya is responsible for:

- Ensuring that Grovest’s IT infrastructure, Filing Systems and any other devices used for Processing Personal Information meet acceptable security standards.
- Ensuring that all electronically held Personal Information is kept only on designated drives and servers and uploaded only to approved cloud computing services.
- Ensuring that servers containing Personal Information are sited in a secure location, away from the general office space.
- Ensuring that all electronically stored Personal Information is backed-up and tested on a regular basis.
- Ensuring that all back-ups containing Personal Information are protected from unauthorised access, accidental deletion and malicious hacking attempts.
- Ensuring that Personal Information being transferred electronically is encrypted.
- Ensuring that all servers and computers containing Personal Information are protected by a firewall and the latest security software.
- Performing regular IT audits to ensure that the security of Grovest’s hardware and software systems are functioning properly.

### **7.4 Marketing Manager**

Grovest’s Marketing Manager is responsible for:

- Approving and maintaining the protection of Personal Information statements and disclaimers that are displayed on Grovest’s website, including those attached to communications such as emails and electronic newsletters.
- Addressing any Personal Information protection queries from journalists or media outlets such as newspapers.
- Where necessary, working with persons acting on behalf of Grovest to ensure that any outsourced marketing initiatives comply with POPIA.

### **7.5 Employees and other Persons acting on behalf of Grovest**

Employees and other persons acting on behalf of Grovest 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 employees.

Employees and other persons acting on behalf of Grovest are required to treat Personal Information as a confidential business asset and to respect the privacy of Data Subjects.

Employees and other persons acting on behalf of Grovest may not utilise, disclose or make public in any manner to any person or third party, any Personal Information, unless such information is already publicly known or the disclosure is necessary in order for the employee or person to perform his or her duties.

## **8. POPIA AUDIT**

Grovest’s Information Officer will schedule periodic POPIA Audits.

The purpose of a POPIA audit is to:

- Identify the processes used to collect, Record, store, disseminate and destroy Personal Information.
- Determine the flow of Personal Information throughout Grovest. For instance, Grovest's various business units, divisions, branches and other associated organisations.
- Redefine the purpose for gathering and Processing Personal Information.
- Confirm the justification grounds for Processing the gathered 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.
- Re-assess all third party SLA's to determine the nature of the relationship, and update or put in place Operator Agreements where such a relationship exists.
- Verify the quality and security of Personal Information.
- Monitor the extend of compliance with POPIA and this Policy.
- Monitor the effectiveness of internal controls established to manage Grovest's POPIA related compliance risk.

In performing the POPIA Audit, Information Officer will liaise with line managers in order to identify areas within in Grovest's operations that are most vulnerable or susceptible to the unlawful Processing of Personal Information.

Information Officer will be permitted direct access to and have demonstrable support from line managers and the Board of Directors in performing their duties.

## 9. REQUEST TO ACCESS PERSONAL INFORMATION PROCEDURE

Data Subjects have the right to:

- Request what Personal Information Grovest holds about them and why.
- Request access to their Personal Information.
- Be informed how to keep their Personal Information up to date.

Access to information requests can be made by email, addressed to the Information Officer. The Information Officer will provide the Data Subject with a "Personal Information Request Form".

Once the completed form has been received, 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 Grovest's Policy.

The Information Officer will process all requests within a reasonable time.

## 10. POPIA COMPLAINTS PROCEDURE

Data Subjects have the right to complain in instances where any of their rights under POPIA have been infringed upon. Grovest takes all complaints very seriously and will address all POPIA related complaints in accordance with the following procedure:

- POPIA complaints must be submitted to Grovest in writing. Where so required **in terms clause 4.5 above**.
- 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 (1) business day.

- The Information Officer will provide the complainant with a written acknowledgement of receipt of the complaint within two (2) business 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 POPIA.
- The Information Officer must also determine whether the complaint relates to an error or breach of confidentiality that has occurred and which may have a wider impact on Grovest's Data Subject/s.
- 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 the Board of Directors 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 Grovest's Board of Directors within seven (7) business days of receipt of the complaint. In all instances, Grovest will provide reasons for any decisions taken and communicate any anticipated deviation from the specified timelines.
- The Information Officer's response to the Data Subject may comprise any of the following:
  - A suggested remedy for the complaint,
  - A dismissal of the complaint and the reasons as to why it was dismissed,
  - 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 directly to the Information Regulator.
- The Information Officer will review the complaints process to assess the effectiveness of the procedure on a periodic basis and to improve the procedure 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.

## **11. DISCIPLINARY ACTION**

Where a POPIA complaint or a POPIA infringement investigation has been finalised, Grovest may recommend any appropriate administrative, legal and/or disciplinary action to be taken against any employee reasonably suspected of being implicated in any non-compliant activity outlined within this Policy.

In the case of ignorance or minor negligence, Grovest will undertake to provide further awareness training to the employee.

Any gross negligence or the wilful mismanagement of Personal Information, will be considered a serious form of misconduct for which Grovest 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.
- Recovery of funds and/or assets in order to limit any prejudice or damages caused.





**ANNEXURE C: POPIA NOTICE AND CONSENT FORM**

**POPIA NOTICE AND CONSENT FORM**

Grovest (Pty) Ltd ("Grovest") understands that your Personal Information is important to you and that you may be apprehensive about disclosing it. Your privacy is just as important to us and we are committed to safeguarding and Processing your information in a lawful manner.

We also want to make sure that you understand how and for what purpose we process your information. If for any reason you think that your information is not processed in a correct manner, or that your information is being used for a purpose other than that for what it was originally intended, you can contact our Information Officer.

You can request access to the information we hold about you at any time and if you think that we have outdated information, please request us to update or correct it.

<b>Our Information Officer's Contact Details</b>	
Name	Jeffrey Wayne Miller
Contact Number	011 – 262 6433
Email Address:	<a href="mailto:popia@grovest.co.za">popia@grovest.co.za</a>

**Purpose for Processing your Information**

We collect, hold, use and disclose your Personal Information mainly to provide you with access to the services and products that we provide. We will only process your information for a purpose you would reasonably expect, including:

- To notify you of new products or developments that may be of interest to you, should you not already have subscribed to our database and/or be an investor or client of Grovest.

Some of your information that we hold may include, your first and last name, email address, a home, postal or other physical address, other contact information, your title, birth date, gender, occupation, qualifications, past employment, residency status, your investments, assets, liabilities, insurance, income, expenditure, family history, medical information and your banking details.

**Consent to Disclose and Share your Information**

We may need to share your information to provide reports, analyses, products or services that you have requested.

Where we share your information, we will take all precautions to ensure that the third party will treat your information with the same level of protection as required by us. Your information may be hosted on servers managed by a third-party service provider, which may be located outside of South Africa.

<b>I hereby authorise and Consent to Grovest sharing my Personal Information with the following persons:</b>
Name & Surname
Signature
Date