



# POPIA POLICY

## INTRODUCTION

The right to privacy is an integral human right recognised and protected in the South African Constitution and in 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 goods and services, Pinnacle Marketing (Pty) Ltd 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/her personal information and being able to conduct his/her affairs relatively free from unwanted intrusions. Given the importance of privacy, Pinnacle Marketing (Pty) Ltd is committed to effectively manage personal information in accordance with POPIA regulations.

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## ADOPTION

The below confirms acknowledgement by the Compliance Function that the POPIA Policy 2024 as stated below has been adopted:

FSP Name	Pinnacle Marketing
FSP No.	15017
Version	V1 2024
Owner	Ruark Jewell
Review Date	06/02/2024

## PURPOSE

This Policy and its guiding principles apply to:

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

The Policy's guiding principles find application in all situations and must be read in conjunction with the Protection of Personal Information Act 4 of 2013 as well as our PAIA Manual as required by the Promotion of Access to Information Act 2 of 2000 (PAIA).

The legal duty to comply with POPIA 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 the Republic of 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.

## RIGHTS OF DATA SUBJECTS

Where appropriate, Pinnacle Marketing (Pty) Ltd will ensure that clients are made aware of the rights conferred upon them as data subjects. Pinnacle Marketing (Pty) Ltd will also ensure that it gives effect to the following several rights:

### RIGHT TO ACCESS

Pinnacle Marketing (Pty) Ltd recognizes that a data subject has the right to establish whether Pinnacle Marketing (Pty) Ltd holds personal information related to him/her, including the right to request access to that personal information. Please refer to the Personal Information Request Form should you wish to request access.

### RIGHT TO HAVE PERSONAL INFORMATION CORRECTED OR DELETED

The data subject has the right to request, where required, that his/her personal information be corrected or deleted where Pinnacle Marketing (Pty) Ltd is no longer authorized 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 personal information. In such circumstances, Pinnacle Marketing (Pty) Ltd will give due consideration to the request and the requirements of POPIA. 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 personal information for the purposes of direct marketing by means of unsolicited electronic communication.

### RIGHT TO SUBMIT A 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 their rights protected under POPIA and to institute civil proceedings regarding the alleged non-compliance with the protection of his/her personal information. Please refer to the POPIA Complaint Form should you wish to submit a complaint directly to our Information Officer.

### RIGHT TO BE INFORMED

The data subject has the right to be notified that his/her personal information is being collected by Pinnacle Marketing (Pty) Ltd. The data subject also has the right to be notified of 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 unauthorized person.

## CONTROL MEASURES

In order to effectively control the risks associated with the Protection of Personal Information Act 4 of 2013, the Compliance Function must establish a regulatory risk and compliance framework and implement control measures that will provide assurance that Pinnacle Marketing (Pty) Ltd.'s obligations are met and that non-compliance is prevented, detected and corrected.

These control measures must be periodically evaluated and tested to ensure their continuing effectiveness.

CONTROL MEASURES	RESPONSIBLE PERSON
Annual Review	Ruark Jewell
Information Officer	Ruark Jewell
Deputy Information Officer	N/A
POPIA Audit	Ruark Jewell
POPIA Awareness Training	Ruark Jewell

## 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, 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 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 product 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. Pinnacle Marketing (Pty) Ltd would be considered a 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.



### INFORMATION OFFICER

The Information Officer is responsible for ensuring the organisation's compliance with the Protection of Personal Information Act 4 of 2013.



### DIRECT MARKETING

This refers to approaching 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

Pinnacle Marketing (Pty) Ltd will appoint an Information Officer and where required, a Deputy Information Officer to assist.

The Information Officer is responsible for ensuring compliance with POPIA. There are no legal requirements under POPIA for an organisation to appoint an Information Officer, however it is considered good business practice, particularly within larger organisations.

Where no Information Officer is appointed, the Head of the organisation will assume the role of Information Officer. Consideration will be given on an annual basis to the re-appointment or replacement of the Information Officer and the re-appointment or replacement of the Deputy Information Officer. Once appointed, Pinnacle Marketing (Pty) Ltd will register the Information Officer with the South African Information Regulator established under POPIA prior to performing his/her duties.

Please refer to the Information Officer Appointment Letter for further information.

## GUIDING PRINCIPLES

All employees and persons acting on behalf of Pinnacle Marketing (Pty) Ltd will at all times be subject to, and act in accordance with the following guiding principles:

### ACCOUNTABILITY

Failing to comply with POPIA could potentially damage the company's reputation or expose Pinnacle Marketing (Pty) Ltd to a civil claim for damages. The protection of personal information is therefore everybody's responsibility. Pinnacle Marketing (Pty) Ltd will ensure that the provisions of POPIA and the guiding principles in this Policy are complied with through the encouragement of desired behavior. 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 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 personal 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 reasons for doing so.

### PURPOSE SPECIFICATION

All of Pinnacle Marketing (Pty) Ltd.'s business units and operations must be informed by the principles of transparency. Pinnacle Marketing (Pty) Ltd will process personal information only for specific, explicitly defined and legitimate reasons and we will inform data subjects of these reasons prior to collecting or recording any personal information.

## **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 collected, and where this secondary purpose is not compatible, Pinnacle Marketing (Pty) Ltd 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 personal information be accurate, the greater the effort will be 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 source.

## **OPEN COMMUNICATION**

Pinnacle Marketing (Pty) Ltd will take reasonable steps to ensure that data subjects are notified (are at all times aware) that their personal information is being collected, including the purpose for which it is being collected or processed. Pinnacle Marketing (Pty) Ltd will ensure that it establishes and maintains a 'contact us' facility, for instance via our website or through an electronic helpdesk, for data subjects to:

- Enquire whether Pinnacle Marketing (Pty) Ltd holds related personal information;
- Requests access to the related personal information;
- Requests for the personal information to be updated, corrected or destroyed; and
- Make a complaint concerning the processing of personal information.

## **SECURITY SAFEGUARDS**

Pinnacle Marketing (Pty) Ltd will manage the security of its filing systems to ensure that personal information is adequately protected. To this end, security controls will be implemented in order to minimize the risk of loss, unauthorized 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 medical 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 the IT network. Pinnacle Marketing (Pty) Ltd will also ensure that all paper and electronic records comprising of personal information are securely stored and made accessible only to authorized individuals.

All new employees will be required to sign employment contracts containing clauses for the use and storage of employee information. Confidentiality clauses will also be included to reduce the risk of unauthorized disclosure or personal information for which Pinnacle Marketing (Pty) Ltd is responsible. All existing employees will, after the required consultation process has been followed, be required to sign an addendum to their employment contracts containing the relevant consent and confidentiality clauses.

Pinnacle Marketing (Pty) Ltd's operators and third party service providers will be required to enter into service level agreements with Pinnacle Marketing (Pty) Ltd 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 personal information held by Pinnacle Marketing (Pty) Ltd. The company will ensure that it provides 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.

### 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 willful or negligent breach of this Policy's processes and procedures may lead to disciplinary action.
- Data subjects who want to make enquiries about their personal information are made aware of the procedures that need to be followed should they wish to do so; and
- 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

The Information Officer is responsible for:

- Taking steps to ensure Pinnacle Marketing (Pty) Ltd.'s reasonable compliance with the provisions of POPIA;
- Keeping Top Management updated about Pinnacle Marketing (Pty) Ltd.'s information protection responsibilities under POPIA;
- Continually analyzing privacy regulations and aligning them with Pinnacle Marketing (Pty) Ltd.'s personal information processing procedures. This will include reviewing Pinnacle Marketing (Pty) Ltd.'s information protection procedures and related activities;
- Ensuring that POPIA Audits are scheduled and conducted on a regular basis;
- Ensuring that Pinnacle Marketing (Pty) Ltd makes it convenient for data subjects who want to update their personal information or submit a POPIA related complaint;
- Approving any contracts entered into with operators, employees and other third parties which may have an impact on the personal information held by Pinnacle Marketing (Pty) Ltd. This will include overseeing the amendment of Pinnacle Marketing (Pty) Ltd.'s employment contracts and 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 Pinnacle Marketing (Pty) Ltd are fully aware of the risks associated with the processing of personal information and that they remain informed about Pinnacle Marketing (Pty) Ltd.'s security controls;
- Organizing and overseeing the awareness training of employees and other individuals involved in the processing of personal information on behalf of Pinnacle Marketing (Pty) Ltd;
- Addressing employee POPIA related questions;
- Addressing all POPIA requests and complaints by Pinnacle Marketing (Pty) Ltd.'s data subjects; and
- Working with the Information Regulator in relation to any ongoing investigations. The Information Officer will 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.

### IT MANAGER

Pinnacle Marketing (Pty) Ltd.'s IT Manager is responsible for:

- Ensuring that Pinnacle Marketing (Pty) Ltd.'s IT infrastructure, filing systems and any other devices used for processing personal information met acceptable security standards;
- Ensuring that all electronically held personal information is kept only on designated drives and services and approved cloud 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 unauthorized 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 Pinnacle Marketing (Pty) Ltd.'s hardware and software systems are functioning properly;
- Performing regular IT audits to verify whether electronically stored personal information has not been accessed or acquired by any unauthorized persons; and
- Performing a proper due diligence review prior to contracting with operators or any other third party service providers to process personal information on behalf of Pinnacle Marketing (Pty) Ltd.

## **MARKETING AND COMMUNICATIONS MANAGER**

The Marketing and Communications Manager is responsible for:

- Approving and maintaining the protection of personal information statements and disclaimers that are displayed on our website, including those attached to communications such as emails and electronic newsletters;
- Addressing any personal information protection queries from journalists and media outlets; and
- Where required, working with persons acting on behalf of Pinnacle Marketing (Pty) Ltd to ensure that any outsourced marketing initiatives comply with POPIA.

## **EMPLOYEES**

Employees 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 employees.

Employees 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.

Employees and other persons acting on behalf of Pinnacle Marketing (Pty) Ltd may not directly or indirectly utilise, disclose or make public, in any manner, to any person or third party, either externally or internally, any personal information, unless such information is already publically known or the disclosure is required in order for the employee or person to perform his/her duties.

Employees 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 aspect related to the protection of a data subject's personal information.

Employees and other persons 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, consent 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 personal information is being collected; and
- Has granted Pinnacle Marketing (Pty) Ltd with explicit written or verbally recorded consent to process his/her personal information.

Employees 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 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 instances 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.

Employees 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 required to perform their respective work-related tasks or duties;
- Save copies of personal information directly onto 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.

Employees and other persons working 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 in 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 sharing or sending 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 devices, that these are kept in a secure place where unauthorised persons cannot access it;
- Ensuring that where personal information has been printed out, that the paper printouts are not left unattended where unauthorised persons 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 be first obtained from the relevant line manager or the Information Officer to delete or dispose of the personal information in an appropriate manner; and
- Undergo POPIA awareness training from time to time, at least annually.

In performing the POPIA Audit, the Information Officer will liaise with Senior Management in order to identify areas within operations that are most vulnerable or susceptible to the unlawful 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.



## PROCEDURES

### ACCESS REQUEST PROCEDURE

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 email, addressed to the Information Officer. The Information Officer will provide the data subject with an Access Request Form to complete (attached to this Policy). 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 our PAIA Manual. All requests will be processed in a reasonable time.

### POPIA COMPLAINT PROCEDURE

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 procedural steps:

- POPIA 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 1 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 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 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 unauthorized persons, the Information Officer will consult with Top Management where after the affected data subjects and the Information Regulator will be informed of the breach;
- The Information Officer will revert to the complainant with a proposed solution with the option of escalating the matter to Top Management within 7 days of receipt of the complaint. In all instances, Pinnacle Marketing (Pty) Ltd will provide reasons for any decision taken and communicate any anticipated deviations from the specified timelines;
- The Information Officer's response to the data subject may comprise of any of the following:
  - A suggested remedy for the complaint;
  - A dismissal of the complaint and the reasons as to why it was dismissed; or
  - 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 submit a complaint 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 reasons for any complaints will also be reviewed to ensure the avoidance of occurrences giving rise to POPIA related complaints.

## DISCIPLINARY ACTION

Where a POPIA complaint or a POPIA infringement investigation has been finalized, Pinnacle Marketing (Pty) Ltd 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 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 action 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.

## POPIA AUDITS

The Information Officer will schedule periodic POPIA audits and 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 the business 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 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 the POPIA related risks.

In performing the POPIA audit, the Information Officer will liaise with Senior Management in order to identify areas within operations that are most vulnerable or susceptible to the unlawful 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.

## INFORMATION OFFICER APPOINTMENT

Pinnacle Marketing (Pty) Ltd, hereby and with immediate effect appoints you as the Information Officer as required by the Protection of Personal Information Act 4 of 2013.

This appointment may at any time be withdrawn or amended in writing.

The Information Officer is entrusted with the following responsibilities:

- Taking steps to ensure Pinnacle Marketing (Pty) Ltd.'s reasonable compliance with the provisions of POPIA;
- Keep Top Management updated about the business' 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 analyzing privacy regulations and aligning them with Pinnacle Marketing (Pty) Ltd.'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 Pinnacle Marketing (Pty) Ltd;
- Approving any contracts entered into with operators, employees and other third parties which may have an impact on the personal information held by Pinnacle Marketing (Pty) Ltd. This will include overseeing the amendment of the company's employment contracts and other service level agreements;
- Encouraging compliance with the conditions required for the lawful processing of personal information;
- Ensure that employees and other persons acting on behalf of Pinnacle Marketing (Pty) Ltd are fully aware of the risks associated with the processing of personal information and that they remain informed about Pinnacle Marketing (Pty) Ltd.'s security controls;
- Organizing and overseeing awareness training of employees and other individuals involved in the processing of personal information on behalf of Pinnacle Marketing (Pty) Ltd;
- Addressing employee POPIA related queries;
- Addressing all POPIA related requests and complaints made by 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.

I, Ruark Jewell, hereby accept the appointment as Information Officer

Full Name	Ruark Jewell
Designation	Compliance Manager
Date	06/02/2024

## 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 (POPIA).

Please submit your complaint to the Information Officer via the below contact details:

Information Officer	Ruark Jewell
Phone Number	021 879 1119
Email Address	compliance@pinnaclemarketing.co.za

### DATA SUBJECT DETAILS

Full Name	
ID Number	
Phone Number	
Email Address	
Postal Address	

### DETAILS OF COMPLAINT

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### DESIRED OUTCOME

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### SIGNATURE SECTION

Signature	
Date	

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

Phone Number	010 023 5200
Email Address	POPIAComplaints@infoeregulator.org.za
Website	<a href="https://infoeregulator.org.za/">https://infoeregulator.org.za/</a>
Postal Address	PO Box 31533 Braamfontein, Johannesburg 2017


## ACCESS REQUEST FORM

Please submit your access to personal information request to the Information Officer via the below contact details:

Information Officer	Ruark Jewell
Phone Number	021 879 1119
Email Address	compliance@pinnaclemarketing.co.za

Please be aware that we may require you to provide proof of identification or letter of authority prior to processing your request. There may also be a reasonable charge for providing copies of the information requested as per our PAIA Manual.

DATA SUBJECT DETAILS	
Full Name	
ID Number	
Phone Number	
Email Address	
Postal Address	
REQUEST	
Inform me whether Pinnacle Marketing (Pty) Ltd holds any of my personal information.	<input type="checkbox"/>
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"/>
INSTRUCTIONS	
SIGNATURE SECTION	
Signature	
Date	



For all policy and/or compliance queries please contact us on:

**T: 021 879 1119**

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