POPIA COMPLIANCE POLICY

4D Employee Benefits (PTY)LTD
FSP 26372

SIRIUS LEX
COMMITTED TO COMPLIANCE.

TABLE OF CONTENTS

1. THE AIM OF THE POPIA COMPLIANCE POLICY

1.1. Background

In terms of the FAIS Act, there is already a responsibility on all Financial Service Providers to ensure that data is kept safe, and in most cases for a period of 5 years after the relationship with the client has been terminated. In addition, POPIA is placing an additional level of data security on al entities to be adhered to.

1.2. The aim of the POPIA Compliance Policy

This policy aims to ensure that the FSP protects the clients' personal information, whilst adhering to all relevant legislation:

- *FAIS*
- *FICA*
- *POPIA*

1.3. The principles of the POPIA Compliance Policy

1. *Data collection;*
2. *Data processing;*
3. *Data storage;*
4. *Data privacy;*
5. *Destruction of data (where and when applicable)*

1.4. The purpose of this document

1. *To ensure compliance with all the relevant legislation;*
2. *The aim is to focus on POPIA*

2. KEY CONCEPTS

1. *Develop, implement, monitor and maintain a compliance framework;*
2. *Perform personal information assessments;*
3. *Create awareness;*
4. *Ensure compliance;*
5. *Continuous Management*

3. ROLES AND RESPONSIBILITIES

One person to be appointed to take full responsibility for this policy.

3.1. Information Officer(s)

- *Information Officer:* *Francois Christian Symington Koekemoer*
- *Date of appointment:* *01/07/2021*

  *** This is NOT the head of IT ***

  *** This person has to be senior in the business***

This person takes full responsibility for the implementation of the POPIA compliance Policy.

3.2. The role of all employees

All employees will have to comply with this policy and everything related to POPIA.

Employees will have to identify PI and ensure that all measures are adhered to.

3.3. The POPIA Policy and other Governance Risk and Compliance departments

The POPIA policy is in line with the following internal policies of the FSP: Information Technology Governance

- *Information and Data Security*
- *Corporate Governance*
- *Compliance*
- *Risk Management*
- *Business Continuity Management)*
- *Conflict of Interest Management*
- *Treating Customers Fairly*

4. POLICY DEVELOPMENT, ALIGNMENT AND IMPLEMENTATION

A Financial Services Provider collects and processes Personal Information (PI) pertaining to their clients and for the purposes of advice given and financial services rendered.
A client's consent needs to be obtained to collect and process his data – a completed application form and relevant compliance documents provides implied consent.

This Policy was accepted and implemented by 4D Employee Benefits (PTY) LTD on the 1st day of July 2021 .

Signature 1 ______________

Name F C S Kockemoer

Capacity Director

Signature 2 ______________

Name Marnis De Kock

Capacity Director.