



Information Manual

As prescribed by the provisions of:
The Promotion of Access to Information Act, 2000
and
The Protection of Personal Information Act, 2013



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KPMG.co.za

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1 Definitions

- 1.1. "Data Subject" means the person to whom Personal Information relates, as contemplated in terms of section 1 of the POPIA;
- 1.2. "Deputy Information Officer" means a Deputy Information Officer designated in terms of section 56 of the POPIA;
- 1.3. "Information Officer" means in the case of a juristic person, (i) the chief executive officer or equivalent officer of the juristic person or any person duly authorised by that officer; or (ii) the person who is acting as such or any person duly authorised by such acting person as contemplated in section 1 of the Act;
- 1.4. "Information Regulator" means the Information Regulator established in terms of section 39 of POPIA;
- 1.5. "KPMG" or "Firm" means, collectively or individually as the context may require, KPMG Services (Pty) Ltd, with registration number 1999/012876/07, and KPMG Inc., with registration number 1999/021543/21;
- 1.6. "Manual" means this manual compiled by KPMG in terms of PAIA and POPIA;
- 1.7. "PAIA" or "Act" means the Promotion of Access to Information Act, 2 of 2000, including the PAIA Regulations, as amended from time to time;
- 1.8. "Personal Information" means information relating to an identified, or identifiable, living natural person and, where applicable, an identifiable existing juristic person as contemplated in the POPIA;
- 1.9. "Personnel" means all partners, directors, officers, employees, individual contractors and other personnel of KPMG;
- 1.10. "POPIA" means the Protection of Personal Information Act, 4 of 2013, including the POPIA Regulations, as amended from time to time;
- 1.11. "Processing" means any operation, activity or set of operations, whether or not by automated means, concerning Personal Information as contemplated in the POPIA;
- 1.12. "Private Body" means any former or existing juristic person, as contemplated in the Act and POPIA;
- 1.13. "Record" means a record as contemplated in PAIA and includes Personal Information;
- 1.14. "Requester" means, in relation to a Private Body,
 - i. any person, including, but not limited to, a public body or an official thereof, making a request for access to a Record of that Private Body; or
 - ii. a person acting on behalf of such person as contemplated in the Act;
- 1.15. "Responsible Party" means a public or Private Body or any other person which, alone or in conjunction with others, determines the purpose of and means for Processing Personal Information as contemplated in the POPIA;

2 The Manual

2.1 Introduction

The Act seeks to advance the values of transparency and accountability and give effect to the constitutional right of access to information. The Act came into effect on 9 March 2001.

The Act establishes the following statutory rights of Requesters to any Record of a Private Body if:

- The Record is required for the exercise or protection of any of his or her legal rights;
- The Requester complies with all the procedural requirements; and
- Access is not refused in terms of any ground referred to in the Act.

POPIA seeks to promote the protection of Personal Information processed by a Private Body and establishes the Information Regulator with duties and functions in terms of the POPIA and the Act.

The purpose of the POPIA is to:

- give effect to the constitutional right to privacy, by safeguarding Personal Information when processed by a Responsible Party, subject to justifiable limitations that are aimed at—
 - balancing the right to privacy against other rights, particularly the right of access to information; and
 - protecting important interests, including the free flow of information within the Republic of South Africa and across international borders;
- regulate the manner in which Personal Information may be processed, by establishing conditions that prescribe the minimum threshold requirements for the lawful Processing of Personal Information in line with international standards;
- provide Data Subjects with rights and remedies to protect their Personal Information; and
- establish voluntary and compulsory measures, including the establishment of an Information Regulator.

2.2 KPMG

KPMG Services (Pty) Ltd, with registration number 1999/012876/07, and KPMG Inc., with registration number 1999/021543/21, (collectively referred to as “KPMG”) are member firms of the KPMG global organisation of independent member firms affiliated with KPMG International Limited (“KPMG International”), a private English company limited by guarantee. KPMG International provides no services to clients. Each member firm of KPMG International is a legally distinct and separate entity and each describes itself as such. The KPMG name and logo are trademarks used under license by the independent member firms of the KPMG global organisation.

This Manual is relevant and will be applicable to KPMG only. This Manual will thus not apply to any Records held by KPMG International or any other independent KPMG member firms not in South Africa.

2.3 Scope

This Manual has been prepared and published in accordance with the requirements of section 51 of the Act, including the requirements of POPIA. Its purpose is to facilitate access to Records held by KPMG.

Specifically, the Manual provides information on:

- The contact details of the Information Officer, who will manage requests in terms of the Act;
- The structure and functions of KPMG;
- The subjects and categories of Records that are held by KPMG;
- Records that are available in terms of any other legislation; and
- The procedure that needs to be followed to obtain access to a Record.

As required by section 17 of the POPIA, the Manual documents the Processing operations and activities under the control of KPMG, as referred to in Section 51 of the Act, and provides information as follows:

- Purpose of the Processing of Personal Information by the Firm;
- Categories of Data Subjects and Personal Information/special Personal Information relating thereto;
- Recipients of Personal Information;
- Cross-border flows of Personal Information;
- Description of information security measures implemented or to be implemented by the Firm;
- Objection to the Processing of Personal Information by a Data Subject; and
- Request for correction or deletion of Personal Information.

2.4 Availability of the Manual

This Manual is available in a PDF (Portable Document Format) version.

A copy of the Manual is available from:

The Information Officer: Jan Vliegenthart
KPMG
85 Empire Road
Parktown

Tel: (011) 647 7111

Fax: (011) 647 8000

e-mail: jan.vliegenthart@kpmg.co.za

The Manual is accessible in PDF format from KPMG's website www.kpmg.co.za

This Manual may be amended from time to time and as soon any amendments have been made and finalised the latest version will be made available.

2.5 Policy with regard to confidentiality and Access to Information

KPMG will hold any information provided to it by individuals or others on a confidential basis, subject to KPMG's obligations under law, including this Act, as well as confidentiality agreements.

3 Entry point for requests

The Chief Executive Officer of KPMG has delegated his powers in terms of the Act to the Information Officer, who will handle all requests in terms of this Act, including POPIA, on his behalf. All requests can be referred to:

The Information Officer: Jan Vliegenthart

Street Address: 85 Empire Road
Parktown

Postal Address: Private Bag 9
Parkview
2122

Tel: (011) 647 7111

Fax: (011) 647 8000

e-mail: jan.vliegenthart@kpmg.co.za

The Information Officer may, where necessary, appoint Deputy Information Officers in order to ensure fulfilment of KPMG's obligations and responsibilities as set out in the Act and POPIA.

4 Who may request access to information

The Act provides that a person may only request information in terms of the Act, if the information is required for the exercise or protection of a right. Only requests for access, where the Requester is able to furnish the Information Officer with sufficient particulars as to the right the Requester is seeking to exercise or protect, will be considered.

A Requester can request access to information in different capacities; the category will influence the amount to be charged when a request has been lodged. Requesters may be classified in different categories:

- A personal Requester, that is a person who requests information about him / herself;
- An agent Requester, that is a person requesting information on behalf of someone else;
- A third-party Requester, that is a person requesting information about someone else; or
- A public body, requests information in the public interest.

5 Protection of Personal Information that is processed by the firm

Chapter 3 of POPIA sets out the minimum conditions for lawful Processing of Personal Information by a Responsible Party. These conditions may not be deviated from unless specific exclusions apply as outlined in POPIA.

KPMG processes Personal Information relating to both natural and juristic persons in order to carry out its business and organisational functions. The manner in which this information is Processed and the purpose for which it is Processed is determined by the Firm. The Firm is accordingly a Responsible Party for the purposes of POPIA and will ensure that the Personal Information of a Data Subject:

- 1) is processed lawfully, fairly and transparently. This includes the provision of appropriate information to Data Subjects when their data is collected by the Firm, in the form of privacy or data collection notices. The Firm must also have a legal basis (for example, consent) to process Personal Information,
- 2) is processed only for the purposes for which it was collected,
- 3) will not be processed for a secondary purpose unless that processing is compatible with the original purpose,
- 4) is adequate, relevant and not excessive for the purposes for which it was collected,
- 5) is accurate and kept up to date,
- 6) will not be kept for longer than is necessary,
- 7) is processed in accordance with integrity and confidentiality principles, this includes physical and organisational measures to ensure that Personal Information, in both physical and electronic form, are subject to an appropriate level of security when stored, used and communicated by the Firm, in order to protect against access and acquisition by unauthorised persons and accidental loss, destruction or damage;
- 8) is processed in accordance with the rights of Data Subjects, where applicable. Data Subjects have the right to:
 - a) be notified that their Personal Information is being collected by the Firm. The Data Subject also has the right to be notified in the event of a data breach,
 - b) know whether the Firm holds Personal Information about them, and to access that information. Any request for information must be handled in accordance with the provisions of this Manual,
 - c) request the correction or deletion of inaccurate, irrelevant, excessive, out of date, incomplete, misleading or unlawfully obtained personal information,
 - d) object to the Firm's use of their Personal Information and request the deletion of such Personal Information (deletion would be subject to the Firm's Record keeping requirements),
 - e) object to the processing of Personal Information for purposes of direct marketing by means of unsolicited electronic communications, and
 - f) complain 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.

Purpose of the Processing of Personal Information by the Firm

As outlined above, Personal Information may only be Processed for a specific purpose. The purposes for which the Firm Processes or will Process Personal Information is set out in **Part 1 of Appendix 1**.

Categories of Data Subjects and Personal Information/special Personal Information relating thereto

As per section 1 of POPIA, a Data Subject may either be a natural or a juristic person. **Part 2 of Appendix 1** sets out the various categories of Data Subjects in respect of which the Firm Processes Personal Information on and the types of Personal Information relating thereto.

Recipients of Personal Information

Part 3 of Appendix 1 outlines the recipients to whom the Firm may provide a Data Subjects Personal Information.

Cross-border flows of Personal Information

Section 72 of POPIA provides that Personal Information may only be transferred out of the Republic of South Africa if the:

- 1) Recipient country can offer such data an “adequate level” of protection. This means that its data privacy laws must be substantially similar to the Conditions for Lawful Processing as contained in POPIA, or
- 2) Data Subject consents to the transfer of their Personal Information, or
- 3) Transfer is necessary for the performance of a contractual obligation between the Data Subject and the Responsible Party, or
- 4) Transfer is necessary for the performance of a contractual obligation between the Responsible Party and a third party, in the interests of the Data Subject, or
- 5) Transfer is for the benefit of the Data Subject, and it is not reasonably practicable to obtain the consent of the Data Subject, and if it were, the Data Subject, would in all likelihood provide such consent.
- 6) The entity in the recipient country to which data is transferred has appropriately adopted Binding Corporate Rules.

Part 4 of Appendix 1 sets out the planned cross-border transfers of Personal Information and the conditions from above that apply thereto.

Description of information security measures to be implemented by the Firm

Part 5 of Appendix 1 sets out the types of security measures implemented or to be implemented by the Firm in order to ensure that Personal Information is respected and protected. A preliminary assessment of the suitability of the information security measures implemented or to be implemented by the Firm may be conducted in order to ensure that the Personal Information that is processed by the Firm is safeguarded and Processed in accordance with the Conditions for Lawful Processing.

Objection to the Processing of Personal Information by a Data Subject

Section 11 (3) of POPIA and Regulation 2 of the POPIA Regulations provides that a Data Subject may, at any time object to the Processing of his/her/its Personal Information in the prescribed form attached to this Manual as **Appendix 3** subject to exceptions contained in POPIA.

Request for correction or deletion of Personal Information

Section 24 of POPIA and Regulation 3 of the POPIA Regulations provides that a Data Subject may request for their Personal Information to be corrected/deleted in the prescribed form attached as **Appendix 3** to this Manual.

6 Guidance to Requesters (Section 51(1)(b))

The South African Information Regulator is required by law, specifically Regulation 2 of the Regulations relating to the Promotion of Access to Information, 2021, dated 27 August 2021, to make the guide available in each of the official languages in the prescribed format. In addition, the Information Regulator, must make available the number of copies of the guide in the official languages as requested, upon the written request of any person, including an Information Officer, in the prescribed format.

Information Officers are required by law, specifically Regulation 3 of the Regulations relating to the Promotion of Access to Information, 2021, dated 27 August 2021, to make a copy of the guide available at his or her registered head office, for public inspection, during normal office hours. In addition the Information Officer must make available the number of copies of the guide in the official languages as requested, upon the written request of any person in the prescribed format.

The contact details of the Information Regulator are:

Postal Address: **P.O Box 31533**
 Braamfontein
 Johannesburg
 2017

Telephone Number: **+27-10-023 5200**

Email: **enquiries@inforegulator.org.za**

Website: **www.inforegulator.org.za**

7 Records automatically available (Section 51(1)(c))

The Act provides for the automatic disclosure of certain Records without a person having to request access in terms of the Act.

To date no notice in terms of section 52(2) of the Act has been published regarding the categories of Records that are automatically available without having to request access.

8 Records available in terms of other legislation (Section 51(1)(d))

Records are held in accordance with the following legislation (as amended from time to time):

- Auditing Profession Act 26 of 2005;
- Basic Conditions of Employment Act 75 of 1997;
- Broad-Based Black Economic Empowerment Act 53 of 2003;
- Companies Act 71 of 2008;
- Compensation for Occupational Injuries and Diseases Act 130 of 1993;
- Competition Act 89 of 1998;
- Constitution of South Africa Act 108 of 1996;
- Criminal Procedure Act 51 of 1977;
- Collective Investment Schemes Control Act 45 of 2002;
- Electronic Communications and Transactions Act 25 of 2000;
- Employment Equity Act 55 of 1998;
- Financial Advisory and Intermediary Services Act 32 of 2002;
- Financial Intelligence Centre Act 38 of 2001;
- Income Tax Act 58 of 1962;
- Insolvency Act 24 of 1936;
- Regulation of Interception of Communications and Provision of Communication-related Information Act 70 of 2002;
- Labour Relations Act 66 of 1995;
- Long Term Insurance Act 52 of 1998
- National Credit Act 34 of 2005;
- Occupational Health and Safety Act 85 of 1993;
- Prevention and Combating of Corrupt Activities Act 12 of 2004;
- Prevention of Organised Crime Act 121 of 1998;
- Promotion of Access to Information Act 2 of 2000;
- Promotion of Equality and Prevention of Unfair Discrimination Act 4 of 2000;
- Protection of Personal Information Act 4 of 2013;
- Protection of Constitutional Democracy Against Terrorist and Related Activities Act 33 of 2004;
- Protected Disclosures Act 26 of 2000;
- Skills Development Act 97 of 1997;
- Skills Development Levy Act 9 of 1999;
- South African Reserve Bank Act 90 of 1999;

- Unemployment Insurance Act 30 of 1966;
- Value Added Tax Act 89 of 1991.

Although KPMG has used its best endeavours to supply the Requester with a complete list of applicable legislation, it is possible that the above list may be incomplete. Wherever it comes to KPMG's attention that existing or new legislation allows a Requester access on a basis other than that set out in the Act, KPMG shall promptly update the list.

If a Requester believes that a right to access to a Record exists in terms of the legislation listed above, or any other legislation, the Requester is required to indicate what legislative right the request is based on, to allow the Information Officer the opportunity of considering the request in light thereof.

9 Structure and classes of Records held by KPMG (Section 51(1)(e))

9.1 Scope

The information contained in this chapter is intended to identify the main classes of Records held within KPMG and their organisational structure to help the Requester to gain a better understanding of the main business activities of KPMG.

Further assistance in identifying Records held by KPMG is obtainable from the Information Officer.

9.2 Structure

KPMG comprises a number of functions, each representing a key area of KPMG's work. Each function is divided into a business unit, which is typically overseen by a Director of KPMG.

9.3 Categories and subjects of Records

9.3.1 Human Resources/Payroll

9.3.1.1 Applicant details

This includes but is not limited to CV, interview notes, results of any testing done and exam results.

9.3.1.2 Personnel Records

- Full name
- Biographic (Marital status, birth date, identity number, nationality, addresses, next of kin)
- Letter of appointment
- General Terms of Employment
- Effective start and end date with KPMG
- Position (History)
- Race & Gender
- General
 - Current studies (exam progress)
 - Qualifications
 - Training contracts details
 - Disability information
 - Disciplinary details
 - Leave Entitlement information
- Annual Cost to Company
- Package structuring
- Performance management Records

- Promotions
- Annual declarations
- Bank Details
- Tax Number
- RSC Codes
- Correspondence relating to personnel

9.3.1.3 Ex-employees

This would effectively be the same as personnel Records plus possible exit interview and forwarding address.

9.3.1.4 Pension/Provident Fund Records

- Claims (Withdrawals, Retirements, Deaths and Disabilities)
- Member Data
- Transfers / Liquidations
- Pensioners Annuity / Traditional Funds
- Disability information
- Accounting Records

9.3.1.5 Medical Aid Information

- Claims
- Member Data
- Accounting Records
- Rules and amendments thereto

9.3.1.6 PAYE Records and returns

9.3.1.7 Policies, Standards, guidelines and procedures

9.3.2 Projects & Accounts Receivable

- Client Details – addresses; contact person
- All projects opened with the following information - Lockup / Engagement Partner; Project Manager
- For each project the following details:
 - All Time and disbursements charged to each project
 - All time and expense entries per person
 - All invoices billed to clients and their status outstanding
 - Work in progress per project

9.3.3 Accounts payable / Expense claims

- Vendor Details - Addresses, Bank details, Payment terms
- KPMG Bank details
- All Vendor invoices / expense claims
- All payments to vendors

9.3.4 General Ledger

- All amounts from other subsystems interfaced into GL
- All financial information for KPMG for last 3 years - Financial Statements
- Detail per type of Account.

9.3.5 Cash Management

- All Bank details for KPMG
- Downloaded Bank statements from bank imported into Cash Management
- Account reconciliation

9.3.6 Fixed Assets

- All Fixed Asset information
- Most Serial numbers for computer equipment
- Asset Category
- Depreciation Methods per category
- Balances per Asset

9.3.7 Client Records

- Correspondence
- Business information of client and/or third party
- Agreements with client
- Records generated by KPMG for the client or relating to the client
- Fees
- Statutory and tax related Records of the client
- Proposal and tender documents
- Annual financial statements or other financial Records of or relating to the client
- Working papers
- Minutes of meetings
- Policies and Codes of conduct of the client

9.3.8 Other KPMG Records

- Learning and Development training material, training Records and communications
- Marketing and Communication related Records which include but are not limited to communication and marketing strategies, proposal documents and brand information
- Statutory Records
- Records held by KPMG officials
- Information technology and databases
- Patents and trademarks
- Insurance
- Legal documentation
- Records relating to corporate governance
- Memorandum and articles of association

- Minutes of meetings
- Travel Records
- Agreements

10 Procedure

10.1 Prescribed access form and completion

In order for KPMG to facilitate the Requester's access to a Record the Requester needs to complete the prescribed request for access to Record form [PAIA Regulation 7] available on the Firm's and/or the Information Regulator's website and submit same to the appointed Information Officer for consideration. Please take note that the prescribed access form must be completed in full, failure to do so will result in the process being delayed until such additional information is provided.

Should there be insufficient space on the prescribed access form, additional information may be provided on a folio, attached to the prescribed access form. The attached folio must however be referred to in the prescribed access form.

10.2 Proof of identity

Proof of identity is required to authenticate the request and the Requester. Therefore in addition to the access form, Requesters will be required to supply a certified copy of the identification document or any other legal means of identification.

10.3 Prescribed fees

Please take note that a request will not be processed until the request fee and the deposit (if applicable) have been paid. Requesters are advised that four (4) types of fees are provided for in terms of the Act.

- Reproduction fee: this fee is payable with respect to all Records that are automatically available;
- Request fee: this fee is an administration fee that must be paid by all Requesters, except personal Requesters (a personal Requester is a Requester seeking access to a Record containing information about the Requester him / herself), before the request is considered and is not refundable;
- Access fee: which is payable once access to a Record is granted, this fee is intended to reimburse KPMG for the costs involved in searching and preparing the Record for delivery;
- Deposit: which is payable if KPMG receives a request for access to information held on a person other than the Requester himself / herself and the preparation for the Record will take more than six (6) hours.

10.3.1 Request fee

A request fee of R140.00 (excluding VAT) is payable upfront where a Requester submits a request for access to information on anybody else other than a Requester him / herself.

10.3.2 Access fees

The applicable fees (excluding VAT) which will be payable are:

	Rand
– Photocopy/printed black & white copy of A4-size page	2.00 per page or part thereof
– Printed copy of an A4-size page	2.00 per page or part thereof
– For a copy in a computer readable form: <ul style="list-style-type: none">• Flash drive (to be provided by Requester)	40.00

<ul style="list-style-type: none"> • Compact disc <ul style="list-style-type: none"> - If provided by the Requester - if provided to the Requester 	40.00 60.00
<ul style="list-style-type: none"> — A transcription of visual images, for an A4-size page or part thereof — For a copy of visual images 	Service to be outsourced. Will depend on quotation from Service provider
<ul style="list-style-type: none"> — A transcription of an audio Record, for an A4-size page or part thereof 	24.00
<ul style="list-style-type: none"> — For a copy of an audio Record on: <ul style="list-style-type: none"> - Flash drive (to be provided by Requester) - Compact disc <ul style="list-style-type: none"> — If provided by the Requester — If provided to the Requester 	40.00 40.00 60.00
<ul style="list-style-type: none"> — To search a Record that must be disclosed, per hour of part of an hour, excluding the first hour, reasonably required for such search and preparation. — To not exceed a total cost of 	145.00 435.00
<ul style="list-style-type: none"> — Postage, e-mail or any other electronic transfer 	Actual expense if any

10.3.3 Deposit

Where KPMG receives a request for access to information held on a person other than the Requester himself / herself and the Information Officer is of the opinion that the preparation of the required Record will take more than six (6) hours, a deposit of one third (1/3) of the amount of the applicable access fee is payable.

11 Granting or refusal of requests

All requests that meet the requirements, as set out above will be processed in line with the time limits as set out in the Act.

Requesters should take note that requests may be refused based on the following grounds, as set out in the Act:

- Mandatory protection of privacy of a third party who is a natural person
- Mandatory protection of commercial information of a third party
- Mandatory protection of certain confidential information of a third party
- Mandatory protection of safety of individuals, and protection of property
- Mandatory protection of Records privileged from production in legal proceedings
- Mandatory protection of the safety of individuals and the protection of property
- Commercial information of the Private Body, and
- Mandatory protection of research information of a third party and of the Private Body

Requestors will be informed within thirty (30) days of receipt of the request, of the decision to grant or refuse the request and reasons (if required) will be provided. Please take note that in terms of the Act this 30-day period maybe extended for a further 30-day period should more time be required to gather the requested information. The requestor will however be notified in writing should it be required that the initial 30-day notice period be extended for a further 30 days.

12 Application to Court

If a Requester is aggrieved by the refusal of the Information Officer to grant a request for a record, the Requester may apply to court for appropriate relief.

13 Useful references

13.1 Websites

The South African Information Regulator	https://www.inforegulator.org.za
KPMG Internet site	www.kpmg.co.za

Appendix 1 Records of Processing Activities

Part 1

Processing of Personal Information in accordance with POPIA

Purpose of the Processing of Personal Information	Type of Processing
<ol style="list-style-type: none">1. To provide services to the Customer in accordance with terms agreed to by the Customer;2. To undertake activities related to the provision of services including:<ol style="list-style-type: none">a. to fulfil foreign and domestic legal, regulatory and compliance requirements and comply with any applicable treaty or agreement with or between foreign and domestic governments applicable to the Firm,b. to verify the identity of Customer representatives who contact the Firm or may be contacted by the Firm,c. for risk assessment, information security management, statistical, trend analysis and planning purposes,d. to monitor and record calls and electronic communications with the Customer for quality, training, investigation and fraud prevention purposes;e. for crime detection, prevention, investigation and prosecution;f. to enforce or defend the Firm's rights, andg. to manage the Firm's relationship with the Customer.3. The purposes related to any authorised disclosure made in terms of agreement, law or regulation,4. Any additional purposes expressly authorised by the Customer, and5. Any additional purposes as may be notified to the Customer or Data Subjects in any notice provided by the Firm	Collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Part 2

Categories of Data Subjects and categories of Personal Information relating thereto

Categories of Personal Information	Data Subject	Personal Information Processed
<p>Customer:</p> <p>Corporate</p> <p>Customer Profile information including, account details, payment information, corporate structure, customer risk rating and other customer information including to the extent the categories of information relate to individuals or representatives of customers (e.g., shareholders, directors, etc.) required for the above-mentioned purposes.</p> <p>Individual</p> <p>Name; contact details (Firm E-Mail Address, Firm Telephone Number), client details (Home Facsimile Number, Home Postal Address, Home Telephone Number, Personal Cellular, Mobile Or Wireless Number, Personal E-Mail Address); regulatory identifiers (e.g. tax identification number); Account information (Bank Account Currency Code, Bank Account ID, Bank Account Name, Bank Account Number, Bank Account Type, Bank account balance); transaction details and branch details; "know-your customer" data, photographs; other identification and verification data as contained in images of ID card, passport and other ID documents; images of customer signatures).</p>	<ul style="list-style-type: none"> — Natural Persons — Juristic Persons 	<p>Personal data relating to a Data Subject received by or on behalf of the Firm from the Customer, Customer affiliates and their respective representatives and related parties in the course of providing accounts and services to the Customer or in connection with a transaction or services. Customer personal data may include names, contact details, identification and verification information, nationality and residency information, taxpayer identification numbers, voiceprints, bank account and transactional information (where legally permissible), to the extent that these amount to personal data under POPIA.</p>
<p>Payment beneficiaries:</p> <p>Bank Account Currency Code, Bank Account ID, Bank Account Name, Bank Account Number, Bank Account Type; beneficiary address, transaction details; payment narrative and, for certain data transferred from the UK only, National Insurance numbers.</p>		
<p>Personnel:</p> <p>Name; employee ID number; business contact details (address/telephone number/email address).</p>		

Part 3

Recipients of Personal Information

The Firm, its affiliates and their respective representatives.

Part 4

Cross border transfers of Personal Information

When making authorised disclosures or transfers of Personal Information in terms of section 72 of POPIA, Personal Data may only be disclosed to recipients located in countries which offer a level of protection as in South Africa.

Part 5

Description of information security measures

The Firm undertakes to institute and maintain the data protection measures to accomplish the following objectives outlined below. The details given are to be interpreted as examples of how to achieve an adequate data protection level for each objective. The Firm may use alternative measures with regards to technological security development, as needed, provided that the objectives are achieved.

Physical Access Controls

The Firm shall implement suitable measures in order to prevent unauthorised persons from gaining access to the data processing equipment where the data are processed.

Data Integrity Controls

The Firm undertakes to implement suitable measures to prevent the unauthorised manipulation, alteration, deletion of data used by the Firm including Personal Information of Customers.

User Control

The Firm shall implement suitable measures to prevent its data processing systems from being used by unauthorised persons by means of data transmission equipment.

Users Access Control to Data

The Firm represents that the persons entitled to use the Firm's data processing system are only able to access the data within the scope and to the extent covered by their respective access permissions (authorisation).

Data Transmission Control

The Firm shall be obliged to enable the verification and tracing of the locations / destinations to which the Personal Information is transferred by utilisation of the Firm's data communication equipment / devices.

Data Transport Control

The Firm shall implement suitable measures to prevent Personal Information from being read, copied, altered or deleted by unauthorised persons during the transmission thereof or during the transport of the data media.

Organisation Control

The Firm shall maintain its internal organisation in a manner that meets the requirements of this Manual.

Appendix 2 Additional Prescribed Forms (Objection to Processing)

OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION IN TERMS OF SECTION 11(3) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013

REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018

[Regulation 2]

Note:

1. Affidavits or other documentary evidence as applicable in support of the objection may be attached.
2. If the space provided for in this Form is inadequate, submit information as an Appendix to this Form and sign each page.
3. Complete as is applicable.

A	Details of Data Subject
Name(s) and surname/ registered name of Data Subject:	
Unique Identifier/ Identity Number:	
Residential, postal or business address:	
Contact number(s):	
Fax number / E-mail address:	
B	Details of Responsible Party
Name(s) and surname/ registered name of Data Subject:	
Residential, postal or business address:	
Contact number(s):	
Fax number / E-mail address:	
C	REASONS FOR OBJECTION IN TERMS OF SECTION 11(1)(d) to (f) (Please provide detailed reasons for the objection)

Signed at _____ this _____ day of _____ 20 ____.

Signature of Data Subject/Designated Person

Appendix 3 Additional Prescribed Forms (Request for Correction or Deletion of Personal Information)

REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION OR DESTROYING OR DELETION OF RECORD OF PERSONAL INFORMATION IN TERMS OF SECTION 24(1) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013

REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018

[Regulation 3]

Note:

1. Affidavits or other documentary evidence as applicable in support of the request may be attached.
2. If the space provided for in this Form is inadequate, submit information as an Appendix to this Form and sign each page.
3. Complete as is applicable.

Mark the appropriate box with an "x".

Request for:

- Correction or deletion of the personal information about the data subject which is in possession or under the control of the responsible party.
- Destroying or deletion of a Record of personal information about the data subject which is in possession or under the control of the responsible party and who is no longer authorised to retain the Record of information.

A	Details of Data Subject
Name(s) and surname/ registered name of data subject:	
Unique Identifier/ Identity Number:	
Residential, postal or business address:	
Contact number(s):	
Fax number / E-mail address:	
B	DETAILS OF RESPONSIBLE PARTY
Name(s) and surname / registered name of responsible party:	
Residential, postal or business address:	
Contact number(s):	
Fax number / E-mail address:	
C	INFORMATION TO BE CORRECTED/DELETED/DESTRUCTED/DESTROYED

D	<p>REASONS FOR</p> <ul style="list-style-type: none"> CORRECTION OR DELETION OF THE PERSONAL INFORMATION ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24(1)(a) WHICH IS IN POSSESSION OR UNDER THE CONTROL OF THE RESPONSIBLE PARTY; and or <p>REASONS FOR</p> <ul style="list-style-type: none"> DESTRUCTION OR DELETION OF A RECORD OF PERSONAL INFORMATION ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24(1)(b) WHICH THE RESPONSIBLE PARTY IS NO LONGER AUTHORISED TO RETAIN. (Please provide detailed reasons for the request)

Signed at _____ this _____ day of _____ 20 _____.

Signature of Data Subject/Designated Person



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