

POLICY ON: DATA PRIVACY

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Department : RISK AND COMPLIANCE

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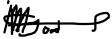

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1 DEFINITIONS

In this Policy (as defined below), unless the context requires otherwise, the following words and expressions bear the meanings assigned to them and cognate expressions bear corresponding meanings –

- 1.1 **"Child"** means any natural person under the age of 18 (eighteen) years;
- 1.2 **"Data Breach"** means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, Personal Information under the control of or in the possession of the NBCRFLI;
- 1.3 **"Data Subject"** has the meaning ascribed thereto under POPIA;
- 1.4 **"Employees"** means any employee of the NBCRFLI;
- 1.5 **"NBCRFLI"** means the National Bargaining Council for the Road Freight and Logistics Industry, being the statutory body established in terms of section 29(15)(a) of the Labour Relations Act 66 of 1995 ("**LRA**"), as amended;
- 1.6 **"Operator"** means a person or entity who Processes Personal Information for a Responsible Party in terms of a contract or mandate, without coming under the direct authority of that Responsible Party;
- 1.7 **"PAIA"** means the Promotion of Access to Information Act No. 2 of 2000;
- 1.8 **"Personal Information"** has the meaning ascribed thereto under POPIA and specifically includes any form of information that can be used to identify a Data Subject;
- 1.9 **"Policy"** means this Privacy Policy;
- 1.10 **"POPIA"** means the Protection of Personal Information Act No. 4 of 2013;
- 1.11 **"Processing"** has the meaning ascribed thereto under POPIA. **"Process"** has a corresponding meaning;
- 1.12 **"Regulator"** means the Information Regulator established in terms of POPIA;
- 1.13 **"Act"** refers to the Protection of Personal Information Act 4 of 2013
- 1.14 **"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;

1.15 **"Special Personal Information"** means Personal Information concerning a Data Subject's religious or philosophical beliefs, race or ethnic origin, trade union membership, political opinions, health, sexual life, biometric information or criminal behaviour; and

1.16 **"Third Party"** means any independent agent, contractor, consultant, sub-contractor or other representative of the NBCRFLI.

2 **PURPOSE OF THIS POLICY**

2.1 The purpose of this Policy is to inform Data Subjects about how the NBCRFLI Processes their Personal Information.

2.2 The NBCRFLI, in its capacity as Responsible Party , shall strive to observe, and comply with its obligations under POPIA as well as accepted information protection principles, practices and guidelines when it Processes Personal Information from or in respect of a Data Subject.

2.3 This Policy applies to Personal Information collected by the NBCRFLI in connection with the services which the NBCRFLI provides. This includes information collected directly from you as a Data Subject, as well as information we collect indirectly through our service providers who collect your information on our behalf.

2.4 This Privacy Policy does not apply to the information practices of Third Party companies who we may engage with in relation to our business operations (including, without limitation, their websites, platforms and/or applications) which we do not own or control; or individuals that the NBCRFLI does not manage or employ. These Third Party sites may have their own privacy policies and terms and conditions and we encourage you to read them before using them.

3 **POLICY STATEMENT BY COUNCIL:**

3.1 The NBCRFLI is committed to the optimal compliance with applicable laws and regulations while simultaneously protecting the interests of its stakeholders.

3.2 This data privacy policy is aligned to the requirements of the Protection of Personal Information Act no 4 of 2013 (POPIA)

3.3 The Council, EXCO, Council's Committees, service providers and employees and any governance structures that may be created, are subject to this Policy. Council, EXCO, and Council's Committees are required to set the right tone and support the NBCRFLI compliance activities, as well as allocate resources towards the implementation thereof.

3.4 This policy has been developed and aligned to the following founding principles of the POPI Act. i.e.

✓ **Principle 1: Accountability**

This principle contemplates the assigning of responsibility by organisations for overseeing compliance with the Act.

✓ **Principle 2: Processing Limitation**

This principle requires that personal information may only be processed in a fair and lawful manner.

✓ **Principle 3: Purpose Specification**

The principle of Purpose Specification helps to determine the scope within which personal information may be processed by an organisation.

✓ **Principle 4: Further Processing Limitation**

Once an organisation has identified and obtained consent for specific, legitimate and explicitly defined purposes, the processing of such personal information may only occur insofar as it is necessary for the fulfilment of those purposes.

✓ **Principle 5: Information Quality**

Clause 16 of The Protection of Personal Information Act sets out, in general terms, the responsibility of organisations to ensure and maintain the quality of the personal information that they process.

✓ **Principle 6: Openness**

The sixth principle of “Openness” is linked directly to an organisation’s duty to process information in a fair and transparent manner.

✓ **Principle 7: Security Safeguards**

✓ The underlying theme of Principle 7 is that all personal information should be kept secure against the risk of loss, unauthorised access, interference, modification, destruction or disclosure

✓ **Principle 8: Data Subject Participation**

Principle 8 empowers individuals to access and/or request the correction or deletion of any personal information held about them that may be inaccurate, misleading or outdated.

3.5 The NBCRFLI will ensure that the compliance management process pertaining to data privacy is embedded in all the systems and processes, thus ensuring that the data privacy controls remain current and dynamic and continually promote the achievement of strategic goals and objectives.

4 **PROCESS OF COLLECTING PERSONAL INFORMATION**

- 4.1 The NBCRFLI collects Personal Information directly from Data Subjects, unless an exception is applicable (such as, for example, where the Data Subject has made the Personal Information public or the Personal Information is contained in or derived from a public record).
- 4.2 The NBCRFLI will always collect Personal Information in a fair, lawful and reasonable manner to ensure that it protects the Data Subject's privacy and will Process the Personal Information based on legitimate grounds in a manner that does not adversely affect the Data Subject in question.
- 4.3 The NBCRFLI often collects Personal Information directly from the Data Subject and/or in some cases, from Third Parties. Where the NBCRFLI obtains Personal Information from Third Parties, the NBCRFLI will ensure that it obtains the consent of the Data Subject to do so or will only Process the Personal Information without the Data Subject's consent where the NBCRFLI is permitted to do so in terms of clause 4.1 above or the applicable law.
- 4.4 An example of such Third Parties includes: (i) recruitment agencies; (ii) the Council Fraud Hotline called '*Be Heard*' – a hotline operated by the NBCRFLI in terms of which employees can report non-compliance with the NBCRFLI's Main Collective Agreement; and (iii) other companies providing services to the NBCRFLI; and (iv) where the NBCRFLI makes use of publicly available sources of information.

5 **LAWFUL PROCESSING OF PERSONAL INFORMATION**

- 5.1 Where the NBCRFLI is the Responsible Party, it will only Process a Data Subject's Personal Information (other than for Special Personal Information) where –
- 5.2 consent of the Data Subject (or a competent person, where the Data Subject is a Child) is obtained;
- 5.3 Processing is necessary to carry out the actions for conclusion of a contract to which a Data Subject is party;
- 5.4 Processing complies with an obligation imposed by law on the NBCRFLI;
- 5.5 Processing protects a legitimate interest of the Data Subject; and/or
- 5.5.1 Processing is necessary for pursuing the legitimate interests of the NBCRFLI or of a third party to whom the information is supplied.
- 5.5.2 The NBCRFLI will only Process Personal Information where one of the legal bases referred to in paragraph 5.1 above are present.
- 5.5.3 The NBCRFLI will make the manner and reason for which the Personal Information will be processed clear to the Data Subject.

5.5.3.1 Where the NBCRFLI is relying on a Data Subject's consent as the legal basis for Processing Personal Information, the Data Subject may withdraw his/her/its consent or may object to the NBCRFLI's Processing of the Personal Information at any time. However, this will not affect the lawfulness of any Processing carried out prior to the withdrawal of consent or any Processing justified by any other legal ground provided under POPIA.

5.5.3.2 If the consent is withdrawn or if there is otherwise a justified objection against the use or the Processing of such Personal Information, the NBCRFLI will ensure that the Personal Information is no longer processed.

6 SPECIAL PERSONAL INFORMATION AND PERSONAL INFORMATION OF CHILDREN

6.1 Special Personal Information is sensitive Personal Information of a Data Subject and the NBCRFLI acknowledges that it will generally not Process Special Personal Information unless –

6.1.1 Processing is carried out in accordance with the Data Subject's consent;

6.1.2 Processing is necessary for the establishment, exercise or defence of a right or obligation in law;

6.1.3 Processing is for historical, statistical or research purposes, subject to stipulated safeguards;

6.1.4 information has deliberately been made public by the Data Subject; or

6.1.5 specific authorisation applies in terms of POPIA.

6.2 The NBCRFLI acknowledges that it may not Process any Personal Information concerning a Child and will only do so where it has obtained the consent of the parent or guardian of that Child or where it is permitted to do so in accordance with applicable laws.

7 PURPOSE FOR PROCESSING PERSONAL INFORMATION

7.1 The NBCRFLI understands its obligation to make Data Subjects aware of the fact that it is Processing their Personal Information and inform them of the purpose for which the NBCRFLI Processes such Personal Information.

7.2 The NBCRFLI will only Process a Data Subject's Personal Information for a specific, lawful and clear purpose (or for specific, lawful and clear purposes) and will ensure that it makes the Data Subject aware of such purpose(s) as far as possible.

7.3 It will ensure that there is a legal basis for the Processing of any Personal Information. Further, the NBCRFLI will ensure that Processing will relate only to the purpose for and of which the Data Subject has been made aware (and where relevant, consented to) and will not Process any Personal Information for any other purpose(s).

| | |
|---------|--|
| 7.4 | The NBCRFLI will generally use Personal Information for purposes required to operate and manage its normal operations as a statutory body and these purposes include one or more of the following non-exhaustive purposes – |
| 7.5 | Generally for the purposes of fulfilling its mandate in terms of the LRA, including – |
| 7.5.1 | Disputes resolution processes; |
| 7.5.2 | Funds and wellness administration; |
| 7.5.3 | Conducting background searches/tracing or verification; |
| 7.5.4 | Confirming, verifying and updating stakeholder details; |
| 7.5.5 | For the detection and prevention of fraud, crime, corruption, money laundering or other malpractice; |
| 7.5.6 | Conducting industry satisfaction research; |
| 7.5.7 | Conducting membership verification for Parties to the NBCRFLI and for submission to Department of Employment and Labour |
| 7.5.8 | To assist Parties to NBCRFLI with their retention and recruitment strategies for sustainability of NBCRFLI |
| 7.5.9 | Promotion of NBCRFLI's benefits and activities to stakeholders |
| 7.5.9.1 | providing our services to stakeholders to carry out the services requested and to maintain and constantly improve the relationship; |
| 7.5.9.2 | in connection with and to comply with legal and regulatory requirements or when it is otherwise allowed by law; and |
| 7.5.9.3 | to comply and enforce the NBCRFLI's Main Collective Agreement in line with the LRA, and Commission for Conciliation, Mediation and Arbitration (CCMA) accreditation; |
| 7.5.10 | For purposes of on boarding suppliers or service providers as approved suppliers/service providers of the NBCRFLI. For this purpose, the NBCRFLI will also Process a service provider's/supplier's Personal Information for purposes of performing credit checks, and this may include engaging third party credit vetting agencies; |
| 7.5.11 | for purposes of managing the NBCRFLI's relationships with its suppliers; |
| 7.5.12 | In connection with the execution of payment processing functions, including payment of the NBCRFLI's suppliers'/service providers' invoices; |
| 7.5.13 | For purposes of monitoring the use of the NBCRFLI's electronic systems and online platforms and/or general Data Subjects. The NBCRFLI will, from time to time, engage third party service |

providers (who will Process the Data Subject's Personal Information on behalf of the NBCRFLI) to facilitate this;

7.5.14 for purposes of preventing, discovering and investigating violations of this Policy, the applicable law and other the NBCRFLI policies;

7.5.15 in connection with legal proceedings;

7.5.16 for purposes of performing general company secretariat functions;

7.5.17 to manage the NBCRFLI's corporate social initiatives;

7.5.18 for employment-related purposes such as recruiting staff, administering payroll, background checks, etc.;

7.5.19 in connection with internal audit purposes (i.e. ensuring that the appropriate internal controls are in place in order to mitigate the relevant risks, as well as to carry out any investigations where this is required);

7.5.20 in connection with external audit and keeping purposes purposes. For this purpose, the NBCRFLI may engage external service providers and, in so doing, may share Personal Information of the Data Subjects with third parties;

7.5.21 for such other purposes to which the Data Subject may consent from time to time; and

7.5.22 For such other purposes as authorised in terms of applicable law.

8 KEEPING PERSONAL INFORMATION ACCURATE

8.1 The NBCRFLI will take reasonable steps to ensure that all Personal Information is kept as accurate, complete and up to date as reasonably possible depending on the purpose for which Personal Information is collected or further processed.

8.2 The NBCRFLI may not always expressly request the Data Subject to verify and update his/her/its Personal Information unless this process is specifically necessary.

8.3 The NBCRFLI, however, expects that the Data Subject will notify the NBCRFLI from time to time in writing of any updates required in respect of his/her/its Personal Information.

9 STORAGE AND PROCESSING OF PERSONAL INFORMATION BY THE NBCRFLI AND THIRD PARTY SERVICE PROVIDERS

- 9.1 The NBCRFLI may store your Personal Information in hardcopy format and/or in electronic format using the NBCRFLI's own secure on-site servers or other internally hosted technology. Your Personal Information may also be stored by Third Parties, via cloud services or other technology, with whom the NBCRFLI has contracted with, to support the NBCRFLI's operations as a statutory body.
- 9.2 The NBCRFLI's Third Party service providers, including data storage and processing providers, may from time to time also have access to a Data Subject's Personal Information in connection with purposes for which the Personal Information was initially collected to be processed.
- 9.3 The NBCRFLI will ensure that such Third Party service providers will process the Personal Information in accordance with the provisions of this Policy, all other relevant internal policies and procedures and POPIA.
- 9.4 These Third Parties do not use or have access to your Personal Information other than for purposes specified by us, and the NBCRFLI requires such parties to employ at least the same level of security that the NBCRFLI uses to protect your personal data.
- 9.5 Your Personal Information may be processed in South Africa or another country where the Third Party service providers maintain servers and facilities and the NBCRFLI will take steps, including by way of contracts, to ensure that it continues to be protected, regardless of its location, in a manner consistent with the standards of protection required under applicable law.

10 RETENTION OF PERSONAL INFORMATION

- 10.1 The NBCRFLI may keep records of the Personal Information it has collected, correspondence, or comments it has collected in an electronic or hardcopy file format.
- 10.2 In terms of POPIA, the NBCRFLI may not retain Personal Information for a period longer than is necessary to achieve the purpose for which it was collected or processed and is required to delete, destroy (in such a way that it cannot be reconstructed) or de-identify the information as soon as is reasonably practicable once the purpose has been achieved. This prohibition will not apply in the following circumstances –
- 10.2.1 where the retention of the record is required or authorised by law;
- 10.2.2 The NBCRFLI requires the record to fulfil its lawful functions or activities;
- 10.2.3 retention of the record is required by a contract between the parties thereto;
- 10.2.4 the Data Subject (or competent person, where the Data Subject is a Child) has consented to such longer retention; or

10.2.5 The record is retained for historical, research or statistical purposes provided safeguards are put in place to prevent use for any other purpose.

Accordingly, the NBCRFLI will, subject to the exceptions noted in this Policy, retain Personal Information for as long as necessary to fulfil the purposes for which that Personal Information was collected and/or as permitted or required by applicable law.

10.3 Where the NBCRFLI retains Personal Information for longer periods for statistical, historical or research purposes, the NBCRFLI will ensure that appropriate safeguards have been put in place to ensure that all recorded Personal Information will continue to be Processed in accordance with this Policy and applicable laws.

10.4 Once the purpose for which the Personal Information was initially collected and processed no longer applies or becomes obsolete, the NBCRFLI will ensure that the Personal Information is deleted, destroyed or de-identified sufficiently so that a person cannot re-identify such Personal Information. In instances where we de-identify your Personal Information, the NBCRFLI may use such de-identified information indefinitely.

11 **FAILURE TO PROVIDE PERSONAL INFORMATION**

11.1 Should the NBCRFLI need to collect Personal Information by law or otherwise and you fail to provide the Personal Information when requested, we may be unable to perform our statutory duty in terms of the applicable law.

12 **SAFE-KEEPING OF PERSONAL INFORMATION**

12.1 The NBCRFLI shall preserve the security of Personal Information and, in particular, prevent its alteration, loss and damage, or access by non-authorised third parties.

12.2 The NBCRFLI will ensure the security and integrity of Personal Information in its possession or under its control with appropriate, reasonable technical and organisational measures to prevent loss, unlawful access and unauthorised destruction of Personal Information.

12.3 The NBCRFLI has implemented physical, organisational, contractual and technological security measures (having regard to generally accepted information security practices or industry specific requirements or professional rules) to keep all Personal Information secure, including measures protecting any Personal Information from loss or theft, and unauthorised access, disclosure, copying, use or modification. Further, the NBCRFLI maintains and regularly verifies that the security measures are effective and regularly updates same in response to new risks.

13 BREACHES OF PERSONAL INFORMATION

- 13.1 A Data Breach refers to any incident in terms of which reasonable grounds exist to believe that the Personal Information of a Data Subject has been accessed or acquired by any unauthorised person.
- 13.2 A Data Breach can happen for many reasons, which include: (a) loss or theft of data or equipment on which Personal Information is stored; (b) inappropriate access controls allowing unauthorised use; (c) equipment failure; (d) human error; (e) unforeseen circumstances, such as a fire or flood; (f) deliberate attacks on systems, such as hacking, viruses or phishing scams; and/or (g) alteration of Personal Information without permission and loss of availability of Personal Information.
- 13.3 The NBCRFLI will address any Data Breach in accordance with the terms of POPIA.
- 13.4 The NBCRFLI will notify the Information Regulator and the affected Data Subject (unless the applicable law requires that we delay notification to the Data Subject) in writing in the event of a Data Breach (or a reasonable belief of a Data Breach) in respect of that Data Subject's Personal Information.
- 13.5 The NBCRFLI will provide such notification as soon as reasonably possible after it has become aware of any Data Breach in respect of such Data Subject's Personal Information.
- 13.6 Where the NBCRFLI acts as an 'Operator' for purposes of POPIA and should any Data Breach affect the data of Data Subjects whose information the NBCRFLI Processes as an Operator, the NBCRFLI shall (in terms of POPIA) notify the relevant Responsible Party immediately where there are reasonable grounds to believe that the Personal Information of relevant Data Subjects has been accessed or acquired by any unauthorised person.

14 PROVISION OF PERSONAL INFORMATION TO THIRD PARTY SERVICE PROVIDERS

- 14.1 The NBCRFLI may disclose Personal Information to Third Parties and will enter into written agreements with such Third Parties to ensure that they Process any Personal Information in accordance with the provisions of this Policy, and POPIA.
- 14.2 The NBCRFLI notes that such Third Parties may assist the NBCRFLI with the purposes listed in paragraph 7.3 above – for example, service providers may be used, *inter alia*,
- 14.2.1 for data storage;
- 14.2.2 to assist the NBCRFLI with auditing processes (external auditors);
- 14.2.3 To assist NBCRFLI to provide integrated health services to industry members and for trucking wellness purposes;
- 14.2.4 for providing outsourced services to the NBCRFLI, including in respect of its (i) legal, (ii) data storage requirements and (iii) upskilling of its Employees; and/or

- 14.2.5 To notify the Data Subjects of any pertinent information concerning the NBCRFLI.
- 14.3 The NBCRFLI will disclose Personal Information with the consent of the Data Subject or if the NBCRFLI is permitted to do so without such consent in accordance with applicable laws.
- 14.4 Further, the NBCRFLI may also send Personal Information to a foreign jurisdiction outside of the Republic of South Africa, including for Processing and storage by Third Parties.
- 14.5 When Personal Information is transferred to a jurisdiction outside of the Republic of South Africa including to any cloud, data centre or server located outside of the South Africa, the NBCRFLI will obtain the necessary consent to transfer the Personal Information to such foreign jurisdiction or may transfer the Personal Information where the NBCRFLI is permitted to do so in accordance with the provisions applicable to cross-border flows of Personal Information under POPIA.
- 14.6 The Data Subject should also take note that the Processing of Personal Information in a foreign jurisdiction may be subject to the laws of the country in which the Personal Information is held, and may be subject to disclosure to the governments, courts of law, enforcement or regulatory agencies of such other country, pursuant to the laws of such country.

15 ACCESS TO PERSONAL INFORMATION

- 15.1 POPIA read with the relevant provisions of the Promotion of Access to Information Act, No. 2 of 2000 ("**PAIA**") confers certain access rights on Data Subjects. The NBCRFLI's PAIA Manual can be found (nbcrfli.org.za) ("**PAIA Manual**"). These rights include -
- 15.2 ***a right of access***: a Data Subject having provided adequate proof of identity has the right to: (i) request a Responsible Party to confirm whether any Personal Information is held about the Data Subject; and/or (ii) request from a Responsible Party a description of the Personal Information held by the Responsible Party including information about Third Parties who have or have had access to the Personal Information. A Data Subject may request:
- 15.2.1.1 the NBCRFLI to confirm, free of charge, whether it holds any Personal Information about him/her/it; and
- 15.2.1.2 To obtain from the NBCRFLI the record or description of Personal Information concerning him/her/it and any information regarding the recipients or categories of recipients who have or had access to the Personal Information. Such record or description is to be provided: (a) within a reasonable time; and (b) in a reasonable manner and format and in a form that is generally understandable.
- 15.2.2 ***a right to request correction or deletion***: a Data Subject may also request the NBCRFLI to -

- 15.2.2.1 correct or delete Personal Information about the Data Subject in its possession or under its control that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully; or
- 15.2.2.2 Destroy or delete a record of Personal Information about the Data Subject that the NBCRFLI is no longer authorised to retain records in terms of POPIA's retention and restriction of records provisions.
- On receipt of such a request, the NBCRFLI is required to, as soon as is reasonably practicable –
- 15.2.2.2.1 correct the information;
- 15.2.2.2.2 delete or destroy the information;
- 15.2.2.2.3 provide the Data Subject with evidence in support of the information; or
- 15.2.2.2.4 where the Data Subject and Responsible Party cannot reach agreement on the request and if the Data Subject requests this, the NBCRFLI will take reasonable steps to attach to the information an indication that correction has been requested but has not been made;
- 15.2.3 **a right to withdraw consent and to object to processing:** a Data Subject that has previously consented to the Processing of his/her/its Personal Information has the right to withdraw such consent and may do so by providing the NBCRFLI with notice to such effect at the address set out in paragraph 19. Further, a Data Subject may object, on reasonable grounds, to the Processing of Personal Information relating to him/her/it.
- 15.3 Accordingly, the NBCRFLI may request the Data Subject to provide sufficient identification to permit access to, or provide information regarding the existence, use or disclosure of the Data Subject's Personal Information. Any such identifying information shall only be used for the purpose of facilitating access to or information regarding the Personal Information.
- 15.4 The Data Subject can request in writing to review any Personal Information about the Data Subject that the NBCRFLI holds including Personal Information that the NBCRFLI has collected, utilised or disclosed.
- 15.5 The NBCRFLI shall respond to these requests in accordance with POPIA and PAIA and provide the Data Subject with any such Personal Information to the extent required by law and any of the NBCRFLI's policies and procedures which apply in terms of the PAIA.
- 15.6 The Data Subject can challenge the accuracy or completeness of his/her/its Personal Information in the NBCRFLI's records at any time in accordance with the process set out in the PAIA Manual for accessing information.

15.7 If a Data Subject successfully demonstrates that their Personal Information in the NBCRFLI's records is inaccurate or incomplete, the NBCRFLI will ensure that such Personal Information is amended or deleted as required (including by any Third Parties).

16 TIME PERIODS

16.1 The NBCRFLI will respond to each written request of a Data Subject not later than 30 (thirty) days after receipt of such requests. Under certain circumstances, the NBCRFLI may, however, extend the original period of 30 days once for a further period of not more than 30 (thirty) days.

16.2 A Data Subject has the right to make a complaint to the NBCRFLI in respect of this time limit by contacting the NBCRFLI using the contact details provided in paragraph 19 below.

17 COSTS TO ACCESS TO PERSONAL INFORMATION

The prescribed fees to be paid for copies of the Data Subject's Personal Information are listed in the PAIA Manual.

18 CHANGES TO THIS POLICY

18.1 The NBCRFLI reserves the right to make amendments to this Policy from time to time and will use reasonable efforts to notify Data Subjects of such amendments.

18.2 The current version of this Policy will govern the respective rights and obligations between you and the NBCRFLI each time that you access and use our site.

18.3 FREQUENCY OF REVIEW OF THIS POLICY

This policy shall be reviewed every 2 years, or prior to the review date if deemed necessary by the custodian, the Senior Management Committee, the National Secretary or by Council, Exco and Council's Committees.

19 CONTACTING US

19.1 All comments, questions, concerns or complaints regarding your Personal Information or this Policy, should be forwarded to us as follows —

Tel. **[0117037000 / 0114031555]**

Physical Address: The National Secretary or General Manager: Risk and Compliance, the NBCRFLI, De Korte Street, Johannesburg, 2000

Postal Address: The National Secretary or General Manager: Risk and Compliance, the NBCRFLI, De Korte Street, Johannesburg, 2000

19.2 If a Data Subject is unsatisfied with the manner in which the NBCRFLI addresses any complaint with regard to the NBCRFLI's Processing of Personal Information, the Data Subject can contact the office of the Regulator, the details of which are set out below –

Website: <http://justice.gov.za/inforeg/>

Tel: 012 406 4818

Fax: 086 500 3351

Email: inforeg@justice.gov.za

Version Control:

| Revision No | Date | Created by | Comments | Approved | Signature |
|-------------|------------|------------|--------------------------------------|----------|-----------|
| 01 | 04/12/2022 | None | Newly drafted to replace POPI Policy | G Maluta | |
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