



ITOO SPECIAL RISKS (PTY) LTD (ITOO)

DATA SUBJECT ENQUIRY PROTOCOLS

1 March 2022

The Protection of Personal Information Act (POPIA) places an important responsibility on parties who collect, store, use and destroy personal information ("responsible parties") and also provides rights and remedies to persons whose personal information is being processed ("data subjects").

We need to collect personal information to effectively carry out our everyday business functions and services and, in some circumstances, to comply with the requirements of the law and/or regulations.

For more information on our processing activities, please refer to our Privacy Statement which is available on our website: <https://itoo.co.za/> or upon request at our office.

As a responsible party, we are obligated under POPIA to abide by the principles which ensure that personal information shall be:

- a) processed lawfully, fairly and in a transparent manner in relation to the data subject.
- b) collected for specified and legitimate purposes and not be further processed in a manner that is incompatible with those purposes.
- c) adequate, relevant, and limited to what is necessary in relation to the purposes for which the information is processed.
- d) accurate and, where necessary, kept up to date.
- e) kept for no longer than is necessary for the purposes for which the personal data was processed, or for the agreed upon retention period.
- f) processed in a manner that ensures appropriate security of the personal information, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

As a data subject, you may request access to your personal information that we hold. You may also request that your personal information be corrected or deleted in circumstances where such information has become outdated, is not accurate, is incomplete, misleading, or excessive, if it has not been obtained by lawful means, or if we are no longer entitled to retain the information.

We are obliged, if so requested, to provide confirmation to you on whether or not we hold your personal information, to provide a description of the personal information in question and to confirm the identity of all third parties or the categories of third parties who have received your personal information.

We must comply with any such request from you:

- within a reasonable time period, and



- in a reasonable manner and format, and in a form that is generally understandable.

In accordance with POPIA, we are only obligated to provide access to personal information belonging to you, directly to you, unless you have consented otherwise, and in such a case we will require satisfactory proof of capacity before considering the access request.

Should we refuse to provide personal information to you, this must be based on the same grounds for refusal as allowed under the Promotion of Access to Information Act (PAIA). Our PAIA Manual is available on our website at <https://itoo.co.za/> or upon request at our office.

ACCESS REQUEST AND OBJECTION PROCEDURE

This procedure provides the process for individuals to follow when making a request or a complaint to iTOO, along with the protocols we will follow when such a request is received.

The right of access

You have the right to obtain from us, confirmation as to whether or not your personal information is being processed. We are committed to upholding the rights of individuals and have dedicated processes in place for providing access to personal information.

Where requested, we will provide the following information:

- the categories or type of personal data concerned.
- the purpose/s of the processing.
- the recipient/s or categories of recipient/s to whom any personal data has been or will be disclosed.
- If the data has been transferred to a third country or international organisation(s)

(and if applicable, the appropriate safeguards used)

- the envisaged period for which the personal data will be stored *(or the criteria used to determine that period)*
- where the personal data was not collected directly from you, any available information as to its source.

How to make a Data Subject Access Request

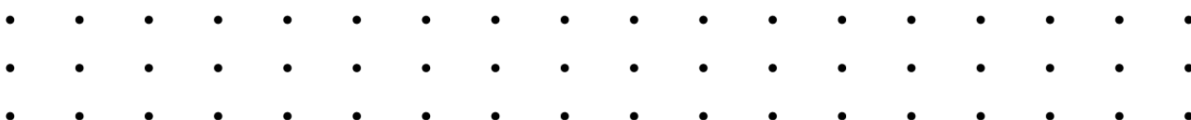
You need to make this request in writing using the form provided in *Annexure A*.

Where a request is received by electronic means, we will provide the requested information in a commonly used electronic form *(unless otherwise requested by you)*.

What we do when we receive a Data Subject Access Request

Identity Verification

Data subject access requests are passed to our **Information officer** as soon as received and a record of the request is noted.





The person assigned to the request will use all reasonable measures to verify your identity, as the individual to whom the personal information relates. Where we are unable to do so, we may contact you for further information, or ask you to provide evidence of your identity prior to actioning any request. This is to protect your information and rights.

If a third party, relative or representative is requesting the information on your behalf, we will verify their authority to act for you and again, may contact you to confirm their identity and gain your authorisation prior to actioning any request.

Information Gathering

If you have provided enough information in your request to collate the personal information held about you, we will gather all forms (*hard-copy, electronic, etc*) and ensure that the information required is provided in an acceptable format. If we do not have enough information to locate your records, we may contact you for further details. This will be done as soon as possible and within the timeframes set out below.

Information Provision

Once we have collated all the personal information held about you, we will send this to you in writing. The information will be in a concise, transparent, and easily accessible format, using clear and plain language.

Fees and Timeframes

Whilst we will confirm, free of charge, whether or not we hold personal information about you, should we require, depending on the nature of your request, that you pay us a fee in order to enable us to respond to your request and for the services provided to you, we will:

- provide you with a written estimate of the fee before providing the services; and
- we may require you to pay a deposit for all or part of the fee.

Where the request is made by electronic means, we will provide the information in a commonly used electronic format, unless an alternative format is requested.

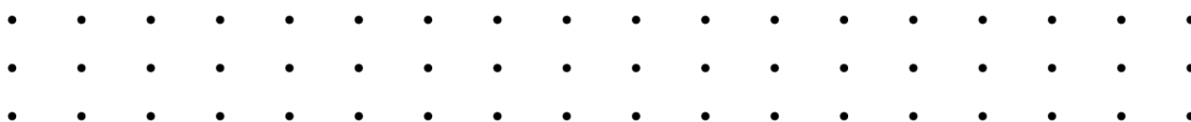
We will always aim to provide the requested information at our earliest convenience, but at a maximum, 30 days from the date the request is received. However, where the retrieval or provision of information is particularly complex or is subject to a valid delay, the period may be extended by two further months. If this is the case, we will write to you within 30 days and keep you informed of the delay and provide the reasons.

Your other rights

You have the right to request the correction of any inaccurate data held by us. Where we are notified of inaccurate data, and agree that the data is incorrect, we will amend the details as directed by you and make a note on our system of the change and reasons.

We will rectify the errors within 30 days and inform you in writing of the correction and where applicable, provide the details of any third-party to whom the data has been disclosed. Where applicable, we will inform all third parties to whom your personal information was disclosed, of the corrections or updates needed.

In certain circumstances, you may also have the right to request from us, the erasure of personal data or to restrict the processing of personal data where it concerns your personal information, as well as the right to object to such processing.





If for any reason, we are unable to act in response to a request for rectification and/or data completion, we will always provide a written explanation to you and inform you of your right to complain to the Information Regulator.

You can use the form and contact details in Annexure A to make such requests.

Automated Decision-making

We do not employ any automated decision-making.

Exemptions and Refusals

POPIA contains certain exemptions from the provision of personal information. If one or more of these exemptions applies to your request or where we do not act upon the request, we shall inform you at the earliest convenience, or at the latest, within 30 days of receipt of the request.

Where possible, we will provide you with the reasons for not acting and any possibility of lodging a complaint.

Lodging a complaint

Any complaints or concerns with regards to the way in which we process personal information or the way in which we handle your request or objection may be directed to our Information officer:

Information Officer	Mr Justin Naylor
Business Address:	Ground Floor, Florence House 22 Oxford Road Park Town, Johannesburg 2193
Postal Address:	P O Box 87419 Houghton, 2041
Email Address:	justinn@itoo.co.za
Telephone:	0861 767 778

Should we not resolve your complaint or if you remain dissatisfied with our actions, you have the right to lodge a complaint with the Information Regulator. The contact details of the Information Regulator are:

Postal Address:	P.O Box 31533, Braamfontein, Johannesburg, 2017
Physical Address:	JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
E-Mail Address:	complaints.IR@justice.gov.za
Telephone:	010 023 5200
Website:	https://www.inforegulator.org.za/



Annexure A

FORM: REQUESTS IN RELATION TO YOUR RIGHTS IN TERMS OF THE PROTECTION OF PERSONAL INFORMATION ACT NO 4 OF 2013 (POPIA)

Particulars of the Responsible Party from whom you are requesting access:

Registered Company Name: iTOO Special Risks (Pty) Ltd
Business Address: Ground Floor, Florence House
22 Oxford Road
Park Town, Johannesburg
2193

Postal Address: P O Box 87419
Houghton,
2041

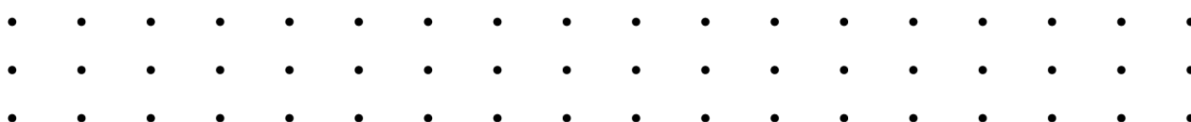
Telephone: 0861 767 778
Email Address: info@itoo.co.za

Please note:

- All Personal Information collected in this form is for the purposes of assessing and giving effect to your requests.
- Affidavits or other documentary evidence as applicable in support of your requests may be attached.
- If the space provided for in this form is inadequate, submit information as an Annexure to this form and sign each page.
- All completed requests with supporting documentation must be submitted to info@itoo.co.za
-

Mark the appropriate request box with an "x" and only complete the relevant sections.

	Access request for details of the personal information held by iTOO about you	Complete sections A, B, C, G, H
	Objection to the processing of your personal information.	Complete sections A, B, D, G, H
	Correct or delete personal information about the data subject in the possession or under the control iTOO that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, or obtained unlawfully.	Complete sections A, B, E, G, H
	Destroy or delete a record of personal information about the data subject that iTOO is no longer authorised to retain.	Complete sections A, B, F, G, H





A. DETAILS OF THE DATA SUBJECT (to whom the request relates)

*Proof of identification must be attached, for example, copy of ID, Passport.
Certified copies must not be older than 3 months.*

Full Names and Surname/ Registered Name if data subject is a juristic person	
ID/Passport number or Registration number if data subject is a juristic person	
Residential, postal, or business address	
Contact number	
Email address	

B. PARTICULARS OF PERSON MAKING REQUEST ON BEHALF OF THE DATA SUBJECT

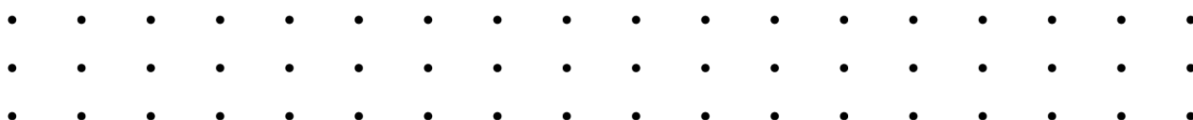
*This section must be completed if the request is made on behalf of a data subject or juristic entity.
Proof of capacity must be attached, for example power of attorney, affidavit, authorisation.*

Full Names and Surname/Registered Name if requester is a juristic person	
ID/Passport number or Registration number if requester is a juristic person	
Residential, postal, or business address	
Contact number	
Email address	

C. INFORMATION REQUESTED

*Please provide as much detail as possible about the personal information you want, to help us to deal with
your request quickly and efficiently.*

I would like you to:	
Confirm if iTOO processes my personal information	
Provide a copy of my personal data held	



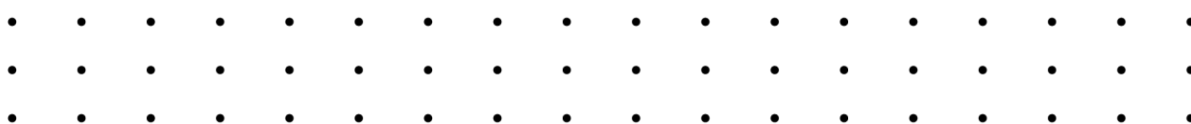


Provide an explanation and/or documentation and material relating to the following:		
	The reason / purposes for processing my personal information	
	The categories or type of information being processed	
	The recipients, or categories of recipients of my information	
	The planned retention period of my information, or details of how the retention period is determined	
	Where my personal information is transferred across the borders of South Africa, the security safeguards relating to such transfer	

D. REASONS FOR OBJECTING TO THE PROCESSING OF YOUR PERSONAL INFORMATION	
Provide detailed reasons for objecting to the processing of your personal information	
If known, please provide details of the record to which the objection relates	

E. PERSONAL INFORMATION RECORDS TO BE CORRECTED OR DELETED <i>This section must be completed if the request is for the correction or deletion of personal information about the data subject in the possession or under the control of iTOO, and the information is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, or obtained unlawfully.</i>	
Provide detailed reasons for the correction or deletion	
If known, please provide details of the record to which the correction or deletion relates	

F. PERSONAL INFORMATION RECORDS TO BE DELETED OR DESTROYED <i>This section must be completed if the request is for the destruction or deletion of a record of personal information about the data subject that iTOO is no longer authorised to retain.</i>	
Provide detailed reasons for the destruction or deletion	



If known, please provide details of the record to which the destruction or deletion relates	
---	--

G. MEANS OF CONTACT <i>Please complete this section to inform us on how you would like to be contacted by marking the appropriate box with an "x" and providing the relevant contact details.</i> <i>We will use your preferred contact method to notify you if your request has been granted or denied and the reasons for such denial where applicable.</i>					
Telephone number		Email		Physical address	
Relevant contact details					

DECLARATION AND SIGNATURE

I, _____ (full name), confirm that the information provided above is correct and that I am the person duly authorised to act on behalf of the data subject, as noted within this form.

I acknowledge that iTOO is obligated to confirm the identity of the data subject and where applicable, the person duly authorised to act on behalf of the data subject. It may be necessary for iTOO to contact me to obtain further information in order to action my request.

I understand that my request will not be valid until all the required information as requested by iTOO has been received by iTOO.

I am aware that whilst iTOO provides the information requested without a fee, should I make unfounded, repeated, or excessive requests, iTOO may charge a reasonable administrative fee in order to process my request.

Signed at on this day of 20

Signature:

