



# PROTECTION OF PERSONAL INFORMATION ACT (POPIA)

## LICENTIA FRANCHISE SA (PTY) LTD

Company Registration Number:  
**2015/172514/07**

### POPIA POLICY

PREPARED UNDER THE

PROTECTION OF PERSONAL INFORMATION ACT  
(ACT NO 4 OF 2013)

#### Licentia Franchise SA (Pty) Ltd

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## FOREWORD

Licentia Franchise SA (Pty) Ltd and all affiliated Franchisees, Agents, and Employees would like to welcome you.

We, at Licentia Franchise SA (Pty) Ltd (“Licentia or “us” or “we” and or any affiliated Companies, Groups, or Franchises) have developed this policy for you to understand how we collect, communicate, and use any personal information that you submit to us.

At Licentia Franchise SA, your privacy is important to us, and we value the trust that you place in us by sharing your personal information. It is our policy to respect your privacy regarding any information we may collect from you across our website and when you interact with us.

This privacy policy aims to inform you about how we collect and process any information/data that we gather from you or information/data you provide to us. It covers information that could identify you (“personal information”) and information that does not. It covers information that could identify you (“personal information”) and information that does not.

## 1. POLICY STATEMENT

- 1.1. Licentia Franchise SA (Pty) Ltd processes the personal information of its clients and other data subjects from time to time. As such, it is obliged to comply with the Protection of Personal Information Act No. 4 of 2013 (“POPI”) as well as the Promotion of Access to Information Act No. 2 of 2000 (“PAIA”).
- 1.2. In line with this, Licentia Franchise SA (Pty) Ltd is committed to protecting its client's and other data subjects' privacy and ensuring that their personal information is used appropriately, transparently, securely, and in accordance with applicable laws.
- 1.3. This Policy sets out how Licentia Franchise SA (Pty) Ltd deals with such personal information and clarifies the general purpose for which the information is used, as well as how data subjects can participate in this process in relation to their personal information.
- 1.4. In addition to this policy, the Company has also developed a manual and made it available as prescribed under the PAIA Manual. Where parties/requesters submit requests for information disclosure in terms of this manual, internal measures have been developed together with adequate systems to process requests for information or access thereto.
- 1.5. Licentia Franchise SA (Pty) shall;

✓ Comply with both the law and good practice;

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- ✓ Respect individuals' rights;
- ✓ Be open and honest with individuals whose data is held;
- ✓ Provide training and support for staff who handle personal data, so that they can act confidently and consistently;

Licentia Franchise SA (Pty) recognizes that its priority under the POPI Act is to avoid causing harm to individuals.

In the main this means:

- ✓ Keeping information securely in the right hands;
- ✓ Holding good quality information.

The Act also aims to ensure that the legitimate concerns of individuals about how their data may be used are considered. In addition to being open and transparent, Licentia Franchise SA (Pty) shall seek to give individuals as much choice as possible and reasonable control over what data is held and how it is used.

## 2. DEFINITIONS

- 2.1. "Biometric information" means:  
Physical, physiological, or behavioral identification, including fingerprinting, amongst others.
- 2.2. "Processing" means:
- 2.2.1 The collection, receipt, recording organization, collation, storage, updating, modification, retrieval, alteration, consultation, or use.
- 2.2.2 Dissemination utilizing transmission, distribution, or making available in any form.
- 2.2.3 Merging, linking, erasure, or destruction of information.
- 2.3. Data subject refers to any person who can be identified, directly or indirectly, via an identifier such as a name, an ID number, location data, or via factors specific to the person's physical, physiological, genetic, mental, economic, cultural, or social identity.
- 2.4. "PAIA" means the Promotion of Access to Information Act No. 2 of 2000.
- 2.5. "POPI" means the Protection of Personal Information Act No 4 of 2013.
- 2.6. "Regulator" means the Information Regulator established in terms of the POPI Act.

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### 3. INTRODUCTION

#### 3.1. Purpose of the Policy

Definition of personal information:

In terms of the Act, personal information is data that can be used to identify a person. It is defined as “information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person.”

”The scope of the policy is limited to the records held by the Company.

The purpose of this policy is to enable Licentia Franchise SA (Pty) Ltd to:

- ✓ Comply with the law in respect of the data it holds about individuals;
- ✓ Follow good practice;
- ✓ Protect Licentia Franchise SA (Pty), franchisees, agents, staff, clients, and other entities and individuals;
- ✓ Protect the Company from the consequences of a breach of its responsibilities.

#### 3.2. Personal Information

This policy applies to information relating to identifiable individuals, in terms of the Protection of Personal Information Act, 2013 (hereinafter POPI Act).

#### 3.3. Key Risks

Licentia Franchise SA (Pty) has identified the following potential key risks, which this policy is designed to address:

- ✓ Breach of confidentiality, (information being given out inappropriately).
- ✓ Insufficient clarity about the range of uses for which data shall be used and stored - leading to Data Subjects being insufficiently informed.
- ✓ Failure to offer choice about data use when appropriate;
- ✓ Breach of security by allowing unauthorized access;
- ✓ Harm to individuals if personal data is not up to date.

### 4. INFORMATION OFFICER RESPONSIBILITIES

This policy applies to information relating to identifiable individuals, in terms of the Protection of Personal Information Act, 2013 (hereinafter POPI Act).

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#### 4.1. Scope

This scope is defined by the provisions of the POPI Act, Condition 1, and Chapter 5, Part B.

#### 4.2. Information Officer Responsibilities

##### Director (Information Officer) of Licentia Franchise SA (Pty) Ltd;

Director (Information Officer):	Jean Oliver
Postal Address:	Suite MW 465 Middelburg Mpumalanga
Physical Address:	34 Louws Creek Aerorand Middelburg Mpumalanga
Cell Number:	082 376 7338
E-Mail Address:	<a href="mailto:director@licentia.co.za">director@licentia.co.za</a>

##### Manager (Deputy Information Officer) of Licentia Franchise SA (Pty) Ltd;

Director (Information Officer):	Jean-Marie Devoldere
Postal Address:	Suite MW 465 Middelburg Mpumalanga
Physical Address:	34 Louws Creek Aerorand Middelburg Mpumalanga

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### Responsibilities

The Information Officer has the following responsibilities:

- ✓ Developing, implementing, monitoring, maintaining, and publishing, a POPI Policy that addresses all relevant provisions of the POPI Act;
- ✓ The undertaking of personal information impact assessment to ensure that adequate measures and standards exist to comply with the conditions for the lawful processing of personal information;
- ✓ The development, monitoring, and maintenance of a manual, as well as the making available thereof, as prescribed in section 51 of the Promotion of Access to Information Act, 2000 (Act No. 2 of 2000);
- ✓ Reviewing the POPI Act and periodic updates as published;
- ✓ Consent to process the client's information is obtained from the client (or a person who has been given authorization from the client to provide the client's personal information).
- ✓ Ensuring that POPI Act induction training takes place for all franchisees, agents, staff, and individuals;
- ✓ Ensuring that periodic communication awareness on POPI Act responsibilities take place and are adhered to;
- ✓ Ensuring that Privacy Notices for internal and external purposes are developed and published;
- ✓ Handling data subject access requests;
- ✓ Approving unusual or controversial disclosures of personal data;
- ✓ Approving contracts with Data Operators;
- ✓ Implementing appropriate policies and controls for ensuring the Information Quality of Personal Information;
- ✓ Ensuring that appropriate Security Safeguards are in line with the POPI Act for Personal Information;
- ✓ Managing the relationship with the Regulator as foreseen in the POPI Act.

## **5. PROCESSING LIMITATION**

### **5.1. Scope**

The scope of this aspect of the policy is defined by the provisions of the POPI Act, Condition 2.

### **5.2. Processing Limitation**

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Licentia Franchise SA (Pty) Ltd undertakes to comply with the POPI Act, Conditions 2 in terms of processing limitation, sections 9 to 12, subject to the following stipulation (Forms of Consent).

### 5.3. **Forms of Consent**

Licentia Franchise SA (Pty) Ltd undertakes to gain written consent where appropriate.

### 5.4. **Nature of Personal Information**

Licentia Franchise SA (Pty) Ltd management has used the POPI-Personal Information Diagnostic tool to identify all instances of Personal Information in the organization.

5.4.1 Licentia Franchise SA (Pty) Ltd collects and processes various information on its clients. The information collected is based on need and it shall be processed for that need/purpose only.

Whenever possible, Licentia Franchise SA (Pty) Ltd shall inform the relevant party of the information required (Requirement List for Information mandatory to Licentia's Mandate and Services) and which information is deemed optional.

5.4.2 The client shall be informed of the consequence/s of failing to provide such personal information and any prejudice which may be incurred due to non-disclosure.

For example, Licentia Franchise SA (Pty) Ltd may not be able to assist a client without certain information relating to that individual or the organization in a position to render services to a client in the absence of certain information which is required.

5.4.3 Licentia Franchise SA (Pty) Ltd shall process information in a manner that is lawful and reasonable (i.e., shall not infringe the privacy of the individual or the company).

5.4.4 Where consent is required for the processing of information, such consent shall be obtained.

5.4.5 Information shall be processed under the following circumstances:

- ✓ When carrying out actions for the conclusion or performance of a contract, mandate, and or instructions received.

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- ✓ When complying with an obligation imposed by law on Licentia Franchise SA, and or the Client.
- ✓ For the protection of a legitimate interest of the data subject.
- ✓ Where necessary, for pursuing the legitimate interests of the Company, Individual, or of an authorized third party to whom the information is supplied for the services rendered.

5.4.6 Examples of the personal information Licentia Franchise SA (Pty) Ltd collects include, but are not limited to:

- ✓ Any Legal Entity Information registered to the Individual; Trust, Non-Profitable Organization, Company, Close Corporation. Including the Entity Registration Number.
- ✓ TAX and or VAT Number.
- ✓ Contact information, including but not limited to Cell, Telephone, E-Mail, Postal Address, and Physical Address.
- ✓ Any Identifying Number, and Proof of Residence.
- ✓ Symbol, Location Information, Online Identifier, or another Assignment to the Client.
- ✓ All relevant lease Agreements, Contracts, Letters, and Resolutions.
- ✓ The Biometric Information of the Client or Data Subject.

5.4.7 Disclosure of personal information

- ✓ Licentia Franchise SA (Pty) Ltd may share the client's personal information with authorized third parties as well as obtain information from such third parties for reasons set out in Clause 5 above.
- ✓ Licentia Franchise SA (Pty) Ltd may also disclose client's information where there is a duty or a right to disclose in terms of applicable legislation, the law or where it may be necessary to protect the rights of the organization or it is in the interests of the data subject.

**5.5. Disclosure Of Information To Third Parties**

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5.5.1 Licentia Franchise SA (Pty) Ltd Site/Webpages shall disclose personal information when required by law or in the good-faith belief that such action is necessary to:

- ✓ Conform to the edicts of the law or comply with a legal process served on Licentia Franchise SA (Pty) Ltd;
- ✓ Protect and defend the rights or property of Licentia Franchise SA (Pty) Ltd or visitors to Licentia Franchise SA (Pty) Ltd webpages;
- ✓ Identify persons who may be violating the law, the legal notice, or the rights of third parties;
- ✓ Co-operate with the investigations of purported unlawful activities;
- ✓ To carry out credit checks on potential clients.

5.5.2 We may share your personal information with our affiliates and business partners to improve the products, services, and offers provided to you as well as our affiliates and business partners, franchisees and agencies. Where this occurs, we require our business partners and affiliates to honor this policy and the provisions of POPIA generally.

5.5.3 We maintain a strict “No-Spam” policy. We shall also not sell or rent your email address to a third party.

## 5.6. Direct Marketing

The company shall ensure that:

5.6.1 It does not process any personal information for direct marketing (utilizing any form of electronic communication, including automatic calling machines, SMS, or e-mail) unless the data subject has given him, her, or its consent to the processing or is an existing customer.

5.6.2 It shall only approach data subjects, whose consent is required and who have not previously withheld such consent, once to request the consent. This shall be done in the prescribed manner and form;

5.6.3 The data subjects shall only be approached for direct marketing of Licentia Franchise SA (Pty) Ltd’s own similar products or services. In all instances, the data subject shall be given a reasonable opportunity to object, free of charge and in a manner free of unnecessary formality, to such use of his, her, or its electronic details at the time when the information is collected.

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5.6.4 Any communication for direct marketing shall contain details of the identity of the sender or the person on whose behalf the communication has been sent and an address or other contact details to which the recipient may send a request that such communications cease.

## 6. PURPOSE SPECIFICATION

### 6.1. Scope

This scope is defined by the provisions of the POPI Act, Condition 3.

### 6.2. Purpose Specification

Licentia Franchise SA (Pty) Ltd undertakes to comply with the POPI Act, Conditions 2 in terms of processing limitation, sections 13 and 14, subject to the following stipulation (Retention Periods).

### 6.3. Retention Periods

Licentia Franchise SA (Pty) Ltd will establish *\*retention periods* for at least the following categories of data: (If Applicable)

Definition: \*The length of time records should be kept in a certain location or form for administrative, legal, fiscal, historical, or other purposes.

- ✓ Franchisees
- ✓ Agents
- ✓ Staff
- ✓ Clients
- ✓ Suppliers
- ✓ Government Departments

Detailed coverage of the relevant retention periods has been documented in the Personal Information Diagnostic tool.

### 6.4. RETENTION OF RECORDS

6.4.1 Licentia Franchise SA (Pty) Ltd is obligated to retain certain information, as prescribed by law.

This includes but is not limited to the following:

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- ✓ Regarding the Companies Act, No. 71 of 2008 and the Companies Amendment Act No 3 of 2011, hard copies of the documents mentioned below must be retained for 7 years;
- ✓ Any documents, accounts, books, writing, records, or other information that a company is required to keep in terms of the Act;
- ✓ Notice and minutes of all meetings, including resolutions adopted;
- ✓ Copies of reports presented at the annual general meeting;
- ✓ Copies of annual financial statements required by the Act and copies of accounting records as required by the Act.

6.4.2 The Basic Conditions of Employment No. 75 of 1997, as amended, requires the organization to retain records relating to its staff for no less than 3 years.

## 7. FURTHER PROCESSING LIMITATION

### 7.1. Scope

This scope of the policy is defined by the provisions of the POPI Act, Condition 4.

### 7.2. Further Processing

Licentia Franchise SA (Pty) Ltd undertakes to comply with the POPI Act, Condition 2 in terms of the processing limitation, Section 15.

7.2.1 For purposes of this Policy, clients include potential, past, and existing clients of Licentia Franchise SA (Pty) Ltd, whether once-off or recurring, in respect of products and services.

7.2.2 Licentia Franchise SA (Pty) Ltd also collects and processes clients' personal information for marketing purposes to ensure that its products and services remain relevant to all our clients and potential clients.

7.2.3 Use of client's information:

7.2.3.1 The client's personal information shall only be used for the purpose for which it was collected and as agreed. This may include, but not be limited to:

- ✓ Providing products or services to clients;

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- ✓ In connection with sending accounts and communication to a client in respect of services rendered;
- ✓ Confirming, verifying, and updating clients' details;
- ✓ Conducting market or customer satisfaction research;
- ✓ For audit and record-keeping purposes;
- ✓ In connection with legal proceedings.
- ✓ In connection with and to comply with legal and regulatory requirements or when it is otherwise allowed by law.

## 8. INFORMATION QUALITY

### 8.1. Scope

This scope of the policy is defined by the provisions of the POPI Act, Condition 5.

Licentia Franchise SA (Pty) Ltd shall comply with all of the aspects of Condition 5, Section 16.

### 8.2. Accuracy

Licentia Franchise SA (Pty) Ltd will regularly review its procedures for ensuring that its records remain accurate and consistent and, in particular:

- ✓ ICT\* systems will be designed, where possible, to encourage and facilitate the entry of accurate data;
- ✓ Data on any entity and individual will be held in as few places as necessary, and unnecessary additional data sets will be discouraged;
- ✓ Effective procedures will be in place so that all relevant systems are updated when information about any individual changes;

Definition: \*An ICT system is a set-up consisting of hardware, software, data, and the people who use them. It commonly includes communications technology, such as the internet. ICT and computers are not the same things. Computers are the hardware that is often part of an ICT system.

### 8.3. Updating

Licentia Franchise SA (Pty) Ltd will review Personal Information when notified by the Data Subject that there has been a change.

### 8.4. Archiving

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Archived electronic records of Licentia Franchise SA (Pty) Ltd are stored securely off-site by the relevant service providers.

## 9. OPENNESS

### 9.1. Scope

This scope of the policy is defined by the provisions of the POPI Act, Condition 6.

### 9.2. Openness

In line with Conditions 6 and 8 of the Act, Licentia Franchise SA (Pty) Ltd is committed to ensuring that in principle Data Subjects are aware:

- ✓ That their data is being processed;
- ✓ The purpose for which it is being processed;
- ✓ The types of disclosure that are likely;
- ✓ How to exercise their rights concerning the data.

### 9.3. Procedure

Data Subjects will generally be informed through this policy.

## 10. SECURITY SAFEGUARDS

### 10.1. Scope

This scope of the policy is defined by the provisions of the POPI Act, condition 7, Sections 19 to 22.

This section of the policy only addresses security issues relating to Personal Information. It does not cover the security of the premises, business continuity, or any other aspect of security.

### 10.2. Specific Risks

Licentia Franchise SA (Pty) Ltd has identified the following risks:

- ✓ Personal Information could be misused.
- ✓ Staff may be tricked into giving away information through “social engineering”.

### 10.3. Setting Security Levels

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Access to information on the main Licentia Franchise SA (Pty) Ltd computer system will be controlled by a secured login and passwords.

Licentia Franchise SA (Pty) Ltd has used the POPI-Personal Information Diagnostic tool to identify security levels required for each record held which contains Personal Information.

#### 10.4. Security Measures

Licentia Franchise SA (Pty) Ltd shall review its security controls and processes regularly to ensure that personal information is secure.

10.7.1 It shall take appropriate, reasonable technical and organizational measures to prevent loss or damage, unauthorized destruction of personal information, and unlawful access to or processing of personal information.

This shall be achieved by –

- ✓ Identifying internal and external risks;
- ✓ Establishing and maintaining appropriate safeguards;
- ✓ Regularly verifying these safeguards and their implementation;
- ✓ Updating the safeguards;
- ✓ Implementing generally accepted information security practices and procedures.

#### 10.5. Business Continuity

Licentia Franchise SA (Pty) Ltd will ensure that adequate steps are taken to provide business continuity in the event of an emergency.

#### 10.6. Security Breaches

10.6.1 Should Licentia Franchise SA (Pty) Ltd detect a security breach on any of its systems that contain personal information, it shall take the required steps to assess the nature and extent of the breach to ascertain if any information has been compromised.

11.6.2 Licentia Franchise SA (Pty) Ltd shall notify the affected parties should they have reason to believe that their information has been compromised. Such notification shall only be made where the organization can identify the data subject to which the information relates. Where it is not possible, it may be necessary to consider website publication and whatever else the Information Regulator prescribes.

#### Licentia Franchise SA (Pty) Ltd

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10.6.3 Notification shall be provided in writing utilizing either:

- ✓ Email
- ✓ Registered mail
- ✓ The organization's website

10.6.4 The notification shall provide the following information where possible:

- ✓ Description of possible consequences of the breach;
- ✓ Measures that are taken to address the breach;
- ✓ Recommendations to be taken by the data subject to mitigate adverse effects;
- ✓ The identity of the party responsible for the breach.

10.6.5 In addition to the above, Licentia Franchise SA (Pty) Ltd shall notify the Regulator of any breach and/or compromise of personal information in its possession and work closely with and comply with any recommendations issued by the Regulator.

- ✓ The following shall apply in this regard:
  - The Information Officer shall be responsible for overseeing the investigation;
  - The Information Officer shall be responsible for reporting to the Information Regulator within 3 working days of a breach/ compromise of personal information;
  - The Information Officer shall be responsible for reporting to the Data Subject(s) within 3 working days, as far as is reasonable and practicable, of a breach/ compromise of personal information.

10.6.6 The timeframes above are guidelines and depending on the merits of the situation may require earlier or later reporting.

## 10.7. Related Policy

Please refer to the Licentia Franchise SA (Pty) Ltd Information Security Policy for further guidance.

## 11. DATA SUBJECT PARTICIPATION

### 11.1. Scope

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This scope of the policy is defined by the provisions of the POPI Act, Condition 8, Sections 23 to 25.

#### **11.2. Responsibility**

Any Data Subject access requests will be handled by the POPI Act Information Officer in terms of Condition 8.

#### **11.3. Procedure for Making Requests**

Requests for access to Personal Information will be handled in compliance with the POPI Act and compliance with the Promotion of Access to Information Act (PAIA), as defined in the Licentia Franchise SA (Pty) Ltd PAIA Manual.

#### **11.4. Provision for Verifying Identity**

Where the individual making a Data Subject access request is not personally known to the POPI Act Information Officer their identity will be verified before handing over any information.

#### **11.5. Access And Correction Of Personal Information**

11.5.1 Clients have the right to request access to any personal information that Licentia Franchise SA (Pty) Ltd holds about them;

11.5.2 Clients have the right to request Licentia Franchise SA (Pty) Ltd to update, correct, or delete their personal information on reasonable grounds. Such requests must be made to the Information Officer or Licentia Franchise SA (Pty) Ltd's head office;

11.5.3 If the Client objects to the processing of their personal information, Licentia Franchise SA (Pty) Ltd may no longer process said personal information. The consequences of the failure to give consent to process the personal information must be set out before the client confirms his/her objection;

11.5.4 The client must provide reasons for the objection to the processing of his/her personal information.

#### **11.6. Fees**

Fees for access to Personal Information will be handled in compliance with the PAIA Manual.

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### 11.7. Procedure for Granting Access

Procedures for access to Personal Information will be handled in compliance with PAIA, as defined in the Licentia Franchise SA (Pty) Ltd PAIA Manual.

## 12. PROCESSING OF SPECIAL PERSONAL INFORMATION

### 12.1. Scope

This scope of the policy is defined by the provisions of the POPI Act, Part B, Sections 26 to 33.

### 12.2. Processing of Special Personal Information

Licentia Franchise SA (Pty) Ltd adheres to the provisions of the Act regarding processing Special Personal Information which relates to the religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life or biometric information of a Data Subject.

Special Personal Information includes criminal behavior relating to alleged offenses or proceedings dealing with alleged offenses.

Unless a general or specific authorization applies, the processing of Special Personal Information is prohibited.

## 13. PROCESSING OF PERSONAL INFORMATION OF CHILDREN

### 13.1. Scope

This scope of the policy is defined by the provisions of the POPI Act, Part C, Sections 34 and 35.

### 13.2. Processing of Personal Information of Children

Licentia Franchise SA (Pty) Ltd adheres to the provisions of the Act regarding the Personal Information of children which only applies to under 18 individuals and age, a check is required for all Personal Information records.

Unless a general or specific authorization applies to the processing of Personal Information of children under the age of 18 is prohibited.

Licentia Franchise SA (Pty) Ltd has used the POPI-Personal Information Diagnostic tool to identify any records held which contain the Personal Information of children.

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## **14. PRIOR AUTHORISATION**

### **14.1. Scope**

This aspect of the policy is defined by the provisions of the POPI Act, Chapter 6.

### **14.2. Prior Authorisation**

Licentia Franchise SA (Pty) Ltd adheres to the process of Prior Authorisation in terms of Sections 57 to 59.

## **15. TRANSBORDER INFORMATION FLOWS**

### **15.1. Scope**

This scope of the policy is defined by the provisions of the POPI Act, Chapter 9.

### **15.2. Transborder Information Flows**

Licentia Franchise SA (Pty) Ltd will ensure that the POPI Act Chapter 9, Section 72 is fully complied with.

Licentia Franchise SA (Pty) Ltd has used the POPI-Personal Information Diagnostic tool to identify Transborder flows that contain Personal Information.

Compliance with Section 72 will be achieved through the use of the necessary contractual commitments from the relevant parties.

### **15.3. Transfer Of Information Outside Of South Africa**

Licentia Franchise SA (Pty) Ltd shall not transfer personal information about a data subject to a third party who is in a foreign country unless one or more of the following apply:

15.3.1 The third party is subject to a law, binding corporate rules, or a binding agreement that provides an adequate level of protection of personal information and effectively upholds principles for reasonable processing of the information;

15.3.2 The data subject consents to the transfer;

15.3.3 The transfer is necessary for the performance of a contract between the data subject and the company;

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15.3.4 The transfer is necessary for the conclusion or performance of a contract concluded in the interest of the data subject between the company and a third party; or

15.3.5 The transfer is for the benefit of the data subject, and it is not reasonably practicable to obtain the consent of the data subject to that transfer and if it were reasonably practicable to obtain such consent, the data subject would be likely to give it.

## **16. STAFF TRAINING & ACCEPTANCE OF RESPONSIBILITIES**

### **16.1. Scope**

This scope of the policy is written in support of the provisions of the POPI Act, Chapter 5, Part B.

### **16.2. Documentation**

Information for staff is contained in this policy document and other materials made available by the Information Officer.

### **16.3. Induction**

Licentia Franchise SA (Pty) Ltd Information Officer will ensure that all Staff, Franchisees, and Agents who have access to any kind of Personal Information will have their responsibilities outlined during their induction procedures.

Each Staff member and or Franchisee, Agents has and shall in the case of new and or alternative employees, franchisees, undersign a confidentiality and non-disclosure agreement with and pertaining to Licentia Franchise SA (Pty) Ltd documentation and client's personal information.

### **16.4. Continuing Training**

Licentia Franchise SA (Pty) Ltd will provide opportunities for staff to explore POPI Act issues through training, team meetings, and supervision.

### **16.5. Procedure for Staff Signifying Acceptance of Policy**

Licentia Franchise SA (Pty) Ltd will ensure that all staff sign acceptance of this policy once they have had a chance to understand the policy and their responsibilities in terms of the policy and the POPI Act.

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## 17. POLICY REVIEW

### 17.1. Responsibility

Licentia Franchise SA (Pty) Ltd Information Officer is responsible for an annual review.

### 17.2. Procedure

Licentia Franchise SA (Pty) Ltd's Information Officer will ensure relevant stakeholders are consulted as part of the annual review.

### 17.3. Amendments To This Policy

Amendments to this Policy shall take place from time to time subject to the discretion of Licentia Franchise SA (Pty) Ltd and according to any changes in the law. Such changes shall be brought to the attention of the clients where it affects them.

## 18. REQUESTS FOR INFORMATION

In terms of requests to be processed under POPI, the following forms shall be used –

- 18.1 Objection to the processing of personal information – A data subject who wishes to object to the processing of personal information in terms of section 11(3)(a) of the Act, must submit the objection to the responsible party on Form 1.

[Download Form 1 here](#)

- 18.2 Request for correction or deletion of personal information or destruction or deletion of record of personal information – A data subject who wishes to request a correction or deletion of personal information or the destruction or deletion of a record of personal information in terms of section 24(1) of the Act, must submit a request to the responsible party on Form 2.

[Download Form 2 here](#)

- 18.3 Request for data subject's consent to process personal information – A responsible party who wishes to process the personal information of a data subject for direct marketing by electronic communication must submit a request for written consent to that data subject, on Form 4.

[Download Form 4 here](#)

### Licentia Franchise SA (Pty) Ltd

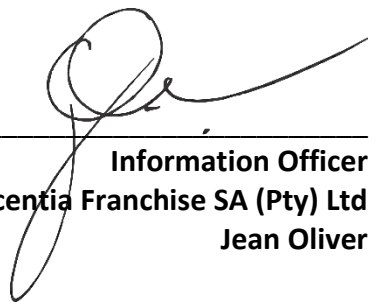
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- 18.4 Submission of Complaint – Any person who wishes to submit a complaint contemplated in section 74(1) of the Act must submit such a complaint to the Regulator on Part I of Form 5. A responsible party or a data subject who wishes to submit a complaint contemplated in section 74(2) of the Act must submit such a complaint to the Regulator on Part II of Form 5.

[Download Form 5 here](#)



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**Information Officer**  
**Director: Licentia Franchise SA (Pty) Ltd**  
**Jean Oliver**

**Licentia Franchise SA (Pty) Ltd**

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