



Mindset & Managing
Initiatives

M&M Initiatives - POPIA Policy Statement on the protection and processing of information

This Policy Statement document provides information in respect of the Protection of Personal Information Act (POPIA) and the duties and responsibilities of M&M Initiatives and its clients.

1. INTRODUCTION

POPIA is South Africa's primary data protection law. The purpose of POPIA is to promote the protection of Personal Information that is processed by any person, by prescribing certain minimum requirements for the processing of such personal information. These minimum requirements must be met in order for a person to process information to comply with the minimum requirements set at all times.

From time to time in the conduct of its business, M&M Initiatives will come into possession of and will resultingly process the personal information of individuals, also referred to as data subjects. The purpose of this Policy Statement is to document how M&M Initiatives will manage and process the personal information of individuals (data subjects) and, in doing so, comply with the minimum requirements of the POPIA.

M&M Initiatives will only process Information for a specific, explicitly defined and lawful purpose related to a function or activity carried out by it. M&M Initiatives will accordingly process the information of its data subjects from time to time for the purpose of carrying on its business and for good and lawful cause. M&M Initiatives will ensure that it only processes the information of its data subjects for the specific purpose stated and will take reasonable steps to ensure that its data subjects are aware of that purpose.

- Where we refer to “process”, it means how we collect, use, store, make available, destroy, update, disclose, or otherwise deal with personal information.
- As a general rule we will only process this personal information if it is required to deliver or offer a service, provide a product, carry out a transaction or obligation in a contract. We may combine this personal information and use the combined personal information for any of the purposes stated in this Privacy Policy.

- If you use our services, goods or products, you agree that we may process this personal information as explained under this Privacy Policy. Sometimes you may provide us with consent to process this personal information.
- M&M Initiatives is a global organisation and as such this Privacy Policy will apply to the processing of personal information by any member of M&M Initiatives globally. If M&M Initiatives processes personal information for another party under a contract or a mandate, the other party's privacy policy will apply to the processing of such information.
- M&M Initiatives can change this Privacy Policy from time to time if the law or our business practices requires such change.
- This policy establishes a general standard for the appropriate protection of personal information (POPI) within the M&M Initiatives environment. It furthermore, it provides principles regarding the rights of individuals to privacy and to reasonable safeguards of their personal information.

2. SCOPE, MINIMUM REQUIREMENTS AND DEFINITIONS

M&M Initiatives and their clients share duties and responsibilities with regard to POPIA. All parties are required to:

- Accept and comply with the POPIA regulations.
- Implement and maintain agreed security and technical measures with regard to the security and confidentiality and protection of personal information – in compliance with POPIA, HPA, HPCSA and other legislation
- Investigate any issues regarding possible breach of security or confidentiality and manage complaints, requests for withdrawal within 15 work days of being received.
- When research is conducted, anonymised, depersonalised data will be used – in compliance with POPIA and HPCSA regulations

2.1 Scope

In terms of the scope, all employees, contractors, consultants, temporary and other workers at M&M Initiatives, including all personnel affiliated with third parties must adhere to this policy. This policy applies to information assets owned or leased by M&M Initiatives, or to devices that connect to a M&M Initiatives network or reside at a M&M Initiatives site.

2.2 Minimum requirements

In order for M&M Initiatives to process information in a manner which is consistent with POPIA, M&M Initiatives must:

- Process the Information lawfully and in a reasonable manner that does not infringe the right to privacy of the person whose personal information is being processed;
- Process the information for a specific, explicitly defined and lawful purpose related to a function or activity of M&M Initiatives;

- Process the information only if, given the purpose for which it is processed, it is adequate, relevant and not excessive and if:
 - the person whose information will be processed has consented to its information being processed;
 - it is necessary to process the information to carry out actions for the conclusion or performance of a contract to which the person whose Information will be processed is a party; or
 - it is necessary to process the Information to comply with an obligation imposed by law on M&M Initiatives or to protect a legitimate interest of M&M Initiatives and/or the person whose Information will be processed;
- take reasonable steps to ensure that the person whose information will be processed is aware of the information that will be processed, the source from which that Information will be collected and the purpose for which that information will be processed;
- take reasonable steps to ensure that the information that is processed is complete, accurate, not misleading and updated where necessary;
- take reasonable technical and organisational measures to secure the integrity and confidentiality of information that is processed so as to prevent the loss, damage or unauthorised destruction of information and the unlawful access to or processing of information; and
- take reasonable steps to ensure that the person whose Information will be processed is aware of his rights in and to his information.

2.3 Definitions

The following definitions in alphabetical order apply:

- **“Anonymised data”** means that personal data cannot be attributed to a specific data subject without the use of additional information kept separately and subject to “technical and organisational” measures.
- **“Business”** means the business of M&M Initiatives and which includes all matters reasonably connected thereto, including matters relating to legal and corporate governance;
- **“Client”** means a person who requests and enters into an Operator Agreement as well as SLA with M&M INITIATIVES to process personal information of their employees or third parties.
- **“Data Subject”** means the person whose information M&M Initiatives processes. This may include Information pertaining to employees, candidates for employment, customers, suppliers, officers, business associates, partners, and the like.
- **“HPA”** means the Health Professions Act No. 56 of 1974, as amended from time to time.
- **“HPCSA”** means the Health Professions Council of South Africa.
- **“Information”** means “personal information” and “special personal information” as defined in POPIA.
- **“Information Officer”** means the person described in clause 13;
- **“Information Regulator”** means the information regulator as that term is defined in Section 39 of POPIA;

- **“M&M INITIATIVES”** means the M&M Initiatives CC (Registration Number: 1994/009867/23).
- **“Operator”** means a person who processes Information on behalf of M&M Initiatives in terms of its business operations, contracts and may include, without limitation, the attorneys, auditors and its related and/or inter-related companies as that term is defined in Section 2 of the Companies Act, No. 71 of 2008;
- **“PAIA”** means the Promotion of Access to Information Act, 2000 (Act No. 2 of 2000) as amended from time to time.
- **“Person”** means a person defined in POPIA, and “Persons” will have a corresponding meaning;
- **“Personal information”** means information relating to an identifiable, living, natural person, and where it is applicable an identifiable, existing juristic person, including, but not limited to:
 - a. Information relating to the race, gender, sex, pregnancy, marital status, national, ethnic, or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language, and birth of the person.
 - b. Information relating to the education or the medical, financial, criminal, or employment history of the person.
 - c. Any identifying number, symbol, email address, telephone number, location information, online identifier, or other particular assignment to the person.
 - d. The biometric information of the person.
 - e. The personal opinions, views, or preferences of the person.
 - f. Correspondence sent by the person that would reveal the contents of the original correspondence.
 - g. The views or opinions of another individual about the person.
 - h. The name of the person, if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person.
- **“POPIA”** means the Protection of Personal Information Act No. 4 of 2013 which has as its main function and objective, the regulation and control of the processing of personal information.
- **“Processing”** means any operation or activity or any set of operations, whether or not by automatic means, concerning personal information, including:
 - The collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation, or use.
 - Dissemination by means of transmission, distribution, or making available in any other form.
 - Merging, linking, as well as restriction, degradation, erasure, or destruction of information.
- **“Policy”** means this policy and any amendments made to it from time to time;
- **“Process(ing)”** means anything that is done by M&M Initiatives in relation to its data subject’s Information, whether or not by automated means, including the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval,

alteration, consultation, use, dissemination, distribution, merging, linking, restriction, degradation, erasure and/or destruction of Information;

- **“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 of personal information.

3. AWARENESS AND CONSENT

M&M Initiatives is required to ensure that its data subjects are aware of the purpose for which their information is being processed, the manner in which it will be processed and their rights in respect thereof. M&M Initiatives will do this by:

- publishing a copy of this policy on its website at www.mminitiatives.com;
- making a copy of this Policy available for inspection at its principal place of business at 26A Nicolson Street, Bailey’s Muckleneuk, Pretoria, 0181;
- using bona fide endeavours to communicate the existence of this Policy to those of its data subjects whose Information M&M Initiatives has processed prior to the date referred to in Section 114(1) of POPIA;
- referring to this Policy in its recruitment and/or job advertisements; and
- incorporating this Policy by reference into, inter alia, the following
 - documents:employment agreements;
 - standard terms and conditions of trading;
 - offer to purchase contracts;
 - job cards;
 - credit applications; and
 - any other contracts or agreements that M&M Initiatives may enter into with its data subjects.
- M&M Initiatives will, where it is necessary or appropriate to do so, obtain the written consent of its data subjects to process their Information in accordance with POPIA, inter alia, by:
 - requesting its data subjects to consent to the processing by M&M Initiatives of their information; and
 - requiring applicable data subjects to sign consent as requested
 - M&M Initiatives will catalogue and store the record of consents that it obtains from its data subjects.

4. POLICY STATEMENT

4.1 What is personal information?

Personal information refers to any information that identifies you or specifically relates to you, or your employees stored or processed on the product/s. Personal information includes, but is not limited to, the following information about you and / or your employees:

- Marital status
- National origin
- Age

- Language
- Birth place
- Education
- Relevant financial history
- Identifying number (like an employee number, identity number or passport number)
- E-mail address; physical address (like residential address, work address or your physical location); telephone number
- Trade union membership
- Biometric information (like fingerprints, signature or voice)
- Race; gender; sex; pregnancy status; ethnic origin; social origin; colour; sexual orientation
- Physical health; mental health; well-being; disability; religion; belief; conscience; culture
- Medical history; criminal history; employment history
- Personal views, preferences and opinions
- Another's views or opinions about you
- Full names and initials

4.2 When will we process your personal information?

We will only process this personal information for lawful purposes relating to our business in the following circumstances and if the following applies:

- If you have consented to the processing
- If a person legally authorised by you, the law or a court, has consented thereto
- If it is necessary to conclude or perform under a contract we have with you
- If it is required to protect or pursue your, our or a third party's legitimate interest
- If the information is being used for any Human Resource or payroll related requirement
- If the processing is needed to create, use or protect a right or obligation in law
- If the processing is for statistical or research purposes and all legal conditions are met
- If the special personal information was made public by you
- If the processing is required or permitted by law

4.3 When and from where we obtain personal information about you

M&M will only process information obtained directly from the data subject, except where the information is public record or has deliberately been made public by the data subject; the data subject has consented to the collection by M&M Initiatives of the information from another source; the collection of Information from a source other than the data subject would not prejudice a legitimate interest of the data subject, is necessary to maintain or comply with an obligation imposed on M&M Initiatives by law or to maintain the legitimate interests of M&M Initiatives or the information will be used for legal proceedings; it is not reasonably practicable in the circumstances of the particular case to collect the information directly from a data subject, or to do so would prejudice a lawful purpose of the collection, or it has received the consent of a data subject to process information about that data

subject that it receives from another source, in which event it may process information about a data subject that it receives from another source.

In the normal operation of our business

- We collect personal information from you directly.
- We may collect personal information from a public record or if you have deliberately made the information public.
- We collect personal information from 3rd parties that are directly integrated with our software platform
- We collect information about you based on your use of our products, services or service channels.
- We collect information about you based on how you engage or interact with us such as via emails, letters, telephone calls and surveys
- We collect personal information from completed forms i.e. contact and billing information
- If the law requires us to do so, we will ask for your consent before collecting personal information

4.4 Third parties from whom we may collect your personal information

Third parties from whom we may collect your personal information include, but are not limited to, the following:

- Our partners, your employer, employees directly, any of our other Bureau or channel partners and any connected companies, subsidiary companies, its associates, cessionaries, delegates, assigns, affiliates or successors in title and / or appointed third parties (like its authorised agents, partners, contractors and suppliers) for any of the purposes identified in this Privacy Policy;
- your spouse, dependents, partners, employer, and other similar sources;
- people you have authorised to share your personal information, like a person that makes a travel booking on your behalf or a medical practitioner for insurance purposes;
- attorneys, tracing agents, debt collectors and other persons that assist with the enforcement of agreements;
- payment processing services providers, merchants, banks and other persons that assist with the processing of your payment instructions, like EFT transaction partners.
- insurers, brokers, other financial institutions or other organisations that assist with insurance and assurance underwriting, the providing of insurance and assurance policies and products, the assessment of insurance and assurance claims and other related purposes;
- law enforcement and fraud prevention agencies and other persons tasked with the prevention and prosecution of crime;
- regulatory authorities, industry ombudsman, governmental departments, local and international tax authorities;
- trustees, Executors or Curators appointed by a court of law;
- our service providers, agents and sub-contractors like couriers and other persons we use to offer and provide products and services to you;

- courts of law or tribunals;

4.5 Reasons we need to process your personal information

We will process your personal information for the following reasons:

- to provide you with products, goods and services;
- to market our products, goods and services to you;
- to respond to your enquiries and complaints;
- to comply with legislative, regulatory, risk and compliance requirements (including directives, sanctions and rules), voluntary and involuntary codes of conduct and industry agreements or to fulfil reporting requirements and information requests;
- to conduct market, behavioural and psychological related research;
- to develop, test and improve products and services for you;
- for historical, statistical and research purposes;
- to process payment instruments;
- to create, manufacture and print payment advice;
- to enable us to deliver goods, documents or notices to you;
- for security, identity verification and to check the accuracy of your personal information;
- to communicate with you and carry out your instructions and requests;
- for customer satisfaction surveys, promotional offerings.
- to enable you to take part in and make use of value-added products and services;
- to assess our lending and insurance risks; and / or
- for any other related purposes.

4.6 How will we use your personal information for marketing purposes

- We will use your personal information to market our services, related products and services to you
- We will do this in person, by post, telephone, or electronic channels such as SMS or email
- If you are not our customer, or in any other instances where the law requires, we will only market to you by electronic communications with your consent
- In all cases you can request us to stop sending marketing communications to you at any time

4.7 When, how and with whom we share your personal information

In general, we will only share your personal information if any one or more of the following apply:

- If you have consented to this
- If it is necessary to conclude or perform under a contract we have with you
- If the law requires it; and / or
- If it's necessary to protect or pursue your, our or a third party's legitimate interests

- M&M Initiatives will not hold its data subjects' Information as its own and will make no claim to ownership thereof, unless a data subject agrees otherwise.
- M&M Initiatives will only disclose its data subjects' Information to those of its employees and officers who need to know for the purpose of the agreed operational requirements and will not disclose Information to any third party unless the consent of the applicable data subject to do so has been obtained.
- M&M Initiatives may disclose its data subjects' information without first obtaining consent:
 - if M&M Initiatives deems it appropriate to disclose that information to an operator for the purpose of agreed confidential business operations and keeping to data protection guidelines of this policy; and/or
 - if M&M Initiatives is required by any applicable law or any applicable regulator to disclose that Information.

Where required, each member of M&M Initiatives may share your personal information with the following persons. These persons have an obligation to keep your personal information secure and confidential.

- Other members of M&M Initiatives, its associates, cessionary, delegates, assigns, affiliates or successors in title and / or appointed third parties (like its authorised agents, partners, contractors and suppliers) for any of the purposes identified in this Privacy Policy
- Our employees as required by their employment conditions
- Attorneys, tracing agents, debt collectors and other persons that assist with the enforcement of agreements
- Payment processing services providers, merchants, banks and other persons that assist with the processing of your payment instructions, like 3rd party EFT service providers
- Law enforcement and fraud prevention agencies and other persons tasked with the prevention and prosecution of crime
- Regulatory authorities, industry ombudsmen, governmental departments, local and international tax authorities and other persons the law requires us to share your personal information with
- Our service providers, agents and sub-contractors like couriers and other persons we use to offer and provide products and services to you
- Persons to whom we have ceded our rights or delegated our obligations to under agreements, like where a business is sold
- Courts of law or tribunals that require the personal information to adjudicate referrals, actions or applications;
- Trustees, Executors or Curators appointed by a court of law
- Participating partners in our customer loyalty reward programmes, where you purchase goods, products and service or spend loyalty rewards; and / or our joint venture and other partners with whom we have concluded business agreements, for your benefit

4.8 Under what circumstances will we transfer your information to other countries?

We will only transfer your personal information to third parties in another country in any one or more of the following circumstances:

- Where the client is based in another country
- Where your personal information will be adequately protected under the other country's laws or an agreement with the third-party recipient
- Where the transfer is necessary to enter into or perform under a contract with you, or a contract with a third party that is in your interest
- Where you have consented to the transfer; and / or
- Where it is not reasonably practical to obtain your consent, the transfer is in your interest

This transfer will happen within the requirements and safeguards of the law. Where possible, the party processing your personal information in the other country will agree to apply the same level of protection as available by law in your country or if the other country's laws provide better protection the other country's laws would be agreed to and applied.

An example of us transferring your personal information to another country is where foreign payments take place if you purchase goods or services in a foreign country, or request that we facilitate salary payments to your employees in the countries.

4.9 Your duties and rights about the personal information we have about you

The following applies with regard to your personal information that we may have:

- You must provide proof of identity when enforcing the rights below.
- You must inform us when your personal information changes.

You have the right to request access to the personal information we have about you by contacting us. This includes requesting:

- Confirmation that we hold your personal information
- A copy or description of the record containing your personal information; and
- The identity or categories of third parties who have had access to your personal information

We will attend to requests for access to personal information within a reasonable time. You may be required to pay a reasonable fee to receive copies or descriptions of records, or information about third parties. We will inform you of the fee before attending to your request.

Note that the law may limit your right to access information.

- You have the right to request us to correct or delete the personal information we have about you if it is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, obtained unlawfully or we are no longer authorised to keep it. You must inform us of your request in writing. Please refer to our PAIA Manual for further

information in this regard, like the process you should follow to give effect to this right. It may take up to 15 business days for the change to reflect on our systems. We may request documents from you to verify the change in personal information.

- A specific agreement that you have entered into with us may determine how you must change your personal information provided at the time when you entered into the specific agreement. Please adhere to these requirements. If the law requires us to keep the personal information, it will not be deleted upon your request. The deletion of certain personal information may lead to the termination of your relationship with us.

You may object on reasonable grounds to the processing of your personal information.

- We will not be able to give effect to your objection if the processing of your personal information was and is permitted by law; you have provided consent to the processing and our processing done according to your consent or the processing is necessary to conclude or perform under a contract with you.
- You must inform us of any objection in writing. Please refer to our PAIA Manual for further information in this regard, like the process you should follow to give effect to this right.
- Where you have provided your consent for the processing of your personal information, you may withdraw your consent. If you withdraw your consent we will explain the consequences to you. We may proceed to process your personal information even if you have withdrawn your consent if the law permits or requires it. It may take up to 15 business days for the change to reflect on our systems, during this time we may still process your personal information.
- You have a right to file a complaint with us or any Regulator with jurisdiction about an alleged contravention of the protection of your personal information by us. We will address your complaint as far as possible.
- Each Data Subject, after having provided adequate proof of identity to M&M Initiatives, has the right to:
 - request that M&M Initiatives confirms, free of charge, whether or not it holds Information about that Data Subject;
 - request the record of or a description of the Information that M&M Initiatives holds about that Data Subject;
 - request that M&M Initiatives correct or delete any Information in its possession or under its control about the Data Subject that is inaccurate, irrelevant, excessive, out of date, incomplete or misleading, or to destroy or delete a record of any Information about it that the M&M Initiatives is no longer authorised to retain; and
 - withdraw its consent for M&M Initiatives to Process its Information at any time, but the withdrawal of consent will not affect:
 - the Processing of its Information before the withdrawal of consent; nor
 - the Processing of any of its Information that is required by M&M Initiatives to comply with law and/or finalise the performance of any agreement that it has entered into with the Data Subject concerned.

- Should any Data Subject wish to exercise any of the rights referred to above, it can do so by contacting the Information Officer to give effect to the data subject's request or withdrawal.

4.10 How we secure your personal information

We will take appropriate and reasonable technical and organisational steps to protect your personal information according to industry best practices. Our security measures (including physical, technological and procedural safeguards) will be appropriate and reasonable. This includes the following:

- Keeping our systems secure (like monitoring access and usage)
- Storing our records securely
- Controlling the access to our buildings, systems and/or records; and
- Safely destroying or deleting records
- Ensure compliance with international security standards
- M&M Initiatives will accordingly secure the integrity and confidentiality of its data subjects' Information, inter alia, by ensuring that:
 - Information that is in printed form is dealt with only by those representatives of M&M Initiatives who need to deal with that Information;
 - Information that is in printed form is stored in a secure cabinet or facility when it is not being processed;
 - all employees and officers of M&M Initiatives who have access to or process information keep their workstations tidy and free of Information which is not then being processed to ensure that any information that is visible at workstations, and is not being processed, is not disseminated other than in accordance with the provisions of this policy;
 - all information in electronic form is stored in an online location that is protected from unauthorised access by appropriate hardware and software;
 - any hardware on which Information is stored is secure and password protected;
 - employees and officers of M&M Initiatives will ensure that information is not displayed upon their computer hardware when they are not themselves processing that information on such hardware; and
 - where any device on which Information is stored is lost or stolen, the Information Officer is immediately notified and M&M Initiatives will use reasonable endeavours to attempt to recover and/or delete any Information stored upon that device.
- M&M Initiatives will review the Information that it processes and stores from time to time, and will destroy and/or delete any Information of its data subjects that is no longer required for the purpose in clause 5 of this Policy, or that it is no longer authorised or obliged to retain.
- In the event that it comes to the attention of M&M Initiatives that its data subjects' information has been accessed, acquired or processed by any unauthorised person:
 - the Information Officer will notify the applicable data subject or data subjects and the Information Regulator as soon as reasonably possible; and
 - M&M Initiatives will comply with such directions as the Information Regulator may prescribe.

4.11 How long do we keep your personal information?

M&M Initiatives is required to store, retain and secure the integrity and confidentiality of its data subjects' Information by taking appropriate, reasonable technical and organisational measures to prevent the loss, damage or unauthorised destruction of their Information and to prevent any person from unlawfully accessing their Information.

We will keep your personal information for as long as:

- The law requires us to keep it
- A contract between you and us requires us to keep it
- You have consented to us keeping it
- We are required to keep it to achieve the purposes listed in this Privacy Policy
- We require it for statistical or research purposes
- A code of conduct requires us to keep it; and / or
- We require it for our lawful business purposes

Note: We may keep your personal information even if you no longer have a relationship with us, for the historical data that may be required by your employer or employee.

4.12 Children's Privacy

Our Service does not address anyone under the age of 12. We do not knowingly collect personally identifiable information from anyone under the age of 12. If You are a parent or guardian and You are aware that Your child has provided M&M Initiatives with Personal Data, please contact Us. If We become aware that We have collected Personal Data from anyone under the age of 12 without verification of parental consent, we take steps to remove that information from Our servers.

If We need to rely on consent as a legal basis for processing your information and your country requires consent from a parent, we may require your parent's consent before we collect and use that information.

4.13 Our cookie policy

A cookie is a small piece of data sent from our websites or applications to your computer or device hard drive or Internet browser where it is saved. The cookie contains information to personalise your experience on our websites or applications and may improve your experience on the websites or applications. The cookie will also identify your device, like the computer or smart phone.

By using our websites or applications you agree that cookies may be forwarded from the relevant website or application to your computer or device. The cookie will enable us to know that you have visited the website or application before and will identify you. We may also use the cookie to prevent fraud and for analytics.

5. ADMINISTRATIVE

5.1 Amendments

M&M Initiatives may alter or amend this Policy or any part thereof at any time. M&M Initiatives will use reasonable endeavours not to change this Policy too often, and to bring to its data subjects' attention any material changes to it, but its data subjects will be required to ensure that they keep up to date with the latest version of the policy that is available on M&M Initiatives's website and at M&M Initiatives's principal place of business.

5.2 Information officer

- M&M Initiatives will appoint an Information Officer.
- The name and contact details of the Information Officer can be obtained by visiting M&M Initiatives's website or by sending an email to the following email address: info@mminitiatives.com
- The Information Officer will be responsible for, inter alia:
 - ensuring that M&M Initiatives Processes the Information of its data subjects in a lawful and reasonable manner that does not unreasonably infringe its data subjects' right to privacy;
 - providing regular training and support to the employees and officers of M&M Initiatives who have access to or process Information, so that they can do so lawfully and in terms of this policy;
 - creating awareness about the provisions of this policy and
 - ensuring that it applies due diligence in the monitoring of developments in relation to the law pertaining to protection of Information, and in amending and/or updating M&M Initiatives's approach to such protection, including by way of updating and/or amending this Policy.
- The Information Officer will be trained appropriately to give effect to this policy, and will address any reasonable queries or concerns that any data subjects may have regarding this policy or the processing of their information as contemplated in it.

5.3 Information Regulator

In the event that any of M&M Initiatives's Data Subjects has any queries or concerns that cannot be addressed by the Information Officer, the Data Subject has the right to contact the Information Regulator. The Information Regulator's details are as follows:

- Physical address: JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
- Postal address: PO Box 31533, Braamfontein, Johannesburg, 2017
- Email address: complaints.IR@justice.gov.za and infoereg@justice.gov.za.

5.4 Enforcement

An employee found to have violated this policy may be subject to disciplinary action, up to and including termination of employment. A violation of this policy by a temporary worker, contractor, or vendor may result in the termination of their contract or assignment with M&M Initiatives.

Any exception to the policy must comply with the Exceptions Policy.

5.5 Information officer contact details

The information officer for M&M Initiatives is Dr. Marié de Beer.

Marie@mminitiatives.com

012-4609726 / 082 781 4288