

Data Subject Enquiry Protocols

(In accordance with the Protection of Personal Information Act, No. 4 of 2013 — “POPIA”)

1. Purpose

This document establishes the protocols for receiving, verifying, and responding to data subject enquiries in compliance with the **Protection of Personal Information Act (POPIA)** and related South African legislation, including the **Promotion of Access to Information Act (PAIA)**.

It ensures that all requests from clients, employees, and third parties concerning their personal information are handled lawfully, transparently, and efficiently.

2. Definitions

- **Data Subject:** A natural or juristic person whose personal information is collected, processed, or stored by Credora.
- **Information Officer:** The individual appointed under POPIA to oversee compliance, respond to data enquiries, and liaise with the Information Regulator.
- **Deputy Information Officer:** Any authorised individual designated by the Information Officer to assist with compliance duties.
- **Personal Information:** Any information relating to an identifiable natural or juristic person, as defined in section 1 of POPIA.
- **Processing:** Any operation concerning personal information, including collection, storage, use, dissemination, or destruction.
- **Enquiry:** Any formal request submitted by a data subject for access to, correction, deletion, or restriction of their personal information.

3. Application

These protocols apply to all enquiries from:

- Policyholders, claimants, or insured parties;
- Employees and contractors;
- Brokers, intermediaries, or suppliers;
- Any other individual or organisation whose data is processed by Credora.

4. Rights of the Data Subject

Under POPIA, a data subject has the right to:

1. Confirm whether Credora holds personal information about them;
2. Request access to such information;
3. Request correction or deletion of personal information that is inaccurate, irrelevant, excessive, or unlawfully obtained;
4. Object to the processing of personal information;
5. Withdraw consent previously granted;
6. Request restriction of processing; and
7. Lodge a complaint with the **Information Regulator**.

5. Submitting a Data Subject Enquiry

All requests must be made in writing using the **Data Subject Enquiry Form** or via formal correspondence containing sufficient identifying details.

Submission Channels:

- **Email:** privacy@credora.co.za
- **Post/Delivery:**
Credora Financial Services (Pty) Ltd
194 Bancor Avenue, Colab Building, Menlyn Maine, Waterkloof Glen Ext 2, Pretoria, 0181
- **Telephone:** 012 881 4580 (verbal requests will be reduced to writing by the Information Officer).

Minimum required information:

- Full name and ID/passport number;
- Relationship with Credora (client, broker, employee, etc.);
- Contact information;
- Specific details of the request;
- Certified copy of identity document and proof of address (for verification).

6. Verification and Acknowledgement Process

1. The Information Officer verifies the requester's identity and confirms authority (for third-party or legal representatives, written consent or power of attorney is required).
2. The enquiry is logged in the **POPIA Enquiry Register** within **24 hours** of receipt.
3. A written acknowledgement is issued to the data subject within **5 working days**, confirming receipt and expected turnaround time.

7. Investigation and Response

- The Information Officer will coordinate with relevant departments to locate, review, or update the requested personal information.
- Responses will be provided within **21 working days**, or as otherwise permitted under PAIA and POPIA.
- If an extension is required (e.g., complex requests), the data subject will be notified in writing before expiry of the initial 21-day period.
- Any refusal will be accompanied by written reasons and information on how to lodge a complaint with the **Information Regulator**.

8. Outcomes and Actions

Depending on the request type, Credora may:

- Provide a copy or description of the personal information held;
- Correct, update, or delete information;
- Restrict or cease processing; or
- Record a formal objection to processing.

If the data subject withdraws consent, such withdrawal will not affect the lawfulness of processing activities already completed prior to withdrawal.

9. Record-Keeping

All enquiries and responses will be retained securely for **five (5) years** in compliance with FAIS, FSCA, and POPIA requirements.

Records include:

- The request and verification documentation;
- Internal correspondence and decision outcomes;
- Dates of receipt and response;
- Details of any corrective actions taken.

10. Security and Confidentiality

All enquiries are treated as confidential and processed in line with Credora's **Data Security Policy** and **Data Retention & Destruction Policy**.

Access to personal information is restricted to authorised staff only.

11. Escalation and Complaints

If a data subject is dissatisfied with Credora's response, they may escalate the matter to:

The Information Regulator (South Africa)

JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

☎ 010 023 5207 | ✉ complaints.IR@justice.gov.za

🌐 www.inforegulator.org.za

12. Contact Information

Information Officer: Warren Bennett

Email: compliance@credora.co.za

Telephone: 012 881 4580

Address: 194 Bancor Avenue, Colab Building, Menlyn Maine, Waterkloof Glen Ext 2, Pretoria, 0181

13. Review of Protocols

This protocol will be reviewed annually or whenever POPIA regulations or internal processes are amended, ensuring ongoing compliance and alignment with FSCA and Information Regulator guidance.

