

FirstRand Trust

Privacy notice

MAY 2024

TABLE OF CONTENTS

1	BACKGROUND AND PURPOSE OF THIS NOTICE	3
2	DEFINITIONS	3
3	RESPONSIBLE PARTY AND CONTACT DETAILS	4
4	WHAT IS PERSONAL INFORMATION?	5
5	WHEN WILL FRT PROCESS DATA SUBJECTS' PERSONAL INFORMATION?	6
6	WHEN WILL FRT PROCESS DATA SUBJECTS' SPECIAL PERSONAL INFORMATION?	6
7	WHEN AND HOW WILL FRT PROCESS THE PERSONAL INFORMATION OF CHILDREN?.....	6
8	WHEN, AND FROM WHERE, DOES FRT OBTAIN PERSONAL INFORMATION ABOUT DATA SUBJECTS?.....	6
9	WHEN AND HOW FRT OBTAINS DATA SUBJECT'S PERSONAL INFORMATION FROM/WITH THIRD-PARTY SOURCES	7
10	REASONS FRT NEEDS TO PROCESS DATA SUBJECTS' PERSONAL INFORMATION	8
11	WHY DOES FRT FURTHER USE OR PROCESS DATA SUBJECT' PERSONAL INFORMATION?	10
12	WHEN, HOW, AND WITH WHOM DOES FRT DATA SUBJECTS' PERSONAL INFORMATION?.....	10
13	UNDER WHAT CIRCUMSTANCES WILL FRT TRANSFER DATA SUBJECTS' PERSONAL INFORMATION TO OTHER COUNTRIES?	11
14	DATA SUBJECTS' DUTIES AND RIGHTS REGARDING THE PERSONAL INFORMATION FRT HAS ABOUT THEM	11
15	HOW FRT SECURES DATA SUBJECT	13
16	HOW LONG DOES FRT KEEP DATA SUBJECT' PERSONAL INFORMATION?.....	14
17	HOW FRT PROCESSES PERSONAL INFORMATION ABOUT PERSONS RELATED TO A JURISTIC PERSON.	14
	ANNEXURES	15

1 BACKGROUND AND PURPOSE OF THIS NOTICE

Protecting the personal information of the grant recipients, suppliers and business partners of the FirstRand Trust (**FRT**) is important to FRT. To do so, FRT follows general principles in accordance with applicable privacy laws and the Protection of Personal Information Act, 2013, as amended (POPIA) in particular.

FRT has developed this privacy notice (**notice**) to enable data subjects to understand how it collects, uses and safeguards their personal information.

All examples provided in this notice are for illustrative purposes and are not exhaustive.

VERY IMPORTANT: If a data subject submits personal information for funding, in relation to a grant, project or a product or service or accepts any terms of use or agreement with FRT, they agree that in order to:

- assess the appropriateness of the proposed project for funding approval;
- conclude and fulfil contractual terms or obligations to the data subject;
- comply with obligations imposed by law; or
- protect or pursue a data subject's, FRT's, or a third party's legitimate interests;

personal information may be processed through centralised functions and systems of FRT and its operators, and may be used for the purposes, in the manner of, and with the appropriate controls as set out in this notice.

Where it is necessary to obtain consent for processing, FRT will seek consent separately. Data subjects should read the consent request carefully as it may limit their rights.

FRT may change this notice from time to time if required by law or its business practices. The latest version of the notice displayed at <https://www.firststrand.co.za/investors/esg-resource-hub/policies-and-practices/> will apply to data subjects' interactions with FRT. For more information about FRT, visit <https://www.firststrand.co.za/foundations/social-investing/firststrand-foundation/>.

2 DEFINITIONS

Term	Definition
Beneficiary	<ul style="list-style-type: none"> • Any public benefit organisation as defined in Section 30 of the Income Tax Act carrying on, within South Africa, any one or more public benefit activities listed in Part 1 of the Ninth Schedule of the Income Tax Act. • Any school, university, college, educational institution, board or body contemplated in Section 10(1)(cA)(i) of the Income Tax Act provided that the resources of that organisation are applied in pursuance of one or more public benefit activities listed in Part I of the Ninth Schedule of the Income Tax Act. • Any welfare organisation as defined in Section 1 of the VAT Act carrying on, within South Africa, any one or more welfare activities as determined by the Minister of Finance for the purposes of the definition of welfare organisation in terms of Section 1 of the VAT Act. • Any person or association of persons carrying on, within South Africa, any one or more public benefit activities listed in Part I of the Ninth Schedule of the Income Tax Act.

	<ul style="list-style-type: none"> Any person or association of persons carrying on within South Africa, any one or more welfare activities, as determined by the Minister of Finance for the purposes of the of the definition of welfare organisation in terms of Section 1 of the VAT Act.
Business partner	A natural or juristic person holding a business relationship with FRT, where such relationship does not fall within the definition of a supplier, employee or grant recipient and such person is a data subject.
Data subject	The person to whom personal information relates, for the purposes of this notice, the data subject refers to a prospective, current or former grant recipient, implementation partner, beneficiary, supplier or business partner whose personal information is processed by FRT.
FirstRand Trust or FRT	The FirstRand Trust, with Master’s reference number IT332/91 and its trustees.
Grant	A monetary donation made by the FRT to a grant recipient to carry on one or more public benefit activities (as defined in the Income Tax Act) in line with objectives of FRT;
Grant recipient	<ul style="list-style-type: none"> prospective grant recipients or implementation partners (persons that are interested in applying for funding from FRT); new and existing grant recipients or implementation partners (persons that have taken up funding from FRT); previous grant recipients or implementation partners (persons that had funding from FRT); and grant beneficiaries (persons who benefit from the programs and work of the grant recipients or implementation partner).
Implementation partner	Organisations that have been approved by the board of trustees and given the necessary grant funding to implement projects on behalf of FRT.
Income Tax Act	Income Tax Act, 1962, as amended.
POPIA	Protection of Personal Information Act, 2013, as amended.
Process	How the FRT collects, uses, retrieves, records, stores, makes available, destroys, updates, discloses, or otherwise deals with the personal information of grant recipients, ultimate beneficiaries, suppliers and other business partners.
Supplier	A natural or juristic person that provides a product or renders a service to the FRT and is a data subject.
VAT Act	Value Added Tax, 1991, as amended.

3 RESPONSIBLE PARTY AND CONTACT DETAILS

FRT is the responsible party which means it is responsible for determining why and how it will use data subjects’ personal information.

FRT contact details:

4 Merchant Place
 Corner Fredman Drive and Rivonia Road
 Sandton
 2196
 Email address: frfprivacy@firstrand.co.za

FRT has appointed the FirstRand group (through its Social Investing Office) and FNB Fiduciary Proprietary Limited to assist with managing its day-to-day activities. These companies will process personal information for FRT as operators and have an obligation to keep data subjects' personal information secure and confidential.

4 WHAT IS PERSONAL INFORMATION?

Personal information refers to any information that identifies or can, together with other information identify, a data subject or specifically relates to a data subject. Personal information includes, but is not limited to, the following information about a data subject:

- marital status and matrimonial property regime, national origin, age, language, birth, education;
- financial information (e.g. income, expenses, banking account information, financial records, obligations, assets and liabilities, investing, lending, insurance and transactions);
- invoices issued by the data subject to FRT;
- the agreement between FRT and the data subject;
- other identifying information of the data subject, which includes company registration number, VAT number and tax number;
- employment history and current employment status;
- gender or sex (for statistical purposes as required by law);
- identifying number (e.g. an identity number or passport number or other types of unique identifiers);
- e-mail address; physical address (e.g. residential address, work address or physical location); telephone number;
- online identifiers (e.g. cookies, online analytical identifier numbers, internet protocol (IP) addresses, device fingerprints, device ID), social media profiles;
- biometric information (e.g. fingerprints, signature, facial biometrics or voice);
- race (for statistical purposes as required by law);
- physical health, mental health, wellbeing, disability, religion, belief, conscience,; culture;
- medical history, criminal history, employment history;
- personal views, preferences and opinions;
- confidential correspondence; or
- another's views or opinions about a data subject's name also constitute personal information.

There is also a category of personal information called **special personal information**, which includes the following personal information about a data subject:

- criminal behaviour, to the extent that such information relates to the alleged commission of an offence (to prevent money laundering as required by law, or when entering into a business relationship with FRT), or any proceedings in respect of any offence allegedly committed by a data subject or the disposal of such proceedings;
- religious and philosophical beliefs (for example, where such information underpins a grant recipient's or implementation partners business or initiative);
- race or ethnic origin (e.g. for performing vendor and other risk management or statistical processes);
- trade union membership;
- political beliefs;
- health, including physical or mental health, disability and medical history (e.g. when assessing eligibility for funding); or
- biometric information (e.g. to verify identity).

5 WHEN WILL FRT PROCESS DATA SUBJECTS' PERSONAL INFORMATION?

FRT may process data subjects' personal information for lawful purposes relating to its business if the following circumstances apply:

- it is necessary to assess the appropriateness of the proposed project for funding approval by the board of trustees;
- it is necessary to conclude or perform under a contract FRT has with the data subject;
- the law requires or permits it;
- it is required to protect or pursue the data subject's, FRT's or a third party's legitimate interest;
- the data subject has consented thereto;
- a person legally authorised by the data subject, the law, or a court, has consented thereto; or
- the grant recipient or beneficiary is a child, and a competent person (such as a parent or guardian) has consented thereto on their behalf.

6 WHEN WILL FRT PROCESS DATA SUBJECTS' SPECIAL PERSONAL INFORMATION?

FRT may process data subjects' special personal information in the following circumstances, among others:

- 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 to the extent that the purpose of processing is in the public interest or obtaining consent may require a disproportionate effort and sufficient guarantees are in place to protect affected data subjects, and all other legal conditions are met;
- if the special personal information was made public by the data subject;
- if the processing is required by law;
- if racial information is processed and the processing is required to identify the data subject; or
- if the data recipient consented to the processing.

7 WHEN AND HOW WILL FRT PROCESS THE PERSONAL INFORMATION OF CHILDREN?

A child is a person who is defined as a child by a country's legislation, and who has not been recognised as an adult by the courts. FRT processes the personal information of children if the law permits this.

FRT may process the personal information of children if any one or more of the following applies:

- a person with the ability to sign legal agreements has consented to the processing, being the parent or guardian of the child;
- the processing is needed to create, use, or protect a right or obligation in law,
- the child's personal information was made public by the child, with the consent of a person who can sign legal agreements; or
- the processing is for statistical, or research purposes and all legal conditions are met.

8 WHEN, AND FROM WHERE, DOES FRT OBTAIN PERSONAL INFORMATION ABOUT DATA SUBJECTS?

FRT collects information about data subjects:

- directly from data subjects;
- based on engagements/interactions of the data subject with FRT, such as on social media, and through reports, emails, letters, telephone calls and surveys;

- based on a data subject's relationship with FRT;
- from third parties that FRT interacts with for the purposes of conducting its business (such as approved business partners who are natural or juristic person holding a business relationship with FRT to offer grant recipients value-added solutions), credit bureaus, regulators and government departments or service providers; and
- from public sources (such as newspapers, company registers, online search engines, deed registries, public posts on social media, public directories).

FRT collects and processes data subjects' personal information at the start of, and for the duration of their relationship with FRT. FRT may also process a data subjects' personal information when their relationship with FRT has ended.

If the law requires FRT to do so, it will ask for a data subject's consent before collecting personal information about them from third parties.

Third parties (which may include parties FRT engages with as independent responsible parties, joint responsible parties, or operators) from whom FRT may collect data subjects' personal information include, but are not limited to, the following:

- people the data subject has authorised to share their personal information,
- attorneys, tracing agents, debt collectors and other persons that assist with the enforcement of agreements;
- third party professional service providers such as accountants, tax professionals and legal services providers;
- law enforcement and fraud prevention agencies, and other persons tasked with the prevention and prosecution of crime;
- regulatory authorities, industry ombuds, government departments, and local and international tax authorities;
- credit bureaus;
- institutions of higher learning and qualification information providers;
- trustees, executors, or curators appointed by a court of law;
- courts of law or tribunals; and
- social media platforms.

9 WHEN AND HOW FRT OBTAINS DATA SUBJECT'S PERSONAL INFORMATION FROM/WITH THIRD-PARTY SOURCES

FRT may obtain data subjects' personal information from third-party sources such as credit bureaus for any one or more of the following reasons:

- if the data subject requested FRT to do so, or agreed that it may do so;
- to verify a data subject's identity;
- to prevent or detect fraud or other financial crimes;
- to obtain or verify a data subject employment details;
- to obtain and verify a data subject's marital status;
- to obtain, verify, or update a data subject's contact or address details;
- to obtain a credit report about a data subject which includes their credit history and credit score, when the data subject applies for funding;
- to trace a data subject's whereabouts;

- to conduct research, statistical analysis or system testing; or
- to determine the source(s) of a data subject's income.

10 REASONS FRT NEEDS TO PROCESS DATA SUBJECTS' PERSONAL INFORMATION

FRT may process data subjects' personal information for the reasons outlined below.

Contract

FRT may process data subjects' personal information if it is necessary to conclude or perform under a contract FRT has with a data subject or to provide a solution to a data subject. This includes:

- assess and process applications for grants, including verifying information provided in the application;
- to conduct a needs analysis so that only persons who meet FRT's criteria are considered for grants;
- to provide a data subject with grants they have requested;
- procuring goods and services from the supplier or business partner;
- to open, manage and maintain data subject accounts or relationships with FRT;
- to arrange training, mentorship, coaching or financial literacy for data subject either by FRT or from FRT's suppliers or business partners;
- to enable FRT to receive goods, documents or notices from a supplier or business partner;
- to enable FRT to make payment to or recover payment from a data subject;
- to enable data subject to participate in and make use of value-added solutions offered by FRT or FRT's business partners;
- to communicate with a data subject and carry out data subject instructions and requests;
- to respond to data subject enquiries and complaints;
- to enforce and collect on any agreement when a data subject is in default or breach of the terms and conditions of the agreement, such as tracing data subject, or to institute legal proceedings against a data subject. In such scenarios FRT may aggregate the contact details provided to it to determine the data subject's most accurate contact details in order to enforce or collect on any agreement the data subject has with FRT;
- to disclose and obtain personal information from credit bureaus regarding a data subject's credit history;
- to include data subject profiles and feedback in FRT reports on the usage of its funds or otherwise to promote FRT's activities;
- performing vendor and other risk management processes;
- to meet record-keeping obligations; or
- for any other related purposes.

Law

FRT may process data subject' personal information if the law requires or permits it. This includes:

- to comply with legislative, regulatory, risk and compliance requirements (including directives, sanctions, and rules);
- to comply with applicable voluntary and involuntary codes of conduct;
- to fulfil reporting requirements and information requests;
- to meet record-keeping obligations;

- to give effect to and adhere to legislation governing various protected relationships (e.g. civil unions, marriages, customary marriages); or
- for any other related purposes.

Legitimate interest

FRT may process data subjects' personal information in the daily management of its business and finances and to protect FRT's data subjects, employees, service providers and assets. It is to the FRT's benefit to ensure that its procedures, policies, and systems operate efficiently and effectively.

FRT may process data subjects' personal information to provide them with the most appropriate grants solutions and to develop and improve grants and FRT's business.

FRT may process a data subject's personal information if it is required to protect or pursue their, the FRT's or a third party's, legitimate interest. This includes:

- to develop, implement, monitor, and improve FRT's business processes, policies and systems;
- to manage business continuity and emergencies;
- to protect and enforce the FRT's rights and remedies in the law;
- to develop, test and improve funding solutions for grant recipients, data subject this may include connecting the data subject's personal information with other personal information obtained from third parties or public records to better understand data subject needs and develop solutions that meet these needs. FRT may also consider data subjects' behaviour, preferences, expectations, feedback and financial history;
- to enable data subject to participate in and make use of value-added solutions;
- to respond to a data subject's enquiries and communications including the recording of engagements and analysing the quality of FRT's engagements with a data subject ;
- to respond to complaints including deriving analytics of complaints to understand trends and prevent future complaints and providing compensation where appropriate;
- to enforce and collect on any agreement when a data subject is in default or breach of the terms and conditions of the agreement, such as tracing the data subject, or to institute legal proceedings against the data subject. In such a scenario, FRT may aggregate the contact details provided to any of the companies in FRT to determine the data subject's most accurate contact details in order to enforce or collect on any agreement the grant recipient, supplier and business partner has with FRT;
- to meet record-keeping obligations;
- to fulfil reporting requirements and information requests;
- to detect, prevent and report theft, fraud, money laundering, corruption, and other crimes. This may include the processing of special personal information, such as alleged criminal behaviour or the supply of false, misleading, or dishonest information when applying for funding from FRT, or avoiding liability by way of deception, to the extent allowable under applicable privacy laws. This may also include the monitoring of buildings from which we operate including CCTV cameras and access control;
- for statistical purposes; and
- for any other related purposes.

11 WHY DOES FRT FURTHER USE OR PROCESS DATA SUBJECT' PERSONAL INFORMATION?

At the time that FRT collects personal information from data subject, it will have a reason or purpose to collect that personal information. In certain circumstances, however, FRT may use that same personal information for other purposes. FRT will only do this where the law allows it to, and the other purposes are compatible with the original purpose/s applicable when FRT collected the data subject's personal information. FRT may also need to request a data subject's specific consent for the further processing in limited circumstances. Examples of these other purposes are included in the list of purposes set out in section 10 above.

FRT may also further use or process a data subject's personal information if:

- the personal information about the data subject was obtained from a public record, like the deed's registry;
- the data subject made the personal information public, like on social media;
- the personal information is used for historical, statistical or research purposes, the results will not identify the data subject;
- proceedings have started or are contemplated in a court or tribunal;
- it is in the interest of national security;
- if FRT must adhere to the law, specifically tax legislation; or
- the Information Regulator has exempted the processing.

FRT may also further use or process a data subject's personal information if the data subject has consented to it or in the instance of a child, a competent person has consented to it.

Any enquiries about the further processing of data subject personal information can be made through the contact details of the data subject's solution provider or FRT's platform provider, as set out in section 3 of this notice.

12 WHEN, HOW, AND WITH WHOM DOES FRT DATA SUBJECTS' PERSONAL INFORMATION?

In general, FRT will only share data subjects' personal information if any one or more of the following apply:

- If the data subject has consented to this;
- if it is necessary to conclude or perform under a contract FRT has with the data subject;
- if the law requires it; or
- if it is necessary to protect or pursue the data subject's, FRT's or a third party's legitimate interest.

Where permitted, FRT may share a data subject's personal information with the following persons, which may include parties that FRT engages with as independent responsible parties, joint responsible parties, or operators. These persons have an obligation to keep data subject' personal information secure and confidential:

- FRT's employees, as required by their employment conditions;
- the data subject's spouse, dependants, partners, employer, joint applicant or mandated persons, beneficiaries and other similar sources;
- people the data subject has authorised to obtain their personal information;
- attorneys, tracing agents, debt collectors and other persons that assist with the enforcement of agreements;
- law enforcement and fraud prevention agencies, and other persons tasked with the prevention and prosecution of crime;

- regulatory authorities, industry ombuds, government departments, and local and international tax authorities and other persons the law requires FRT to share data subject personal information with;
- credit bureaus;
- qualification information providers;
- trustees, executors, or curators appointed by a court of law;
- payment or account verification service providers;
- our service providers, agents, and subcontractors;
- persons to whom FRT have ceded its rights or delegated its obligations to under agreements, such as where a business is sold;
- courts of law or tribunals that require the personal information to adjudicate referrals, actions or applications;
- the general public, where data subject submit content to FRT social media sites/pages; or
- FRT's joint venture and business partners with which it has concluded business agreements and where legally permissible.

13 UNDER WHAT CIRCUMSTANCES WILL FRT TRANSFER DATA SUBJECTS' PERSONAL INFORMATION TO OTHER COUNTRIES?

FRT will only transfer a data subject's personal information to third parties in another country in any one or more of the following circumstances:

- where a data subject's 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 the data subject or a contract with a third party that is in the data subject's interest;
- where the data subject has consented to the transfer; and/or
- where it is not reasonably practical to obtain the data subject's consent, but the transfer is in the data subject's interest/benefit.

This transfer will happen within the requirements and safeguards of applicable laws or data protection rules that apply to FRT.

Where possible, the party processing a data subject's personal information in another country will agree to apply the same level of protection as available by law in the data subject's 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 FRT transferring the data subject's personal information to another country would be where personal information is stored with a cloud services provider and the servers are located in a foreign country.

14 DATA SUBJECTS' DUTIES AND RIGHTS REGARDING THE PERSONAL INFORMATION FRT HAS ABOUT THEM

A data subject must provide FRT with proof of identity when enforcing the rights below to enable FRT to verify the identity of the data subject.

A data subject must inform FRT when their personal information changes, as soon as possible after the change.

A data subject warrant that when they provide FRT with personal information of any other person, they have permission from them to share their personal information with FRT. FRT will process the personal information of such other person as stated in this notice.

Right to access

Data subjects have the right to request access to the personal information FRT has about them by contacting FRT. This includes requesting:

- confirmation that FRT holds the data subject's personal information;
- a copy or description of the record containing the data subject's personal information; and
- the identity or categories of third parties who have had access to the data subject's personal information.

FRT will attend to requests for access to personal information within a reasonable time and in alignment with the law. Data subjects may be required to pay a reasonable fee (aligned to the law) to receive copies or descriptions of records, or information about, third parties. FRT will inform data subject of the fee before attending to their request.

Data subject should note that the law may limit their right to access information. For example, information relating to FRT's intellectual property, competitively sensitive information, or legally privileged information.

Right to correction, deletion, or destruction

Data subjects have the right to request FRT to correct, delete or destroy the personal information it has about them if it is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, obtained unlawfully, or if FRT is no longer authorised to keep it. Data subjects must inform FRT of their request in the prescribed form. Prescribed form 2 has been included as an annexure to this notice.

FRT will take reasonable steps to determine if the personal information is correct and make any correction needed. It may take a reasonable time for the change to reflect on FRT's platform/systems. FRT may request documents from the data subject to verify the change in personal information.

A specific agreement that a data subject has entered into with FRT may determine how the data subject must change their personal information provided at the time when they entered into the specific agreement. Data subjects must adhere to these requirements.

If the law requires FRT to keep the personal information, it will not be deleted or destroyed upon the data subject grant recipient, implementation partner, beneficiary, supplier and business partner's request. The deletion or destruction of certain personal information may lead to the termination of a data subject's relationship with FRT.

Right to objection

Data subject may object on reasonable grounds to the processing of their personal information where the processing is in their legitimate interest, FRT's legitimate interest or in the legitimate interest of another party.

Data subject must inform FRT of their objection in the prescribed form. Prescribed form 1 is included as an annexure to this notice.

FRT will not be able to give effect to the data subject's objection if the processing of their personal information was and is permitted by law, the data subject has provided consent to the processing and FRT's processing was conducted in line with their consent; or the processing is necessary to conclude or perform under a contract with the data subject.

FRT will also not be able to give effect to a data subject's objection if the objection is not based upon reasonable grounds and substantiated with appropriate evidence.

FRT will provide data subject with feedback regarding their objections.

Right to withdraw consent

Where a data subject has provided their consent for the processing of their personal information, the data subject may withdraw their consent. If they withdraw their consent, FRT will explain the consequences to the data subject. If a data subject withdraws their consent, FRT may not be able to provide certain solutions to the data subject or permit the data subject access to FRT's platform. FRT will inform the data subject if this is the case. FRT may proceed to process data subject personal information, even if they have withdrawn their consent, if the law permits or requires it. It may take a reasonable time for the change to reflect on FRTs' systems. During this time, FRT may still process the data subject's personal information.

Right to complain

Data subjects have a right to file a complaint with FRT or any regulator with jurisdiction (in South Africa data subject can contact the Information Regulator) about an alleged contravention of the protection of their personal information. FRT will address data subject complaints as far as possible.

The contact details of the Information Regulator are provided below.

JD House
27 Siemens Street
Braamfontein
Johannesburg
2001

PO Box 31533
Braamfontein
Johannesburg
2017

Tel no: +27 (0)10 023 5200
Website: <https://info regulator.org.za>
Complaints email: POPIAComplaints@info regulator.org.za
General enquiries email: enquiries@info regulator.org.za

15 HOW FRT SECURES DATA SUBJECT

FRT will take appropriate and reasonable technical and organisational steps to protect data subjects' personal information in line with industry best practices. FRT's security measures, including physical, technological, and procedural safeguards, will be appropriate and reasonable. This includes the following:

- keeping systems secure (such as monitoring access and usage);
- storing records securely;
- controlling the access to premises, systems and/or records; and
- safely destroying or deleting records.

16 HOW LONG DOES FRT KEEP DATA SUBJECT' PERSONAL INFORMATION?

FRT will keep data subjects' personal information for as long as:

- the law requires FRT to keep it;
- a contract between the data subject and FRT requires FRT to keep it;
- the data subject has consented to FRT keeping it;
- FRT is required to keep it to achieve the purposes listed in this notice;
- FRT requires it for statistical or research purposes;
- a code of conduct requires FRT to keep it; and/or
- FRT requires it for lawful business purposes.

TAKE NOTE: FRT may keep data subjects' personal information even if they no longer have a relationship with FRT or if they request FRT to delete or destroy it, if the law permits or requires.

17 HOW FRT PROCESSES PERSONAL INFORMATION ABOUT PERSONS RELATED TO A JURISTIC PERSON

If a data subject is a juristic person, such as a company or close corporation, FRT may collect and use personal information relating to the juristic person's directors, officers, employees, beneficial owners, partners, shareholders, members, authorised signatories, representatives, agents, payers, payees, data subjects, guarantors, spouses of guarantors, sureties, spouses of sureties, other security providers and other persons related to the juristic person. These are related persons.

If a data subject provides the personal information of a related person to FRT, they warrant that the related person is aware that they are sharing their personal information with FRT, and that the related person has consented thereto.

FRT will process the personal information of related persons as stated in this notice, thus references to "data subjects" in this notice will include related persons with the necessary amendments and limitations.

ANNEXURES

- **FORM 2**

REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION OR DESTROYING OR DELETION OF RECORD OF PERSONAL INFORMATION IN TERMS OF SECTION 24(1) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013) REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018 [Regulation 3]

- **FORM 1:**

OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION IN TERMS OF SECTION 11(3) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013) REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018 [Regulation 2]

FORM 2

REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION OR DESTROYING OR DELETION OF RECORD OF PERSONAL INFORMATION IN TERMS OF SECTION 24(1) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013)

REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018
[Regulation 3]

Note:

1. Affidavits or other documentary evidence as applicable in support of the request may be attached.
2. If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.
3. Complete as is applicable.

Mark the appropriate box with an "x".

Request for:

Correction or deletion of the personal information about the data subject which is in possession or under the control of the responsible party.

Destroying or deletion of a record of personal information about the data subject which is in possession or under the control of the responsible party and who is no longer authorised to retain the record of information.

A	DETAILS OF THE DATA SUBJECT
Name(s) and surname / registered name of data subject:	
Unique identifier/ Identity Number:	
Residential, postal or business address:	
	Code ()
Contact number(s):	
Fax number/E-mail address:	
B	DETAILS OF RESPONSIBLE PARTY
Name(s) and surname / registered name of responsible party:	
Residential, postal or business address:	
	Code ()
Contact number(s):	

Fax number/ E-mail address:	
C	INFORMATION TO BE CORRECTED/DELETED/ DESTROYED/ DESTROYED
D	<p>REASONS FOR *CORRECTION OR DELETION OF THE PERSONAL INFORMATION ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24(1)(a) WHICH IS IN POSSESSION OR UNDER THE CONTROL OF THE RESPONSIBLE PARTY ; and or</p> <p>REASONS FOR *DESTRUCTION OR DELETION OF A RECORD OF PERSONAL INFORMATION ABOUT THE DATA SUBJECT IN TERMS OF SECTION 24(1)(b) WHICH THE RESPONSIBLE PARTY IS NO LONGER AUTHORISED TO RETAIN.</p> <p><i>(Please provide detailed reasons for the request)</i></p>

Signed at this day of20.....

.....
Signature of data subject/ designated person

FORM 1
OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION IN TERMS OF
SECTION 11(3) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO.
4 OF 2013)

REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2018
 [Regulation 2]

Note:

1. *Affidavits or other documentary evidence as applicable in support of the objection may be attached.*
2. *If the space provided for in this Form is inadequate, submit information as an Annexure to this Form and sign each page.*
3. *Complete as is applicable.*

A	DETAILS OF DATA SUBJECT
Name(s) and surname/ registered name of data subject:	
Unique Identifier/ Identity Number	
Residential, postal or business address:	
	Code ()
Contact number(s):	
Fax number / E-mail address:	
B	DETAILS OF RESPONSIBLE PARTY
Name(s) and surname/ Registered name of responsible party:	
Residential, postal or business address:	
	Code ()
Contact number(s):	
Fax number/ E-mail address:	
C	REASONS FOR OBJECTION IN TERMS OF SECTION 11(1)(d) to (f) <i>(Please provide detailed reasons for the objection)</i>

Signed at this day of20.....

.....
Signature of data subject/designated person