

Personal Information Access Request Procedure



moshesh

PARTNERS

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1. INTRODUCTION

- 1.1. Moshesh Partners Fund Management (Pty) Ltd (the "Company") acknowledges that it is a Responsible Party in terms of the Protection of Personal Information Act, 2013 (Act no. 4 of 2013) ("**POPIA**"). This document describes how the Company responds to requests from Data Subjects for access to their Personal Information. This process will ensure that the Company complies with its legal obligations when Data Subjects request access to their Personal Information from the Information Officer.

2. REFERENCE DOCUMENTS

- 2.1. The Protection of Personal Information Act, 2013 (Act no. 4 of 2013); and
- 2.2. European Union General Data Protection Regulation ("GDPR").

3. DEFINITIONS

- 3.1. "Data Subject" means the person to whom the Personal Information relates.
- 3.2. "Operator" means a person who processes Personal Information for the Responsible Party in terms of a contract;
- 3.3. "Personal Information" means any information relating to an identifiable, living natural person, or to the extent applicable, a juristic person. This includes, but is not limited to, information relating to race, gender, sex, pregnancy, marital status, ethnic and social origin, colour, sexual orientation, age, physical or mental health, religion, disability, language, information relating to educational, medical, financial, criminal or employment history, any identifying number, e-mail address, physical address, telephone number, location information, online identifier or biometric Personal Information.
- 3.4. "Personal Information Access Request" means a process designed to ensure the Company complies with its legal obligations when providing Data Subjects with access to their Personal Information.
- 3.5. "Processing" means any activity 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, or merging, linking, as well as restriction, degradation, erasure or destruction of Personal Information.
- 3.6. "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 Personal Information.

4. PERSONAL INFORMATION ACCESS REQUEST FROM THE DATA SUBJECT

- 4.1. A Personal Information Access Request is a request made by an individual or a juristic entity via its authorised representative for Personal Information held by the Company.

- 4.2. The Personal Information Access Request provides the Data Subject with the right to view or request copies of Personal Information Processed by the Company.
- 4.3. The Personal Information Access Request must be made in writing to the Information Officer of the Company.
- 4.4. The Data Subject can make a Personal Information Access Request by sending an e-mail to the Information Officer at chris@moshesh.partners.

5. PERSONAL INFORMATION ACCESS REQUEST PROCESS

- 5.1. The individual requesting access to their Personal Information will need to complete a Personal Information Access Request form and provide it to the Information Officer.
- 5.2. The Information Officer will verify the identity of the individual making the Personal Information Access Request to ensure that the individual has the right to view the Personal Information.
- 5.3. The Information Officer will notify the Data Subject that their Personal Information Access Request will be attended to within 30 (thirty) days.
- 5.4. The Information Officer will ensure all relevant Personal Information is sourced internally or from third parties, if so required.
- 5.5. The Information Officer will provide a response to the Data Access Request form as well as the Personal Information via a secure method.

6. PERSONAL INFORMATION ACCESS REQUEST REJECTIONS

- 6.1. Personal Information Access Requests may be rejected if:
 - 6.1.1. The Personal Information is stored only for statistical purposes and the identification of the Data Subject from the Personal Information is not possible; or
 - 6.1.2. The Personal Information Access Request is made for other non-Personal Information protection purposes.

7. EXCLUSIONS

- 7.1. A Data Subject does not have the right to access Personal Information recorded about another Data Subject, unless Personal Information is being accessed by the authorized representative of the Data Subject.
- 7.2. The following information will not be disclosed by the Company:
 - 7.2.1. Information about other Data Subjects;
 - 7.2.2. Publicly available information;
 - 7.2.3. Privileged documents; and
 - 7.2.4. Information protected by copyright law.

Information Officer

Chris Botha



31 March 2021