

DATA SUBJECT REQUEST PROCEDURE

1. Purpose

This document details the procedure for a data subject (natural or juristic person to whom the personal data relates) to request access to their data. In terms of the **Reunert Group Data Privacy Policy**, RRS (hereinafter referred to as 'we') respects the rights of data subjects to:

- access their personal information and know with whom we shared their personal information;
- correct or delete inaccurate, irrelevant, excessive, out of date, incomplete, misleading or illegally obtained information;
- withdraw consent; and
- object to the processing of their information when it is not necessary for the conclusion or performance of a contract or to comply with an obligation imposed by law.

2. Responsible Employees

The Information Officer, or delegated Deputy Information Officer, is responsible for responding to all requests for access to personal information made in terms of the Protection of Personal Information Act (POPIA).

3. Data Subject Rights

A data subject has the right to:

- request that the responsible party confirm, free of charge, whether it holds personal information about the data subject;
- request information about the identity of all third parties who have or have had access to the information, or
- categories of third parties who have or have had access to the information; and
- the record of the personal information about the data subject, or
- a description of the personal information about the data subject held by the responsible party.

We shall provide the information within a reasonable time (30 days), in a reasonable manner, and a generally understandable format. We may charge a fee for providing access.

4. Requesting Access to a Personal Information Record

A request for information must be submitted to the Information Officer or Deputy Information Officer at POPIA-RRS@reutech.co.za by completing:

Form A: Request for access to a record

The Information Officer will determine whether we are the responsible party i.t.o. POPIA regarding the data subject's personal information. If we are the responsible party, the request for information will be processed.

If we are not the responsible party, the data subject will be informed who the responsible party is. In order to process the data request, we may:

- request the data subject to provide documentary proof of authority to act on behalf of their company, a copy of their ID or another form of identification;
- request further information from the data subject to help us find the information to which the data subject requested access;

If a fee is payable, we will provide the data subject with a written estimate of the fee before the request is processed. In addition, we may require the data subject to pay a deposit for all or part of the fee.

5. Response to Data Record Request

We will respond to a data request as follows:

- The Information Officer will notify the data subject of our decision to either provide or refuse access to the information within 30 days.
- The notification can be sent by e-mail or in the format requested by the data subject.

If the data subject requested a copy of their record, the outcome of our decision will be communicated via:

Form B: Outcome of request for access to a record.

The Information Officer may extend the period for responding to the request once for no more than an additional 30 days if:

- the request is for a large number of records or requires a search through a large number of records, and compliance with the original period would unreasonably interfere with our activities;
- we need to search for the records in, or collect them from, an office other than our head office, and we cannot reasonably complete that task within the original 30-day period;
- we need to, or should, consult among entities within the Reunert Group or with another private body to decide whether to grant the request, and we cannot reasonably do that within the original 30-day period;
- or
- the data subject consents to an extension in writing.

If we grant the data subject's request, the notice will state:

- the access fee the data subject must pay if applicable;
- the format in which we will provide the information; and
- the data subject's right to correction of information in terms of section 24 of the POPIA.

If we refuse the data subject's request, we will advise in writing why, including any POPIA and PAIA (Promotion of Access to Information Act 2 of 2000) provisions that we rely on, without referencing the content of the requested data record.

Information will be provided in the format requested unless conversion of the information to that format:

- will interfere with the effective administration of RRS;
- will be detrimental to the preservation of the record; or
- will amount to an infringement of copyright that we do not own.

6. Request to Correct or Delete Personal Information

A data subject may ask us to:

- correct or delete personal information about the data subject in our possession or under our control that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully; and
- destroy or delete a record of personal information about the data subject that we are no longer authorised to retain in terms of section 14 of the POPIA.

A request to correct or delete personal information must be submitted to the Information Officer or Deputy Information Officer at POPIA-RRS@reutech.co.za by completing:

Form C: Request for correction or deletion of personal information or destruction or deletion of a record of personal information

The Information Officer will determine whether we are the responsible party i.t.o. POPIA regarding the data subject's personal information. If we are the responsible party, the request for information will be processed.

If we are not the responsible party, the data subject will be informed who the responsible party is.

In order to process the data request, we may:

- request the data subject to provide documentary proof of authority to act on behalf of their company, a copy of their ID or another form of identification;
- request further information from the data subject to help us find the information to which the data subject requested access;

7. Response to Request to Correct or Delete Personal Information

We will respond to the request to correct or delete personal information within 60 days as follows:

- We will advise of any action taken as a result of the request.

Where we can comply to the request:

- we will correct the information as requested;
- we will destroy or delete the information as requested;
- we will advise the data subject of steps taken in respect of the data subject as a result of the information changes

Where we cannot comply to the request:

- we will provide the data subject with evidence in support of why we will not comply; or
- if the data subject is not satisfied with our response, the data subject may ask that we attach an indication to the information, if reasonable in the circumstances, that a correction was requested but not made.

8. Request to Withdraw Consent

A data subject has the right to withdraw consent to process their personal information at any time.¹

¹ Section 11(2)(b) of POPIA.

To withdraw consent, a data subject is required to submit the request to withdraw consent in writing with specific reference to the consent given.

9. Objection to Processing of Personal Information

A data subject may object to the processing of their personal information at any time, on reasonable grounds and taking into account applicable Privacy Notices available on www.reutechradar.co.za and the RRS intraweb. An objection must be submitted to the Information Officer or Deputy Information Officer at POPIA-RRS@reutech.co.za by completing:

Form D: Objecting to the processing of your personal information

A data subject may also object to the processing of their personal information for direct marketing by any communication channel.

A data subject may not object to processing of their personal information if we process their personal information to:

- carry out actions for the conclusion or performance of a contract with the data subject; or
- comply with a legal obligation.

10. Response to a Data Subject's Objection to the Processing of their Information

The Information Officer will consider the grounds for the Data Subject's objection to processing of their personal information and notify the data subject of our decision to either:

- stop processing the personal information, or
- to deny the objection and continue processing the personal information and the reasons for this decision.

11. Associated Documents

Forms referenced in this procedure:

FORM A: Request for access to a record

FORM B: Outcome of request for access to a record, and fees payable

FORM C: Request for correction or deletion of personal information or destruction or deletion of a record of personal information

FORM D: Objection to the processing of your personal information

Reunert Group Data Privacy Policy

12. Document Metadata

Document revision:	1
Approval date:	August 2021
Document owner:	Deputy Information Officer
Document author:	RRS
Last updated:	August 2021
Next review date:	August 2022
Published:	August 2021

FORM A

Request for access to a record²

- 1. If the space provided in the form is inadequate, please submit additional information as an annexure to this form and sign each page.
- 2. We will process a request for access to a record other than a record containing your personal information after you have paid the request fee.
- 3. The fee depends on the form in which you need to access the record and the time we have to search for and prepare the record.
- 4. We will let you know in writing whether your request has been approved or denied, and if we approve your request, we will let you know what the related fees are.

To: The information officer

Address

E-mail address

Fax number

- This request is in my own name
- I'm making this request on behalf of someone else—[Please attach proof of the capacity in which you are making this request].

² Regulation 7 of PAIA.

YOUR DETAILS

Name and surname
Identity number
Postal address
Residential address
E-mail address
Telephone number
Cell number
Fax number

HOW DO YOU PREFER TO BE CONTACTED?

Postal address
Residential address
E-mail address
Fax

DETAILS OF THE PERSON ON WHOSE BEHALF YOU ARE MAKING THIS REQUEST (IF APPLICABLE)

Name and surname
Identity number
Postal address
Residential address
E-mail address
Telephone number
Cell number
Fax number

WHICH RIGHT ARE YOU EXERCISING OR PROTECTING?

Which right are you exercising or protecting?

Explain why you need this record to exercise or protect that right.

DETAILS OF THE RECORD YOU ARE REQUESTING

Please provide full particulars of the record that you wish to access, including the reference number if you have it. This will help us find the record.

Describe the record or relevant part of the record

Reference number (if you have it)

Any further information about the record.

TYPE OF RECORD

Written or printed record	
Visual images (including photographs, slides, video recordings, computer-generated images, sketches, etc.)	
Recorded words or information that can be reproduced in sound	
Held on a computer or in an electronic or machine-readable form	

FORMAT IN WHICH YOU WOULD LIKE TO RECEIVE THE RECORD

A printed copy of record (including copies of any virtual images, transcriptions and information held on a computer or in an electronic or machine-readable form.	
Written or printed transcription of virtual images (including photographs, slides, video recordings, computer-generated images, sketches, etc.)	

Transcription of soundtrack (written or printed)	
Copy of record on a flash drive (including virtual images and soundtracks)	
Copy of record on compact disc drive (including virtual images and soundtracks)	

HOW WOULD YOU LIKE TO ACCESS THE RECORD?

Personal inspection of the record at our registered address (including listening to recorded words, information which can be reproduced in sound, or information held on computer or in electronic or machine-readable form)	
Postal services to a postal address	
Postal services to a street address	
Fax information in written or printed format (including transcriptions)	
E-mail information (including soundtracks if possible)	
Preferred language	

(If the record is not available in the language you prefer, we may give you access in the language in which the record is available.)

Date _____ Signed at _____

Signature of the requester / person on behalf of whom the request is made

FOR OFFICE USE

Reference number	
Date received	
Access fees (if any)	
Deposit (if any)	

DETAILS OF THE PERSON WHO RECEIVED THE REQUEST

Job Title	
Name and surname of Information Officer	

Signature of Information Officer

FORM B

Outcome of request for access to a record, and fees payable³

- 1. If your request is granted
 - a. you must pay the deposit (if any) before we can process your request; and
 - b. we will only release the record you requested once we receive full payment.
- 2. Please note your reference number in all future correspondence.

To:

Address

E-mail address

Fax number

Reference number

YOUR REQUEST HAS BEEN

- Approved
- Denied

Because

--

YOU REQUESTED

Personal inspection of the record at our registered address (including listening to recorded words, information which can be reproduced in sound, or information held on computer or in electronic or machine-readable form)	
--	--

Please take these steps:

1. Make an appointment to inspect the record.
2. Bring this form with you.

Accessing a record this way is free. However, if you need copies of the information, you will be charged the appropriate fees as set out below.

OR

YOU REQUESTED

A printed copy of record (including copies of any virtual images, transcriptions and information held on a computer or in an electronic or machine-readable form.	
Written or printed transcription of virtual images (including photographs, slides, video recordings, computer-generated images, sketches, etc.)	
Transcription of soundtrack (written or printed)	
Copy of record on a flash drive (including virtual images and soundtracks)	
Copy of record on compact disc drive (including virtual images and soundtracks)	

YOU ASKED TO ACCESS THE RECORD AS FOLLOWS

Postal services to a postal address	
Postal services to a street address	
Fax information in written or printed format (including transcriptions)	
E-mail information (including soundtracks if possible)	
Preferred language	

FEES PAYABLE WITH REGARDS TO YOUR REQUEST

Item	Cost per A4-size page or part thereof/item	Number of pages/items	Total
Copy of Guide	R3.90		
Photocopy	R3.90		
Printed copy	R4.80		
Copy in a computer-readable form on:			
a) Flash drive	a) R0.00		
b) Compact disc	b) 56.00		
Transcription of visual images	Service to be outsourced. Will depend on quotation from Service provider.		
Copy of visual images			
Transcription of an audio record			
Copy of an audio record	R56.00		
Postage	Actual cost		
TOTAL:			

DEPOSIT PAYABLE

If the search exceeds six hours.

How many hours did the search take?	
What is the deposit payable? (Calculated as a third of the total amount per request)	

OUR BANK DETAILS

Bank	
Account holder	
Type of account	
Account number	
Branch code	
Reference number	
Proof of payment address	

Date _____ Signed at _____

Signature of Information Officer

FORM C

Request for correction or deletion of personal information or destruction or deletion of a record of personal information⁴

- 1. You may attach affidavits and other evidence to support your objection.
- 2. If the space provided in the form is inadequate, please submit additional information as an annexure to this form and sign each page.

What would you like us to do?

- Correct personal information we have about you.
- Delete personal information we have about you.
- Destroy or delete a record of personal information about you that we are no longer authorised to retain.

DETAILS OF THE DATA SUBJECT

Name and surname/Registered name

Identity number/Registration number

Address (residential, postal, or business)

Contact number(s)

E-mail address/Fax number

DETAILS OF THE RESPONSIBLE PARTY

Name and surname/Registered name

Address (residential, postal, or business)

Contact number(s)

E-mail address/Fax number

⁴ 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)

WHICH PIECE OF INFORMATION WOULD YOU LIKE US TO CORRECT, DELETE, OR DESTROY?

WHY ARE YOU MAKING THIS REQUEST?

Date _____

Signed at _____

Signature of the data subject or designated person

FORM D

Objecting to the processing of your personal information⁵

- 1. You may attach affidavits and other evidence to support your objection.
- 2. If the space provided in the form is inadequate, please submit additional information as an annexure to this form and sign each page.

DETAILS OF THE DATA SUBJECT

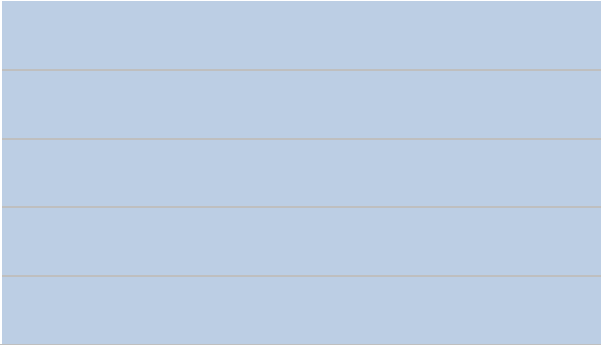
Name and surname/Registered name

Identity number/Registration number

Address (residential, postal, or business)

Contact number(s)

E-mail address/Fax number

A light blue rectangular area with horizontal lines, intended for providing details of the data subject.

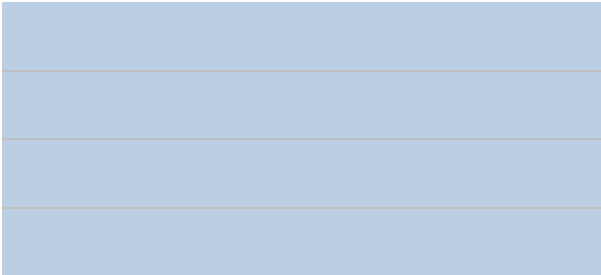
DETAILS OF THE RESPONSIBLE PARTY

Name and surname/Registered name

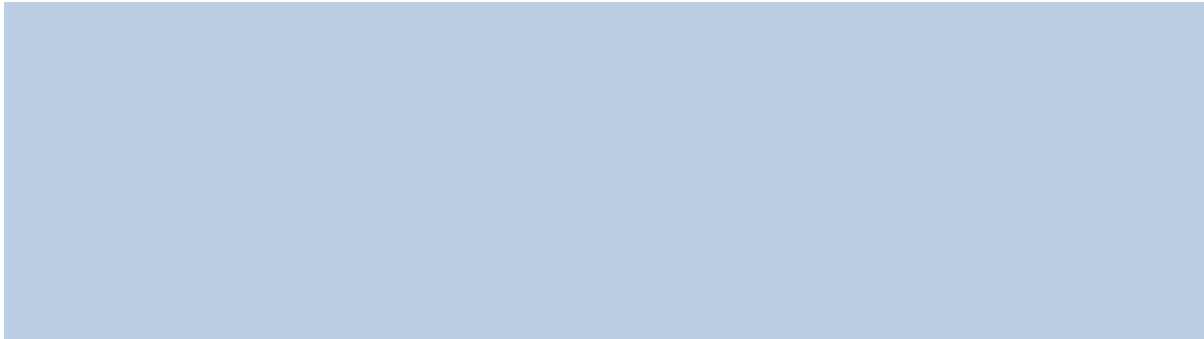
Address (residential, postal, or business)

Contact number(s)

E-mail address/Fax number

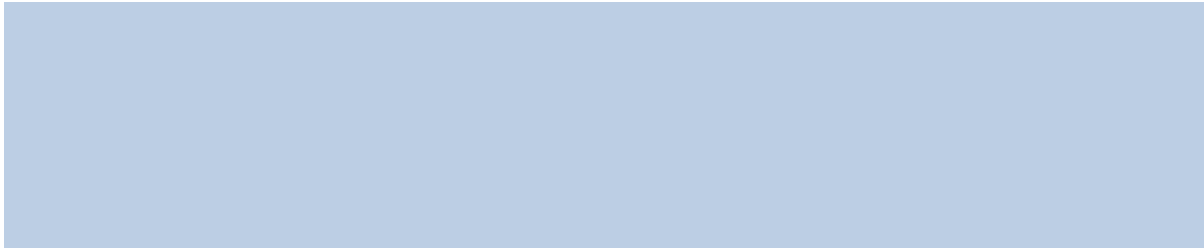
A light blue rectangular area with horizontal lines, intended for providing details of the responsible party.

REASONS FOR OBJECTING TO THE PROCESSING OF YOUR PERSONAL INFORMATION⁶

A large light blue rectangular area intended for providing reasons for objecting to the processing of personal information.

⁵ 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)

⁶ In terms of Section 11(1)(d) to (f)



Date _____

Signed at _____

Signature of the data subject or designated person