

Protection of Personal Information Act – Questionnaire

Operator/3rd Party Questionnaire

The Protection of Personal Information Act (POPIA) requires **Kanaan Asset Managers** (as the responsible party) to secure the integrity and confidentiality of personal information in its possession, or under its control by taking appropriate, reasonable technical and organisational measures to prevent

- Loss, damage to or unauthorised destruction of personal information; and
- Unlawful access to or processing of personal information.

It further requires that a **Kanaan Asset Managers** must have due regard to information security practices and procedures. The deadline for compliance is 1 July 2021

Service Providers to **Kanaan Asset Managers** will be required to adhere to POPIA and Data Protection laws, combined with the relevant retirement fund's Data Protection and Privacy Policies.

Our clients expect compliance by 1 July 2021. This set of questions is aimed at providing a level of comfort that the processes are in place to meet this deadline. The questions seek to understand what is already in place and also ask for assurance that the necessary steps being taken to ensure compliance by the 1 July 2021 deadline.

Please complete the attached set of questions and return to us as soon as possible. Where any answer to a question is no, please provide timeline for implementation.

1. Name of Operator/Third Party

2. Do you have a data protection policy in place to comply with POPIA?

3. Who is your information officer?

4. Please any list any Deputy Information Officers.

5. What protection do you have against cyber-crime attacks, viruses and any similar risks?

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6. How often is the effectiveness of the protection against external system attacks, viruses and any other similar risks tested?

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7. Do you have professional indemnity cover and cyber insurance in place which includes loss of data and possible POPIA breaches and how are the adequacy levels determined?

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8. What protection do you have against cyber-crime attacks, viruses and any similar risks?

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9. What security safeguards have you developed/have in place against risks such as loss, unauthorised access, destruction, use, amendment or disclosure of Personal Information collected, processed or managed on behalf of funds? (For instance, appropriate storage facilities, password requirements, building-entry systems, IT firewalls and other similar processes and/or systems)

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10. Data breach: Please explain the current process in place to report a data breach in respect of a fund's data and/or Personal Information. Also address at which point, based on the current process, funds will be advised of the breach.

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11. Confirm that any Personal Information collected, managed or processed will, with effect from 1 July 2021, only be used for the purpose for which the information is collected in terms of our agreement/mandate with you (and specifically not for direct marketing purposes).

12. Confirm that you intend to put the necessary processes/steps in place to monitor compliance and that breaches will be reported to the Responsible Party.

13. Please advise whether steps have been identified to ensure that with effect from 1 July 2021, any Personal Information will not be shared with any third parties, unless such sharing is part of the operational process, the third party is another service provider to **Kanaan Asset Managers** or the sharing is instructed by/agreed with **Kanaan Asset Managers**.

14. Please indicate which steps are currently in place to ensure that Personal Information shared internally or externally via email, is protected. (e.g. Password protection etc). Indicate whether any changes will be made to the current process.

15. Formal training on POPIA: Please advise whether your staff has been/will be trained on POPIA?

Name of person completing document

Signature

Date