



PROTECTION OF PERSONAL INFORMATION POLICY

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1 INTRODUCTION

- 1.1 This Policy regulates the use and protection of Personal Information that ATNS Processes.
- 1.2 ATNS acknowledges the need to ensure that Personal Information is handled with care and is committed to ensuring that it complies with the requirements of POPIA for the Processing of Personal Information.

2 PURPOSE OF THIS POLICY

- 2.1 POPIA imposes obligations on both public and private bodies for the Processing of Personal Information.
- 2.2 The purpose of this Policy is to inform Data Subjects about how ATNS Processes their Personal Information by, *inter alia*, collecting or collating, receiving, recording, storing, updating, distributing, erasing or destroying, disclosing and/or generally using the Data Subject's Personal Information.
- 2.3 This Policy explains how ATNS Processes the Personal Information of Data Subjects, the choices Data Subjects have regarding its use and disclosure, and how Data Subjects may correct the Personal Information which ATNS **has** on record for the relevant Data Subjects.

3 DEFINITIONS

In this Policy (as defined below), unless the context requires otherwise, the following words and expressions bear the meanings assigned to them and cognate expressions bear corresponding meanings –

- 3.1 "**Child**" means any natural person under the age of 18 (eighteen) years;
- 3.2 "**Data Breach**" means an actual or suspected breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, Personal Information under the control of or in the possession of ATNS;

- 3.3 **"Data Subject"** means the ATNS employees, Non-Executive Directors, clients or suppliers or any other persons in respect of whom ATNS Processes Personal Information, who may be either natural or juristic persons;
- 3.4 **"Employees"** means any employee of ATNS;
- 3.5 **"Operator"** means a person or entity who Processes Personal Information for a Responsible Party in terms of a contract or mandate, without coming under the direct authority of that Responsible Party;
- 3.6 **"Personal Information"** means information relating to any Data Subject, including but not limited to (i) views or opinions of another individual about the Data Subject; and (ii) information relating to such Data Subject's –
- 3.6.1 race, sex, gender, sexual orientation, pregnancy, marital status, nationality, ethnic or social origin, colour, age, physical or mental health, well-being, disability, religion, conscience, belief, cultural affiliation, language and birth;
- 3.6.2 education, medical, financial, criminal or employment history;
- 3.6.3 names, identity number and/or any other personal identifier, including any number(s), which may uniquely identify a Data Subject, account or client number, password, pin code, numeric, alpha, or alpha-numeric design or configuration of any nature, symbol, email address, domain name or IP address, physical address, cellular phone number, telephone number or other particular assignment;
- 3.6.4 blood type, fingerprint or any other biometric information;
- 3.6.5 personal opinions, views or preferences;
- 3.6.6 correspondence that is implicitly or expressly of a personal, private or confidential nature (or further correspondence that would reveal the contents of the original correspondence); and
- 3.6.7 information relating to corporate structure, composition and business operations (in circumstances where the Data Subject is a juristic person);
- 3.7 **"ATNS"** means the Air Traffic and Navigation Services SOC Limited;
- 3.8 **"Policy"** means this ***Protection of Personal Information*** Policy;
- 3.9 **"POPIA"** means the Protection of Personal Information Act, No 4 of 2013;

3.10 **"Processing"** means any operation or activity or any set of operations, whether or not by automatic means, concerning Personal Information, including –

3.10.1 the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;

3.10.2 dissemination by means of transmission, distribution or making available in any other form by electronic communications or other means; or

3.10.3 merging, linking, blocking, degradation, erasure or destruction. For the purposes of this definition, "Process" has a corresponding meaning;

3.11 **"record"** means any recorded information –

3.11.1 regardless of form or medium, including any of the following:

3.11.1.1 writing on any material;

3.11.1.2 information produced, recorded or stored by means of any tape recorder, computer equipment, whether hardware or software or both, or other device, and any material subsequently derived from information so produced, recorded or stored;

3.11.1.3 label, marking or other writing that identifies or describes anything of which it forms part, or to which it is attached by any means;

3.11.1.4 book, map, plan, graph or drawing;

3.11.1.5 photograph, film, negative, tape or other device in which one or more visual images are embodied so as to be capable, with or without the aid of some other equipment, of being reproduced;

3.11.2 in the possession or under the control of ATNS;

3.11.3 whether or not it was created by ATNS; and

3.11.4 regardless of when it came into existence;

3.12 **"Regulator"** means the Information Regulator established in terms of POPIA;

- 3.13 **"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;
- 3.14 **"Special Personal Information"** means Personal Information concerning a Data Subject's religious or philosophical beliefs, race or ethnic origin, trade union membership, political opinions, health, sexual life, biometric information or criminal behaviour; and
- 3.15 **"Third Party"** means any independent contractor, agent, consultant, sub-contractor or other representative of ATNS.

4 REGULATORY FRAMEWORK

THE REGULATORY FRAMEWORKS FOR THE PROTECTION OF PERSONAL INFORMATION POLICY ARE PROVIDED BY:

- 4.1 The Protection of personal Information Act 4 of 2013
- 4.2 The Promotion of Access to Information Act 2 of 2000, as amended
- 4.3 The National Archives and Records Service of South Africa Act 43 of 1996
- 4.4 The Constitution of South Africa of 1996
- 4.5 The Minimum Information Security standards, 1996

5 LINKS TO OTHER POLICIES

5.1 Policies that are related to the Protection of Personal Information Policy are:

- 5.1.1. Protection of Personal Information Act (POPIA) Manual;
- 5.1.2. Records Management Policy;
- 5.1.3. Information and Knowledge Management Policy;
- 5.1.4. Promotion of Access to Information Act (PAIA) Manual;
- 5.1.5. The Identity and Access Management Policy;
- 5.1.6. The Employment Equity Policy;
- 5.1.7. Employees Health and Wellness Policy;
- 5.1.8. Training and Development Policy;
- 5.1.9. HIV/Aids Policy;
- 5.1.10. Child Of Employees Bursars Policy;
- 5.1.11. Planning And Governance, Ip005: It Access and Identity Management Policy;
- 5.1.12. ATNS Sustainable Development Policy and Sustainability Guidelines;
- 5.1.13. Data and Information Governance Policy.

6 APPLICATION OF POPIA

- 6.1 ATNS, in its capacity as a Responsible Party shall strive to observe, and comply with, its obligations under the POPIA as well as accepted information protection principles, practices and guidelines when it Processes Personal Information from or in respect of any Data Subject.
- 6.2 This Policy applies to Personal Information collected by ATNS in connection with the services which it offers and provides. This includes information collected offline through our websites, branded pages on Third-Party platforms and applications accessed or used through such websites or Third-Party platforms which are operated by or on behalf of ATNS. This **Protection of Personal Information** Policy does not

apply to the information practices of Third-Party companies (including, without limitation, their websites, platforms and/or applications) which we do not own or control; or individuals that ATNS does not manage or employ. These Third-Party sites may have their own privacy policies and terms and conditions and Data Subjects are encouraged to read them before using those Third-Party sites.

7 WHAT INFORMATION AND ACTIVITIES DOES POPIA APPLY TO?

- 7.1 POPIA applies to the Processing of Personal Information of natural (i.e. living) and juristic (i.e. legal) persons (referred to as Data Subjects) by all Responsible Parties domiciled in the Republic of South Africa and those that are not domiciled in the Republic of South Africa but make use of means within the Republic of South Africa to process Personal Information.
- 7.2 POPIA applies to any Personal Information entered into a record by automated or non-automated means, provided that where the recorded Personal Information is Processed by non-automated means, it forms part of a filing system.
- 7.3 POPIA also provides that if there are any other pieces of legislation which contain more extensive protections for the Processing of Personal Information, that piece of legislation will apply.

8 SPECIAL PERSONAL INFORMATION AND PERSONAL INFORMATION OF CHILDREN

- 8.1 Special Personal Information is sensitive Personal Information of a Data Subject and ATNS acknowledges that it is not allowed to Process Special Personal Information other than in the specific circumstances prescribed under POPIA and/or generally if such –
- 8.1.1 Processing is carried out in accordance with the Data Subject's express consent;
- 8.1.2 Processing is necessary for the establishment, exercise or defence of a right or obligation in law;
- 8.1.3 Processing is necessary to comply with an obligation of international public law;
- 8.1.4 Processing is for historical, statistical or research purposes, subject to stipulated safeguards;

- 8.1.5 information has deliberately been made public by the Data Subject; or
- 8.1.6 specific authorisation has been obtained in terms of POPIA.
- 8.2 ATNS acknowledges that it may not Process any Personal Information concerning a Child and will only do so where it has obtained the consent of the parent or guardian of that Child or where it is permitted to do so in accordance with applicable laws.

9 PERSONAL INFORMATION OF ATNS EMPLOYEES

- 9.1 ATNS Processes the Personal Information of its Employees for employment-related purposes in accordance with the requirements of POPIA and in terms of ATNS internal policies and procedures.

10 COLLECTING PERSONAL INFORMATION

- 10.1 ATNS will always collect Personal Information in a fair, lawful, and reasonable manner to ensure that it protects the Data Subject's privacy, and will Process the Personal Information based on lawful grounds in a manner that does not adversely affect the Data Subject in question.
- 10.2 ATNS collects Personal Information directly from Data Subjects, unless an exception is applicable (such as, for example, where the Data Subject has made the Personal Information public, has authorised a Third Party to provide the ATNS with their Personal Information or the Personal Information is contained in or derived from a public record).
- 10.3 ATNS will always collect Personal Information in a fair, lawful, and reasonable manner to ensure that it protects the Data Subject's privacy, and will Process the Personal Information based on legitimate grounds in a manner that does not adversely affect the Data Subject in question.
- 10.4 Where ATNS obtains Personal Information from Third Parties, ATNS will ensure that it does so in compliance with POPIA.
- 10.5 Examples of such Third Parties may include –
 - 10.5.1 our clients' advisors or brokers;
 - 10.5.2 recruitment agencies;
 - 10.5.3 counterparties;

- 10.5.4 credit reference agencies; or
- 10.5.5 other companies providing services to ATNS.

11 WHEN AND HOW DOES THE ATNS OBTAIN CONSENT?

- 11.1 In certain cases, the ATNS obtains the consent of Data Subjects in order to Process the Personal Information of such Data Subjects. Data Subjects may provide their consent to ATNS either electronically or in writing.
- 11.2 ATNS may also rely on other lawful grounds for its Processing of Personal Information including to carry out actions in relation to the conclusion or performance of a contract to which the Data Subject is a party; to comply with a public law duty or to carry out an obligation imposed on the ATNS in terms of applicable law (as further detailed in section 13 below).
- 11.3 ATNS will inform Data Subjects of the manner and reason for which their Personal Information will be Processed before ATNS obtains their consent.
- 11.4 Where ATNS is relying on a Data Subject's consent as the legal basis for Processing Personal Information, the Data Subject may withdraw his/her/its consent or may object to ATNS's Processing of the Personal Information as set out in paragraph 22.2.4 below. This will not affect the lawfulness of any Processing carried out prior to the withdrawal of consent or any Processing justified by any other legal ground provided under POPIA.
- 11.5 If the consent is withdrawn or if there is a justified objection to the use or the Processing of such Personal Information, ATNS will ensure that the Personal Information is no longer Processed.

12 LAWFUL PROCESSING OF PERSONAL INFORMATION

- 12.1 ATNS will generally only Process a Data Subject's Personal Information where –
 - 12.1.1 consent of the Data Subject (or a competent person where the Data Subject is a Child) is obtained;
 - 12.1.2 Processing is necessary to carry out the actions for conclusion of a contract to which a Data Subject is party;
 - 12.1.3 Processing is necessary for the fulfilment of an employment contract to which the Data Subject is a party;

- 12.1.4 Processing complies with an obligation imposed by law on ATNS;
- 12.1.5 Processing protects a legitimate interest of the Data Subject; and/or
- 12.1.6 Processing is necessary for pursuing the legitimate interests of ATNS or of a Third Party to whom the Personal Information is supplied.

13 PURPOSES FOR THE PROCESSING OF PERSONAL INFORMATION

- 13.1 ATNS will only Process a Data Subject's Personal Information for a specific, lawful and clear purpose (or for specific, lawful and clear purposes) and will ensure that it makes the Data Subject aware of such reasons and purpose(s) as far as possible.
- 13.2 ATNS may use Personal Information for, without limitation, the following purposes as set out in the table below –

Purpose descriptions
13.2.1. Personal Information is Processed as part of the "Know Your Customer" / "KYC" process as per the requirements of the Financial Intelligence Centre Act, No. 38 of 2001;
13.2.2. Personal Information is Processed in order to conduct due diligence processes on selected SMMEs to be considered for partnerships with multinationals in future projects (i.e., SMMEs that will form part of the ATNS Incubation Programme or the SMME development programme);
13.2.3. Personal Information is Processed in order to comply with obligations imposed on the ATNS under the Based Black Economic Empowerment Act, No. 53 of 2003 ("BEE Act") read together with the Department of Trade and Industry's Codes of Good Practice on Broad-Based Black Economic Empowerment published in terms of Government Gazette No. 36928 on 11 October 2013 under section 9(1) of the BEE Act, as amended or reissued from time to time;
13.2.4. Personal Information is Processed in connection with the ATNS' obligations in terms of the Air Traffic and Navigation Services Company Act, No. 45 of 1993;
13.2.5. Personal Information is Processed in order to comply with the ATNS' investment and/or procurement strategies;
13.2.6. Personal Information is Processed for purposes of providing the ATNS bursary programme;
13.2.7. Personal Information is Processed in order to ensure that the relevant financial and ESG (Environmental, Social and Governance) obligations are complied with (which obligations flow from the relevant legal agreements);

13.2.8. Personal Information of suppliers or potential suppliers is Processed by the ATNS for procurement and supply purposes and where potential suppliers respond to tender invitations.
13.2.9. Personal Information is Processed in connection with the execution of payment processing functions;
13.2.10. Personal Information is Processed in connection with internal audit purposes (i.e., ensuring that the appropriate internal controls are in place in order to mitigate the relevant risks, as well as to carry out any investigations where this is required);
13.2.11. Personal Information is Processed for employment-related purposes such as recruiting staff, administering payroll, assessing credit and criminal history, and determining Employment Equity Act, No. 55 of 1998 statistics and to ensure that it is complying with its legal obligations under the applicable laws, including, but not limited to – <ul style="list-style-type: none"> - the Labour Relations Act, No. 66 of 1995; - the Basic Conditions of Employment Act, No. 75 of 1997; - the Skills Development Act, No. 97 of 1998; - the Unemployment Insurance Act, No. 63 of 2001; - the Occupational Health and Safety Act, No. 85 of 1993; and - the Compensation for Occupational Injuries and Diseases Act, No. 130 of 1993.;
13.2.12. to respond to any correspondence that the Data Subject may send to ATNS, including via email or by telephone;
13.2.13. for such other purposes to which the Data Subject may consent from time to time; and
13.2.14. for such other purposes authorised in terms of applicable law or for the ATNS to perform a public law duty.

14 STORING YOUR PERSONAL INFORMATION

- 14.1 Personal Information that we collect from Data Subject is stored in a secure environment and is not available to any person outside ATNS (except as set out in this Policy).
- 14.2 Personal Information may also be stored by Third Parties, via cloud services or other technology, with whom ATNS has contracted with, to support ATNS's business operations.

- 14.3 ATNS's Third Party service providers, including data storage and processing providers, may from time to time also have access to a Data Subject's Personal Information in connection with purposes for which the Personal Information was initially collected to be Processed.
- 14.4 ATNS will ensure that such Third-Party service providers will Process the Personal Information in accordance with the provisions of this Policy, all other relevant internal policies, procedures and POPIA.
- 14.5 These Third Parties do not use or have access to Personal Information other than for purposes specified by ATNS, and ATNS requires such parties to employ at least the same level of security that ATNS uses to protect the Personal Information.
- 14.6 Personal Information may be Processed in the Republic of South Africa or another country where Third Party service providers maintain servers and facilities and ATNS will take steps, including by way of contracts, to ensure that it continues to be protected, regardless of its location, in a manner consistent with the standards of protection required under POPIA and any applicable law.

15 HOW LONG WILL ATNS UTILISE OR RETAIN PERSONAL INFORMATION?

- 15.1 ATNS may keep a record of a Data Subject's Personal Information, correspondence or comments on file, in an electronic or hardcopy file format.
- 15.2 ATNS will not keep Data Subject's Personal Information longer than the period for which it is required based on the purpose for which the ATNS is Processing such Personal Information, unless ATNS are required by law to do so, or you have consented to us keeping such information for a longer period.
- 15.3 Where ATNS retains Personal Information for longer periods for statistical, historical or research purposes, ATNS will ensure that appropriate safeguards have been put in place to ensure that all recorded Personal Information will continue to be Processed in accordance with this Policy and the applicable laws.
- 15.4 Once the purpose for which the Personal Information was initially collected and processed no longer applies or becomes obsolete **or when ATNS is no longer authorised**, ATNS will ensure that the Personal Information is deleted, destroyed or de-identified **in a manner that prevents its reconstruction in an intelligible form**.
- 15.5 In instances where ATNS de-identify the Data Subject personal Information, ATNS may use such de-identified information indefinitely without further notice to you.

16 RESTRICTED PROCESSING

- 16.1 In terms of POPIA, ATNS is required to place a restriction on the Processing of Personal Information where:
- 16.1.1 the accuracy of such information is contested by the Data Subject;
 - 16.1.2 the Personal Information is no longer required to achieve the purpose for which it was collected or subsequently Processed (but has to be maintained for purposes of proof);
 - 16.1.3 the Processing is unlawful: ~~and~~
 - 16.1.4 the Data Subject requests the restriction of use; or
 - 16.1.5 the Data Subject requests to transmit the data into another automated Processing system.

17 FAILURE TO PROVIDE PERSONAL INFORMATION

- 17.1 Should ATNS need to collect Personal Information by law or under the terms of a contract and a Data Subject fails to provide the Personal Information when requested, the ATNS may then be consequently unable to perform the contract or abide by the obligation in law.
- 17.2 In such a case, the ATNS may have to decline to provide or receive the relevant services and will notify the Data Subject accordingly.

18 SAFE-KEEPING OF PERSONAL INFORMATION

- 18.1 ATNS shall preserve the security of Personal Information and, in particular, prevent its alteration, loss and damage, or access by non-authorised third parties.
- 18.2 ATNS will ensure the security and integrity of Personal Information in its possession or under its control with appropriate, reasonable technical and organisational measures to prevent loss, unlawful access and unauthorised destruction of Personal Information.
- 18.3 ATNS has implemented physical, organisational, contractual and technological security measures in line with industry standards to keep all Personal Information secure, including measures protecting any Personal Information from loss or theft, and unauthorised access, disclosure, copying, use or modification.

18.4 Furthermore, ATNS maintains and regularly verifies that the security measures are effective and continually updates same in response to new risks.

19 DATA BREACHES

19.1 A Data Breach refers to any incident in terms of which actual or suspected breach of security that leads to reasonable grounds to believe that the Personal Information of a Data Subject has been unlawfully accessed, altered, or acquired and disclosed by any unauthorised person.

19.2 A Data Breach can happen for many reasons, which include:

19.2.1 loss or theft of data or equipment on which Personal Information is stored;

19.2.2 where someone outside of ATNS obtains unauthorised access to Personal Information or Special Personal Information;

19.2.3 equipment failure;

19.2.4 human error;

19.2.5 deliberate attacks on systems, such as hacking, viruses or phishing scams; and/or

19.2.6 alteration of Personal Information without permission and loss of availability of Personal Information.

19.3 ATNS will address any Data Breach in accordance with the terms of POPIA. In this regard, ATNS ensures that adequate controls are in place so that –

19.3.1 Data Breaches are identified, investigated, and timeously reported in accordance with the ATNS procedures for same and that actions which are proportionate, consistent, and transparent are taken;

19.3.2 internal assessments are carried out in order to ensure that the impact of any Data Breaches is addressed in order to minimise and mitigate any risk in relation to affected Personal Information under ATNS's control; and

19.3.3 all **significant** Data Breaches are recorded and regularly reported.

19.4 ATNS will notify the Regulator and the affected Data Subject (unless the law requires that we delay notification to the Data Subject) in writing in the event of a Data Breach (or a reasonable belief of a Data Breach) in respect of that Data Subject's Personal Information.

- 19.5 ATNS will provide such notification as soon as reasonably possible after it has become aware of any Data Breach in respect of such Data Subject's Personal Information.
- 19.6 Where ATNS acts as an Operator for purposes of POPIA and should any Data Breach affect the data of Data Subjects whose information ATNS Processes as an Operator, ATNS shall (in terms of POPIA) notify the relevant Responsible Party immediately where there are reasonable grounds to believe that the Personal Information of relevant Data Subjects has been accessed or acquired by any unauthorised person.

20 PROVISION OF PERSONAL INFORMATION TO THIRD PARTY

- 20.1 ATNS may, where required to do so, disclose certain Personal Information to Third Parties and will enter into written agreements with such Third Parties to ensure that they Process any Personal Information in accordance with the provisions of this Policy and POPIA.
- 20.2 ATNS notes that such Third Parties may assist ATNS with the purposes listed in paragraph 13.2 above – for example, Third Parties may be used, *inter alia*, to:
- 20.2.1 assist ATNS with legal, technical and financial due diligence processes;
 - 20.2.2 assist ATNS with auditing processes (including external audits);
 - 20.2.3 advise ATNS on certain investment or procurement transactions;
 - 20.2.4 provide outsourced services to the ATNS including in respect of its IT and data storage requirements;
 - 20.2.5 assist ATNS with regulatory compliance processes; and
 - 20.2.6 notify the Data Subjects of any pertinent information concerning ATNS.
- 20.3 ATNS may also send Personal Information to a foreign jurisdiction outside of the Republic of South Africa, including for Processing and storage by Third Parties.
- 20.4 When Personal Information is transferred to a jurisdiction outside of the Republic of South Africa, ATNS will comply with the requirements under POPIA for the lawful transfer of such Personal Information to any foreign jurisdiction.
- 20.5 The Data Subject should also take note that the Processing of Personal Information in a foreign jurisdiction may be subject to the laws of the country in which the Personal Information is held, and may be subject to disclosure to the governments, courts of

law, enforcement or regulatory agencies of such other country, pursuant to the laws of such country.

21 KEEPING PERSONAL INFORMATION ACCURATE

- 21.1 ATNS is required to take reasonably practicable steps to ensure that Personal Information is complete, accurate, not misleading and up to date and accordingly, ATNS will take reasonable steps to ensure that all Personal Information is kept as accurate, complete and up-to-date as reasonably possible, including where appropriate, the ATNS may expressly request the Data Subject to verify and update his/her/its Personal Information.
- 21.2 ATNS, however, expects that the Data Subject will notify ATNS from time to time in writing of any updates required in respect of his/her/its Personal Information.

22 ACCESS TO PERSONAL INFORMATION

- 22.1 POPIA read with the relevant provisions of the Promotion of Access to Information Act, No. 2 of 2000 ("**PAIA**") confers on natural persons and where applicable, juristic persons whose Personal Information is processed, certain rights. ATNS' PAIA Manual can be found on ATNS website. These rights include –
- 22.2 a right of access: a Data Subject having provided adequate proof of identity has the right to: (i) request a Responsible Party to confirm whether any Personal Information is held about the Data Subject; and/or (ii) request from a Responsible Party a description of the Personal Information held by the Responsible Party including information about Third Parties who have or have had access to the Personal Information. A Data Subject may request:
- 22.2.1 ATNS to confirm, free of charge, whether it holds any Personal Information about him/her/it; and
- 22.2.2 to obtain from ATNS, at a prescribed fee (if any), the record or description of Personal Information concerning him/her/it and any information regarding the recipients or categories of recipients who have or had access to the Personal Information. Such record or description is to be provided:
- 22.2.2.1 within a reasonable time; and
- 22.2.2.2 in a reasonable manner and format and in a form that is generally understandable;

- 22.2.3 a right to request correction or deletion: a Data Subject may also request the ATNS to -
- 22.2.3.1 correct or delete Personal Information about the Data Subject in its possession or under its control that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully; or
- 22.2.3.2 destroy or delete a record of Personal Information about the Data Subject that the ATNS is no longer authorised to retain records in terms of POPIA's retention and restriction of records provisions.
- On receipt of such a request, ATNS is required to, as soon as is reasonably practicable
- 22.2.3.3 correct the information;
- 22.2.3.4 delete or destroy the information;
- 22.2.3.5 provide the Data Subject with evidence in support of the information; or
- 22.2.3.6 where the Data Subject and Responsible Party cannot reach agreement on the request and if the Data Subject requests this, ATNS will take reasonable steps to attach to the information an indication that correction has been requested but has not been made;
- 22.2.4 a right to withdraw consent and to object to processing: any Data Subject that has previously consented to the Processing of his/her/its Personal Information has the right to withdraw his/her/its consent and may do so upon providing the ATNS with notice to such effect at the address set out in paragraph 28. Furthermore, a Data Subject may object, on reasonable grounds, to the Processing of Personal Information relating to him/her/it.
- 22.3 ATNS shall respond to these requests under certain conditions imposed by POPIA and PAIA. ATNS will provide the Data Subject with any such Personal Information to the extent required by POPIA and any of ATNS's policies and procedures which apply in terms of PAIA.
- 22.4 The Data Subject can challenge the accuracy or completeness of his/her/its Personal Information in ATNS's records at any time in accordance with the process set out in clause 10 of the ATNS PAIA Manual.

- 22.5 If a Data Subject successfully demonstrates that their Personal Information in ATNS's records is inaccurate or incomplete, ATNS will ensure that such Personal Information is amended or deleted as required (including by any Third Parties).

23 TIME PERIOD TO RESPOND TO REQUESTS

- 23.1 ATNS will respond to each written request of a Data Subject not later than 30 days after receipt of such requests. Under certain circumstances, the ATNS may, however, extend the original period of 30 days once for a further period of not more than 30 days.
- 23.2 A Data Subject has the right to make a complaint to the ATNS in respect of this time limit by contacting ATNS using the contact details provided in paragraph 28 below.

24 COSTS TO ACCESS TO PERSONAL INFORMATION

The prescribed fees to be paid for copies of the Data Subject's Personal Information are listed in clause 13 of the ATNS PAIA Manual.

25 CHANGES TO THIS POLICY

- 25.1 ATNS reserves the right to make amendments to this Policy from every two (2) years or as and when necessary and will use reasonable efforts to notify Data Subjects of such amendments.
- 25.2 The current version of this Policy will govern the respective rights and obligations between Data Subject and ATNS.

26 NON-COMPLIANCE

- 26.1 Any deviation shall be authorised by the Chief Executive Officer acting within their delegated authority in terms of the Board approved Delegation of Authority Policy, in consultation with the Chairperson of the Board and the Chairperson of the Committee that recommended the Policy to the Board.
- 26.2 Non-compliance with this policy may have serious financial and legal risks to the company and may result in disciplinary action taken against a transgressing employee(s).

27 RISKS

KEY ELEMENTS (PROCESSES)	RISKS	CONTROLS	MITIGATION PLAN
SAFE-KEEPING OF PERSONAL INFORMATION	Lack of fireproof storage to safeguard the documents against fire destruction, leading the organisation to lose valuable information.		To procure a fireproof storage facility
DATA BREACH	Lack of proper retention of company documents, due to inadequate filing system and proper handover. Which may lead the organisation to lose information.	Standard Operating Procedures	Regularly review of the ATNS platforms to ensure proper retention of documents

28 PERTINENT INFORMATION

28.1 All comments, questions, concerns or complaints regarding your Personal Information or this Policy, should be forwarded to us as follows —

Physical Address:	Eastgate Office Park Block C South Boulevard Road Bruma 2198 Gauteng Republic of South Africa
Postal Address:	Private Bag X15 Kempton Park 1620 Gauteng South Africa

Information Officer	Chief Executive Officer
Deputy Information Officer	<ul style="list-style-type: none"> • Chief Governance Risk and Compliance Officer E-mail: legalrequests@atns.co.za • Company Secretary Email: cosec@atns.co.za • Chief: Human Capital Officer Email: humanresourceconsultants@atns.co.za • Chief Technology and Information Officer Email: T_i_management_sec_@atns.co.za

28.2 If a Data Subject is unsatisfied with the manner in which ATNS addresses any complaint with regard to ATNS's Processing of Personal Information, the Data Subject can contact the office of the Regulator, the details of which are set out below –

Website: <http://justice.gov.za/inforeg/>

Tel: 012 406 4818

Fax: 086 500 3351

Email: inforeg@justice.gov.za

Document Approval

Chief Governance Risk & Compliance Officer		
	SIGNATURE	DATE

	SIGNATURE	DATE
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AUTHORITY/CAPACITY	SIGNATURE	DATE

AUTHORITY/CAPACITY	SIGNATURE	DATE

Attachments

DOCUMENT	TYPE	VERSION