



REQUEST TO ACCESS PERSONAL INFORMATION PROCEDURE

Data subjects have the right to:

- Request what personal information Thornybush including Simbambili Game Lodge holds about them and why.
- Request access to their personal information.
- Be informed how to keep their personal information up to date.

Access to information requests can be made by email, addressed to the Information Officer. The Information Officer will provide the data subject with a "Personal Information Request Form".

Once the completed form has been received, the Information Officer will verify the identity of the data subject prior to handing over any personal information. All requests will be processed and considered against Thornybush's PAIA Policy.

The Information Officer will process all requests within a reasonable time.



POPI COMPLAINTS PROCEDURE

Data subjects have the right to complain in instances where any of their rights under POPIA have been infringed upon. Thornybush takes all complaints very seriously and will address all POPI related complaints in accordance with the following procedure:

- POPI complaints must be submitted to Thornybush in writing via email to the Information Officer, michael@thornybush.com . Where so required, the Information Officer will provide the data subject with a "POPI Complaint Form".
- Where the complaint has been received by any person other than the Information Officer, that person will ensure that the full details of the complaint reach the Information Officer within 1 working day.
- The Information Officer will provide the complainant with a written acknowledgement of receipt of the complaint within 2 working days.
- The Information Officer will carefully consider the complaint and address the complainant's concerns in an amicable manner. In considering the complaint, the Information Officer will endeavour to resolve the complaint in a fair manner and in accordance with the principles outlined in POPIA.
- The Information Officer must also determine whether the complaint relates to an error or breach of confidentiality that has occurred and which may have a wider impact on Thornybush's data subjects.
- Where the Information Officer has reason to believe that the personal information of data subjects has been accessed or acquired by an unauthorised person, the Information Officer will consult with Thornybush's governing body where after the affected data subjects and the Information Regulator will be informed of this breach.
- The Information Officer will revert to the complainant with a proposed solution with the option of escalating the complaint to Thornybush's Board of Directors within 7 working days of receipt of the complaint. In all instances, Thornybush will provide reasons for any decisions taken and communicate any anticipated deviation from the specified timelines.
- The Information Officer's response to the data subject may comprise any of the following:
 - A suggested remedy for the complaint,
 - A dismissal of the complaint and the reasons as to why it was dismissed,
 - An apology (if applicable) and any disciplinary action that has been taken against any employees involved.
- Where the data subject is not satisfied with the Information Officer's suggested remedies, the data subject has the right to complain to the Information Regulator.
- The Information Officer will review the complaints process to assess the effectiveness of the procedure on a periodic basis and to improve the procedure where it is found wanting. The reason for any complaints will also be reviewed to ensure the avoidance of occurrences giving rise to POPI related complaints.



1. **DISCIPLINARY ACTION**

Where a POPI complaint or a POPI infringement investigation has been finalised, Thornybush may recommend any appropriate administrative, legal and/or disciplinary action to be taken against any employee reasonably suspected of being implicated in any non-compliant activity outlined within this policy.

In the case of ignorance or minor negligence, Thornybush will undertake to provide further awareness training to the employee. Any gross negligence or the wilful mismanagement of personal information, will be considered a serious form of misconduct for which Thornybush may summarily dismiss the employee. Disciplinary procedures will commence where there is sufficient evidence to support an employee's gross negligence.

Examples of immediate actions that may be taken subsequent to an investigation include:

- A recommendation to commence with disciplinary action.
- A referral to appropriate law enforcement agencies for criminal investigation.
- Recovery of funds and assets to limit any prejudice or damages caused.



ANNEXURE A: PERSONAL INFORMATION REQUEST FORM

PERSONAL INFORMATION REQUEST FORM

Please submit the completed form to the Information Officer:

Name	
Contact Number	
Email Address:	

Please be aware that we may require you to provide proof of identification prior to processing your request.

There may also be a reasonable charge for providing copies of the information requested.

A. Particulars of Data Subject

Name & Surname	
Identity Number:	
Postal Address:	
Contact Number:	
Email Address:	

B. Request

I request Thornybush to:

(a) Inform me whether it holds any of my personal information	<input type="checkbox"/>
(b) Provide me with a record or description of my personal information	<input type="checkbox"/>
(c) Correct or update my personal information	<input type="checkbox"/>
(d) Destroy or delete a record of my personal information	<input type="checkbox"/>

C. Instructions

D. Signature Page

Signature	
Date	



ANNEXURE B: POPI COMPLAINT FORM

POPI COMPLAINT FORM

We are committed to safeguarding your privacy and the confidentiality of your personal information and are bound by the Protection of Personal Information Act.

Please submit your complaint to the Information Officer:

Name	
Contact Number	
Email Address:	

Where we are unable to resolve your complaint, to your satisfaction you have the right to complaint to the Information Regulator.

The Information Regulator: Ms Mmamoroke Mphelo

Physical Address: SALU Building, 316 Thabo Sehume Street, Pretoria

Email: inforreg@justice.gov.za

Website: <http://www.justice.gov.za/inforeg/index.html>

A. Particulars of Complainant

Name & Surname	
Identity Number:	
Postal Address:	
Contact Number:	
Email Address:	

B. Details of Complaint

C. Desired Outcome

D. Signature Page

Signature:
Date



ANNEXURE C: POPI NOTICE AND CONSENT FORM

POPI NOTICE AND CONSENT FORM

We understand that your personal information is important to you and that you may be apprehensive about disclosing it. Your privacy is extremely important to us and we are committed to safeguarding and processing your information in a lawful manner.

We also want to make sure that you understand how and for what purpose we process your information. If for any reason you think that your information is not processed in a correct manner, or that your information is being used for a purpose other than that for what it was originally intended, you can contact our Information Officer.

You can request access to the information we hold about you at any time and if you think that we have outdated information, please request us to update or correct it.

Our Information Officer's Contact Details

Name	Michael Aldren
Email Address:	InfoOfficer@thornybush.com

Purpose for Processing your Information

We collect, hold, use and disclose your personal information mainly to provide you with access to the services and products that we provide. We will only process your information for a purpose you would reasonably expect, including:

- Providing you with advice, products and services that suit your needs as requested.
- To verify your identity and to conduct credit reference searches.
- To issue, administer and manage your insurance policies.
- To process insurance claims and to take recovery action.
- To notify you of new products or developments that may be of interest to you.
- To confirm, verify and update your details.
- To comply with any legal and regulatory requirements.

Some of your information that we hold may include, your first and last name, email address, a home, postal or other physical address, other contact information, your title, birth date, gender, occupation, qualifications, past employment, residency status, your investments, assets, liabilities, insurance, income, expenditure, family history, medical information and your banking details.

Consent to Disclose and Share your Information

We may need to share your information to provide advice, reports, analyses, products or services that you have requested.

Where we share your information, we will take all precautions to ensure that the third party will treat your information with the same level of protection as required by us. Your information may be hosted on servers managed by a third-party service provider, which may be located outside of South Africa.

I hereby authorize and consent to Thornybush sharing my personal information with the following persons:

Thornybush

Name & Surname
Signature
Date