

Matrix Fund Managers Privacy Policy in terms of the Protection of Personal Information Act, No. 4 2013 (South Africa)	
Organisation	Matrix Fund Managers
Scope	This policy applies to the business of Matrix FM wherever it is conducted, but based at the registered office.
Prepared by	Mduduzi Ntombela
Introduction	
Purpose of policy	<p>The purpose of this policy is to enable Matrix FM to:</p> <ul style="list-style-type: none"> • comply with the law in respect of the data it holds about individuals; • follow good practice; • protect Matrix FM’s staff and other individuals • protect the organisation from the consequences of a breach of its responsibilities.
Personal Information	This policy applies to information relating to identifiable individuals, in terms of the Protection of Personal Information Act, 2013 (hereinafter POPI Act).
Policy Statement	<p>Matrix FM will:</p> <ul style="list-style-type: none"> • comply with both the law and good practice • respect individuals’ rights • be open and honest with individuals whose data is held • provide training and support for staff who handle personal data, so that they can act confidently and consistently Matrix FM recognises that its first priority under the POPI Act is to avoid causing harm to individuals. <p>In the main this means:</p> <ul style="list-style-type: none"> • keeping information securely in the right hands, and • retention of good quality information. <p>Secondly, the Act aims to ensure that the legitimate concerns of individuals about the ways in which their data may be used are taken into account. In addition to being open and transparent, Matrix FM will seek to give individuals as much choice as is possible and reasonable over what data is held and how it is used.</p>
Key Risks	<p>Matrix FM has identified the following potential key risks, which this policy is designed to address:</p> <ul style="list-style-type: none"> • Breach of confidentiality (information being given out inappropriately) • Insufficient clarity about the range of uses to which data will be put — leading to Data Subjects being insufficiently informed • Failure to offer choice about data use when appropriate

	<ul style="list-style-type: none"> • Breach of security by allowing unauthorised access • Harm to individuals if personal data is not up to date • Data Operator contracts
Information Officer Responsibilities	
Scope	The scope of this aspect of the policy is defined by the provisions of the POPI Act, Condition 1 and Chapter 5, Part B.
Information Officer Responsibilities	<p>The Information Officer has the following responsibilities:</p> <ul style="list-style-type: none"> • Developing, publishing and maintaining a POPI Policy which addresses all relevant provisions of the POPI Act, including but not limited to the following: • Reviewing the POPI Act and periodic updates as published • Ensuring that POPI Act induction training takes place for all staff • Ensuring that periodic communication awareness on POPI Act responsibilities takes place • Ensuring that Privacy Notices for internal and external purposes are developed and published • Handling data subject access requests • Approving unusual or controversial disclosures of personal data • Approving contracts with Data Operators • Ensuring that appropriate policies and controls are in place for ensuring the Information Quality of personal information • Ensuring that appropriate Security Safeguards in line with the POPI Act for personal information are in place • Handling all aspects of relationship with the Regulator as foreseen in the POPI Act • Provide direction to any Deputy Information Officer if and when appointed
Appointment	<p>The appointment of the Matrix FM Information Officer will be authorised by the Designated Head.</p> <p>Consideration will be given on an annual basis of the re-appointment or replacement of the Information Officer; the need for any Deputy to assist the Information Officer.</p>
Processing Limitation	
Scope	The scope of this aspect of the policy is defined by the provisions of the POPI Act, Condition 2.
Processing Limitation	Matrix FM undertakes to comply with the POPI Act, Conditions 2 in terms of processing limitation, sections 9 to 12, subject to the following stipulation (Forms of Consent).
Forms of Consent	Matrix FM undertakes to gain written consent where appropriate; alternatively a recording must be kept of verbal consent.

Nature of Personal Information	Matrix FM will use all available tools and information to identify all instances of personal information in the organisation.
Purpose of Specification	
Scope	The scope of this aspect of the policy is defined by the provisions of the POPI Act, Condition 3.
Purpose Specification	Matrix FM undertakes to comply with the POPI Act, Conditions 2 in terms of processing limitation, sections 13 and 14, subject to the following stipulation (Retention periods).
Retention Periods	<p>Matrix FM will establish retention periods for at least the following categories of data:</p> <ul style="list-style-type: none"> • Directors • Staff • Investors • Suppliers • Service providers <p>Detailed coverage of the relevant retention periods will be documented in line with the Act and any other applicable laws.</p>
Further Processing Limitation	
Scope	The scope of this aspect of the policy is defined by the provisions of the POPI Act, Condition 4.
Further Processing Limitation	Matrix FM undertakes to comply with the POPI Act, Conditions 2 in terms of processing limitation, section 15.
Information Quality	
Scope	<p>The scope of this aspect of the policy is defined by the provisions of the POPI Act, Condition 5.</p> <p>Matrix FM will comply with all of the aspects of Condition 5, section 16.</p>
Accuracy	<p>Matrix FM will regularly review its procedures for ensuring that its records remain accurate and consistent and, in particular:</p> <ul style="list-style-type: none"> • ICT systems will be designed, where possible, to encourage and facilitate the entry of accurate data. • Data on any individual will be held in as few places as necessary, and all staff will be discouraged from establishing unnecessary additional data sets. • Effective procedures will be in place so that all relevant systems are updated when information about any individual changes. • Staff who keep more detailed information about individuals will be given additional guidance on accuracy in record keeping.
Updating	Matrix FM will review all personal information on an annual

	basis.
Archiving	<p>Archived electronic records of Matrix FM are stored securely off site.</p> <p>Paper record archiving takes place in Matrix FM's offices (stored in secure cabinets) and/or through the services of Metrofile.</p> <p>A certificate of destruction from Metrofile will be obtained for each batch of archived documents destroyed.</p>
Transparency	
Scope	The scope of this aspect of the policy is defined by the provisions of the POPI Act, Condition 6.
Transparency	<p>In line with Conditions 6 and 8 of the Act, Matrix FM is committed to ensuring that in principle Data Subjects are aware that their data is being processed and</p> <ul style="list-style-type: none"> • for what purpose it is being processed; • what types of disclosure are likely; and • how to exercise their rights in relation to the data.
Procedure	<p>Data Subjects will generally be informed in the following ways:</p> <ul style="list-style-type: none"> • Staff: through this policy • Investors and other interested parties: through the Matrix FM Privacy Policy <p>Whenever data is collected, the number of mandatory fields will be kept to a minimum and Data Subjects will be informed which fields are mandatory and why.</p>
Security Safeguard	
Scope	<p>The scope of this aspect of the policy is defined by the provisions of the POPI Act, Condition 7, section 19 to 22.</p> <p>This section of the policy only addresses security issues relating to personal information. It does not cover security of the building, business continuity or any other aspect of security.</p>
Specific Risks	<p>Matrix FM has identified the following risks:</p> <ul style="list-style-type: none"> • Staff with access to personal information could misuse it. • Staff may be tricked into giving away information, either about investors / suppliers or colleagues.
Setting Security Levels	<p>Access to information on the main Matrix FM computer system will be controlled by function.</p> <p>Matrix FM will identify security levels required for each record held which contains Personal Information.</p>
Security Measures	Matrix FM will ensure that all necessary controls are in place in terms of access to personal information.
Business Continuity	Matrix FM will ensure that adequate steps are taken to provide business continuity in the event of an emergency.
Related Policy	Matrix FM has an Information Security Policy for further guidance in this regard.

Data Subject Participation	
Scope	The scope of this aspect of the policy is defined by the provisions of the POPI Act, Condition 8, sections 23 to 25.
Responsibility	Any subject access requests will be handled by the POPI Act Information Officer in terms of Condition 8.
Procedure for Making Requests	Subject access requests must be in writing. All staff are required to pass on anything which might be a subject access request to the POPI Act Information Officer without delay. Requests for access to personal information will be handled in compliance with the POPI Act and in compliance with the Promotion of Access to Information Act (PAIA).
Provision for Verifying Identity	Where the individual making a subject access request is not personally known to the POPI Act Information Officer their identity will be verified before handing over any information.
Charging	Fees for access to personal information will be handled in compliance with the PAIA Act.
Procedure for Granting Access	Procedures for access to personal information will be handled in compliance with the PAIA Act
Processing of Special Personal Information	
Scope	The scope of this aspect of the policy is defined by the provisions of the POPI Act, Part B, sections 26 to 33.
Processing of Special Personal Information	Matrix FM has the policy of adhering to the process of Special Personal Information which relates to the religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life or biometric information of a data subject. Special personal information includes criminal behaviour relating to alleged offences or proceedings dealing with alleged offences. Unless a general authorisation, alternatively a specific authorisation relating to the different types of special personal information applies, a responsible party is prohibited from processing special personal information.
Prior Authorisation	
Scope	The scope of this aspect of the policy is defined by the provisions of the POPI Act, Part C, sections 34 and 35.
Prior Authorisation	Matrix FM has the policy of adhering to the process of Special Personal Information of children. This applies to individuals under 18 years of age, so an age check is required for all personal information records. General authorisation concerning personal information of children only applies where individuals under 18 years of age are involved. Matrix FM identify any records held which contain Personal

	Information of children.
Direct Marketing, Directories and Automated Decision Making	
Scope	The scope of this aspect of the policy is defined by the provisions of the POPI Act, Chapter 8.
Direct Marketing, Directories and Automated Decision Making	Matrix FM undertakes to comply with the POPI Act Chapter 8, sections 69 to 71.
Opting in	Whenever data is first collected which might be used for any marketing purpose, this purpose will be made clear, and the Data Subject will be given a clear opportunity to opt in.
Sharing Lists	Matrix FM has the policy of sharing lists (or carrying out joint or reciprocal mailings) only on an occasional and tightly-controlled basis. Details will only be used for any of these purposes where the Data Subject has been informed of this possibility, along with an option to opt out, and has not exercised this option. Matrix FM undertakes to obtain external lists only where it can be guaranteed that the list is up to date and those on the list have been given an opportunity to opt out.
Electronic Contact	Whenever e-mail addresses are collected, any future use for marketing will be identified, and the provision of the address made optional.
Trans-border Information Flows	
Scope	The scope of this aspect of the policy is defined by the provisions of the POPI Act, Chapter 8.
Trans-border Information Flows	Matrix FM will ensure that the POPI Act Chapter 9, section 72 is fully complied with. Matrix FM will identify Trans border flows which contain Personal Information. Compliance with section 72 will be achieved through the use of the necessary contractual commitments from the relevant third parties.
Staff Training & Acceptance of Responsibilities	
Scope	The scope of this aspect of the policy is written in support of the provisions of the POPI Act, Chapter 5, Part B.
Documentation	Information for staff is contained in this policy document and other materials made available by the Information Officer.
Induction	The Matrix FM Information Officer will ensure that all staff who have access to any kind of personal information will have their responsibilities outlined during their induction procedures.
Continuing Training	Matrix FM will provide opportunities for staff to explore POPI Act issues through training, team meetings, and supervisions.
Procedure for Staff Signifying Acceptance of policy	Matrix FM will ensure that all staff sign acceptance of this policy once they have had a chance to understand the policy and their responsibilities in terms of the policy and the POPI

	Act.
Policy Review	
Responsibility	The Matrix FM Information Officer is responsible for an annual review to be completed prior to the policy anniversary date
Procedure	The Matrix FM Information Officer will ensure relevant stakeholders are consulted as part of the annual review to be completed prior to the policy anniversary date.