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RCC COMPLIANCE CONSULTING

PROTECTION OF PERSONAL INFORMATION (POPIA) POLICY

Contents

1. INTRODUCTION	2
2. PURPOSE OF THE POLICY	2
3. SCOPE OF THE POLICY	2
4. DEFINITIONS	2
5. PRINCIPLES OF LAWFUL PROCESSING	3
6. PERSONAL INFORMATION WE COLLECT	3
7. HOW WE COLLECT PERSONAL INFORMATION	4
8. PURPOSE OF PROCESSING PERSONAL INFORMATION	4
9. LAWFUL BASIS FOR PROCESSING	4
10. INFORMATION QUALITY AND DATA ACCURACY	4
11. STORAGE, RETENTION & DESTRUCTION OF INFORMATION	5
12. SECURITY SAFEGUARDS	5
13. DISCLOSURE OF PERSONAL INFORMATION	5
14. CROSS-BORDER TRANSFER OF INFORMATION	5
15. DATA SUBJECT RIGHTS	6
16. INFORMATION OFFICER DETAILS	6
17. POPIA CHAMPIONS	7
18. BREACH NOTIFICATION	8
19. THIRD-PARTY OPERATORS	8
20. WEBSITE AND COOKIES	8
21. POLICY UPDATES	8
22. ACCEPTANCE OF THIS POLICY	9

1. INTRODUCTION

RCC Compliance Consulting (hereinafter referred to as “RCC”, “the Company”, “we”, or “us”) is a regulatory compliance practice located at Cnr Cradock and Warren Rd, Lyttleton Manor, Centurion, 0157. As a trusted provider of FAIS, FICA, POPIA, AML, and governance solutions, RCC is committed to ensuring that all personal information processed during the course of our operations is handled responsibly, lawfully, and securely. This Policy serves to articulate our dedication to protecting the confidentiality, integrity, and availability of personal information as mandated by the Protection of Personal Information Act 4 of 2013 (“POPIA”). Through this Policy, stakeholders gain a clear understanding of how RCC manages personal information and the standards that guide all our compliance activities.

2. PURPOSE OF THE POLICY

The purpose of this Policy is to outline RCC’s structured approach to processing personal information in a manner that complies with POPIA. It aims to promote transparency by explaining the principles, procedures, and security measures that underpin our data-handling practices. Additionally, the Policy ensures that clients, representatives, employees, and partners understand their rights, as well as RCC’s obligations, regarding personal information protection. By establishing clear guidelines, RCC demonstrates its ongoing commitment to responsible data governance and regulatory accountability. This Policy also supports trust between RCC and its stakeholders by clarifying how personal information is safeguarded.

3. SCOPE OF THE POLICY

This Policy applies to all personal information processed by RCC in any form whether electronic, paper-based, verbal, or otherwise. It governs all RCC employees, consultants, contractors, and third-party service providers who process personal information on our behalf. The Policy further applies to all clients, prospective clients, training participants, representatives, suppliers, and business partners whose personal information we collect or process. Regardless of whether the information is obtained during compliance engagements, onboarding processes, consultations, digital interactions, or training sessions, RCC processes it in accordance with this Policy. The broad application of this Policy reflects RCC’s aim to implement consistent and comprehensive data protection standards across its entire operational framework.

4. DEFINITIONS

This section provides essential definitions to ensure clarity and alignment with POPIA terminology.

Personal Information: Any information relating to an identifiable, living natural person or identifiable juristic person.

Processing: Any operation or activity concerning personal information, including collection, storage, dissemination, modification, or destruction.

Responsible Party: RCC Compliance Consulting, which determines the purpose and means of processing personal information.

Operator: A third-party service provider processing personal information on behalf of RCC.

Data Subject: The natural or juristic person to whom the personal information relates.

These definitions are fundamental to understanding the rights, duties, and responsibilities set out in this Policy, and they guide all aspects of RCC's data protection approach.

5. PRINCIPLES OF LAWFUL PROCESSING

RCC adheres strictly to POPIA's eight conditions for lawful processing of personal information. These conditions form the foundation of our compliance culture and guide every step of the data lifecycle. Accountability ensures RCC takes responsibility for upholding POPIA across its operations, while processing limitation ensures information is collected lawfully and only when necessary. Purpose specification requires clear identification of why information is collected, and further processing limitation prevents its use for unrelated purposes. Information quality, openness, security safeguards, and data subject participation collectively ensure that stakeholders' rights are respected and that data protection remains a priority in all RCC services. These principles reflect RCC's commitment to ethical and compliant information handling.

6. PERSONAL INFORMATION WE COLLECT

RCC collects a range of personal information necessary for delivering compliance services in terms of the FAIS Act, FIC Act, POPIA, and other regulatory frameworks. This includes identification details, contact information, employment and representative records, FAIS licensing documentation, FICA/KYC information, competency results, and training records. We may also collect billing information, contractual documents, and governance-related data to support compliance reporting and risk management initiatives. Information is collected strictly for compliance and operational purposes, and RCC ensures that only relevant and necessary information is obtained. This careful and purposive approach helps RCC uphold POPIA's principle of minimality and promotes responsible information handling.

7. HOW WE COLLECT PERSONAL INFORMATION

RCC collects personal information through various lawful and transparent methods. These include direct submissions by clients or representatives, email communications, onboarding forms, training registrations, and digital interactions through our website. Additionally, information may be obtained through regulatory bodies such as the FSCA, FIC, or CIPC where authorised. During compliance engagements, clients may provide documents required for FAIS, FICA, AML, or POPIA compliance, which RCC processes as part of its professional obligations. At all times, RCC ensures that data subjects are aware of how their information is collected and the purpose thereof, reinforcing transparency and accountability.

8. PURPOSE OF PROCESSING PERSONAL INFORMATION

RCC processes personal information primarily to deliver regulatory compliance services mandated by law. This includes ensuring compliance with the FAIS Act, FIC Act, POPIA, and related legislation. Information is used to support risk management processes, internal governance frameworks, and representative oversight. We process information to assist with licensing applications, amendments, and competency tracking, including RE Exams, CPD, and Class of Business requirements. Personal information is also processed to conduct TCF, FAIS, and FICA training, to issue compliance templates, and to manage administrative and contractual obligations. Each processing activity aligns with RCC's mission to support clients in achieving full regulatory compliance.

9. LAWFUL BASIS FOR PROCESSING

RCC processes personal information based on lawful grounds established under POPIA. These include compliance with legal obligations such as regulatory reporting, FIC obligations, and FAIS competency monitoring. Contractual necessity may apply where processing is required to deliver our services or fulfil agreements with clients. RCC also relies on legitimate interests where processing facilitates efficient operations or protects the integrity of compliance processes. In certain instances, consent may be required and will be obtained transparently. These lawful bases ensure that RCC processes personal information ethically, responsibly, and in accordance with POPIA's provisions.

10. INFORMATION QUALITY AND DATA ACCURACY

RCC is committed to maintaining the highest standards of information accuracy and quality. We implement verification processes to ensure personal information is complete, relevant, and up to date, particularly when used for regulatory submissions or compliance monitoring. Clients and representatives are encouraged to provide updated information whenever changes occur, such as changes in contact details, employment status, or licensing

requirements. RCC also maintains internal checks and quality control procedures to reduce errors and inaccuracies. This approach supports POPIA's requirement for responsible information management and helps ensure compliance outcomes are reliable and credible.

11. STORAGE, RETENTION & DESTRUCTION OF INFORMATION

RCC stores personal information securely using controlled systems and physical safeguards designed to prevent unauthorised access or loss. Information is retained only for as long as necessary to fulfil the purpose for which it was collected or to satisfy legal and regulatory obligations. Once information is no longer required, RCC follows secure destruction or archiving procedures to protect confidentiality. Retention periods may vary depending on legislative requirements—for example, FICA documentation may be retained for a statutory minimum period. Our structured retention approach ensures information is preserved appropriately while preventing unnecessary storage of outdated data.

12. SECURITY SAFEGUARDS

RCC employs comprehensive security measures to protect personal information from risks such as unauthorised access, loss, theft, or cyber threats. These measures include password protection, encrypted systems, role-based access permissions, secure document storage, and regular security assessments. Physical files are stored in secure environments, and digital systems are protected through technical and administrative controls. In addition, third-party service providers who have access to personal information are required to adhere to strict operator agreements. Through these safeguards, RCC ensures the ongoing protection of personal information and fosters trust with its clients and partners.

13. DISCLOSURE OF PERSONAL INFORMATION

RCC only discloses personal information when necessary and lawful to do so. This may include sharing information with regulatory authorities such as the FSCA, FIC, or IR, or with accredited training bodies and approved service providers. Where disclosure to operators or consultants is required, RCC ensures that they are bound by confidentiality and data protection obligations. Information will never be sold, misused, or shared with third parties for purposes unrelated to compliance services. This controlled disclosure process reflects RCC's commitment to integrity, confidentiality, and ethical information management.

14. CROSS-BORDER TRANSFER OF INFORMATION

RCC does not transfer personal information outside South Africa. However, should international transfer become necessary for example, when cloud-based systems store data in foreign jurisdictions RCC will ensure that adequate protections are in place. These may

include evaluating the data protection laws of the recipient country, implementing binding contractual agreements, and obtaining data subject consent where required. RCC will take care to ensure that cross-border transfers do not compromise the privacy or security of personal information, maintaining full compliance with POPIA at all times.

15. DATA SUBJECT RIGHTS

POPIA grants data subjects specific rights regarding their personal information, and RCC is committed to upholding these rights. Data subjects may request access to their information, ask for corrections or deletions, object to processing, or withdraw consent when applicable. RCC provides clear procedures for submitting such requests and responds within reasonable timeframes. Data subjects also have the right to lodge complaints with the Information Regulator if they believe their information has been mishandled. This commitment to transparency and responsiveness empowers stakeholders and strengthens RCC's culture of privacy protection.

16. INFORMATION OFFICER DETAILS

RCC has appointed an Information Officer responsible for overseeing POPIA implementation, responding to data subject requests, managing internal compliance processes, and liaising with the Information Regulator. The Information Officer ensures that privacy protocols are embedded throughout RCC's operations and that staff receive appropriate guidance. Stakeholders may direct inquiries or requests to the Information Officer at Matsheke.thanzi@gmail.com. This designated role reinforces RCC's accountability and commitment to ongoing compliance with POPIA's requirements.

The duties and responsibilities of the Information Officer include, amongst others:

- a) To ensure that she is duly registered with the office of the Information Regulator as the Information Officer.
- b) To ensure and encourage compliance with the requirements of POPIA in RCC Compliance Consulting.
- c) To deal with any POPIA related requests made to RCC Compliance Consulting.
- d) To co-operate with the office of the Information Regulator in relation to investigations conducted pursuant to Chapter 6 of Popia in relation to RCC Compliance Consulting.
- e) To ensure that:

- a privacy compliance framework is developed, implemented, monitored and maintained.
- a personal information impact assessment is done to ensure that adequate measures and standards exist in order to comply with the conditions for the lawful processing of personal information.
- a manual is developed, monitored, maintained and made available as prescribed in sections 14 and 51 of PAIA, as amended.
- internal measures are developed together with adequate systems to process requests for information or access thereto.
- internal awareness sessions are conducted regarding the provisions of POPIA, regulations made in terms of POPIA, codes of conduct, or information obtained from the Regulator; and
- copies of the Paia manual are provided to any person, upon request.

17. POPIA CHAMPIONS

The appointed POPIA Champions are Ranwaha Thengo Abiel and Mafunisa Elelwani. Their duties and responsibilities include, amongst others:

- a) To enforce and monitor compliance with this Policy within their respective departments and branches, this will ensure that privacy is embedded in the day to day activities of RCC Compliance Consulting.
- b) To deploy and assist in the training and awareness of employees, representatives and independent service providers regarding this Policy.
- c) To develop in-depth knowledge of the data processing activities of their respective departments/ branches/ functions to ensure that RCC Compliance Consulting has an accurate view of what personal information is being processed.
- d) To provide advice on projects which have privacy considerations and assist the Information Officer and Deputy Information Officers in documenting Privacy Impact Assessments.
- e) To assist the Information Officer and Deputy Information Officers during personal data breaches and data subject requests.
- f) To assist the Information Officer and Deputy Information Officers during privacy audits.

- g) To consult with the Information Officer on relevant privacy matters.
- h) To report to the Information Officer on a quarterly basis on the privacy posture of their respective departments or branches.

18. BREACH NOTIFICATION

In the event of a data breach, RCC will take immediate action to identify, contain, and address the incident. The Company will assess the nature and extent of the breach to determine whether personal information may have been compromised. Affected data subjects will be notified as soon as reasonably possible, along with the Information Regulator when required under POPIA. RCC will also implement corrective measures to prevent recurrence and strengthen its security framework. This proactive approach ensures transparency, mitigates harm, and maintains the trust of clients and stakeholders.

19. THIRD-PARTY OPERATORS

When RCC engages third-party service providers to carry out specific functions requiring access to personal information, these operators are carefully vetted and bound by contractual data protection obligations. Operators must process information only on RCC's instructions and ensure confidentiality, security, and compliance with POPIA. RCC also monitors operator performance to ensure ongoing adherence to data protection standards. By enforcing strict operator controls, RCC minimises risks and ensures personal information remains protected throughout all outsourced processes.

20. WEBSITE AND COOKIES

RCC's website may utilise cookies and similar technologies to enhance user experience, monitor website performance, and support service improvements. Cookies allow the website to remember user preferences and provide a more efficient browsing experience. Users may disable cookies through their browser settings if they prefer not to permit their use. RCC ensures that any data collected through cookies is handled lawfully, transparently, and solely for purposes aligned with improving client engagement and service delivery. This approach ensures that website users maintain control over their browsing data.

21. POLICY UPDATES

RCC may update this Policy periodically to reflect changes in legislation, operational adjustments, or enhancements to data protection practices. Updated versions will be made available on our website to ensure stakeholders remain informed about how their personal information is handled. RCC encourages clients and visitors to review the Policy regularly to

stay abreast of any developments. These updates demonstrate RCC's ongoing commitment to maintaining compliance and adapting to evolving regulatory and technological environments.

22. ACCEPTANCE OF THIS POLICY

By engaging with RCC's services or accessing our website, stakeholders acknowledge and accept the terms of this POPIA Policy. Continued interaction with RCC signifies understanding and agreement with how personal information is collected, processed, and protected. Clients, representatives, trainees, and website users are encouraged to familiarise themselves with this Policy to ensure they understand their rights and the safeguards in place. RCC appreciates the trust placed in us and remains committed to upholding the highest standards of data protection.

Last Updated: Up to date

RCC Compliance Consulting remains committed to maintaining responsible, transparent, and robust data protection practices that foster trust and ensure full compliance with South African regulatory requirements.