

Information Access Request Policy

INTRODUCTION

This Information Access Request Policy sets out our policy for responding to your access requests under section 23 of the Protection of Personal Information Act 4 of 2013 (“**POPI Act**”).

If you are requesting access to records in terms of the Promotion of Access to Information Act 2 of 2000 (“**PAIA**”), please refer to Itec's PAIA Manual available at its registered office or on request.

This document explains your rights in relation to an access request made to Itec and its responsibilities when dealing with that request.

RIGHTS

Where Itec is a responsible party of your personal information, you have the right –

1. to receive confirmation from Itec that Itec processes your personal information;
2. to know what personal information of yours is processed by Itec;
3. to receive details on the purpose for which your personal information is being processed and how Itec processes your personal information;
4. to know whether your personal information is being disclosed to anyone else;
5. to know how long your personal information is being stored and the criteria applied to that time period;
6. to know that you have the right to request rectification, erasure and restriction on the processing of your personal information;
7. to complain to the applicable regulator;
8. to know whether your personal information is collected from another source;
9. to know whether any automated decision making is applied to decision made about you; and
10. to access and receive a copy of you personal information which Itec processes in an intelligible form.

WHO IS RESPONSIBLE FOR RESPONDING TO REQUESTS?

Itec's Information Officer is responsible for handling all data subject access requests.

Information Officer

Alan Chapman

Email: legal@itecgroup.co.za

Tel: +27 11 236 2000

HOW TO MAKE A INFORMATION ACCESS REQUEST

If you are a data subject and wish to request access, please –

1. fill in the Access Request Form (**Annexure A**), sign and date it;
2. attach a copy of your proof of identity to the form; and
3. send the completed form and proof of identity to the Information Officer via email.

Use of the Access Request Form is not mandatory. However, completing the form should enable us to process your request more efficiently.

An access request does not need to be made in writing and can be made orally but it is helpful if it is made in writing (for record keeping purposes). If you wish to make an access request orally, please contact the Information Officer.

RESPONDING TO AN INFORMATION ACCESS REQUEST

Where you request access to your personal information which Itec processes, the following will happen –

1. **Verify the identity of the data subject:** The Information Officer will ask for information to verify the identity of the requester (if not already provided).
2. **Confirm that Itec is the Responsible Party:** The Information Officer will confirm whether Itec is the responsible party of your personal information, or rather an operator. If so, the Information Officer will inform and refer you to the actual responsible party. This will be recorded in writing.
3. **Collect the requested information:** The Information Officer will then search Itec's databases for the requested information. This information may be stored manually or electronically. It may be stored by third parties.
4. **Fees:** If the information request is excessive or manifestly unfounded, then Itec has the right to charge a reasonable fee which will be ZAR50.00 to cover its administrative costs in dealing with the request.
5. **Exemption:** In limited circumstances, an exemption may apply. The Information Officer must consider whether Itec is exempt from responding to the access request and if so, on what grounds. This will be communicated to you.
6. **Time period:** Itec undertakes to respond to the request within 30 calendar days starting from when Itec received the information necessary to identify you, to identify the information requested, and provide you with the information. If Itec is unable to respond within that time period, explain why Itec was unable to provide the information within the time period. Wherever possible, Itec will aim to complete the request in advance of the deadline.
7. **Issue a response:** Once any queries around the information requested have been resolved, copies of the information will be sent to you electronically wherever possible.

Please note that if the requested information reveals details directly or indirectly about another person, Itec will have to seek the consent of that person before it can let you see that information or redact such information.

PAIA REQUESTS

If you are requesting access to records in terms of PAIA, please refer to Itec's PAIA Manual available at its registered office or on request.