

PoPIA Compliance Affirmation

The 8 Conditions

Condition 1 - Accountability

What it means...	What we do...	How we do it...
Ensure compliance with the POPI Act and lawful processing.	As a Responsible Party we ensure that all our partners and participants comply with the requirements set out in the Act. As an Operator we ensure that all our processing aligns with the conditions of the act and in accordance with the purpose of original collection.	SB assumes the role of Responsible Party by driving compliance with our Data Partners: <ul style="list-style-type: none"> - POPIA Aligned DP Mandate - POPIA compliant information exchange

Condition 2 – Processing Limitation

What it means...	What we do...	How we do it...
Lawful processing, principle of minimality, without infringing on DS rights: Consent, Justification and Objection	As an Operator, Sawubona fulfils a data aggregation purpose. Processing by Sawubona is only undertaken in instances where consent is evidenced, or justification is lawful and aligned with data partner activities.	Sawubona and Data Partners offer clear guidelines outlining the process for Data Subjects to object or withdraw consent: <ul style="list-style-type: none"> - PAIA Manual - POPIA Aligned DP Mandate

Condition 3 – Purpose Specification

What it means...	What we do...	How we do it...
Collection must be specific and legal and related to business function	Sawubona processes data in accordance with the business purposes and instructions of the Data Partner Sawubona ensure that data submitted to the ecosystem is collected legally and aligned with the Data Partner business function.	Sawubona processing activities are guided primarily by the principles of the Act and in accordance with Data Partner business needs: <ul style="list-style-type: none"> - Data Partner Service Mandate (Contract of Service or SLA) - Privacy Notice - Sawubona - Privacy Notice - Data Partner

Condition 4 – Further Processing

What it means...	What we do...	How we do it...
Further processing must be compatible with or in service to the initial purpose for the collection of the PI.	Processing activities provide clear benefit to data subjects and avoid prejudice to privacy. Further processing undertaken on behalf of Data Partners aligns with the original purpose, or consent ensured at collection, unless data is derived from a public record or voluntarily made available by the DS. In many instances information is used for statistical purposes and is not published in an identifiable form.	Contractual and legal obligations provide clearly defined processing mandates: <ul style="list-style-type: none"> - Data Partner Service Mandate (Contract of Service or SLA) - Privacy Notice - Sawubona - Privacy Notice - Data Partner - Annual alignment review of Prior Authorisation requirements

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Condition 5 – Information Quality

What it means...	What we do...	How we do it...
Ensuring information is accurate and complete and updated where necessary.	By default, Sawubona Exchange ensures that information is vetted against multiple reference points to maintain field and attribute accuracy at all times. This is a perpetual service offering for Data Partner participants.	By aggregating fields from all our Data Partners, we can merge sets and prioritise the most recent and accurate information. While partners may never benefit from information that isn't purpose specific, where a legitimate interest exists Sawubona is able to ensure information quality at all times.

Condition 6 – Openness

What it means...	What we do...	How we do it...
Maintain data subject awareness of information collected, the purpose of that collection and the intend use of the data.	Sawubona ensure published statements of intent on our own website and that of our partners and participants. Data Partners should endeavour to express the intent and purpose at the point of collection. The data subject whose information is collected, is made aware of the collection and the purpose for which it is collected together with the information that may be processed by Sawubona.	Sawubona and Data Partners provide details on processing activities regarding the data: <ul style="list-style-type: none"> - Contract of Service (SLA) - Privacy Notice – Sawubona - Privacy Notice – Data Partner - PAIA Manual – Sawubona - PAIA Manual – Data Partner

Condition 7 – Security Safeguards

What it means...	What we do...	How we do it...
Confidentiality and integrity of data	Sawubona oversees the integrity and confidentiality of all data in its care, using all appropriate and reasonable technical and organisational measures to prevent the loss, damage, theft, or unauthorised access.	ISO27001 aligned policy framework for Information Risk Management which includes AUP, DR & BCP and Encryption Standards. Secure Sharing Mandate for all Data Partners and Third Party Service Providers.

Condition 8 – Data Subject Participation

What it means...	What we do...	How we do it...
Ensure DS knowledge and awareness of rights regarding the data	Acknowledge and facilitate data subject rights including access rights, correction and rectification, objection and withdrawal and the corresponding processes.	Sawubona and Data Partners offer clear guidelines outlining the process for Data Subjects to request access or correction to the data or deletion thereof: <ul style="list-style-type: none"> - PAIA Manual - Request verification and response processes