



WENRU

Creating Informed Decisions



WENRU (PTY) LTD – POPIA (DATA PROTECTION) POLICY

1. PURPOSE

The purpose of this POPIA Policy is to ensure that Wenru (Pty) Ltd (“Wenru”) processes personal information lawfully, reasonably, and in a manner that protects the privacy rights of data subjects, in accordance with the Protection of Personal Information Act, 2013 (POPIA).

This policy establishes governance controls for the collection, use, storage, sharing, and protection of personal information and supports Wenru’s broader governance and compliance framework.

AUTHORITY AND APPLICATION

This POPIA Policy is issued under the authority of Wenru (Pty) Ltd’s Governance Framework and constitutes the single authoritative policy governing the processing, protection, and security of personal information within Wenru. It operates subject to applicable legislation and regulatory requirements.

This Policy applies to all personal information processed under Wenru’s RMCP, PAIA Manual, Operations Manual, Standard Operating Procedures, Complaints Management Policy, and Business Continuity Plan.

All representatives, employees, and service providers are required to comply with this Policy. Any breach of this Policy may result in disciplinary or corrective action and, where applicable, regulatory reporting.

2. SCOPE

This policy applies to:

- all personal information processed by Wenru;
- all representatives, administrative staff, management, and outsourced service providers; and
- personal information relating to clients, potential clients, employees, representatives, beneficiaries, and third parties.

3. DEFINITIONS

3.1. Personal Information: Information relating to an identifiable, living natural person or juristic person, as defined in POPIA

3.2. Data Subject: The person to whom personal information relates

3.3. Processing: Any operation concerning personal information, including collection, storage, use, dissemination, or destruction

3.4. Responsible Party: Wenru (Pty) Ltd

4. POPIA GOVERNANCE AND RESPONSIBILITY

4.1. Responsible Party

Wenru is the Responsible Party for all personal information processed in the course of its business.

4.2. Information Officer

The Key Individual is designated as Wenru's Information Officer and is responsible for:

- POPIA compliance oversight;
- policy implementation and monitoring; and
- management of data subject requests and data breaches.

5. CONDITIONS FOR LAWFUL PROCESSING

Wenru processes personal information in accordance with the following POPIA conditions:

- **Accountability:** Wenru takes responsibility for ensuring compliance with POPIA and this Policy.
- **Processing Limitation:** Personal information is processed lawfully and minimally, based on consent, contractual necessity, or legal obligation.
- **Purpose Specification:** Personal information is collected for specific, explicitly defined purposes related to Wenru's services.
- **Further Processing Limitation:** Further processing is compatible with the original purpose of collection.
- **Information Quality:** Wenru takes reasonable steps to ensure personal information is accurate and up to date.
- **Openness:** Data subjects are informed of how their personal information is processed through disclosures and notices.
- **Security Safeguards:** Appropriate technical and organisational measures are implemented to protect personal information.
- **Data Subject Participation:** Data subjects may request access to or correction of their personal information.

6. COLLECTION AND USE OF PERSONAL INFORMATION

Personal information may be collected:

- directly from the data subject; or
- from product providers or third parties where authorised.

Information is used solely for legitimate business purposes, including advice, intermediary services, administration, compliance, and legal obligations.

7. STORAGE, ACCESS, AND RETENTION

- Personal information is stored securely, primarily in electronic format;
- access is restricted to authorised individuals only; and
- information is retained in accordance with legislative and regulatory retention requirements.

8. SHARING OF PERSONAL INFORMATION

Personal information may be shared with:

- product providers;
- regulatory bodies;
- compliance service providers; and
- IT and system service providers.

Sharing is limited to what is necessary and subject to appropriate safeguards.

9. DATA BREACH MANAGEMENT

In the event of a suspected or confirmed data breach:

- the incident is investigated promptly;
- appropriate remedial steps are taken; and
- affected data subjects and the Information Regulator are notified where required by law.

10. OUTSOURCED PROCESSING

Where personal information is processed by outsourced service providers:

- due diligence is conducted;
- contractual safeguards are implemented; and
- oversight is maintained in line with Wenru's Outsourcing Governance Policy.

11. TRAINING AND AWARENESS

All staff and representatives receive appropriate training on POPIA principles and data protection responsibilities.

12. MONITORING AND REVIEW

Compliance with this Policy is monitored through management oversight and compliance reviews. The Policy is reviewed at least annually or upon material regulatory change.

VERSION CONTROL

Version: 1.0

Approved by: Key Individual

Review Cycle: Annual