

## Annexure C.

### **Attestation of Compliance with the Code of Conduct for the Processing of Personal Information by the Banking Industry.**

The Code of Conduct for the Processing of Personal Information by the Banking Industry (the Code) is intended to outline and expand on the specific obligations of the members of The Banking Association South Africa (BASA) as responsible parties, operators, or as joint responsible parties, when processing the Personal Information (PI) and Special Personal Information (SPI) of data subjects. It must be noted that the Code will not replace the provisions of the Protection of Personal Information Act 4 of 2013 (POPIA) and forms part of the Regulations on POPIA as published by the Information Regulator (IR).

I, **THAVANEETHEE REDDY** (full names)

being the Information Officer/~~Deputy Information Officer~~ of **ABSA BANK LIMITED**

(the bank) have reviewed the privacy standards set out in the Code and hereby attest that to the best of my knowledge the reasonably necessary steps have been taken to put systems, measures, and processes in place aimed at complying with the provisions of the Code. Further, such systems, measures, and processes are fully or partially implemented and monitored by the bank to achieve the outcomes below and where control failures are identified, such failures are addressed and remedied.

**This attestation is only applicable to the operations of the bank where POPIA and the Code finds application.**

#### **Accountability**

Compliance with the accountability provisions of the Code including establishing functions and developing frameworks which identify, manage, monitor and report on privacy related risks. An Information Officer / Deputy Information Officers have been appointed.

#### **Processing limitation**

PI and SPI is lawfully processed under an appropriate lawful justification as envisaged in section 4.2 of the Code and in accordance with the purpose(s) of collection. The collection of PI and SPI is adequate, relevant and not excessive. PI and SPI is collected directly from the data subject, unless one of the exceptions listed in section 4.3 of the Code is applicable.

#### **Purpose specification**

PI is collected for a specific, defined, and lawful purpose related to a function or activity of the Bank. The appropriate privacy disclosures are enabled through privacy or similar notice(s) to demonstrate efforts in complying with section 5.1 of the Code, ensuring transparency is achieved. Records of PI are not retained longer than necessary for achieving the purpose for which the information was collected or subsequently processed, unless one of the factors listed in sections 5.2.1 to 5.2.2.4 of the Code is applicable, or unless section 5.3 of the Code applies. Records of PI are destroyed, deleted or de-identified as soon as reasonably practicable after the Bank is no longer legally permitted to retain the record in accordance with section 5.5 of the Code. The processing of PI is restricted in circumstances listed in sections 5.6 and 5.7 of the Code.

#### **Further processing limitation**

An assessment is undertaken prior to further processing of PI to determine whether it is processed in accordance or compatible with the purpose for which it was collected in accordance with section 6 of the Code or aligned to the consent of the data subject.

**Information quality**

The Bank is taking reasonably practicable steps to ensure that the PI collected is complete, accurate, not misleading and updated where necessary in accordance with section 7 of the Code.

**Openness**

The documentation of processing operations under the Bank's responsibility as required by section 51 of the Promotion of Access to Information Act, 2000 is maintained by the Bank which has also taken all reasonably practicable steps to make data subjects aware of the information listed in sections 8.2.1 to 8.2.11 of the Code.

**Security safeguards**

Appropriate, reasonable technical and organisational measures aimed at securing the integrity and confidentiality of the PI in the Bank's possession have been deployed. Operators are appointed in accordance with the provisions of section 8.4 of the Code. The Bank's risk management processes are aimed at identifying and investigating security compromises as defined in section 22 of POPIA and the Bank notifies the Information Regulator and data subject where required in accordance with section 8.5 of the Code.

**Data subject participation**

The data subject rights set out in section 9 of the Code are given effect to and the processes set out therein are applied.

**Prohibition of the processing of special personal information**

The processing of the SPI of data subjects is carried out in accordance with the provisions of sections 10.2, 10.3, and 10.4 of the Code. The Bank monitors compliance with section 10 of the Code and the relevant provisions of POPIA.

**Prohibition on processing personal information of children**

The PI of children is not processed except in compliance with the provisions of section 11 of the Code. The Bank monitors compliance with section 11 of the Code and the relevant provisions of POPIA.

**Direct marketing**

The processing of PI for the purpose of unsolicited direct marketing occurs by the means set out in section 12.1 of the Code, and unsolicited direct marketing by electronic means occurs in accordance with sections 12.2, 12.3, 12.4, and 12.5 of the Code. Appropriate policies and processes are in place to ensure lawful unsolicited direct marketing communications in alignment with section 12.5 of the Code.

**Automated decision-making**

Automated decision making is conducted in accordance with the processes and operations set out in section 13 of the Code.

**Information matching**

Information matching programmes are used in accordance with the processes and operations set out in section 14 of the Code.

**Transfer of information**

The PI of a data subject is transferred to a third party who is in a foreign country in compliance with the provisions of section 16 of the Code.

**Internal dispute resolution**

The Bank has fully or partially put in place policies and procedures aimed at establishing and maintaining an adequate and effective complaints management framework to ensure the fair resolution of complaints in accordance with section 17 of the Code.

**Ombudsman for banking services**

The contact information of the Ombudsman for Banking Services and the documentation required to lodge a complaint with the said ombudsman are provided in accordance with section 18 of the Code. Banks do provide other ombudsman offices or independent adjudicators' information, which might have jurisdiction over that data subject's complaint. Where applicable, the Bank will appoint an independent adjudicator through BASA.

**Dated and signed at** \_SANDTON **on 15 day of** \_OCTOBER **2025.**

**Information Officer/~~Deputy Information Officer~~: THAVANEETHEE REDDY**

Signature:  \_\_\_\_\_

End of BASA's report to the Information Regulator in terms of the POPIA  
Code of Conduct

## Annexure C.

### **Attestation of Compliance with the Code of Conduct for the Processing of Personal Information by the Banking Industry.**

The Code of Conduct for the Processing of Personal Information by the Banking Industry (the Code) is intended to outline and expand on the specific obligations of the members of The Banking Association South Africa (BASA) as responsible parties, operators, or as joint responsible parties, when processing the Personal Information (PI) and Special Personal Information (SPI) of data subjects. It must be noted that the Code does not replace the provisions of the Protection of Personal Information Act 4 of 2013 (POPIA) and forms part of the Regulations on POPIA as published by the Information Regulator (IR).

I, YOLANDE MYBURGH (full names)

being the Information Officer/ ~~Deputy Information Officer~~ of ACCESS BANK SOUTH AFRICA LIMITED

(the bank) have reviewed the privacy standards set out in the Code and hereby attest that to the best of my knowledge the reasonably necessary steps have been taken to put systems, measures, policies and processes in place aimed at complying with the provisions of the Code. Further, such systems, measures, policies and processes are fully or partially implemented and monitored by the bank to achieve the outcomes below and where control failures are identified, such failures are addressed and remedied.

**This attestation is only applicable to the operations of the bank where POPIA and the Code finds application.**

#### **Accountability**

Compliance with the accountability provisions of the Code including establishing functions and developing frameworks which identify, manage, monitor and report on privacy related risks. An Information Officer / Deputy Information Officer/s have been appointed.

#### **Processing limitation**

PI and SPI is lawfully processed under an appropriate lawful justification as envisaged in section 4.2 of the Code and in accordance with the purpose(s) of collection. The collection of PI and SPI is adequate, relevant and not excessive. PI and SPI is collected directly from the data subject, unless one of the exceptions listed in section 4.3 of the Code is applicable.

#### **Purpose specification**

PI is collected for a specific, defined, and lawful purpose related to a function or activity of the Bank. The appropriate privacy disclosures are enabled through privacy or similar notice(s) to demonstrate efforts in complying with section 5.1 of the Code, ensuring transparency is achieved. Records of PI are not retained longer than necessary for achieving the purpose for which the information was collected or subsequently processed, unless one of the factors listed in sections 5.2.1 to 5.2.2.4 of the Code is applicable, or unless section 5.3 of the Code applies. Records of PI are destroyed, deleted or de-identified as soon as reasonably practicable after the Bank is no longer legally permitted to retain the record in accordance with section 5.5 of the Code. The processing of PI is restricted in circumstances listed in sections 5.6 and 5.7 of the Code.

#### **Further processing limitation**

An assessment is undertaken prior to further processing of PI to determine whether it is processed in accordance or compatible with the purpose for which it was collected in accordance with section 6 of the Code or aligned to the consent of the data subject.

**Information quality**

The Bank is taking reasonably practicable steps to ensure that the PI collected is complete, accurate, not misleading and updated where necessary in accordance with section 7 of the Code.

**Openness**

The documentation of processing operations under the Bank's responsibility as required by section 51 of the Promotion of Access to Information Act, 2000 is maintained by the Bank which has also taken all reasonably practicable steps to make data subjects aware of the information listed in sections 8.2.1 to 8.2.11 of the Code.

**Security safeguards**

Appropriate, reasonable technical and organisational measures aimed at securing the integrity and confidentiality of the PI in the Bank's possession have been deployed. Operators are appointed in accordance with the provisions of section 8.4 of the Code. The Bank's risk management processes are aimed at identifying, investigating and managing security compromises as defined in section 22 of POPIA and the Bank notifies the Information Regulator and data subject where required in accordance with section 8.5 of the Code.

**Data subject participation**

The data subject rights set out in section 9 of the Code are given effect to and the processes set out therein are applied.

**Prohibition of the processing of special personal information**

The processing of the SPI of data subjects is carried out in accordance with the provisions of sections 10.2, 10.3, and 10.4 of the Code. The Bank monitors compliance with section 10 of the Code and the relevant provisions of POPIA.

**Prohibition on processing personal information of children**

The PI of children is not processed except in compliance with the provisions of section 11 of the Code. The Bank monitors compliance with section 11 of the Code and the relevant provisions of POPIA.

**Direct marketing**

The processing of PI for the purpose of unsolicited direct marketing occurs by the means set out in section 12.1 of the Code, and unsolicited direct marketing by electronic means occurs in accordance with sections 12.2, 12.3, 12.4, and 12.5 of the Code. Appropriate policies and processes are in place to ensure lawful unsolicited direct marketing communications in alignment with section 12.5 of the Code.

**Automated decision-making**

Automated decision making is conducted in accordance with the processes and operations set out in section 13 of the Code.

**Information matching**

Information matching programmes are used in accordance with the processes and operations set out in section 14 of the Code.

**Transfer of information**

The PI of a data subject is transferred to a third party who is in a foreign country in compliance with the provisions of section 16 of the Code.

**Internal dispute resolution**

The Bank has fully or partially put in place policies and procedures aimed at establishing and maintaining an adequate and effective complaints management framework to ensure the fair resolution of complaints in accordance with section 17 of the Code.

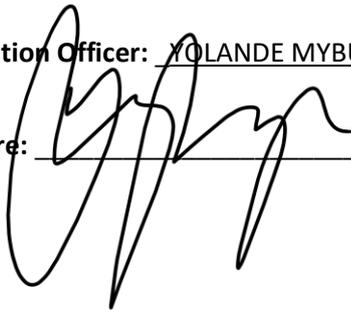
**National Financial Ombud Scheme, South Arica (NFO)**

The contact information of the NFO and the documentation required to lodge a complaint with the said ombudsman are provided in accordance with section 18 of the Code. Banks do provide other ombudsman offices or independent adjudicators' information, which might have jurisdiction over that data subject's complaint. Where applicable, the Bank will appoint an independent adjudicator through BASA.

Dated and signed at JOHANNESBURG on 14 day of OCTOBER \_\_\_\_\_ 2025.

Information Officer: YOLANDE MYBURGH

Signature: \_\_\_\_\_



End of BASA's report to the Information Regulator in terms of the POPIA  
Code of Conduct

## **Annexure C.**

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I, Itumeleng Mokoab Paul Mpolokeng (full names) Deputy Information Officer of African Bank (the bank) have reviewed the privacy standards set out in the Code and hereby attest that to the best of my knowledge the reasonably necessary steps have been taken to put systems, measures, policies and processes in place aimed at complying with the provisions of the Code. Further, such systems, measures, policies and processes are fully or partially implemented and monitored by the bank to achieve the outcomes below and where control failures are identified, such failures are addressed and remedied.

**This attestation is only applicable to the operations of the bank where POPIA and the Code finds application.**

#### **Accountability**

Compliance with the accountability provisions of the Code including establishing functions and developing frameworks which identify, manage, monitor and report on privacy related risks. An Information Officer / Deputy Information Officer/s have been appointed.

#### **Processing limitation**

PI and SPI is lawfully processed under an appropriate lawful justification as envisaged in section 4.2 of the Code and in accordance with the purpose(s) of collection. The collection of PI and SPI is adequate, relevant and not excessive. PI and SPI is collected directly from the data subject, unless one of the exceptions listed in section 4.3 of the Code is applicable.

#### **Purpose specification**

PI is collected for a specific, defined, and lawful purpose related to a function or activity of the Bank. The appropriate privacy disclosures are enabled through privacy or similar notice(s) to demonstrate efforts in complying with section 5.1 of the Code, ensuring transparency is achieved. Records of PI are not retained longer than necessary for achieving the purpose for which the information was collected or subsequently processed, unless one of the factors listed in sections 5.2.1 to 5.2.2.4 of the Code is applicable, or unless section 5.3 of the Code applies. Records of PI are destroyed, deleted or de-identified as soon as reasonably practicable after the Bank is no longer legally permitted to retain the record in accordance with section 5.5 of the Code. The processing of PI is restricted in circumstances listed in sections 5.6 and 5.7 of the Code.

#### **Further processing limitation**

An assessment is undertaken prior to further processing of PI to determine whether it is processed in accordance or compatible with the purpose for which it was collected in accordance with section 6 of the Code or aligned to the consent of the data subject.

#### **Information quality**

The Bank is taking reasonably practicable steps to ensure that the PI collected is complete, accurate, not misleading and updated where necessary in accordance with section 7 of the Code.

### **Openness**

The documentation of processing operations under the Bank's responsibility as required by section 51 of the Promotion of Access to Information Act, 2000 is maintained by the Bank which has also taken all reasonably practicable steps to make data subjects aware of the information listed in sections 8.2.1 to 8.2.11 of the Code.

### **Security safeguards**

Appropriate, reasonable technical and organisational measures aimed at securing the integrity and confidentiality of the PI in the Bank's possession have been deployed. Operators are appointed in accordance with the provisions of section 8.4 of the Code. The Bank's risk management processes are aimed at identifying, investigating and managing security compromises as defined in section 22 of POPIA and the Bank notifies the Information Regulator and data subject where required in accordance with section 8.5 of the Code.

### **Data subject participation**

The data subject rights set out in section 9 of the Code are given effect to and the processes set out therein are applied.

### **Prohibition of the processing of special personal information**

The processing of the SPI of data subjects is carried out in accordance with the provisions of sections 10.2, 10.3, and 10.4 of the Code. The Bank monitors compliance with section 10 of the Code and the relevant provisions of POPIA.

### **Prohibition on processing personal information of children**

The PI of children is not processed except in compliance with the provisions of section 11 of the Code. The Bank monitors compliance with section 11 of the Code and the relevant provisions of POPIA.

### **Direct marketing**

The processing of PI for the purpose of unsolicited direct marketing occurs by the means set out in section 12.1 of the Code, and unsolicited direct marketing by electronic means occurs in accordance with sections 12.2, 12.3, 12.4, and 12.5 of the Code. Appropriate policies and processes are in place to ensure lawful unsolicited direct marketing communications in alignment with section 12.5 of the Code.

### **Automated decision-making**

Automated decision making is conducted in accordance with the processes and operations set out in section 13 of the Code.

### **Information matching**

Information matching programmes are used in accordance with the processes and operations set out in section 14 of the Code.

### **Transfer of information**

The PI of a data subject is transferred to a third party who is in a foreign country in compliance with the provisions of section 16 of the Code.

### **Internal dispute resolution**

The Bank has fully or partially put in place policies and procedures aimed at establishing and maintaining an adequate and effective complaints management framework to ensure the fair resolution of complaints in accordance with section 17 of the Code.

**National Financial Ombud Scheme, South Arica (NFO)**

The contact information of the NFO and the documentation required to lodge a complaint with the said ombudsman are provided in accordance with section 18 of the Code. Banks do provide other ombudsman offices or independent adjudicators' information, which might have jurisdiction over that data subject's complaint. Where applicable, the Bank will appoint an independent adjudicator through BASA.

**Dated and signed at Midrand on 07 day of October 2025.**

**Deputy Information Officer: Itumeleng Mokoia Paul Mpolokeng**

Signature:  DocuSigned by:  
Paul Mpolokeng  
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End of BASA's report to the Information Regulator in terms of the POPIA  
Code of Conduct

## Annexure C.

### **Attestation of Compliance with the Code of Conduct for the Processing of Personal Information by the Banking Industry.**

The Code of Conduct for the Processing of Personal Information by the Banking Industry (the Code) is intended to outline and expand on the specific obligations of the members of The Banking Association South Africa (BASA) as responsible parties, operators, or as joint responsible parties, when processing the Personal Information (PI) and Special Personal Information (SPI) of data subjects. It must be noted that the Code does not replace the provisions of the Protection of Personal Information Act 4 of 2013 (POPIA) and forms part of the Regulations on POPIA as published by the Information Regulator (IR).

I, Rushda Ebrahim Khan (full names)

being the Information Officer/~~Deputy Information Officer~~ of **Albaraka Bank Limited**

(the bank) have reviewed the privacy standards set out in the Code and hereby attest that to the best of my knowledge the reasonably necessary steps have been taken to put systems, measures, policies and processes in place aimed at complying with the provisions of the Code. Further, such systems, measures, policies and processes are fully or partially implemented and monitored by the bank to achieve the outcomes below and where control failures are identified, such failures are addressed and remedied.

**This attestation is only applicable to the operations of the bank where POPIA and the Code finds application.**

#### **Accountability**

Compliance with the accountability provisions of the Code including establishing functions and developing frameworks which identify, manage, monitor and report on privacy related risks. An Information Officer / Deputy Information Officer/s have been appointed.

#### **Processing limitation**

PI and SPI is lawfully processed under an appropriate lawful justification as envisaged in section 4.2 of the Code and in accordance with the purpose(s) of collection. The collection of PI and SPI is adequate, relevant and not excessive. PI and SPI is collected directly from the data subject, unless one of the exceptions listed in section 4.3 of the Code is applicable.

#### **Purpose specification**

PI is collected for a specific, defined, and lawful purpose related to a function or activity of the Bank. The appropriate privacy disclosures are enabled through privacy or similar notice(s) to demonstrate efforts in complying with section 5.1 of the Code, ensuring transparency is achieved. Records of PI are not retained longer than necessary for achieving the purpose for which the information was collected or subsequently processed, unless one of the factors listed in sections 5.2.1 to 5.2.2.4 of the Code is applicable, or unless section 5.3 of the Code applies. Records of PI are destroyed, deleted or de-identified as soon as reasonably practicable after the Bank is no longer legally permitted to retain the record in accordance with section 5.5 of the Code. The processing of PI is restricted in circumstances listed in sections 5.6 and 5.7 of the Code.

#### **Further processing limitation**

An assessment is undertaken prior to further processing of PI to determine whether it is processed in accordance or compatible with the purpose for which it was collected in accordance with section 6 of the Code or aligned to the consent of the data subject.

**Information quality**

The Bank is taking reasonably practicable steps to ensure that the PI collected is complete, accurate, not misleading and updated where necessary in accordance with section 7 of the Code.

**Openness**

The documentation of processing operations under the Bank's responsibility as required by section 51 of the Promotion of Access to Information Act, 2000 is maintained by the Bank which has also taken all reasonably practicable steps to make data subjects aware of the information listed in sections 8.2.1 to 8.2.11 of the Code.

**Security safeguards**

Appropriate, reasonable technical and organisational measures aimed at securing the integrity and confidentiality of the PI in the Bank's possession have been deployed. Operators are appointed in accordance with the provisions of section 8.4 of the Code. The Bank's risk management processes are aimed at identifying, investigating and managing security compromises as defined in section 22 of POPIA and the Bank notifies the Information Regulator and data subject where required in accordance with section 8.5 of the Code.

**Data subject participation**

The data subject rights set out in section 9 of the Code are given effect to and the processes set out therein are applied.

**Prohibition of the processing of special personal information**

The processing of the SPI of data subjects is carried out in accordance with the provisions of sections 10.2, 10.3, and 10.4 of the Code. The Bank monitors compliance with section 10 of the Code and the relevant provisions of POPIA.

**Prohibition on processing personal information of children**

The PI of children is not processed except in compliance with the provisions of section 11 of the Code. The Bank monitors compliance with section 11 of the Code and the relevant provisions of POPIA.

**Direct marketing**

The processing of PI for the purpose of unsolicited direct marketing occurs by the means set out in section 12.1 of the Code, and unsolicited direct marketing by electronic means occurs in accordance with sections 12.2, 12.3, 12.4, and 12.5 of the Code. Appropriate policies and processes are in place to ensure lawful unsolicited direct marketing communications in alignment with section 12.5 of the Code.

**Automated decision-making**

Automated decision making is conducted in accordance with the processes and operations set out in section 13 of the Code.

**Information matching**

Information matching programmes are used in accordance with the processes and operations set out in section 14 of the Code.

**Transfer of information**

The PI of a data subject is transferred to a third party who is in a foreign country in compliance with the provisions of section 16 of the Code.

**Internal dispute resolution**

The Bank has fully or partially put in place policies and procedures aimed at establishing and maintaining an adequate and effective complaints management framework to ensure the fair resolution of complaints in accordance with section 17 of the Code.

**National Financial Ombud Scheme, South Africa (NFO)**

The contact information of the NFO and the documentation required to lodge a complaint with the said ombudsman are provided in accordance with section 18 of the Code. Banks do provide other ombudsman offices or independent adjudicators' information, which might have jurisdiction over that data subject's complaint. Where applicable, the Bank will appoint an independent adjudicator through BASA.

Dated and signed at \_\_\_Durban\_\_\_ on \_\_9<sup>th</sup> day of \_\_\_October\_\_ 2025.

Information Officer/~~Deputy Information Officer~~: Rushda Ebrahim Khan

Signature: \_\_\_\_\_

End of BASA's report to the Information Regulator in terms of the POPIA  
Code of Conduct

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I, Tendayi Bamhare (full names) being the Information Officer/ Deputy Information Officer of Bidvest Bank Limited (the bank) have reviewed the privacy standards set out in the Code and hereby attest that to the best of my knowledge the reasonably necessary steps have been taken to put systems, measures, policies and processes in place aimed at complying with the provisions of the Code. Further, such systems, measures, policies and processes are fully or partially implemented and monitored by the bank to achieve the outcomes below and where control failures are identified, such failures are addressed and remedied.

**This attestation is only applicable to the operations of the bank where POPIA and the Code finds application.**

#### **Accountability**

Compliance with the accountability provisions of the Code including establishing functions and developing frameworks which identify, manage, monitor and report on privacy related risks. An Information Officer / Deputy Information Officer/s have been appointed.

#### **Processing limitation**

PI and SPI is lawfully processed under an appropriate lawful justification as envisaged in section 4.2 of the Code and in accordance with the purpose(s) of collection. The collection of PI and SPI is adequate, relevant and not excessive. PI and SPI is collected directly from the data subject, unless one of the exceptions listed in section 4.3 of the Code is applicable.

#### **Purpose specification**

PI is collected for a specific, defined, and lawful purpose related to a function or activity of the Bank. The appropriate privacy disclosures are enabled through privacy or similar notice(s) to demonstrate efforts in complying with section 5.1 of the Code, ensuring transparency is achieved. Records of PI are not retained longer than necessary for achieving the purpose for which the information was collected or subsequently processed, unless one of the factors listed in sections 5.2.1 to 5.2.2.4 of the Code is applicable, or unless section 5.3 of the Code applies. Records of PI are destroyed, deleted or de-identified as soon as reasonably practicable after the Bank is no longer legally permitted to retain the record in accordance with section 5.5 of the Code. The processing of PI is restricted in circumstances listed in sections 5.6 and 5.7 of the Code.

#### **Further processing limitation**

An assessment is undertaken prior to further processing of PI to determine whether it is processed in accordance or compatible with the purpose for which it was collected in accordance with section 6 of the Code or aligned to the consent of the data subject.

**Information quality**

The Bank is taking reasonably practicable steps to ensure that the PI collected is complete, accurate, not misleading and updated where necessary in accordance with section 7 of the Code.

**Openness**

The documentation of processing operations under the Bank's responsibility as required by section 51 of the Promotion of Access to Information Act, 2000 is maintained by the Bank which has also taken all reasonably practicable steps to make data subjects aware of the information listed in sections 8.2.1 to 8.2.11 of the Code.

**Security safeguards**

Appropriate, reasonable technical and organisational measures aimed at securing the integrity and confidentiality of the PI in the Bank's possession have been deployed. Operators are appointed in accordance with the provisions of section 8.4 of the Code. The Bank's risk management processes are aimed at identifying, investigating and managing security compromises as defined in section 22 of POPIA and the Bank notifies the Information Regulator and data subject where required in accordance with section 8.5 of the Code.

**Data subject participation**

The data subject rights set out in section 9 of the Code are given effect to and the processes set out therein are applied.

**Prohibition of the processing of special personal information**

The processing of the SPI of data subjects is carried out in accordance with the provisions of sections 10.2, 10.3, and 10.4 of the Code. The Bank monitors compliance with section 10 of the Code and the relevant provisions of POPIA.

**Prohibition on processing personal information of children**

The PI of children is not processed except in compliance with the provisions of section 11 of the Code. The Bank monitors compliance with section 11 of the Code and the relevant provisions of POPIA.

**Direct marketing**

The processing of PI for the purpose of unsolicited direct marketing occurs by the means set out in section 12.1 of the Code, and unsolicited direct marketing by electronic means occurs in accordance with sections 12.2, 12.3, 12.4, and 12.5 of the Code. Appropriate policies and processes are in place to ensure lawful unsolicited direct marketing communications in alignment with section 12.5 of the Code.

**Automated decision-making**

Automated decision making is conducted in accordance with the processes and operations set out in section 13 of the Code.

**Information matching**

Information matching programmes are used in accordance with the processes and operations set out in section 14 of the Code.

**Transfer of information**

The PI of a data subject is transferred to a third party who is in a foreign country in compliance with the provisions of section 16 of the Code.

**Internal dispute resolution**

The Bank has fully or partially put in place policies and procedures aimed at establishing and maintaining an adequate and effective complaints management framework to ensure the fair resolution of complaints in accordance with section 17 of the Code.

**National Financial Ombud Scheme, South Arica (NFO)**

The contact information of the NFO and the documentation required to lodge a complaint with the said ombudsman are provided in accordance with section 18 of the Code. Banks do provide other ombudsman offices or independent adjudicators' information, which might have jurisdiction over that data subject's complaint. Where applicable, the Bank will appoint an independent adjudicator through BASA.

**Dated and signed at Sandton on 21st day of November 2025.**

**Information Officer/Deputy Information Officer: Tendayi Bamhare (Acting Chief Financial Officer)**

**Signature:** \_\_\_\_\_

End of BASA's report to the Information Regulator in terms of the POPIA  
Code of Conduct



Signed with Impression - Chain of Custody



**Signature Request**

Signature Request ID:	aec1355f-6dcd-4992-a370-679ced9ac637	Timestamp:	2025-11-20 15:22:22 GMT
Signee Name:	Tendayi Bamhare	Sender Name:	Trenita Soni
Request Type:	WebSigning	Request Status:	WEBVIEWER SIGNED

**Original Document**

Document Name:	2025 Attestation for the BASA Annual Report to the IR in terms of the Code Bidvest Bank.pdf	Document Size:	137.4 KB
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**Email Evidence**

Signee Email:	tendayi.bamhare@bidvestbank.co.za	Email Subject:	A document from Trenita Soni is ready for signature
Email Sent Timestamp:	2025-11-20T15:06:51.838709	Email Opened Timestamp:	Not available in Silent Mode

**Web Evidence**

Signee IP Address:	163.116.164.119	Request Timestamp:	2025-11-20 15:21:40 GMT
Signee GPS (if shared):	ZA: Mozilla/5.0 (Windows NT 10.0; Win64; x64) AppleWebKit/537.36 (KHTML, like Gecko) Chrome/142.0.0.0 Safari/537.36 Edg/142.0.0.0	Terms Accepted Timestamp:	2025-11-20 15:21:47 GMT

**Annotations and Modifications**

Signature Count:	1	Form Fields Filled Count:	0
Text Annotation Count:	0	Initial All Pages Count:	0
Single Initial Count:	0		

**Signing Evidence**

Signee Mobile:	+27823751822	Sign Type:	WebSigning
Security Challenge:	NONE	Part of Workflow:	0df4ddb5-6c24-4c22-97ac-d93664550cf3

**Chain Of Custody Generation**

Attached Document Name:	20251120T152222.755605Z 2025 Attestation for the BASA Annual Report to the IR in terms of the Code Bidvest Bank.pdf	Attached Timestamp:	2025-11-20 15:22:22 GMT
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Annexure C.

**Attestation of Compliance with the Code of Conduct for the Processing of Personal Information by the Banking Industry.**

The Code of Conduct for the Processing of Personal Information by the Banking Industry (the Code) is intended to outline and expand on the specific obligations of the members of The Banking Association South Africa (BASA) as responsible parties, operators, or as joint responsible parties, when processing the Personal Information (PI) and Special Personal Information (SPI) of data subjects. It must be noted that the Code does not replace the provisions of the Protection of Personal Information Act 4 of 2013 (POPIA) and forms part of the Regulations on POPIA as published by the Information Regulator (IR).

I, XX MKOSIMATHE E. MKHWANA (full names)

being the Information Officer / Deputy Information Officer of XX bank

*MK*

*AUTHORIZED USER OF THE EXCHANGE*

*MORITZ LYNCH SOUTH AFRICA*

(the bank) have reviewed the privacy standards set out in the Code and hereby attest that to the best of my knowledge the reasonably necessary steps have been taken to put systems, measures, policies and processes in place aimed at complying with the provisions of the Code. Further, such systems, measures, policies and processes are fully or partially implemented and monitored by the bank to achieve the outcomes below and where control failures are identified, such failures are addressed and remedied.

**This attestation is only applicable to the operations of the bank where POPIA and the Code finds application.**

**Accountability**

Compliance with the accountability provisions of the Code including establishing functions and developing frameworks which identify, manage, monitor and report on privacy related risks. An Information Officer / Deputy Information Officer/s have been appointed.

**Processing limitation**

PI and SPI is lawfully processed under an appropriate lawful justification as envisaged in section 4.2 of the Code and in accordance with the purpose(s) of collection. The collection of PI and SPI is adequate, relevant and not excessive. PI and SPI is collected directly from the data subject, unless one of the exceptions listed in section 4.3 of the Code is applicable.

**Purpose specification**

PI is collected for a specific, defined, and lawful purpose related to a function or activity of the Bank. The appropriate privacy disclosures are enabled through privacy or similar notice(s) to demonstrate efforts in complying with section 5.1 of the Code, ensuring transparency is achieved. Records of PI are not retained longer than necessary for achieving the purpose for which the information was collected or subsequently processed, unless one of the factors listed in sections 5.2.1 to 5.2.2.4 of the Code is applicable, or unless section 5.3 of the Code applies. Records of PI are destroyed, deleted or de-identified as soon as reasonably practicable after the Bank is no longer legally permitted to retain the record in accordance with section 5.5 of the Code. The processing of PI is restricted in circumstances listed in sections 5.6 and 5.7 of the Code.

**Further processing limitation**

An assessment is undertaken prior to further processing of PI to determine whether it is processed in accordance or compatible with the purpose for which it was collected in accordance with section 6 of the Code or aligned to the consent of the data subject.

**Information quality**

The Bank is taking reasonably practicable steps to ensure that the PI collected is complete, accurate, not misleading and updated where necessary in accordance with section 7 of the Code.

**Openness**

The documentation of processing operations under the Bank's responsibility as required by section 51 of the Promotion of Access to Information Act, 2000 is maintained by the Bank which has also taken all reasonably practicable steps to make data subjects aware of the information listed in sections 8.2.1 to 8.2.11 of the Code.

**Security safeguards**

Appropriate, reasonable technical and organisational measures aimed at securing the integrity and confidentiality of the PI in the Bank's possession have been deployed. Operators are appointed in accordance with the provisions of section 8.4 of the Code. The Bank's risk management processes are aimed at identifying, investigating and managing security compromises as defined in section 22 of POPIA and the Bank notifies the Information Regulator and data subject where required in accordance with section 8.5 of the Code.

**Data subject participation**

The data subject rights set out in section 9 of the Code are given effect to and the processes set out therein are applied.

**Prohibition of the processing of special personal information**

The processing of the SPI of data subjects is carried out in accordance with the provisions of sections 10.2, 10.3, and 10.4 of the Code. The Bank monitors compliance with section 10 of the Code and the relevant provisions of POPIA.

**Prohibition on processing personal information of children**

The PI of children is not processed except in compliance with the provisions of section 11 of the Code. The Bank monitors compliance with section 11 of the Code and the relevant provisions of POPIA.

**Direct marketing**

The processing of PI for the purpose of unsolicited direct marketing occurs by the means set out in section 12.1 of the Code, and unsolicited direct marketing by electronic means occurs in accordance with sections 12.2, 12.3, 12.4, and 12.5 of the Code. Appropriate policies and processes are in place to ensure lawful unsolicited direct marketing communications in alignment with section 12.5 of the Code.

**Automated decision-making**

Automated decision making is conducted in accordance with the processes and operations set out in section 13 of the Code.

**Information matching**

Information matching programmes are used in accordance with the processes and operations set out in section 14 of the Code.

**Transfer of information**

The PI of a data subject is transferred to a third party who is in a foreign country in compliance with the provisions of section 16 of the Code.

**Internal dispute resolution**

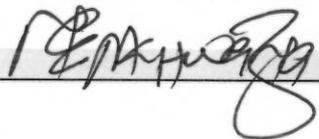
The Bank has fully or partially put in place policies and procedures aimed at establishing and maintaining an adequate and effective complaints management framework to ensure the fair resolution of complaints in accordance with section 17 of the Code.

**National Financial Ombud Scheme, South Arica (NFO)**

The contact information of the NFO and the documentation required to lodge a complaint with the said ombudsman are provided in accordance with section 18 of the Code. Banks do provide other ombudsman offices or independent adjudicators' information, which might have jurisdiction over that data subject's complaint. Where applicable, the Bank will appoint an independent adjudicator through BASA.

Dated and signed at SOHAYMESING on 17<sup>th</sup> day of NOVEMBER 2025.

Information Officer/Deputy Information Officer: NKOSIMATHI E. MKHAWANA

Signature: 

End of BASA's report to the Information Regulator in terms of the POPIA  
Code of Conduct

## **Annexure C.**

### **Attestation of Compliance with the Code of Conduct for the Processing of Personal Information by the Banking Industry.**

The Code of Conduct for the Processing of Personal Information by the Banking Industry (the Code) is intended to outline and expand on the specific obligations of the members of The Banking Association South Africa (BASA) as responsible parties, operators, or as joint responsible parties, when processing the Personal Information (PI) and Special Personal Information (SPI) of data subjects. It must be noted that the Code does not replace the provisions of the Protection of Personal Information Act 4 of 2013 (POPIA) and forms part of the Regulations on POPIA as published by the Information Regulator (IR).

We, Loren Randall-Düvel and Mario Constantinou (full names) being the Deputy Information Officers of Capitec Bank Holdings Limited and its subsidiaries (the bank) have reviewed the privacy standards set out in the Code and hereby attest that to the best of my knowledge the reasonably necessary steps have been taken to put systems, measures, policies and processes in place aimed at complying with the provisions of the Code. Further, such systems, measures, policies and processes are fully or partially implemented and monitored by the bank to achieve the outcomes below and where control failures are identified, such failures are addressed and remedied.

**This attestation is only applicable to the operations of the bank where POPIA and the Code finds application.**

#### **Accountability**

Compliance with the accountability provisions of the Code including establishing functions and developing frameworks which identify, manage, monitor and report on privacy related risks. An Information Officer / Deputy Information Officer/s have been appointed.

#### **Processing limitation**

PI and SPI is lawfully processed under an appropriate lawful justification as envisaged in section 4.2 of the Code and in accordance with the purpose(s) of collection. The collection of PI and SPI is adequate, relevant and not excessive. PI and SPI is collected directly from the data subject, unless one of the exceptions listed in section 4.3 of the Code is applicable.

#### **Purpose specification**

PI is collected for a specific, defined, and lawful purpose related to a function or activity of the Bank. The appropriate privacy disclosures are enabled through privacy or similar notice(s) to demonstrate efforts in complying with section 5.1 of the Code, ensuring transparency is achieved. Records of PI are not retained longer than necessary for achieving the purpose for which the information was collected or subsequently processed, unless one of the factors listed in sections 5.2.1 to 5.2.2.4 of the Code is applicable, or unless section 5.3 of the Code applies. Records of PI are destroyed, deleted or de-identified as soon as reasonably practicable after the Bank is no longer legally permitted to retain the record in accordance with section 5.5 of the Code. The processing of PI is restricted in circumstances listed in sections 5.6 and 5.7 of the Code.

#### **Further processing limitation**

An assessment is undertaken prior to further processing of PI to determine whether it is processed in accordance or compatible with the purpose for which it was collected in accordance with section 6 of the Code or aligned to the consent of the data subject.

### **Information quality**

The Bank is taking reasonably practicable steps to ensure that the PI collected is complete, accurate, not misleading and updated where necessary in accordance with section 7 of the Code.

### **Openness**

The documentation of processing operations under the Bank's responsibility as required by section 51 of the Promotion of Access to Information Act, 2000 is maintained by the Bank which has also taken all reasonably practicable steps to make data subjects aware of the information listed in sections 8.2.1 to 8.2.11 of the Code.

### **Security safeguards**

Appropriate, reasonable technical and organisational measures aimed at securing the integrity and confidentiality of the PI in the Bank's possession have been deployed. Operators are appointed in accordance with the provisions of section 8.4 of the Code. The Bank's risk management processes are aimed at identifying, investigating and managing security compromises as defined in section 22 of POPIA and the Bank notifies the Information Regulator and data subject where required in accordance with section 8.5 of the Code.

### **Data subject participation**

The data subject rights set out in section 9 of the Code are given effect to and the processes set out therein are applied.

### **Prohibition of the processing of special personal information**

The processing of the SPI of data subjects is carried out in accordance with the provisions of sections 10.2, 10.3, and 10.4 of the Code. The Bank monitors compliance with section 10 of the Code and the relevant provisions of POPIA.

### **Prohibition on processing personal information of children**

The PI of children is not processed except in compliance with the provisions of section 11 of the Code. The Bank monitors compliance with section 11 of the Code and the relevant provisions of POPIA.

### **Direct marketing**

The processing of PI for the purpose of unsolicited direct marketing occurs by the means set out in section 12.1 of the Code, and unsolicited direct marketing by electronic means occurs in accordance with sections 12.2, 12.3, 12.4, and 12.5 of the Code. Appropriate policies and processes are in place to ensure lawful unsolicited direct marketing communications in alignment with section 12.5 of the Code.

### **Automated decision-making**

Automated decision making is conducted in accordance with the processes and operations set out in section 13 of the Code.

### **Information matching**

Information matching programmes are used in accordance with the processes and operations set out in section 14 of the Code.

### **Transfer of information**

The PI of a data subject is transferred to a third party who is in a foreign country in compliance with the provisions of section 16 of the Code.

**Internal dispute resolution**

The Bank has fully or partially put in place policies and procedures aimed at establishing and maintaining an adequate and effective complaints management framework to ensure the fair resolution of complaints in accordance with section 17 of the Code.

**National Financial Ombud Scheme, South Arica (NFO)**

The contact information of the NFO and the documentation required to lodge a complaint with the said ombudsman are provided in accordance with section 18 of the Code. Banks do provide other ombudsman offices or independent adjudicators' information, which might have jurisdiction over that data subject's complaint. Where applicable, the Bank will appoint an independent adjudicator through BASA.

**Dated and signed at** Stellenbosch **on** 08 **day of** October 2025 **2025.**

**Deputy Information Officer:** Loren Randall-Duvel and Mario Constantinou

**Signature:** DocuSigned by:  
*Loren Randall-Duvel*  
84B825CED0474CC... Signed by:  
*[Signature]*  
0BF8850F1AC64CE...

End of BASA's report to the Information Regulator in terms of the POPIA  
Code of Conduct

**Attestation of Compliance with the Code of Conduct for the Processing of Personal Information by the Banking Industry.**

The Code of Conduct for the Processing of Personal Information by the Banking Industry (the Code) is intended to outline and expand on the specific obligations of the members of The Banking Association South Africa (BASA) as responsible parties, operators, or as joint responsible parties, when processing the Personal Information (PI) and Special Personal Information (SPI) of data subjects. It must be noted that the Code does not replace the provisions of the Protection of Personal Information Act 4 of 2013 (POPIA) and forms part of the Regulations on POPIA as published by the Information Regulator (IR).

I, Poendree Govender, being the Information Officer of China Construction Bank Corporation, Johannesburg Branch (CCB-JHB) has reviewed the privacy standards set out in the Code and hereby attest that to the best of my knowledge the reasonably necessary steps have been taken to put systems, measures, policies and processes in place aimed at complying with the provisions of the Code. Further, such systems, measures, policies and processes are implemented and monitored by the bank to achieve the outcomes below and where control failures are identified, such failures are addressed and remedied.

**This attestation is only applicable to the operations of the bank where POPIA and the Code finds application.**

**Accountability**

Compliance with the accountability provisions of the Code including establishing functions and developing frameworks which identify, manage, monitor and report on privacy related risks. An Information Officer and Deputy Information Officer have been appointed.

**Processing limitation**

PI and SPI is lawfully processed under an appropriate lawful justification as envisaged in section 4.2 of the Code and in accordance with the purpose(s) of collection. The collection of PI and SPI is adequate, relevant and not excessive. PI and SPI is collected directly from the data subject, unless one of the exceptions listed in section 4.3 of the Code is applicable.

**Purpose specification**

PI is collected for a specific, defined, and lawful purpose related to a function or activity of the Bank. The appropriate privacy disclosures are enabled through privacy or similar notice(s) to demonstrate efforts in complying with section 5.1 of the Code, ensuring transparency is achieved. Records of PI are not retained longer than necessary for achieving the purpose for which the information was collected or subsequently processed, unless one of the factors listed in sections 5.2.1 to 5.2.2.4 of the Code is

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applicable, or unless section 5.3 of the Code applies. Records of PI are destroyed, deleted or de-identified as soon as reasonably practicable after the Bank is no longer legally permitted to retain the record in accordance with section 5.5 of the Code. The processing of PI is restricted in circumstances listed in sections 5.6 and 5.7 of the Code.

#### **Further processing limitation**

An assessment is undertaken prior to further processing of PI to determine whether it is processed in accordance or compatible with the purpose for which it was collected in accordance with section 6 of the Code or aligned to the consent of the data subject.

#### **Information quality**

The Bank is taking reasonably practicable steps to ensure that the PI collected is complete, accurate, not misleading and updated where necessary in accordance with section 7 of the Code.

#### **Openness**

The documentation of processing operations under the Bank's responsibility as required by section 51 of the Promotion of Access to Information Act, 2000 is maintained by the Bank which has also taken all reasonably practicable steps to make data subjects aware of the information listed in sections 8.2.1 to 8.2.11 of the Code.

#### **Security safeguards**

Appropriate, reasonable technical and organisational measures aimed at securing the integrity and confidentiality of the PI in the Bank's possession have been deployed. Operators are appointed in accordance with the provisions of section 8.4 of the Code. The Bank's risk management processes are aimed at identifying, investigating and managing security compromises as defined in section 22 of POPIA and the Bank notifies the Information Regulator and data subject where required in accordance with section 8.5 of the Code.

#### **Data subject participation**

The data subject rights set out in section 9 of the Code are given effect to and the processes set out therein are applied.

#### **Prohibition of the processing of special personal information**

The processing of the SPI of data subjects is carried out in accordance with the provisions of sections 10.2, 10.3, and 10.4 of the Code. The Bank monitors compliance with section 10 of the Code and the relevant provisions of POPIA.

#### **Prohibition on processing personal information of children**

The PI of children is not processed except in compliance with the provisions of section 11 of the Code. The Bank monitors compliance with section 11 of the Code and the relevant provisions of POPIA.

#### **Direct marketing**

The processing of PI for the purpose of unsolicited direct marketing occurs by the means set out in section 12.1 of the Code, and unsolicited direct marketing by electronic means occurs in accordance

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with sections 12.2, 12.3, 12.4, and 12.5 of the Code. Appropriate policies and processes are in place to ensure lawful unsolicited direct marketing communications in alignment with section 12.5 of the Code.

**Automated decision-making**

Automated decision making is conducted in accordance with the processes and operations set out in section 13 of the Code.

**Information matching**

Information matching programmes are used in accordance with the processes and operations set out in section 14 of the Code.

**Transfer of information**

The PI of a data subject is transferred to a third party who is in a foreign country in compliance with the provisions of section 16 of the Code.

**Internal dispute resolution**

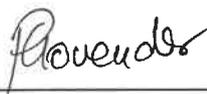
The Bank has put in place policies and procedures aimed at establishing and maintaining an adequate and effective complaints management framework to ensure the fair resolution of complaints in accordance with section 17 of the Code.

**National Financial Ombud Scheme, South Arica (NFO)**

The contact information of the NFO and the documentation required to lodge a complaint with the said ombudsman are provided in accordance with section 18 of the Code. Banks do provide other ombudsman offices or independent adjudicators' information, which might have jurisdiction over that data subject's complaint. Where applicable, the Bank will appoint an independent adjudicator through BASA.

**Dated and signed at Sandton on 3rd day of October 2025.**

**Information Officer: Poendree Govender**

Signature:  \_\_\_\_\_

## Annexure C.

### **Attestation of Compliance with the Code of Conduct for the Processing of Personal Information by the Banking Industry.**

The Code of Conduct for the Processing of Personal Information by the Banking Industry (the Code) is intended to outline and expand on the specific obligations of the members of The Banking Association South Africa (BASA) as responsible parties, operators, or as joint responsible parties, when processing the Personal Information (PI) and Special Personal Information (SPI) of data subjects. It must be noted that the Code does not replace the provisions of the Protection of Personal Information Act 4 of 2013 (POPIA) and forms part of the Regulations on POPIA as published by the Information Regulator (IR).

I, Tsholofelo Machinjike (full names)

being the Information Officer/ Deputy Information Officer of Citibank

(the bank) have reviewed the privacy standards set out in the Code and hereby attest that to the best of my knowledge the reasonably necessary steps have been taken to put systems, measures, policies and processes in place aimed at complying with the provisions of the Code. Further, such systems, measures, policies and processes are fully or partially implemented and monitored by the bank to achieve the outcomes below and where control failures are identified, such failures are addressed and remedied.

**This attestation is only applicable to the operations of the bank where POPIA and the Code finds application.**

#### **Accountability**

Compliance with the accountability provisions of the Code including establishing functions and developing frameworks which identify, manage, monitor and report on privacy related risks. An Information Officer / Deputy Information Officer/s have been appointed.

#### **Processing limitation**

PI and SPI is lawfully processed under an appropriate lawful justification as envisaged in section 4.2 of the Code and in accordance with the purpose(s) of collection. The collection of PI and SPI is adequate, relevant and not excessive. PI and SPI is collected directly from the data subject, unless one of the exceptions listed in section 4.3 of the Code is applicable.

#### **Purpose specification**

PI is collected for a specific, defined, and lawful purpose related to a function or activity of the Bank. The appropriate privacy disclosures are enabled through privacy or similar notice(s) to demonstrate efforts in complying with section 5.1 of the Code, ensuring transparency is achieved. Records of PI are not retained longer than necessary for achieving the purpose for which the information was collected or subsequently processed, unless one of the factors listed in sections 5.2.1 to 5.2.2.4 of the Code is applicable, or unless section 5.3 of the Code applies. Records of PI are destroyed, deleted or de-identified as soon as reasonably practicable after the Bank is no longer legally permitted to retain the record in accordance with section 5.5 of the Code. The processing of PI is restricted in circumstances listed in sections 5.6 and 5.7 of the Code.

#### **Further processing limitation**

An assessment is undertaken prior to further processing of PI to determine whether it is processed in accordance or compatible with the purpose for which it was collected in accordance with section 6 of the Code or aligned to the consent of the data subject.

**Information quality**

The Bank is taking reasonably practicable steps to ensure that the PI collected is complete, accurate, not misleading and updated where necessary in accordance with section 7 of the Code.

**Openness**

The documentation of processing operations under the Bank's responsibility as required by section 51 of the Promotion of Access to Information Act, 2000 is maintained by the Bank which has also taken all reasonably practicable steps to make data subjects aware of the information listed in sections 8.2.1 to 8.2.11 of the Code.

**Security safeguards**

Appropriate, reasonable technical and organisational measures aimed at securing the integrity and confidentiality of the PI in the Bank's possession have been deployed. Operators are appointed in accordance with the provisions of section 8.4 of the Code. The Bank's risk management processes are aimed at identifying, investigating and managing security compromises as defined in section 22 of POPIA and the Bank notifies the Information Regulator and data subject where required in accordance with section 8.5 of the Code.

**Data subject participation**

The data subject rights set out in section 9 of the Code are given effect to and the processes set out therein are applied.

**Prohibition of the processing of special personal information**

The processing of the SPI of data subjects is carried out in accordance with the provisions of sections 10.2, 10.3, and 10.4 of the Code. The Bank monitors compliance with section 10 of the Code and the relevant provisions of POPIA.

**Prohibition on processing personal information of children**

The PI of children is not processed except in compliance with the provisions of section 11 of the Code. The Bank monitors compliance with section 11 of the Code and the relevant provisions of POPIA.

**Direct marketing**

The processing of PI for the purpose of unsolicited direct marketing occurs by the means set out in section 12.1 of the Code, and unsolicited direct marketing by electronic means occurs in accordance with sections 12.2, 12.3, 12.4, and 12.5 of the Code. Appropriate policies and processes are in place to ensure lawful unsolicited direct marketing communications in alignment with section 12.5 of the Code.

**Automated decision-making**

Automated decision making is conducted in accordance with the processes and operations set out in section 13 of the Code.

**Information matching**

Information matching programmes are used in accordance with the processes and operations set out in section 14 of the Code.

**Transfer of information**

The PI of a data subject is transferred to a third party who is in a foreign country in compliance with the provisions of section 16 of the Code.

**Internal dispute resolution**

The Bank has fully or partially put in place policies and procedures aimed at establishing and maintaining an adequate and effective complaints management framework to ensure the fair resolution of complaints in accordance with section 17 of the Code.

**National Financial Ombud Scheme, South Arica (NFO)**

The contact information of the NFO and the documentation required to lodge a complaint with the said ombudsman are provided in accordance with section 18 of the Code. Banks do provide other ombudsman offices or independent adjudicators' information, which might have jurisdiction over that data subject's complaint. Where applicable, the Bank will appoint an independent adjudicator through BASA.

Dated and signed at \_\_Sandton\_\_\_\_ on \_\_03\_\_ day of \_\_October \_ 2025.

**Deputy Information Officer:** Tsholofelo Machinjike

Signature: 

End of BASA's report to the Information Regulator in terms of the POPIA  
Code of Conduct

## **Annexure C.**

### **Attestation of Compliance with the Code of Conduct for the Processing of Personal Information by the Banking Industry.**

The Code of Conduct for the Processing of Personal Information by the Banking Industry (the Code) is intended to outline and expand on the specific obligations of the members of The Banking Association South Africa (BASA) as responsible parties, operators, or as joint responsible parties, when processing the Personal Information (PI) and Special Personal Information (SPI) of data subjects. It must be noted that the Code does not replace the provisions of the Protection of Personal Information Act 4 of 2013 (POPIA) and forms part of the Regulations on POPIA as published by the Information Regulator (IR).

I, Johan Gibhard

being the Information Officer/ Deputy Information Officer of Deutsche Bank AG Johannesburg Branch

(the bank) have reviewed the privacy standards set out in the Code and hereby attest that to the best of my knowledge the reasonably necessary steps have been taken to put systems, measures, policies and processes in place aimed at complying with the provisions of the Code. Further, such systems, measures, policies and processes are fully or partially implemented and monitored by the bank to achieve the outcomes below and where control failures are identified, such failures are addressed and remedied.

**This attestation is only applicable to the operations of the bank where POPIA and the Code finds application.**

#### **Accountability**

Compliance with the accountability provisions of the Code including establishing functions and developing frameworks which identify, manage, monitor and report on privacy related risks. An Information Officer / Deputy Information Officer/s have been appointed.

#### **Processing limitation**

PI and SPI is lawfully processed under an appropriate lawful justification as envisaged in section 4.2 of the Code and in accordance with the purpose(s) of collection. The collection of PI and SPI is adequate, relevant and not excessive. PI and SPI is collected directly from the data subject, unless one of the exceptions listed in section 4.3 of the Code is applicable.

#### **Purpose specification**

PI is collected for a specific, defined, and lawful purpose related to a function or activity of the Bank. The appropriate privacy disclosures are enabled through privacy or similar notice(s) to demonstrate efforts in complying with section 5.1 of the Code, ensuring transparency is achieved. Records of PI are not retained longer than necessary for achieving the purpose for which the information was collected or subsequently processed, unless one of the factors listed in sections 5.2.1 to 5.2.2.4 of the Code is applicable, or unless section 5.3 of the Code applies. Records of PI are destroyed, deleted or de-identified as soon as reasonably practicable after the Bank is no longer legally permitted to retain the record in accordance with section 5.5 of the Code. The processing of PI is restricted in circumstances listed in sections 5.6 and 5.7 of the Code.

#### **Further processing limitation**

An assessment is undertaken prior to further processing of PI to determine whether it is processed in accordance or compatible with the purpose for which it was collected in accordance with section 6 of the Code or aligned to the consent of the data subject.

**Information quality**

The Bank is taking reasonably practicable steps to ensure that the PI collected is complete, accurate, not misleading and updated where necessary in accordance with section 7 of the Code.

**Openness**

The documentation of processing operations under the Bank's responsibility as required by section 51 of the Promotion of Access to Information Act, 2000 is maintained by the Bank which has also taken all reasonably practicable steps to make data subjects aware of the information listed in sections 8.2.1 to 8.2.11 of the Code.

**Security safeguards**

Appropriate, reasonable technical and organisational measures aimed at securing the integrity and confidentiality of the PI in the Bank's possession have been deployed. Operators are appointed in accordance with the provisions of section 8.4 of the Code. The Bank's risk management processes are aimed at identifying, investigating and managing security compromises as defined in section 22 of POPIA and the Bank notifies the Information Regulator and data subject where required in accordance with section 8.5 of the Code.

**Data subject participation**

The data subject rights set out in section 9 of the Code are given effect to and the processes set out therein are applied.

**Prohibition of the processing of special personal information**

The processing of the SPI of data subjects is carried out in accordance with the provisions of sections 10.2, 10.3, and 10.4 of the Code. The Bank monitors compliance with section 10 of the Code and the relevant provisions of POPIA.

**Prohibition on processing personal information of children**

The PI of children is not processed except in compliance with the provisions of section 11 of the Code. The Bank monitors compliance with section 11 of the Code and the relevant provisions of POPIA.

**Direct marketing**

The processing of PI for the purpose of unsolicited direct marketing occurs by the means set out in section 12.1 of the Code, and unsolicited direct marketing by electronic means occurs in accordance with sections 12.2, 12.3, 12.4, and 12.5 of the Code. Appropriate policies and processes are in place to ensure lawful unsolicited direct marketing communications in alignment with section 12.5 of the Code.

**Automated decision-making**

Automated decision making is conducted in accordance with the processes and operations set out in section 13 of the Code.

**Information matching**

Information matching programmes are used in accordance with the processes and operations set out in section 14 of the Code.

**Transfer of information**

The PI of a data subject is transferred to a third party who is in a foreign country in compliance with the provisions of section 16 of the Code.

**Internal dispute resolution**

The Bank has fully or partially put in place policies and procedures aimed at establishing and maintaining an adequate and effective complaints management framework to ensure the fair resolution of complaints in accordance with section 17 of the Code.

**National Financial Ombud Scheme, South Arica (NFO)**

The contact information of the NFO and the documentation required to lodge a complaint with the said ombudsman are provided in accordance with section 18 of the Code. Banks do provide other ombudsman offices or independent adjudicators' information, which might have jurisdiction over that data subject's complaint. Where applicable, the Bank will appoint an independent adjudicator through BASA.

**Dated and signed at Sandton on 4 day of December 2025.**

**Information Officer/Deputy Information Officer: Johan Gibhard**

Signature:  \_\_\_\_\_

End of BASA's report to the Information Regulator in terms of the POPIA  
Code of Conduct

## Annexure C.

### **Attestation of Compliance with the Code of Conduct for the Processing of Personal Information by the Banking Industry.**

The Code of Conduct for the Processing of Personal Information by the Banking Industry (the Code) is intended to outline and expand on the specific obligations of the members of The Banking Association South Africa (BASA) as responsible parties, operators, or as joint responsible parties, when processing the Personal Information (PI) and Special Personal Information (SPI) of data subjects. It must be noted that the Code does not replace the provisions of the Protection of Personal Information Act 4 of 2013 (POPIA) and forms part of the Regulations on POPIA as published by the Information Regulator (IR).

I, Vela Zama (full names)

being the Deputy Information Officer of Discovery Bank

(the bank) have reviewed the privacy standards set out in the Code and hereby attest that to the best of my knowledge the reasonably necessary steps have been taken to put systems, measures, policies and processes in place aimed at complying with the provisions of the Code. Further, such systems, measures, policies and processes are fully or partially implemented and monitored by the bank to achieve the outcomes below and where control failures are identified, such failures are addressed and remedied.

**This attestation is only applicable to the operations of the bank where POPIA and the Code finds application.**

#### **Accountability**

Compliance with the accountability provisions of the Code including establishing functions and developing frameworks which identify, manage, monitor and report on privacy related risks. An Information Officer / Deputy Information Officer/s have been appointed.

#### **Processing limitation**

PI and SPI is lawfully processed under an appropriate lawful justification as envisaged in section 4.2 of the Code and in accordance with the purpose(s) of collection. The collection of PI and SPI is adequate, relevant and not excessive. PI and SPI is collected directly from the data subject, unless one of the exceptions listed in section 4.3 of the Code is applicable.

#### **Purpose specification**

PI is collected for a specific, defined, and lawful purpose related to a function or activity of the Bank. The appropriate privacy disclosures are enabled through privacy or similar notice(s) to demonstrate efforts in complying with section 5.1 of the Code, ensuring transparency is achieved. Records of PI are not retained longer than necessary for achieving the purpose for which the information was collected or subsequently processed, unless one of the factors listed in sections 5.2.1 to 5.2.2.4 of the Code is applicable, or unless section 5.3 of the Code applies. Records of PI are destroyed, deleted or de-identified as soon as reasonably practicable after the Bank is no longer legally permitted to retain the record in accordance with section 5.5 of the Code. The processing of PI is restricted in circumstances listed in sections 5.6 and 5.7 of the Code.

#### **Further processing limitation**

An assessment is undertaken prior to further processing of PI to determine whether it is processed in accordance or compatible with the purpose for which it was collected in accordance with section 6 of the Code or aligned to the consent of the data subject.

**Information quality**

The Bank is taking reasonably practicable steps to ensure that the PI collected is complete, accurate, not misleading and updated where necessary in accordance with section 7 of the Code.

**Openness**

The documentation of processing operations under the Bank's responsibility as required by section 51 of the Promotion of Access to Information Act, 2000 is maintained by the Bank which has also taken all reasonably practicable steps to make data subjects aware of the information listed in sections 8.2.1 to 8.2.11 of the Code.

**Security safeguards**

Appropriate, reasonable technical and organisational measures aimed at securing the integrity and confidentiality of the PI in the Bank's possession have been deployed. Operators are appointed in accordance with the provisions of section 8.4 of the Code. The Bank's risk management processes are aimed at identifying, investigating and managing security compromises as defined in section 22 of POPIA and the Bank notifies the Information Regulator and data subject where required in accordance with section 8.5 of the Code.

**Data subject participation**

The data subject rights set out in section 9 of the Code are given effect to and the processes set out therein are applied.

**Prohibition of the processing of special personal information**

The processing of the SPI of data subjects is carried out in accordance with the provisions of sections 10.2, 10.3, and 10.4 of the Code. The Bank monitors compliance with section 10 of the Code and the relevant provisions of POPIA.

**Prohibition on processing personal information of children**

The PI of children is not processed except in compliance with the provisions of section 11 of the Code. The Bank monitors compliance with section 11 of the Code and the relevant provisions of POPIA.

**Direct marketing**

The processing of PI for the purpose of unsolicited direct marketing occurs by the means set out in section 12.1 of the Code, and unsolicited direct marketing by electronic means occurs in accordance with sections 12.2, 12.3, 12.4, and 12.5 of the Code. Appropriate policies and processes are in place to ensure lawful unsolicited direct marketing communications in alignment with section 12.5 of the Code.

**Automated decision-making**

Automated decision making is conducted in accordance with the processes and operations set out in section 13 of the Code.

**Information matching**

Information matching programmes are used in accordance with the processes and operations set out in section 14 of the Code.

**Transfer of information**

The PI of a data subject is transferred to a third party who is in a foreign country in compliance with the provisions of section 16 of the Code.

**Internal dispute resolution**

The Bank has fully or partially put in place policies and procedures aimed at establishing and maintaining an adequate and effective complaints management framework to ensure the fair resolution of complaints in accordance with section 17 of the Code.

**National Financial Ombud Scheme, South Arica (NFO)**

The contact information of the NFO and the documentation required to lodge a complaint with the said ombudsman are provided in accordance with section 18 of the Code. Banks do provide other ombudsman offices or independent adjudicators' information, which might have jurisdiction over that data subject's complaint. Where applicable, the Bank will appoint an independent adjudicator through BASA.

Dated and signed at Sandton on 26<sup>th</sup> day of September 2025.

Deputy Information Officer: Vela Zama

Signature: *Vzama*

End of BASA's report to the Information Regulator in terms of the POPIA  
Code of Conduct

## Annexure C.

### **Attestation of Compliance with the Code of Conduct for the Processing of Personal Information by the Banking Industry.**

The Code of Conduct for the Processing of Personal Information by the Banking Industry (the Code) is intended to outline and expand on the specific obligations of the members of The Banking Association South Africa (BASA) as responsible parties, operators, or as joint responsible parties, when processing the Personal Information (PI) and Special Personal Information (SPI) of data subjects. It must be noted that the Code does not replace the provisions of the Protection of Personal Information Act 4 of 2013 (POPIA) and forms part of the Regulations on POPIA as published by the Information Regulator (IR).

I, Anzel Jacobsz (full names)

being the ~~Information Officer~~/ Deputy Information Officer of Finbond Mutual Bank

(the bank) have reviewed the privacy standards set out in the Code and hereby attest that to the best of my knowledge the reasonably necessary steps have been taken to put systems, measures, policies and processes in place aimed at complying with the provisions of the Code. Further, such systems, measures, policies and processes are fully or partially implemented and monitored by the bank to achieve the outcomes below and where control failures are identified, such failures are addressed and remedied.

**This attestation is only applicable to the operations of the bank where POPIA and the Code finds application.**

#### **Accountability**

Compliance with the accountability provisions of the Code including establishing functions and developing frameworks which identify, manage, monitor and report on privacy related risks. An Information Officer / Deputy Information Officer/s have been appointed.

#### **Processing limitation**

PI and SPI is lawfully processed under an appropriate lawful justification as envisaged in section 4.2 of the Code and in accordance with the purpose(s) of collection. The collection of PI and SPI is adequate, relevant and not excessive. PI and SPI is collected directly from the data subject, unless one of the exceptions listed in section 4.3 of the Code is applicable.

#### **Purpose specification**

PI is collected for a specific, defined, and lawful purpose related to a function or activity of the Bank. The appropriate privacy disclosures are enabled through privacy or similar notice(s) to demonstrate efforts in complying with section 5.1 of the Code, ensuring transparency is achieved. Records of PI are not retained longer than necessary for achieving the purpose for which the information was collected or subsequently processed, unless one of the factors listed in sections 5.2.1 to 5.2.2.4 of the Code is applicable, or unless section 5.3 of the Code applies. Records of PI are destroyed, deleted or de-identified as soon as reasonably practicable after the Bank is no longer legally permitted to retain the record in accordance with section 5.5 of the Code. The processing of PI is restricted in circumstances listed in sections 5.6 and 5.7 of the Code.

#### **Further processing limitation**

An assessment is undertaken prior to further processing of PI to determine whether it is processed in accordance or compatible with the purpose for which it was collected in accordance with section 6 of the Code or aligned to the consent of the data subject.

**Information quality**

The Bank is taking reasonably practicable steps to ensure that the PI collected is complete, accurate, not misleading and updated where necessary in accordance with section 7 of the Code.

**Openness**

The documentation of processing operations under the Bank's responsibility as required by section 51 of the Promotion of Access to Information Act, 2000 is maintained by the Bank which has also taken all reasonably practicable steps to make data subjects aware of the information listed in sections 8.2.1 to 8.2.11 of the Code.

**Security safeguards**

Appropriate, reasonable technical and organisational measures aimed at securing the integrity and confidentiality of the PI in the Bank's possession have been deployed. Operators are appointed in accordance with the provisions of section 8.4 of the Code. The Bank's risk management processes are aimed at identifying, investigating and managing security compromises as defined in section 22 of POPIA and the Bank notifies the Information Regulator and data subject where required in accordance with section 8.5 of the Code.

**Data subject participation**

The data subject rights set out in section 9 of the Code are given effect to and the processes set out therein are applied.

**Prohibition of the processing of special personal information**

The processing of the SPI of data subjects is carried out in accordance with the provisions of sections 10.2, 10.3, and 10.4 of the Code. The Bank monitors compliance with section 10 of the Code and the relevant provisions of POPIA.

**Prohibition on processing personal information of children**

The PI of children is not processed except in compliance with the provisions of section 11 of the Code. The Bank monitors compliance with section 11 of the Code and the relevant provisions of POPIA.

**Direct marketing**

The processing of PI for the purpose of unsolicited direct marketing occurs by the means set out in section 12.1 of the Code, and unsolicited direct marketing by electronic means occurs in accordance with sections 12.2, 12.3, 12.4, and 12.5 of the Code. Appropriate policies and processes are in place to ensure lawful unsolicited direct marketing communications in alignment with section 12.5 of the Code.

**Automated decision-making**

Automated decision making is conducted in accordance with the processes and operations set out in section 13 of the Code.

**Information matching**

Information matching programmes are used in accordance with the processes and operations set out in section 14 of the Code.

**Transfer of information**

The PI of a data subject is transferred to a third party who is in a foreign country in compliance with the provisions of section 16 of the Code.

### **Internal dispute resolution**

The Bank has fully or partially put in place policies and procedures aimed at establishing and maintaining an adequate and effective complaints management framework to ensure the fair resolution of complaints in accordance with section 17 of the Code.

### **National Financial Ombud Scheme, South Arica (NFO)**

The contact information of the NFO and the documentation required to lodge a complaint with the said ombudsman are provided in accordance with section 18 of the Code. Banks do provide other ombudsman offices or independent adjudicators' information, which might have jurisdiction over that data subject's complaint. Where applicable, the Bank will appoint an independent adjudicator through BASA.

**Dated and signed at Pretoria on 04 day of December 2025.**

**Information Officer/Deputy Information Officer: Anzel Jacobsz**

Signature: 

End of BASA's report to the Information Regulator in terms of the POPIA  
Code of Conduct

## **Annexure C.**

### **Attestation of Compliance with the Code of Conduct for the Processing of Personal Information by the Banking Industry.**

The Code of Conduct for the Processing of Personal Information by the Banking Industry (the Code) is intended to outline and expand on the specific obligations of the members of The Banking Association South Africa (BASA) as responsible parties, operators, or as joint responsible parties, when processing the Personal Information (PI) and Special Personal Information (SPI) of data subjects. It must be noted that the Code does not replace the provisions of the Protection of Personal Information Act 4 of 2013 (POPIA) and forms part of the Regulations on POPIA as published by the Information Regulator (IR).

**I Nompumelelo Amenda Makhetha-Sebake** (full names)

being the Information Officer/ Deputy Information Officer of **FirstRand Bank Limited**

(the bank) have reviewed the privacy standards set out in the Code and hereby attest that to the best of my knowledge the reasonably necessary steps have been taken to put systems, measures, policies and processes in place aimed at complying with the provisions of the Code. Further, such systems, measures, policies and processes are fully or partially implemented and monitored by the bank to achieve the outcomes below and where control failures are identified, such failures are addressed and remedied.

**This attestation is only applicable to the operations of the bank where POPIA and the Code finds application.**

#### **Accountability**

Compliance with the accountability provisions of the Code including establishing functions and developing frameworks which identify, manage, monitor and report on privacy related risks. An Information Officer / Deputy Information Officer/s have been appointed.

#### **Processing limitation**

PI and SPI is lawfully processed under an appropriate lawful justification as envisaged in section 4.2 of the Code and in accordance with the purpose(s) of collection. The collection of PI and SPI is adequate, relevant and not excessive. PI and SPI is collected directly from the data subject, unless one of the exceptions listed in section 4.3 of the Code is applicable.

#### **Purpose specification**

PI is collected for a specific, defined, and lawful purpose related to a function or activity of the Bank. The appropriate privacy disclosures are enabled through privacy or similar notice(s) to demonstrate efforts in complying with section 5.1 of the Code, ensuring transparency is achieved. Records of PI are not retained longer than necessary for achieving the purpose for which the information was collected or subsequently processed, unless one of the factors listed in sections 5.2.1 to 5.2.2.4 of the Code is applicable, or unless section 5.3 of the Code applies. Records of PI are destroyed, deleted or de-identified as soon as reasonably practicable after the Bank is no longer legally permitted to retain the record in accordance with section 5.5 of the Code. The processing of PI is restricted in circumstances listed in sections 5.6 and 5.7 of the Code.

#### **Further processing limitation**

An assessment is undertaken prior to further processing of PI to determine whether it is processed in accordance or compatible with the purpose for which it was collected in accordance with section 6 of the Code or aligned to the consent of the data subject.

**Information quality**

The Bank is taking reasonably practicable steps to ensure that the PI collected is complete, accurate, not misleading and updated where necessary in accordance with section 7 of the Code.

**Openness**

The documentation of processing operations under the Bank's responsibility as required by section 51 of the Promotion of Access to Information Act, 2000 is maintained by the Bank which has also taken all reasonably practicable steps to make data subjects aware of the information listed in sections 8.2.1 to 8.2.11 of the Code.

**Security safeguards**

Appropriate, reasonable technical and organisational measures aimed at securing the integrity and confidentiality of the PI in the Bank's possession have been deployed. Operators are appointed in accordance with the provisions of section 8.4 of the Code. The Bank's risk management processes are aimed at identifying, investigating and managing security compromises as defined in section 22 of POPIA and the Bank notifies the Information Regulator and data subject where required in accordance with section 8.5 of the Code.

**Data subject participation**

The data subject rights set out in section 9 of the Code are given effect to and the processes set out therein are applied.

**Prohibition of the processing of special personal information**

The processing of the SPI of data subjects is carried out in accordance with the provisions of sections 10.2, 10.3, and 10.4 of the Code. The Bank monitors compliance with section 10 of the Code and the relevant provisions of POPIA.

**Prohibition on processing personal information of children**

The PI of children is not processed except in compliance with the provisions of section 11 of the Code. The Bank monitors compliance with section 11 of the Code and the relevant provisions of POPIA.

**Direct marketing**

The processing of PI for the purpose of unsolicited direct marketing occurs by the means set out in section 12.1 of the Code, and unsolicited direct marketing by electronic means occurs in accordance with sections 12.2, 12.3, 12.4, and 12.5 of the Code. Appropriate policies and processes are in place to ensure lawful unsolicited direct marketing communications in alignment with section 12.5 of the Code.

**Automated decision-making**

Automated decision making is conducted in accordance with the processes and operations set out in section 13 of the Code.

**Information matching**

Information matching programmes are used in accordance with the processes and operations set out in section 14 of the Code.

**Transfer of information**

The PI of a data subject is transferred to a third party who is in a foreign country in compliance with the provisions of section 16 of the Code.

**Internal dispute resolution**

The Bank has fully or partially put in place policies and procedures aimed at establishing and maintaining an adequate and effective complaints management framework to ensure the fair resolution of complaints in accordance with section 17 of the Code.

**National Financial Ombud Scheme, South Africa (NFO)**

The contact information of the NFO and the documentation required to lodge a complaint with the said ombudsman are provided in accordance with section 18 of the Code. Banks do provide other ombudsman offices or independent adjudicators' information, which might have jurisdiction over that data subject's complaint. Where applicable, the Bank will appoint an independent adjudicator through BASA.

**Dated and signed at Sandton on 9 day of October 2025.**

**Information Officer/Deputy Information Officer: Nompumelelo Amenda Makhetha-Sebake**

**Signature:** \_\_\_\_\_

End of BASA's report to the Information Regulator in terms of the POPIA  
Code of Conduct

## Annexure C.

### **Attestation of Compliance with the Code of Conduct for the Processing of Personal Information by the Banking Industry.**

The Code of Conduct for the Processing of Personal Information by the Banking Industry (the Code) is intended to outline and expand on the specific obligations of the members of The Banking Association South Africa (BASA) as responsible parties, operators, or as joint responsible parties, when processing the Personal Information (PI) and Special Personal Information (SPI) of data subjects. It must be noted that the Code does not replace the provisions of the Protection of Personal Information Act 4 of 2013 (POPIA) and forms part of the Regulations on POPIA as published by the Information Regulator (IR).

Beverley Mackenzie

I, **XX** \_\_\_\_\_ (full names)

being the Information Officer/ Deputy Information Officer of **XX bank** GBS MUTUAL BANK

(the bank) have reviewed the privacy standards set out in the Code and hereby attest that to the best of my knowledge the reasonably necessary steps have been taken to put systems, measures, policies and processes in place aimed at complying with the provisions of the Code. Further, such systems, measures, policies and processes are fully or partially implemented and monitored by the bank to achieve the outcomes below and where control failures are identified, such failures are addressed and remedied.

**This attestation is only applicable to the operations of the bank where POPIA and the Code finds application.**

#### **Accountability**

Compliance with the accountability provisions of the Code including establishing functions and developing frameworks which identify, manage, monitor and report on privacy related risks. An Information Officer / Deputy Information Officer/s have been appointed.

#### **Processing limitation**

PI and SPI is lawfully processed under an appropriate lawful justification as envisaged in section 4.2 of the Code and in accordance with the purpose(s) of collection. The collection of PI and SPI is adequate, relevant and not excessive. PI and SPI is collected directly from the data subject, unless one of the exceptions listed in section 4.3 of the Code is applicable.

#### **Purpose specification**

PI is collected for a specific, defined, and lawful purpose related to a function or activity of the Bank. The appropriate privacy disclosures are enabled through privacy or similar notice(s) to demonstrate efforts in complying with section 5.1 of the Code, ensuring transparency is achieved. Records of PI are not retained longer than necessary for achieving the purpose for which the information was collected or subsequently processed, unless one of the factors listed in sections 5.2.1 to 5.2.2.4 of the Code is applicable, or unless section 5.3 of the Code applies. Records of PI are destroyed, deleted or de-identified as soon as reasonably practicable after the Bank is no longer legally permitted to retain the record in accordance with section 5.5 of the Code. The processing of PI is restricted in circumstances listed in sections 5.6 and 5.7 of the Code.

#### **Further processing limitation**

An assessment is undertaken prior to further processing of PI to determine whether it is processed in accordance or compatible with the purpose for which it was collected in accordance with section 6 of the Code or aligned to the consent of the data subject.

**Information quality**

The Bank is taking reasonably practicable steps to ensure that the PI collected is complete, accurate, not misleading and updated where necessary in accordance with section 7 of the Code.

**Openness**

The documentation of processing operations under the Bank's responsibility as required by section 51 of the Promotion of Access to Information Act, 2000 is maintained by the Bank which has also taken all reasonably practicable steps to make data subjects aware of the information listed in sections 8.2.1 to 8.2.11 of the Code.

**Security safeguards**

Appropriate, reasonable technical and organisational measures aimed at securing the integrity and confidentiality of the PI in the Bank's possession have been deployed. Operators are appointed in accordance with the provisions of section 8.4 of the Code. The Bank's risk management processes are aimed at identifying, investigating and managing security compromises as defined in section 22 of POPIA and the Bank notifies the Information Regulator and data subject where required in accordance with section 8.5 of the Code.

**Data subject participation**

The data subject rights set out in section 9 of the Code are given effect to and the processes set out therein are applied.

**Prohibition of the processing of special personal information**

The processing of the SPI of data subjects is carried out in accordance with the provisions of sections 10.2, 10.3, and 10.4 of the Code. The Bank monitors compliance with section 10 of the Code and the relevant provisions of POPIA.

**Prohibition on processing personal information of children**

The PI of children is not processed except in compliance with the provisions of section 11 of the Code. The Bank monitors compliance with section 11 of the Code and the relevant provisions of POPIA.

**Direct marketing**

The processing of PI for the purpose of unsolicited direct marketing occurs by the means set out in section 12.1 of the Code, and unsolicited direct marketing by electronic means occurs in accordance with sections 12.2, 12.3, 12.4, and 12.5 of the Code. Appropriate policies and processes are in place to ensure lawful unsolicited direct marketing communications in alignment with section 12.5 of the Code.

**Automated decision-making**

Automated decision making is conducted in accordance with the processes and operations set out in section 13 of the Code.

**Information matching**

Information matching programmes are used in accordance with the processes and operations set out in section 14 of the Code.

**Transfer of information**

The PI of a data subject is transferred to a third party who is in a foreign country in compliance with the provisions of section 16 of the Code.

### Internal dispute resolution

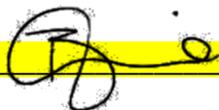
The Bank has fully or partially put in place policies and procedures aimed at establishing and maintaining an adequate and effective complaints management framework to ensure the fair resolution of complaints in accordance with section 17 of the Code.

### National Financial Ombud Scheme, South Arica (NFO)

The contact information of the NFO and the documentation required to lodge a complaint with the said ombudsman are provided in accordance with section 18 of the Code. Banks do provide other ombudsman offices or independent adjudicators' information, which might have jurisdiction over that data subject's complaint. Where applicable, the Bank will appoint an independent adjudicator through BASA.

Dated and signed at Makhanda on 4th day of December 2025.

Information Officer/Deputy Information Officer: Beverley Mackenzie

Signature: 

End of BASA's report to the Information Regulator in terms of the POPIA  
Code of Conduct

## **Attestation of Compliance with the Code of Conduct for the Processing of Personal Information by the Banking Industry.**

The Code of Conduct for the Processing of Personal Information by the Banking Industry (the Code) is intended to outline and expand on the specific obligations of the members of The Banking Association South Africa (BASA) as responsible parties, operators, or as joint responsible parties, when processing the Personal Information (PI) and Special Personal Information (SPI) of data subjects. It must be noted that the Code does not replace the provisions of the Protection of Personal Information Act 4 of 2013 (POPIA) and forms part of the Regulations on POPIA as published by the Information Regulator (IR).

I, Tracy Niken (full names) being the Information Officer/Deputy Information Officer of Goldman Sachs International Bank Johannesburg Branch (the bank) have reviewed the privacy standards set out in the Code and hereby attest that to the best of my knowledge the reasonably necessary steps have been taken to put systems, measures, policies and processes in place aimed at complying with the provisions of the Code. Further, such systems, measures, policies and processes are fully or partially implemented and monitored by the bank to achieve the outcomes below and where control failures are identified, such failures are addressed and remedied.

**This attestation is only applicable to the operations of the bank where POPIA and the Code finds application.**

### **Accountability**

Compliance with the accountability provisions of the Code including establishing functions and developing frameworks which identify, manage, monitor and report on privacy related risks. An Information Officer / Deputy Information Officer/s have been appointed.

### **Processing limitation**

PI and SPI is lawfully processed under an appropriate lawful justification as envisaged in section 4.2 of the Code and in accordance with the purpose(s) of collection. The collection of PI and SPI is adequate, relevant and not excessive. PI and SPI is collected directly from the data subject, unless one of the exceptions listed in section 4.3 of the Code is applicable.

### **Purpose specification**

PI is collected for a specific, defined, and lawful purpose related to a function or activity of the Bank. The appropriate privacy disclosures are enabled through privacy or similar notice(s) to demonstrate efforts in complying with section 5.1 of the Code, ensuring transparency is achieved. Records of PI are not retained longer than necessary for achieving the purpose for which the information was collected or subsequently processed, unless one of the factors listed in sections 5.2.1 to 5.2.2.4 of the Code is applicable, or unless section 5.3 of the Code applies. Records of PI are destroyed, deleted or de-identified as soon as reasonably practicable after the Bank is no longer legally permitted to retain the record in accordance with section 5.5 of the Code. The processing of PI is restricted in circumstances listed in sections 5.6 and 5.7 of the Code.

### **Further processing limitation**

An assessment is undertaken prior to further processing of PI to determine whether it is processed in accordance or compatible with the purpose for which it was collected in accordance with section 6 of the Code or aligned to the consent of the data subject.

**Information quality**

The Bank is taking reasonably practicable steps to ensure that the PI collected is complete, accurate, not misleading and updated where necessary in accordance with section 7 of the Code.

**Openness**

The documentation of processing operations under the Bank's responsibility as required by section 51 of the Promotion of Access to Information Act, 2000 is maintained by the Bank which has also taken all reasonably practicable steps to make data subjects aware of the information listed in sections 8.2.1 to 8.2.11 of the Code.

**Security safeguards**

Appropriate, reasonable technical and organisational measures aimed at securing the integrity and confidentiality of the PI in the Bank's possession have been deployed. Operators are appointed in accordance with the provisions of section 8.4 of the Code. The Bank's risk management processes are aimed at identifying, investigating and managing security compromises as defined in section 22 of POPIA and the Bank notifies the Information Regulator and data subject where required in accordance with section 8.5 of the Code.

**Data subject participation**

The data subject rights set out in section 9 of the Code are given effect to and the processes set out therein are applied.

**Prohibition of the processing of special personal information**

The processing of the SPI of data subjects is carried out in accordance with the provisions of sections 10.2, 10.3, and 10.4 of the Code. The Bank monitors compliance with section 10 of the Code and the relevant provisions of POPIA.

**Prohibition on processing personal information of children**

The PI of children is not processed except in compliance with the provisions of section 11 of the Code. The Bank monitors compliance with section 11 of the Code and the relevant provisions of POPIA.

**Direct marketing**

The processing of PI for the purpose of unsolicited direct marketing occurs by the means set out in section 12.1 of the Code, and unsolicited direct marketing by electronic means occurs in accordance with sections 12.2, 12.3, 12.4, and 12.5 of the Code. Appropriate policies and processes are in place to ensure lawful unsolicited direct marketing communications in alignment with section 12.5 of the Code.

**Automated decision-making**

Automated decision making is conducted in accordance with the processes and operations set out in section 13 of the Code.

**Information matching**

Information matching programmes are used in accordance with the processes and operations set out in section 14 of the Code.

**Transfer of information**

The PI of a data subject is transferred to a third party who is in a foreign country in compliance with the provisions of section 16 of the Code.

**Internal dispute resolution**

The Bank has fully or partially put in place policies and procedures aimed at establishing and maintaining an adequate and effective complaints management framework to ensure the fair resolution of complaints in accordance with section 17 of the Code.

**National Financial Ombud Scheme, South Arica (NFO)**

The contact information of the NFO and the documentation required to lodge a complaint with the said ombudsman are provided in accordance with section 18 of the Code. Banks do provide other ombudsman offices or independent adjudicators' information, which might have jurisdiction over that data subject's complaint. Where applicable, the Bank will appoint an independent adjudicator through BASA.

**Dated and signed at:** Sandton on 17 day of November **2025**.

**Information Officer/Deputy Information Officer:** Deputy Information Officer

Signature:  \_\_\_\_\_

End of BASA's report to the Information Regulator in terms of the POPIA  
Code of Conduct



REG. No. 1995/006163/06

# HBZ Bank Limited

(A Subsidiary of Habib Bank AG Zurich)

Umhlanga Arch, Level 4, 1 Ncondo Place, Umhlanga Ridge, 4320, Kwa-Zulu Natal, South Africa  
www.hbzbank.co.za

02 October 2025

The Banking Association South Africa  
Rosebank Link,  
6th Floor  
173 Oxford Road,  
Rosebank  
Johannesburg,  
2196

## **Attestation of Compliance with the Code of Conduct for the Processing of Personal Information by the Banking Industry.**

The Code of Conduct for the Processing of Personal Information by the Banking Industry (the Code) is intended to outline and expand on the specific obligations of the members of The Banking Association South Africa (BASA) as responsible parties, operators, or as joint responsible parties, when processing the Personal Information (PI) and Special Personal Information (SPI) of data subjects. It must be noted that the Code does not replace the provisions of the Protection of Personal Information Act 4 of 2013 (POPIA) and forms part of the Regulations on POPIA as published by the Information Regulator (IR).

I, **ASHLEY CAMERON** being the Information Officer/ ~~Deputy Information Officer~~ of **HBZ BANK LIMITED** (the bank) have reviewed the privacy standards set out in the Code and hereby attest that to the best of my knowledge the reasonably necessary steps have been taken to put systems, measures, policies and processes in place aimed at complying with the provisions of the Code. Further, such systems, measures, policies and processes are fully or partially implemented and monitored by the bank to achieve the outcomes below and where control failures are identified, such failures are addressed and remedied.

This attestation is only applicable to the operations of the bank where POPIA and the Code finds application.

### Accountability

Compliance with the accountability provisions of the Code including establishing functions and developing frameworks which identify, manage, monitor and report on privacy related risks. An Information Officer / Deputy Information Officer/s have been appointed.

### Processing limitation

PI and SPI is lawfully processed under an appropriate lawful justification as envisaged in section 4.2 of the Code and in accordance with the purpose(s) of collection. The collection of PI and SPI is adequate, relevant and not excessive. PI and SPI is collected directly from the data subject, unless one of the exceptions listed in section 4.3 of the Code is applicable.

### Purpose specification

PI is collected for a specific, defined, and lawful purpose related to a function or activity of the Bank. The appropriate privacy disclosures are enabled through privacy or similar notice(s) to demonstrate efforts in complying with section 5.1 of the Code, ensuring transparency is achieved. Records of PI are not retained longer than necessary for achieving the purpose for which the

**DIRECTORS:** Chairman Ms. Yvette D Singh, Mr. Muhammad H Habib (Swiss), Ms. Nomavuso P Mnxasana, Mr. Louis P Fourie, Ms. Disebo C Moephuli, Ms. Sharoda Rapeti, Mr. Mohsin A Nathani (Canadian), Mr. Ahmed E Paruk, Mr. Anjum Iqbal (British) and Mr. Ashley Cameron



information was collected or subsequently processed, unless one of the factors listed in sections 5.2.1 to 5.2.2.4 of the Code is applicable, or unless section 5.3 of the Code applies. Records of PI are destroyed, deleted or de-identified as soon as reasonably practicable after the Bank is no longer legally permitted to retain the record in accordance with section 5.5 of the Code. The processing of PI is restricted in circumstances listed in sections 5.6 and 5.7 of the Code.

#### Further processing limitation

An assessment is undertaken prior to further processing of PI to determine whether it is processed in accordance or compatible with the purpose for which it was collected in accordance with section 6 of the Code or aligned to the consent of the data subject.

#### Information quality

The Bank is taking reasonably practicable steps to ensure that the PI collected is complete, accurate, not misleading and updated where necessary in accordance with section 7 of the Code.

#### Openness

The documentation of processing operations under the Bank's responsibility as required by section 51 of the Promotion of Access to Information Act, 2000 is maintained by the Bank which has also taken all reasonably practicable steps to make data subjects aware of the information listed in sections 8.2.1 to 8.2.11 of the Code.

#### Security safeguards

Appropriate, reasonable technical and organisational measures aimed at securing the integrity and confidentiality of the PI in the Bank's possession have been deployed. Operators are appointed in accordance with the provisions of section 8.4 of the Code. The Bank's risk management processes are aimed at identifying, investigating and managing security compromises as defined in section 22 of POPIA and the Bank notifies the Information Regulator and data subject where required in accordance with section 8.5 of the Code.

#### Data subject participation

The data subject rights set out in section 9 of the Code are given effect to and the processes set out therein are applied.

#### Prohibition of the processing of special personal information

The processing of the SPI of data subjects is carried out in accordance with the provisions of sections 10.2, 10.3, and 10.4 of the Code. The Bank monitors compliance with section 10 of the Code and the relevant provisions of POPIA.

#### Prohibition on processing personal information of children

The PI of children is not processed except in compliance with the provisions of section 11 of the Code. The Bank monitors compliance with section 11 of the Code and the relevant provisions of POPIA.

#### Direct marketing

The processing of PI for the purpose of unsolicited direct marketing occurs by the means set out in section 12.1 of the Code, and unsolicited direct marketing by electronic means occurs in accordance with sections 12.2, 12.3, 12.4, and 12.5 of the Code. Appropriate policies and processes are in place to ensure lawful unsolicited direct marketing communications in alignment with section 12.5 of the Code.

#### Automated decision-making

**DIRECTORS:** Chairman Ms. Yvette D Singh, Mr. Muhammad H. Habib (Swiss), Mr. Oscar D Grobler, Ms. Nomavuso P Mnxasana, Mr. Pierre L Fourie, Ms. Disebo C Moephuli, Ms. Sharoda Rapeti, Mr. Mohsin A Nathani (Canadian), Mr. Anjum Iqbal (British) and Mr. Ashley N Cameron (CEO)



Automated decision making is conducted in accordance with the processes and operations set out in section 13 of the Code.

#### Information matching

Information matching programmes are used in accordance with the processes and operations set out in section 14 of the Code.

#### Transfer of information

The PI of a data subject is transferred to a third party who is in a foreign country in compliance with the provisions of section 16 of the Code.

#### Internal dispute resolution

The Bank has fully or partially put in place policies and procedures aimed at establishing and maintaining an adequate and effective complaints management framework to ensure the fair resolution of complaints in accordance with section 17 of the Code.

#### National Financial Ombud Scheme, South Arica (NFO)

The contact information of the NFO and the documentation required to lodge a complaint with the said ombudsman are provided in accordance with section 18 of the Code. Banks do provide other ombudsman offices or independent adjudicators' information, which might have jurisdiction over that data subject's complaint. Where applicable, the Bank will appoint an independent adjudicator through BASA.

**Dated and signed at Rosebank on 2<sup>ND</sup> day of October 2025. Information Officer/~~Deputy Information Officer~~:**

**Ashley Cameron**

**Signature:**

## Annexure C.

### **Attestation of Compliance with the Code of Conduct for the Processing of Personal Information by the Banking Industry.**

The Code of Conduct for the Processing of Personal Information by the Banking Industry (the Code) is intended to outline and expand on the specific obligations of the members of The Banking Association South Africa (BASA) as responsible parties, operators, or as joint responsible parties, when processing the Personal Information (PI) and Special Personal Information (SPI) of data subjects. It must be noted that the Code does not replace the provisions of the Protection of Personal Information Act 4 of 2013 (POPIA) and forms part of the Regulations on POPIA as published by the Information Regulator (IR).

I, Natalie Abigail Naicker (full names)

being the Information Officer/ Deputy Information Officer of Investec Bank Limited

(the bank) have reviewed the privacy standards set out in the Code and hereby attest that to the best of my knowledge the reasonably necessary steps have been taken to put systems, measures, policies and processes in place aimed at complying with the provisions of the Code. Further, such systems, measures, policies and processes are fully or partially implemented and monitored by the bank to achieve the outcomes below and where control failures are identified, such failures are addressed and remedied.

**This attestation is only applicable to the operations of the bank where POPIA and the Code finds application.**

#### **Accountability**

Compliance with the accountability provisions of the Code including establishing functions and developing frameworks which identify, manage, monitor and report on privacy related risks. An Information Officer / Deputy Information Officer/s have been appointed.

#### **Processing limitation**

PI and SPI is lawfully processed under an appropriate lawful justification as envisaged in section 4.2 of the Code and in accordance with the purpose(s) of collection. The collection of PI and SPI is adequate, relevant and not excessive. PI and SPI is collected directly from the data subject, unless one of the exceptions listed in section 4.3 of the Code is applicable.

#### **Purpose specification**

PI is collected for a specific, defined, and lawful purpose related to a function or activity of the Bank. The appropriate privacy disclosures are enabled through privacy or similar notice(s) to demonstrate efforts in complying with section 5.1 of the Code, ensuring transparency is achieved. Records of PI are not retained longer than necessary for achieving the purpose for which the information was collected or subsequently processed, unless one of the factors listed in sections 5.2.1 to 5.2.2.4 of the Code is applicable, or unless section 5.3 of the Code applies. Records of PI are destroyed, deleted or de-identified as soon as reasonably practicable after the Bank is no longer legally permitted to retain the record in accordance with section 5.5 of the Code. The processing of PI is restricted in circumstances listed in sections 5.6 and 5.7 of the Code.

#### **Further processing limitation**

An assessment is undertaken prior to further processing of PI to determine whether it is processed in accordance or compatible with the purpose for which it was collected in accordance with section 6 of the Code or aligned to the consent of the data subject.

**Information quality**

The Bank is taking reasonably practicable steps to ensure that the PI collected is complete, accurate, not misleading and updated where necessary in accordance with section 7 of the Code.

**Openness**

The documentation of processing operations under the Bank's responsibility as required by section 51 of the Promotion of Access to Information Act, 2000 is maintained by the Bank which has also taken all reasonably practicable steps to make data subjects aware of the information listed in sections 8.2.1 to 8.2.11 of the Code.

**Security safeguards**

Appropriate, reasonable technical and organisational measures aimed at securing the integrity and confidentiality of the PI in the Bank's possession have been deployed. Operators are appointed in accordance with the provisions of section 8.4 of the Code. The Bank's risk management processes are aimed at identifying, investigating and managing security compromises as defined in section 22 of POPIA and the Bank notifies the Information Regulator and data subject where required in accordance with section 8.5 of the Code.

**Data subject participation**

The data subject rights set out in section 9 of the Code are given effect to and the processes set out therein are applied.

**Prohibition of the processing of special personal information**

The processing of the SPI of data subjects is carried out in accordance with the provisions of sections 10.2, 10.3, and 10.4 of the Code. The Bank monitors compliance with section 10 of the Code and the relevant provisions of POPIA.

**Prohibition on processing personal information of children**

The PI of children is not processed except in compliance with the provisions of section 11 of the Code. The Bank monitors compliance with section 11 of the Code and the relevant provisions of POPIA.

**Direct marketing**

The processing of PI for the purpose of unsolicited direct marketing occurs by the means set out in section 12.1 of the Code, and unsolicited direct marketing by electronic means occurs in accordance with sections 12.2, 12.3, 12.4, and 12.5 of the Code. Appropriate policies and processes are in place to ensure lawful unsolicited direct marketing communications in alignment with section 12.5 of the Code.

**Automated decision-making**

Automated decision making is conducted in accordance with the processes and operations set out in section 13 of the Code.

**Information matching**

Information matching programmes are used in accordance with the processes and operations set out in section 14 of the Code.

**Transfer of information**

The PI of a data subject is transferred to a third party who is in a foreign country in compliance with the provisions of section 16 of the Code.

**Internal dispute resolution**

The Bank has fully or partially put in place policies and procedures aimed at establishing and maintaining an adequate and effective complaints management framework to ensure the fair resolution of complaints in accordance with section 17 of the Code.

**National Financial Ombud Scheme, South Arica (NFO)**

The contact information of the NFO and the documentation required to lodge a complaint with the said ombudsman are provided in accordance with section 18 of the Code. Banks do provide other ombudsman offices or independent adjudicators' information, which might have jurisdiction over that data subject's complaint. Where applicable, the Bank will appoint an independent adjudicator through BASA.

Dated and signed at Sandton on 10th day of October **2025**.

Information Officer/Deputy Information Officer: Natalie Abigail Naicker

Signature:  \_\_\_\_\_

End of BASA's report to the Information Regulator in terms of the POPIA  
Code of Conduct

## Annexure C.

### **Attestation of Compliance with the Code of Conduct for the Processing of Personal Information by the Banking Industry.**

The Code of Conduct for the Processing of Personal Information by the Banking Industry (the Code) is intended to outline and expand on the specific obligations of the members of The Banking Association South Africa (BASA) as responsible parties, operators, or as joint responsible parties, when processing the Personal Information (PI) and Special Personal Information (SPI) of data subjects. It must be noted that the Code does not replace the provisions of the Protection of Personal Information Act 4 of 2013 (POPIA) and forms part of the Regulations on POPIA as published by the Information Regulator (IR).

I, Niyaz Abrahams (full names)

being the ~~Information Officer~~/ Deputy Information Officer of JPMorgan Chase Bank N.A (Johannesburg)

(the bank) have reviewed the privacy standards set out in the Code and hereby attest that to the best of my knowledge the reasonably necessary steps have been taken to put systems, measures, policies and processes in place aimed at complying with the provisions of the Code. Further, such systems, measures, policies and processes are fully or partially implemented and monitored by the bank to achieve the outcomes below and where control failures are identified, such failures are addressed and remedied.

**This attestation is only applicable to the operations of the bank where POPIA and the Code finds application.**

#### **Accountability**

Compliance with the accountability provisions of the Code including establishing functions and developing frameworks which identify, manage, monitor and report on privacy related risks. An Information Officer / Deputy Information Officer/s have been appointed.

#### **Processing limitation**

PI and SPI is lawfully processed under an appropriate lawful justification as envisaged in section 4.2 of the Code and in accordance with the purpose(s) of collection. The collection of PI and SPI is adequate, relevant and not excessive. PI and SPI is collected directly from the data subject, unless one of the exceptions listed in section 4.3 of the Code is applicable.

#### **Purpose specification**

PI is collected for a specific, defined, and lawful purpose related to a function or activity of the Bank. The appropriate privacy disclosures are enabled through privacy or similar notice(s) to demonstrate efforts in complying with section 5.1 of the Code, ensuring transparency is achieved. Records of PI are not retained longer than necessary for achieving the purpose for which the information was collected or subsequently processed, unless one of the factors listed in sections 5.2.1 to 5.2.2.4 of the Code is applicable, or unless section 5.3 of the Code applies. Records of PI are destroyed, deleted or de-identified as soon as reasonably practicable after the Bank is no longer legally permitted to retain the record in accordance with section 5.5 of the Code. The processing of PI is restricted in circumstances listed in sections 5.6 and 5.7 of the Code.

#### **Further processing limitation**

An assessment is undertaken prior to further processing of PI to determine whether it is processed in accordance or compatible with the purpose for which it was collected in accordance with section 6 of the Code or aligned to the consent of the data subject.

**Information quality**

The Bank is taking reasonably practicable steps to ensure that the PI collected is complete, accurate, not misleading and updated where necessary in accordance with section 7 of the Code.

**Openness**

The documentation of processing operations under the Bank's responsibility as required by section 51 of the Promotion of Access to Information Act, 2000 is maintained by the Bank which has also taken all reasonably practicable steps to make data subjects aware of the information listed in sections 8.2.1 to 8.2.11 of the Code.

**Security safeguards**

Appropriate, reasonable technical and organisational measures aimed at securing the integrity and confidentiality of the PI in the Bank's possession have been deployed. Operators are appointed in accordance with the provisions of section 8.4 of the Code. The Bank's risk management processes are aimed at identifying, investigating and managing security compromises as defined in section 22 of POPIA and the Bank notifies the Information Regulator and data subject where required in accordance with section 8.5 of the Code.

**Data subject participation**

The data subject rights set out in section 9 of the Code are given effect to and the processes set out therein are applied.

**Prohibition of the processing of special personal information**

The processing of the SPI of data subjects is carried out in accordance with the provisions of sections 10.2, 10.3, and 10.4 of the Code. The Bank monitors compliance with section 10 of the Code and the relevant provisions of POPIA.

**Prohibition on processing personal information of children**

The PI of children is not processed except in compliance with the provisions of section 11 of the Code. The Bank monitors compliance with section 11 of the Code and the relevant provisions of POPIA.

**Direct marketing**

The processing of PI for the purpose of unsolicited direct marketing occurs by the means set out in section 12.1 of the Code, and unsolicited direct marketing by electronic means occurs in accordance with sections 12.2, 12.3, 12.4, and 12.5 of the Code. Appropriate policies and processes are in place to ensure lawful unsolicited direct marketing communications in alignment with section 12.5 of the Code.

**Automated decision-making**

Automated decision making is conducted in accordance with the processes and operations set out in section 13 of the Code.

**Information matching**

Information matching programmes are used in accordance with the processes and operations set out in section 14 of the Code.

**Transfer of information**

The PI of a data subject is transferred to a third party who is in a foreign country in compliance with the provisions of section 16 of the Code.

**Internal dispute resolution**

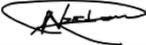
The Bank has fully or partially put in place policies and procedures aimed at establishing and maintaining an adequate and effective complaints management framework to ensure the fair resolution of complaints in accordance with section 17 of the Code.

**National Financial Ombud Scheme, South Arica (NFO)**

The contact information of the NFO and the documentation required to lodge a complaint with the said ombudsman are provided in accordance with section 18 of the Code. Banks do provide other ombudsman offices or independent adjudicators' information, which might have jurisdiction over that data subject's complaint. Where applicable, the Bank will appoint an independent adjudicator through BASA.

Dated and signed at \_\_Sandton\_\_\_\_\_ on \_\_09\_\_ day of \_\_\_\_\_October\_\_\_\_\_ 2025.

Information Officer/Deputy Information Officer: \_\_\_\_\_Niyaz Abrahams\_\_\_\_\_

Signature:  \_\_\_\_\_

End of BASA's report to the Information Regulator in terms of the POPIA  
Code of Conduct

## Annexure C.

### **Attestation of Compliance with the Code of Conduct for the Processing of Personal Information by the Banking Industry.**

The Code of Conduct for the Processing of Personal Information by the Banking Industry (the Code) is intended to outline and expand on the specific obligations of the members of The Banking Association South Africa (BASA) as responsible parties, operators, or as joint responsible parties, when processing the Personal Information (PI) and Special Personal Information (SPI) of data subjects. It must be noted that the Code does not replace the provisions of the Protection of Personal Information Act 4 of 2013 (POPIA) and forms part of the Regulations on POPIA as published by the Information Regulator (IR).

I, Neelesh Mooljee (full names)

being the Deputy Information Officer of Nedbank Group Limited.

(the bank) have reviewed the privacy standards set out in the Code and hereby attest that to the best of my knowledge the reasonably necessary steps have been taken to put systems, measures, policies and processes in place aimed at complying with the provisions of the Code. Further, such systems, measures, policies and processes are fully or partially implemented and monitored by the bank to achieve the outcomes below and where control failures are identified, such failures are addressed and remedied.

**This attestation is only applicable to the operations of the bank where POPIA and the Code finds application.**

#### **Accountability**

Compliance with the accountability provisions of the Code including establishing functions and developing frameworks which identify, manage, monitor and report on privacy related risks. An Information Officer / Deputy Information Officer/s have been appointed.

#### **Processing limitation**

PI and SPI is lawfully processed under an appropriate lawful justification as envisaged in section 4.2 of the Code and in accordance with the purpose(s) of collection. The collection of PI and SPI is adequate, relevant and not excessive. PI and SPI is collected directly from the data subject, unless one of the exceptions listed in section 4.3 of the Code is applicable.

#### **Purpose specification**

PI is collected for a specific, defined, and lawful purpose related to a function or activity of the Bank. The appropriate privacy disclosures are enabled through privacy or similar notice(s) to demonstrate efforts in complying with section 5.1 of the Code, ensuring transparency is achieved. Records of PI are not retained longer than necessary for achieving the purpose for which the information was collected or subsequently processed, unless one of the factors listed in sections 5.2.1 to 5.2.2.4 of the Code is applicable, or unless section 5.3 of the Code applies. Records of PI are destroyed, deleted or de-identified as soon as reasonably practicable after the Bank is no longer legally permitted to retain the record in accordance with section 5.5 of the Code. The processing of PI is restricted in circumstances listed in sections 5.6 and 5.7 of the Code.

#### **Further processing limitation**

An assessment is undertaken prior to further processing of PI to determine whether it is processed in accordance or compatible with the purpose for which it was collected in accordance with section 6 of the Code or aligned to the consent of the data subject.

**Information quality**

The Bank is taking reasonably practicable steps to ensure that the PI collected is complete, accurate, not misleading and updated where necessary in accordance with section 7 of the Code.

**Openness**

The documentation of processing operations under the Bank's responsibility as required by section 51 of the Promotion of Access to Information Act, 2000 is maintained by the Bank which has also taken all reasonably practicable steps to make data subjects aware of the information listed in sections 8.2.1 to 8.2.11 of the Code.

**Security safeguards**

Appropriate, reasonable technical and organisational measures aimed at securing the integrity and confidentiality of the PI in the Bank's possession have been deployed. Operators are appointed in accordance with the provisions of section 8.4 of the Code. The Bank's risk management processes are aimed at identifying, investigating and managing security compromises as defined in section 22 of POPIA and the Bank notifies the Information Regulator and data subject where required in accordance with section 8.5 of the Code.

**Data subject participation**

The data subject rights set out in section 9 of the Code are given effect to and the processes set out therein are applied.

**Prohibition of the processing of special personal information**

The processing of the SPI of data subjects is carried out in accordance with the provisions of sections 10.2, 10.3, and 10.4 of the Code. The Bank monitors compliance with section 10 of the Code and the relevant provisions of POPIA.

**Prohibition on processing personal information of children**

The PI of children is not processed except in compliance with the provisions of section 11 of the Code. The Bank monitors compliance with section 11 of the Code and the relevant provisions of POPIA.

**Direct marketing**

The processing of PI for the purpose of unsolicited direct marketing occurs by the means set out in section 12.1 of the Code, and unsolicited direct marketing by electronic means occurs in accordance with sections 12.2, 12.3, 12.4, and 12.5 of the Code. Appropriate policies and processes are in place to ensure lawful unsolicited direct marketing communications in alignment with section 12.5 of the Code.

**Automated decision-making**

Automated decision making is conducted in accordance with the processes and operations set out in section 13 of the Code.

**Information matching**

Information matching programmes are used in accordance with the processes and operations set out in section 14 of the Code.

**Transfer of information**

The PI of a data subject is transferred to a third party who is in a foreign country in compliance with the provisions of section 16 of the Code.

**Internal dispute resolution**

The Bank has fully or partially put in place policies and procedures aimed at establishing and maintaining an adequate and effective complaints management framework to ensure the fair resolution of complaints in accordance with section 17 of the Code.

**National Financial Ombud Scheme, South Arica (NFO)**

The contact information of the NFO and the documentation required to lodge a complaint with the said ombudsman are provided in accordance with section 18 of the Code. Banks do provide other ombudsman offices or independent adjudicators' information, which might have jurisdiction over that data subject's complaint. Where applicable, the Bank will appoint an independent adjudicator through BASA.

**Dated and signed at** Sandown **on** 10 **day of** October **2025.**

**Deputy Information Officer:** Neelesh Mooljee

A handwritten signature in black ink, appearing to read 'N Mooljee', is centered within a light gray rectangular box.

**Signature:**

## Annexure C.

### **Attestation of Compliance with the Code of Conduct for the Processing of Personal Information by the Banking Industry.**

The Code of Conduct for the Processing of Personal Information by the Banking Industry (the Code) is intended to outline and expand on the specific obligations of the members of The Banking Association South Africa (BASA) as responsible parties, operators, or as joint responsible parties, when processing the Personal Information (PI) and Special Personal Information (SPI) of data subjects. It must be noted that the Code does not replace the provisions of the Protection of Personal Information Act 4 of 2013 (POPIA) and forms part of the Regulations on POPIA as published by the Information Regulator (IR).

I, Raymond Deane Deftereos (full names)

being the Deputy Information Officer of OM Bank

(the bank) have reviewed the privacy standards set out in the Code and hereby attest that to the best of my knowledge the reasonably necessary steps have been taken to put systems, measures, policies and processes in place aimed at complying with the provisions of the Code. Further, such systems, measures, policies and processes are fully or partially implemented and monitored by the bank to achieve the outcomes below and where control failures are identified, such failures are addressed and remedied.

**This attestation is only applicable to the operations of the bank where POPIA and the Code finds application.**

#### **Accountability**

Compliance with the accountability provisions of the Code including establishing functions and developing frameworks which identify, manage, monitor and report on privacy related risks. An Information Officer / Deputy Information Officer/s have been appointed.

#### **Processing limitation**

PI and SPI is lawfully processed under an appropriate lawful justification as envisaged in section 4.2 of the Code and in accordance with the purpose(s) of collection. The collection of PI and SPI is adequate, relevant and not excessive. PI and SPI is collected directly from the data subject, unless one of the exceptions listed in section 4.3 of the Code is applicable.

#### **Purpose specification**

PI is collected for a specific, defined, and lawful purpose related to a function or activity of the Bank. The appropriate privacy disclosures are enabled through privacy or similar notice(s) to demonstrate efforts in complying with section 5.1 of the Code, ensuring transparency is achieved. Records of PI are not retained longer than necessary for achieving the purpose for which the information was collected or subsequently processed, unless one of the factors listed in sections 5.2.1 to 5.2.2.4 of the Code is applicable, or unless section 5.3 of the Code applies. Records of PI are destroyed, deleted or de-identified as soon as reasonably practicable after the Bank is no longer legally permitted to retain the record in accordance with section 5.5 of the Code. The processing of PI is restricted in circumstances listed in sections 5.6 and 5.7 of the Code.

#### **Further processing limitation**

An assessment is undertaken prior to further processing of PI to determine whether it is processed in accordance or compatible with the purpose for which it was collected in accordance with section 6 of the Code or aligned to the consent of the data subject.

**Information quality**

The Bank is taking reasonably practicable steps to ensure that the PI collected is complete, accurate, not misleading and updated where necessary in accordance with section 7 of the Code.

**Openness**

The documentation of processing operations under the Bank's responsibility as required by section 51 of the Promotion of Access to Information Act, 2000 is maintained by the Bank which has also taken all reasonably practicable steps to make data subjects aware of the information listed in sections 8.2.1 to 8.2.11 of the Code.

**Security safeguards**

Appropriate, reasonable technical and organisational measures aimed at securing the integrity and confidentiality of the PI in the Bank's possession have been deployed. Operators are appointed in accordance with the provisions of section 8.4 of the Code. The Bank's risk management processes are aimed at identifying, investigating and managing security compromises as defined in section 22 of POPIA and the Bank notifies the Information Regulator and data subject where required in accordance with section 8.5 of the Code.

**Data subject participation**

The data subject rights set out in section 9 of the Code are given effect to and the processes set out therein are applied.

**Prohibition of the processing of special personal information**

The processing of the SPI of data subjects is carried out in accordance with the provisions of sections 10.2, 10.3, and 10.4 of the Code. The Bank monitors compliance with section 10 of the Code and the relevant provisions of POPIA.

**Prohibition on processing personal information of children**

The PI of children is not processed except in compliance with the provisions of section 11 of the Code. The Bank monitors compliance with section 11 of the Code and the relevant provisions of POPIA.

**Direct marketing**

The processing of PI for the purpose of unsolicited direct marketing occurs by the means set out in section 12.1 of the Code, and unsolicited direct marketing by electronic means occurs in accordance with sections 12.2, 12.3, 12.4, and 12.5 of the Code. Appropriate policies and processes are in place to ensure lawful unsolicited direct marketing communications in alignment with section 12.5 of the Code.

**Automated decision-making**

Automated decision making is conducted in accordance with the processes and operations set out in section 13 of the Code.

**Information matching**

Information matching programmes are used in accordance with the processes and operations set out in section 14 of the Code.

**Transfer of information**

The PI of a data subject is transferred to a third party who is in a foreign country in compliance with the provisions of section 16 of the Code.

**Internal dispute resolution**

The Bank has fully or partially put in place policies and procedures aimed at establishing and maintaining an adequate and effective complaints management framework to ensure the fair resolution of complaints in accordance with section 17 of the Code.

**National Financial Ombud Scheme, South Arica (NFO)**

The contact information of the NFO and the documentation required to lodge a complaint with the said ombudsman are provided in accordance with section 18 of the Code. Banks do provide other ombudsman offices or independent adjudicators' information, which might have jurisdiction over that data subject's complaint. Where applicable, the Bank will appoint an independent adjudicator through BASA.

**Dated and signed at Pinelands on 04 day of November 2025.**

**Information Officer/Deputy Information Officer:** Deputy Information Officer

**Signature:** \_\_\_\_\_



Handwritten Signature

End of BASA's report to the Information Regulator in terms of the POPIA  
Code of Conduct

**Attestation of Compliance with the Code of Conduct for the Processing of Personal Information by the Banking Industry.**

The Code of Conduct for the Processing of Personal Information by the Banking Industry (the Code) is intended to outline and expand on the specific obligations of the members of The Banking Association South Africa (BASA) as responsible parties, operators, or as joint responsible parties, when processing the Personal Information (PI) and Special Personal Information (SPI) of data subjects. It must be noted that the Code does not replace the provisions of the Protection of Personal Information Act 4 of 2013 (POPIA) and forms part of the Regulations on POPIA as published by the Information Regulator (IR).

I, ROOKEYA SALAJEE (Full names)

being the ~~Information Officer~~ / Deputy Information Officer of XX bank

POSTBANK SOC LIMITED

(the bank) have reviewed the privacy standards set out in the Code and hereby attest that to the best of my knowledge the reasonably necessary steps have been taken to put systems, measures, policies and processes in place aimed at complying with the provisions of the Code. Further, such systems, measures, policies and processes are fully or partially implemented and monitored by the bank to achieve the outcomes below and where control failures are identified, such failures are addressed and remedied.

**This attestation is only applicable to the operations of the bank where POPIA and the Code finds application.**

**Accountability**

Compliance with the accountability provisions of the Code including establishing functions and developing frameworks which identify, manage, monitor and report on privacy related risks. An ~~Information Officer~~ / Deputy Information Officer/s have been appointed.

**Processing limitation**

PI and SPI is lawfully processed under an appropriate lawful justification as envisaged in section 4.2 of the Code and in accordance with the purpose(s) of collection. The collection of PI and SPI is adequate, relevant and not excessive. PI and SPI is collected directly from the data subject, unless one of the exceptions listed in section 4.3 of the Code is applicable.

**Purpose specification**

PI is collected for a specific, defined, and lawful purpose related to a function or activity of the Bank. The appropriate privacy disclosures are enabled through privacy or similar notice(s) to demonstrate efforts in complying with section 5.1 of the Code, ensuring transparency is achieved. Records of PI are not retained longer than necessary for achieving the purpose for which the information was collected or subsequently processed, unless one of the factors listed in sections 5.2.1 to 5.2.2.4 of the Code is applicable, or unless section 5.3 of the Code applies. Records of PI are destroyed, deleted or de-identified as soon as reasonably practicable after the Bank is no longer legally permitted to retain the record in accordance with section 5.5 of the Code. The processing of PI is restricted in circumstances listed in sections 5.6 and 5.7 of the Code.

**Further processing limitation**

An assessment is undertaken prior to further processing of PI to determine whether it is processed in accordance or compatible with the purpose for which it was collected in accordance with section 6 of the Code or aligned to the consent of the data subject.

**Information quality**

The Bank is taking reasonably practicable steps to ensure that the PI collected is complete, accurate, not misleading and updated where necessary in accordance with section 7 of the Code.

**Openness**

The documentation of processing operations under the Bank's responsibility as required by section 51 of the Promotion of Access to Information Act, 2000 is maintained by the Bank which has also taken all reasonably practicable steps to make data subjects aware of the information listed in sections 8.2.1 to 8.2.11 of the Code.

**Security safeguards**

Appropriate, reasonable technical and organisational measures aimed at securing the integrity and confidentiality of the PI in the Bank's possession have been deployed. Operators are appointed in accordance with the provisions of section 8.4 of the Code. The Bank's risk management processes are aimed at identifying, investigating and managing security compromises as defined in section 22 of POPIA and the Bank notifies the Information Regulator and data subject where required in accordance with section 8.5 of the Code.

**Data subject participation**

The data subject rights set out in section 9 of the Code are given effect to and the processes set out therein are applied.

**Prohibition of the processing of special personal information**

The processing of the SPI of data subjects is carried out in accordance with the provisions of sections 10.2, 10.3, and 10.4 of the Code. The Bank monitors compliance with section 10 of the Code and the relevant provisions of POPIA.

**Prohibition on processing personal information of children**

The PI of children is not processed except in compliance with the provisions of section 11 of the Code. The Bank monitors compliance with section 11 of the Code and the relevant provisions of POPIA.

**Direct marketing**

The processing of PI for the purpose of unsolicited direct marketing occurs by the means set out in section 12.1 of the Code, and unsolicited direct marketing by electronic means occurs in accordance with sections 12.2, 12.3, 12.4, and 12.5 of the Code. Appropriate policies and processes are in place to ensure lawful unsolicited direct marketing communications in alignment with section 12.5 of the Code.

**Automated decision-making**

Automated decision making is conducted in accordance with the processes and operations set out in section 13 of the Code.

**Information matching**

Information matching programmes are used in accordance with the processes and operations set out in section 14 of the Code.

**Transfer of information**

The PI of a data subject is transferred to a third party who is in a foreign country in compliance with the provisions of section 16 of the Code.



**Internal dispute resolution**

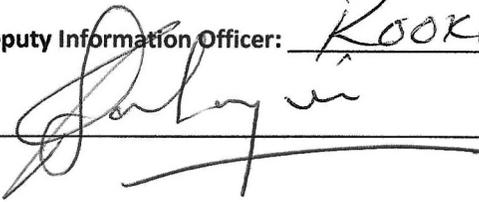
The Bank has fully or partially put in place policies and procedures aimed at establishing and maintaining an adequate and effective complaints management framework to ensure the fair resolution of complaints in accordance with section 17 of the Code.

**National Financial Ombud Scheme, South Arica (NFO)**

The contact information of the NFO and the documentation required to lodge a complaint with the said ombudsman are provided in accordance with section 18 of the Code. Banks do provide other ombudsman offices or independent adjudicators' information, which might have jurisdiction over that data subject's complaint. Where applicable, the Bank will appoint an independent adjudicator through BASA.

Dated and signed at KELVIN on 17<sup>th</sup> day of NOVEMBER 2025.

Information Officer/Deputy Information Officer: ROOKEYA SALAJEE

Signature: 

End of BASA's report to the Information Regulator in terms of the POPIA  
Code of Conduct

## **Annexure C.**

### **Attestation of Compliance with the Code of Conduct for the Processing of Personal Information by the Banking Industry.**

The Code of Conduct for the Processing of Personal Information by the Banking Industry (the Code) is intended to outline and expand on the specific obligations of the members of The Banking Association South Africa (BASA) as responsible parties, operators, or as joint responsible parties, when processing the Personal Information (PI) and Special Personal Information (SPI) of data subjects. It must be noted that the Code does not replace the provisions of the Protection of Personal Information Act 4 of 2013 (POPIA) and forms part of the Regulations on POPIA as published by the Information Regulator (IR).

I, Timothy Kerr-Phillips (full names)

being the Information Officer of Sasfin Limited bank

(the bank) have reviewed the privacy standards set out in the Code and hereby attest that to the best of my knowledge the reasonably necessary steps have been taken to put systems, measures, policies and processes in place aimed at complying with the provisions of the Code. Further, such systems, measures, policies and processes are fully or partially implemented and monitored by the bank to achieve the outcomes below and where control failures are identified, such failures are addressed and remedied.

**This attestation is only applicable to the operations of the bank where POPIA and the Code finds application.**

#### **Accountability**

Compliance with the accountability provisions of the Code including establishing functions and developing frameworks which identify, manage, monitor and report on privacy related risks. An Information Officer / Deputy Information Officer/s have been appointed.

#### **Processing limitation**

PI and SPI is lawfully processed under an appropriate lawful justification as envisaged in section 4.2 of the Code and in accordance with the purpose(s) of collection. The collection of PI and SPI is adequate, relevant and not excessive. PI and SPI is collected directly from the data subject, unless one of the exceptions listed in section 4.3 of the Code is applicable.

#### **Purpose specification**

PI is collected for a specific, defined, and lawful purpose related to a function or activity of the Bank. The appropriate privacy disclosures are enabled through privacy or similar notice(s) to demonstrate efforts in complying with section 5.1 of the Code, ensuring transparency is achieved. Records of PI are not retained longer than necessary for achieving the purpose for which the information was collected or subsequently processed, unless one of the factors listed in sections 5.2.1 to 5.2.2.4 of the Code is applicable, or unless section 5.3 of the Code applies. Records of PI are destroyed, deleted or de-identified as soon as reasonably practicable after the Bank is no longer legally permitted to retain the record in accordance with section 5.5 of the Code. The processing of PI is restricted in circumstances listed in sections 5.6 and 5.7 of the Code.

#### **Further processing limitation**

An assessment is undertaken prior to further processing of PI to determine whether it is processed in accordance or compatible with the purpose for which it was collected in accordance with section 6 of the Code or aligned to the consent of the data subject.

### **Information quality**

The Bank is taking reasonably practicable steps to ensure that the PI collected is complete, accurate, not misleading and updated where necessary in accordance with section 7 of the Code.

### **Openness**

The documentation of processing operations under the Bank's responsibility as required by section 51 of the Promotion of Access to Information Act, 2000 is maintained by the Bank which has also taken all reasonably practicable steps to make data subjects aware of the information listed in sections 8.2.1 to 8.2.11 of the Code.

### **Security safeguards**

Appropriate, reasonable technical and organisational measures aimed at securing the integrity and confidentiality of the PI in the Bank's possession have been deployed. Operators are appointed in accordance with the provisions of section 8.4 of the Code. The Bank's risk management processes are aimed at identifying, investigating and managing security compromises as defined in section 22 of POPIA and the Bank notifies the Information Regulator and data subject where required in accordance with section 8.5 of the Code.

### **Data subject participation**

The data subject rights set out in section 9 of the Code are given effect to and the processes set out therein are applied.

### **Prohibition of the processing of special personal information**

The processing of the SPI of data subjects is carried out in accordance with the provisions of sections 10.2, 10.3, and 10.4 of the Code. The Bank monitors compliance with section 10 of the Code and the relevant provisions of POPIA.

### **Prohibition on processing personal information of children**

The PI of children is not processed except in compliance with the provisions of section 11 of the Code. The Bank monitors compliance with section 11 of the Code and the relevant provisions of POPIA.

### **Direct marketing**

The processing of PI for the purpose of unsolicited direct marketing occurs by the means set out in section 12.1 of the Code, and unsolicited direct marketing by electronic means occurs in accordance with sections 12.2, 12.3, 12.4, and 12.5 of the Code. Appropriate policies and processes are in place to ensure lawful unsolicited direct marketing communications in alignment with section 12.5 of the Code.

### **Automated decision-making**

Automated decision making is conducted in accordance with the processes and operations set out in section 13 of the Code.

### **Information matching**

Information matching programmes are used in accordance with the processes and operations set out in section 14 of the Code.

### **Transfer of information**

The PI of a data subject is transferred to a third party who is in a foreign country in compliance with the provisions of section 16 of the Code.

**Internal dispute resolution**

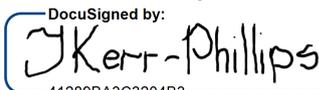
The Bank has fully or partially put in place policies and procedures aimed at establishing and maintaining an adequate and effective complaints management framework to ensure the fair resolution of complaints in accordance with section 17 of the Code.

**National Financial Ombud Scheme, South Arica (NFO)**

The contact information of the NFO and the documentation required to lodge a complaint with the said ombudsman are provided in accordance with section 18 of the Code. Banks do provide other ombudsman offices or independent adjudicators' information, which might have jurisdiction over that data subject's complaint. Where applicable, the Bank will appoint an independent adjudicator through BASA.

**Dated and signed at Johannesburg on 4 day of October 2025.**

**Information Officer: Timothy Kerr-Phillips**

Signature:  \_\_\_\_\_  
41289BA3G3204B3...

End of BASA's report to the Information Regulator in terms of the POPIA  
Code of Conduct

## **Annexure C.**

### **Attestation of Compliance with the Code of Conduct for the Processing of Personal Information by the Banking Industry.**

The Code of Conduct for the Processing of Personal Information by the Banking Industry (the Code) is intended to outline and expand on the specific obligations of the members of The Banking Association South Africa (BASA) as responsible parties, operators, or as joint responsible parties, when processing the Personal Information (PI) and Special Personal Information (SPI) of data subjects. It must be noted that the Code does not replace the provisions of the Protection of Personal Information Act 4 of 2013 (POPIA) and forms part of the Regulations on POPIA as published by the Information Regulator (IR).

I, Vivian Reddy being the Deputy Information Officer of Standard Bank of South Africa (the bank) have reviewed the privacy standards set out in the Code and hereby attest that to the best of my knowledge the reasonably necessary steps have been taken to put systems, measures, policies and processes in place aimed at complying with the provisions of the Code. Further, such systems, measures, policies and processes are fully or partially implemented and monitored by the bank to achieve the outcomes below and where control failures are identified, such failures are addressed and remedied.

**This attestation is only applicable to the operations of the bank where POPIA and the Code finds application.**

#### **Accountability**

Compliance with the accountability provisions of the Code including establishing functions and developing frameworks which identify, manage, monitor and report on privacy related risks. An Information Officer / Deputy Information Officer/s have been appointed.

#### **Processing limitation**

PI and SPI is lawfully processed under an appropriate lawful justification as envisaged in section 4.2 of the Code and in accordance with the purpose(s) of collection. The collection of PI and SPI is adequate, relevant and not excessive. PI and SPI is collected directly from the data subject, unless one of the exceptions listed in section 4.3 of the Code is applicable.

#### **Purpose specification**

PI is collected for a specific, defined, and lawful purpose related to a function or activity of the Bank. The appropriate privacy disclosures are enabled through privacy or similar notice(s) to demonstrate efforts in complying with section 5.1 of the Code, ensuring transparency is achieved. Records of PI are not retained longer than necessary for achieving the purpose for which the information was collected or subsequently processed, unless one of the factors listed in sections 5.2.1 to 5.2.2.4 of the Code is applicable, or unless section 5.3 of the Code applies. Records of PI are destroyed, deleted or de-identified as soon as reasonably practicable after the Bank is no longer legally permitted to retain the record in accordance with section 5.5 of the Code. The processing of PI is restricted in circumstances listed in sections 5.6 and 5.7 of the Code.

#### **Further processing limitation**

An assessment is undertaken prior to further processing of PI to determine whether it is processed in accordance or compatible with the purpose for which it was collected in accordance with section 6 of the Code or aligned to the consent of the data subject.

#### **Information quality**

The Bank is taking reasonably practicable steps to ensure that the PI collected is complete, accurate, not misleading and updated where necessary in accordance with section 7 of the Code.

**Openness**

The documentation of processing operations under the Bank's responsibility as required by section 51 of the Promotion of Access to Information Act, 2000 is maintained by the Bank which has also taken all reasonably practicable steps to make data subjects aware of the information listed in sections 8.2.1 to 8.2.11 of the Code.

**Security safeguards**

Appropriate, reasonable technical and organisational measures aimed at securing the integrity and confidentiality of the PI in the Bank's possession have been deployed. Operators are appointed in accordance with the provisions of section 8.4 of the Code. The Bank's risk management processes are aimed at identifying, investigating and managing security compromises as defined in section 22 of POPIA and the Bank notifies the Information Regulator and data subject where required in accordance with section 8.5 of the Code.

**Data subject participation**

The data subject rights set out in section 9 of the Code are given effect to and the processes set out therein are applied.

**Prohibition of the processing of special personal information**

The processing of the SPI of data subjects is carried out in accordance with the provisions of sections 10.2, 10.3, and 10.4 of the Code. The Bank monitors compliance with section 10 of the Code and the relevant provisions of POPIA.

**Prohibition on processing personal information of children**

The PI of children is not processed except in compliance with the provisions of section 11 of the Code. The Bank monitors compliance with section 11 of the Code and the relevant provisions of POPIA.

**Direct marketing**

The processing of PI for the purpose of unsolicited direct marketing occurs by the means set out in section 12.1 of the Code, and unsolicited direct marketing by electronic means occurs in accordance with sections 12.2, 12.3, 12.4, and 12.5 of the Code. Appropriate policies and processes are in place to ensure lawful unsolicited direct marketing communications in alignment with section 12.5 of the Code.

**Automated decision-making**

Automated decision making is conducted in accordance with the processes and operations set out in section 13 of the Code.

**Information matching**

Information matching programmes are used in accordance with the processes and operations set out in section 14 of the Code.

**Transfer of information**

The PI of a data subject is transferred to a third party who is in a foreign country in compliance with the provisions of section 16 of the Code.

**Internal dispute resolution**

The Bank has fully or partially put in place policies and procedures aimed at establishing and maintaining an adequate and effective complaints management framework to ensure the fair resolution of complaints in accordance with section 17 of the Code.

**National Financial Ombud Scheme, South Arica (NFO)**

The contact information of the NFO and the documentation required to lodge a complaint with the said ombudsman are provided in accordance with section 18 of the Code. Banks do provide other ombudsman offices or independent adjudicators' information, which might have jurisdiction over that data subject's complaint. Where applicable, the Bank will appoint an independent adjudicator through BASA.

Dated and signed at Johannesburg on 2nd day of October 2025.

**Deputy Information Officer:** Vivian Reddy

**Signature:** *V REDDY*

End of BASA's report to the Information Regulator in terms of the POPIA  
Code of Conduct

## **Attestation of Compliance with the Code of Conduct for the Processing of Personal Information by the Banking Industry.**

The Code of Conduct for the Processing of Personal Information by the Banking Industry (the Code) is intended to outline and expand on the specific obligations of the members of The Banking Association South Africa (BASA) as responsible parties, operators, or as joint responsible parties, when processing the Personal Information (PI) and Special Personal Information (SPI) of data subjects. It must be noted that the Code does not replace the provisions of the Protection of Personal Information Act 4 of 2013 (POPIA) and forms part of the Regulations on POPIA as published by the Information Regulator (IR).

I, Calvin Christopher, being the Information Officer of Standard Chartered Bank – Johannesburg Branch

(the bank) have reviewed the privacy standards set out in the Code and hereby attest that to the best of my knowledge the reasonably necessary steps have been taken to put systems, measures, policies and processes in place aimed at complying with the provisions of the Code. Further, such systems, measures, policies and processes are fully or partially implemented and monitored by the bank to achieve the outcomes below and where control failures are identified, such failures are addressed and remedied.

**This attestation is only applicable to the operations of the bank where POPIA and the Code finds application.**

### **Accountability**

Compliance with the accountability provisions of the Code including establishing functions and developing frameworks which identify, manage, monitor and report on privacy related risks. An Information Officer / Deputy Information Officer/s have been appointed.

### **Processing limitation**

PI and SPI is lawfully processed under an appropriate lawful justification as envisaged in section 4.2 of the Code and in accordance with the purpose(s) of collection. The collection of PI and SPI is adequate, relevant and not excessive. PI and SPI is collected directly from the data subject, unless one of the exceptions listed in section 4.3 of the Code is applicable.

### **Purpose specification**

PI is collected for a specific, defined, and lawful purpose related to a function or activity of the Bank. The appropriate privacy disclosures are enabled through privacy or similar notice(s) to demonstrate efforts in complying with section 5.1 of the Code, ensuring transparency is achieved. Records of PI are not retained longer than necessary for achieving the purpose for which the information was collected or subsequently processed, unless one of the factors listed in sections 5.2.1 to 5.2.2.4 of the Code is applicable, or unless section 5.3 of the Code applies. Records of PI are destroyed, deleted or de-identified as soon as reasonably practicable after the Bank is no longer legally permitted to retain the record in accordance with section 5.5 of the Code. The processing of PI is restricted in circumstances listed in sections 5.6 and 5.7 of the Code.

### **Further processing limitation**

An assessment is undertaken prior to further processing of PI to determine whether it is processed in accordance or compatible with the purpose for which it was collected in accordance with section 6 of the Code or aligned to the consent of the data subject.

### **Information quality**

The Bank is taking reasonably practicable steps to ensure that the PI collected is complete, accurate, not misleading and updated where necessary in accordance with section 7 of the Code.

### **Openness**

The documentation of processing operations under the Bank's responsibility as required by section 51 of the Promotion of Access to Information Act, 2000 is maintained by the Bank which has also taken all reasonably practicable steps to make data subjects aware of the information listed in sections 8.2.1 to 8.2.11 of the Code.

### **Security safeguards**

Appropriate, reasonable technical and organisational measures aimed at securing the integrity and confidentiality of the PI in the Bank's possession have been deployed. Operators are appointed in accordance with the provisions of section 8.4 of the Code. The Bank's risk management processes are aimed at identifying, investigating and managing security compromises as defined in section 22 of POPIA and the Bank notifies the Information Regulator and data subject where required in accordance with section 8.5 of the Code.

### **Data subject participation**

The data subject rights set out in section 9 of the Code are given effect to and the processes set out therein are applied.

### **Prohibition of the processing of special personal information**

The processing of the SPI of data subjects is carried out in accordance with the provisions of sections 10.2, 10.3, and 10.4 of the Code. The Bank monitors compliance with section 10 of the Code and the relevant provisions of POPIA.

### **Prohibition on processing personal information of children**

The PI of children is not processed except in compliance with the provisions of section 11 of the Code. The Bank monitors compliance with section 11 of the Code and the relevant provisions of POPIA.

### **Direct marketing**

The processing of PI for the purpose of unsolicited direct marketing occurs by the means set out in section 12.1 of the Code, and unsolicited direct marketing by electronic means occurs in accordance with sections 12.2, 12.3, 12.4, and 12.5 of the Code. Appropriate policies and processes are in place to ensure lawful unsolicited direct marketing communications in alignment with section 12.5 of the Code.

### **Automated decision-making**

Automated decision making is conducted in accordance with the processes and operations set out in section 13 of the Code.

### **Information matching**

Information matching programmes are used in accordance with the processes and operations set out in section 14 of the Code.

### **Transfer of information**

The PI of a data subject is transferred to a third party who is in a foreign country in compliance with the provisions of section 16 of the Code.

### **Internal dispute resolution**

The Bank has fully or partially put in place policies and procedures aimed at establishing and maintaining an adequate and effective complaints management framework to ensure the fair resolution of complaints in accordance with section 17 of the Code.

**National Financial Ombud Scheme, South Arica (NFO)**

The contact information of the NFO and the documentation required to lodge a complaint with the said ombudsman are provided in accordance with section 18 of the Code. Banks do provide other ombudsman offices or independent adjudicators' information, which might have jurisdiction over that data subject's complaint. Where applicable, the Bank will appoint an independent adjudicator through BASA.

Dated and signed at Sandton on 13th day of October 2025.

Information Officer: Calvin Christopher

Signature:  \_\_\_\_\_





**State Bank of India**

(Reg. No. 1996/018176/10)

Johannesburg

**Attestation of Compliance with the Code of Conduct for the Processing of Personal Information by the Banking Industry.**

The Code of Conduct for the Processing of Personal Information by the Banking Industry (the Code) is intended to outline and expand on the specific obligations of the members of The Banking Association South Africa (BASA) as responsible parties, operators, or as joint responsible parties, when processing the Personal Information (PI) and Special Personal Information (SPI) of data subjects. It must be noted that the Code does not replace the provisions of the Protection of Personal Information Act 4 of 2013 (POPIA) and forms part of the Regulations on POPIA as published by the Information Regulator (IR).

I, Mr. Sandeep Prusty being the ~~Information Officer~~/ Deputy Information Officer of State Bank of India, South Africa have reviewed the privacy standards set out in the Code and hereby attest that to the best of my knowledge the reasonably necessary steps have been taken to put systems, measures, policies and processes in place aimed at complying with the provisions of the Code. Further, such systems, measures, policies and processes are fully or partially implemented and monitored by the bank to achieve the outcomes below and where control failures are identified, such failures are addressed and remedied.

**This attestation is only applicable to the operations of the bank where POPIA and the Code finds application.**

**Accountability**

Compliance with the accountability provisions of the Code including establishing functions and developing frameworks which identify, manage, monitor and report on privacy related risks. An Information Officer / Deputy Information Officer/s have been appointed.

**Processing limitation**

PI and SPI is lawfully processed under an appropriate lawful justification as envisaged in section 4.2 of the Code and in accordance with the purpose(s) of collection. The collection of PI and SPI is adequate, relevant and not excessive. PI and SPI is collected directly from the data subject, unless one of the exceptions listed in section 4.3 of the Code is applicable.

**Purpose specification**

PI is collected for a specific, defined, and lawful purpose related to a function or activity of the Bank. The appropriate privacy disclosures are enabled through privacy or similar notice(s) to demonstrate efforts in complying with section 5.1 of the Code, ensuring transparency is achieved. Records of PI are not retained longer than necessary for achieving the purpose for which the information was collected or subsequently processed, unless one of the factors listed in sections 5.2.1 to 5.2.2.4 of the Code is applicable, or unless section 5.3 of the Code applies. Records of PI are destroyed, deleted or de-identified as soon as reasonably practicable after the Bank is no longer legally permitted to retain the record in accordance with section 5.5 of the Code. The processing of PI is restricted in circumstances listed in sections 5.6 and 5.7 of the Code.

**Authorised Financial Services Provider (FSP No: 4282) & Registered Credit Provider (NCRCP12)**

**Physical Address:**

3rd Floor, The Mall Offices  
11 Cradock Avenue  
Rosebank, 2196  
Johannesburg (SA)

**Postal Address:**

P O Box 2538  
Saxonwold 2132  
Johannesburg  
South Africa

Tel : 27 11 778 4500

Fax : 27 11 788 6769

Swift : SBINZAJJ

E-mail : sbijoburg.rsa@statebank.com

Website : www.za.statebank

**Further processing limitation**

An assessment is undertaken prior to further processing of PI to determine whether it is processed in accordance or compatible with the purpose for which it was collected in accordance with section 6 of the Code or aligned to the consent of the data subject.

**Information quality**

The Bank is taking reasonably practicable steps to ensure that the PI collected is complete, accurate, not misleading and updated where necessary in accordance with section 7 of the Code.

**Openness**

The documentation of processing operations under the Bank's responsibility as required by section 51 of the Promotion of Access to Information Act, 2000 is maintained by the Bank which has also taken all reasonably practicable steps to make data subjects aware of the information listed in sections 8.2.1 to 8.2.11 of the Code.

**Security safeguards**

Appropriate, reasonable technical and organisational measures aimed at securing the integrity and confidentiality of the PI in the Bank's possession have been deployed. Operators are appointed in accordance with the provisions of section 8.4 of the Code. The Bank's risk management processes are aimed at identifying, investigating and managing security compromises as defined in section 22 of POPIA and the Bank notifies the Information Regulator and data subject where required in accordance with section 8.5 of the Code.

**Data subject participation**

The data subject rights set out in section 9 of the Code are given effect to and the processes set out therein are applied.

**Prohibition of the processing of special personal information**

The processing of the SPI of data subjects is carried out in accordance with the provisions of sections 10.2, 10.3, and 10.4 of the Code. The Bank monitors compliance with section 10 of the Code and the relevant provisions of POPIA.

**Prohibition on processing personal information of children**

The PI of children is not processed except in compliance with the provisions of section 11 of the Code. The Bank monitors compliance with section 11 of the Code and the relevant provisions of POPIA.

**Direct marketing**

The processing of PI for the purpose of unsolicited direct marketing occurs by the means set out in section 12.1 of the Code, and unsolicited direct marketing by electronic means occurs in accordance with sections 12.2, 12.3, 12.4, and 12.5 of the Code. Appropriate policies and processes are in place to ensure lawful unsolicited direct marketing communications in alignment with section 12.5 of the Code.

**Automated decision-making**

Automated decision making is conducted in accordance with the processes and operations set out in section 13 of the Code.

**Information matching**

Information matching programmes are used in accordance with the processes and operations set out in section 14 of the Code.

**Transfer of information**

The PI of a data subject is transferred to a third party who is in a foreign country in compliance with the provisions of section 16 of the Code.

**Internal dispute resolution**

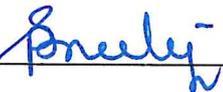
The Bank has fully or partially put in place policies and procedures aimed at establishing and maintaining an adequate and effective complaints management framework to ensure the fair resolution of complaints in accordance with section 17 of the Code.

**National Financial Ombud Scheme, South Arica (NFO)**

The contact information of the NFO and the documentation required to lodge a complaint with the said ombudsman are provided in accordance with section 18 of the Code. Banks do provide other ombudsman offices or independent adjudicators' information, which might have jurisdiction over that data subject's complaint. Where applicable, the Bank will appoint an independent adjudicator through BASA.

**Dated and signed at Johannesburg on 13th day of October 2025.**

**Information Officer/Deputy Information Officer: Mr. Sandeep Prusty**

Signature:  \_\_\_\_\_

End of BASA's report to the Information Regulator in terms of the POPIA  
Code of Conduct

**Attestation of Compliance with the Code of Conduct for the Processing of Personal Information by the Banking Industry.**

The Code of Conduct for the Processing of Personal Information by the Banking Industry (the Code) is intended to outline and expand on the specific obligations of the members of The Banking Association South Africa (BASA) as responsible parties, operators, or as joint responsible parties, when processing the Personal Information (PI) and Special Personal Information (SPI) of data subjects. It must be noted that the Code does not replace the provisions of the Protection of Personal Information Act 4 of 2013 (POPIA) and forms part of the Regulations on POPIA as published by the Information Regulator (IR).

I, Jacqueline Marais Linde

being the Deputy Information Officer of Tyme Bank Ltd (the bank)

have reviewed the privacy standards set out in the Code and hereby attest that to the best of my knowledge the reasonably necessary steps have been taken to put systems, measures, policies and processes in place aimed at complying with the provisions of the Code. Further, such systems, measures, policies and processes are fully or partially implemented and monitored by the bank to achieve the outcomes below and where control failures are identified, such failures are addressed and remedied.

**This attestation is only applicable to the operations of the bank where POPIA and the Code finds application.**

**Accountability**

Compliance with the accountability provisions of the Code including establishing functions and developing frameworks which identify, manage, monitor and report on privacy related risks. An Information Officer / Deputy Information Officer/s have been appointed.

**Processing limitation**

PI and SPI is lawfully processed under an appropriate lawful justification as envisaged in section 4.2 of the Code and in accordance with the purpose(s) of collection. The collection of PI and SPI is adequate, relevant and not excessive. PI and SPI is collected directly from the data subject, unless one of the exceptions listed in section 4.3 of the Code is applicable.

**Purpose specification**

PI is collected for a specific, defined, and lawful purpose related to a function or activity of the Bank. The appropriate privacy disclosures are enabled through privacy or similar notice(s) to demonstrate efforts in complying with section 5.1 of the Code, ensuring transparency is achieved. Records of PI are not retained longer than necessary for achieving the purpose for which the information was collected or subsequently processed, unless one of the factors listed in sections 5.2.1 to 5.2.2.4 of the Code is applicable, or unless section 5.3 of the Code applies. Records of PI are destroyed, deleted or de-identified as soon as reasonably practicable after the Bank is no longer legally permitted to retain the record in accordance with section 5.5 of the Code. The processing of PI is restricted in circumstances listed in sections 5.6 and 5.7 of the Code.

**Further processing limitation**

An assessment is undertaken prior to further processing of PI to determine whether it is processed in accordance or compatible with the purpose for which it was collected in accordance with section 6 of the Code or aligned to the consent of the data subject.

**Information quality**

The Bank is taking reasonably practicable steps to ensure that the PI collected is complete, accurate, not misleading and updated where necessary in accordance with section 7 of the Code.

**Openness**

The documentation of processing operations under the Bank's responsibility as required by section 51 of the Promotion of Access to Information Act, 2000 is maintained by the Bank which has also taken all reasonably practicable steps to make data subjects aware of the information listed in sections 8.2.1 to 8.2.11 of the Code.

**Security safeguards**

Appropriate, reasonable technical and organisational measures aimed at securing the integrity and confidentiality of the PI in the Bank's possession have been deployed. Operators are appointed in accordance with the provisions of section 8.4 of the Code. The Bank's risk management processes are aimed at identifying, investigating and managing security compromises as defined in section 22 of POPIA and the Bank notifies the Information Regulator and data subject where required in accordance with section 8.5 of the Code.

**Data subject participation**

The data subject rights set out in section 9 of the Code are given effect to and the processes set out therein are applied.

**Prohibition of the processing of special personal information**

The processing of the SPI of data subjects is carried out in accordance with the provisions of sections 10.2, 10.3, and 10.4 of the Code. The Bank monitors compliance with section 10 of the Code and the relevant provisions of POPIA.

**Prohibition on processing personal information of children**

The PI of children is not processed except in compliance with the provisions of section 11 of the Code. The Bank monitors compliance with section 11 of the Code and the relevant provisions of POPIA.

**Direct marketing**

The processing of PI for the purpose of unsolicited direct marketing occurs by the means set out in section 12.1 of the Code, and unsolicited direct marketing by electronic means occurs in accordance with sections 12.2, 12.3, 12.4, and 12.5 of the Code. Appropriate policies and processes are in place to ensure lawful unsolicited direct marketing communications in alignment with section 12.5 of the Code.

**Automated decision-making**

Automated decision making is conducted in accordance with the processes and operations set out in section 13 of the Code.

**Information matching**

Information matching programmes are used in accordance with the processes and operations set out in section 14 of the Code.

**Transfer of information**

The PI of a data subject is transferred to a third party who is in a foreign country in compliance with the provisions of section 16 of the Code.

**Internal dispute resolution**

The Bank has fully or partially put in place policies and procedures aimed at establishing and maintaining an adequate and effective complaints management framework to ensure the fair resolution of complaints in accordance with section 17 of the Code.

**National Financial Ombud Scheme, South Arica (NFO)**

The contact information of the NFO and the documentation required to lodge a complaint with the said ombudsman are provided in accordance with section 18 of the Code. Banks do provide other ombudsman offices or independent adjudicators' information, which might have jurisdiction over that data subject's complaint. Where applicable, the Bank will appoint an independent adjudicator through BASA.

**Dated and signed at Pretoria on the 3<sup>rd</sup> day of October 2025.**

**Deputy Information Officer:** Jacqueline M. Linde

**Signature:**

