

Customer Complaints Procedure

PROCESS OWNER	:	Helga Janse van Rensburg	Popi Information Officer
APPROVED BY	:	Ashley Regenass	Chief Executive Officer
APPROVAL DATE	:	14 Sep 21	
DOCUMENT REF. No.	:	Syn CC01	
REVISION No.	:	01	

Revision	Author	Approved by	Reason for change	Date issued	Next revision due date
01	Helga Janse van Rensburg and	Ashley Regenass	Implementation of the Policy.	14 Sep 21	01/03/2022

This document contains 5 pages.

1. Introduction

The POPI Act deals with complaints in some length under chapter 10 (Enforcement).

In terms of section 74, any person may submit a complaint to the Regulator in the prescribed manner and form alleging interference with the protection of the personal information of a Data Subject. A complaint to the Regulator must be made in writing.

If an Information Supplier, Responsible Party or Data Subject feels that the Company has acted outside of the requirements of POPI or in terms of the conditions by which the Company had processed a Data Subjects' Personal Information, we would like to invite such a person to address their complaint to us in writing at the details below.

2. To determine if it is a Popi Complaint

If the Data Subject alleges that the Company or its representatives:

- 2.1 Were not authorised to process an individual's personal information;
- 2.2 Have processed, shared, or otherwise dealt with personal information outside of terms agreed with that party; or
- 2.3 Have otherwise contravened or failed to comply with any provision of the POPI Act.

It should be treated as a POPI complaint. The person or institution lodging the complaint is hereinafter referred to as "the Complainant".

3. Responsibilities

5.1 **Information** Officer is responsible for dealing with all complaints in line with this procedure.

5.2 **All** employees are responsible for ensuring any complaints made in relation to the scope of this procedure are reported to the Information Officer.

4. External Complaints Procedure

4.1 Data subjects can complain to SynergERP about:

- a. How their personal data has been processed;
- b. How their request for access has been handled;
- c. How their complaint has been handled;
- d. Appeal against any decision made following a complaint.

4.2 Data subject(s) shall lodge a complaint regarding their Personal Information by emailing Popi@synergerp.com, stating in the subject line – "Popi Complaint – *the Complainant name*".

4.3 When complaints are received, it will be directed to the Information Officer for investigation and resolution.

SynergERP (Pty) Ltd

Columbia Avenue | International Business Gateway
C/O New Road & 6th Road | Midridge Park | Midrand | 1685

Phone: 010 329 4000 | Website: www.synergerp.com

Postnet Suite 556, Private Bag X29, Gallo Manor, 2052

Directors: A. Regenass | E. van der Merwe | F. van der Westhuizen | P. Spies

Registration Number: 2015/106266/07



4.4 All complaints will be resolved within 7 business days and appeals will be resolved within 14 business days.

4.5 If the complaint isn't attended to within the specified period, it should be escalated to the Managing Director to ensure action is taken.

4.6 The Information Officer is obligated to maintain a register of all complaints made as well as details of the resolution.

4.7 Management will review all complaints monthly.

5. Internal Complaints Procedure

5.1 If a complaint against the Company is not in writing, SynergERP must request the Complainant to lodge the complaint in writing and to provide the necessary supporting documentation.

5.2 The Information Officer will receive the written complaint and supporting documentation.

5.3 The Information Officer will log the date and contents of the complaint in the Complaints Register. This record must be maintained for a period of five years.

5.4 The Information Officer will appoint a relevant staff member/s to investigate the complaint.

5.5 The Information Officer will acknowledge receipt of the complaint in writing within 3 business days of receipt and give the Complainant the name and contact details of the staff member/s responsible for the resolution of the complaint.

5.6 The relevant internal department or staff member/s and any other resources or manpower, will investigate the complaint to ascertain whether the complaint can be resolved immediately.

5.7 If the complaint is of a serious nature, the complaint will be handled and investigated by the Information Officer or any other senior staff/executive management.

5.8 If the complaint can be resolved immediately, the relevant staff member/s will take the necessary action and advise the Complainant accordingly.

5.9 If the complaint cannot be resolved immediately, SynergERP Information officer will send the Complainant a written summary of the steps to be taken to resolve the matter and the expected date of resolution.

5.10 If unable to resolve the complaint within 7 working days of logging the complaint in the Complaints Register, Compliance will notify the Complainant by means of a written acknowledgement. This must outline the current status of the complaint and the expected date of final resolution.

5.11 If unable to resolve the complaint within a further 14 days of the written acknowledgement, Compliance will notify the Complainant, giving full written reasons as to why the outcome was not favourable, and advise the Complainant of their right to seek legal redress by referring the complaint to the Information Regulator.

SynergERP (Pty) Ltd

Columbia Avenue | International Business Gateway
C/O New Road & 6th Road | Midridge Park | Midrand | 1685

Phone: 010 329 4000 | Website: www.synergerp.com

Postnet Suite 556, Private Bag X29, Gallo Manor, 2052

Directors: A. Regenass | E. van der Merwe | F. van der Westhuizen | P. Spies

Registration Number: 2015/106266/07



5.12 The notification must clearly indicate that the Complainant may refer the matter to the Information Regulator. The Information Regulator's address and other contact details must be provided to the Complainant.

5.13 The relevant internal department or staff member/s investigating the complaint must keep the Information Officer and Compliance up to date with the investigation.

5.14 As soon as Compliance receives any updates, developments, and activities regarding the complaint, they must update the Complaints Register with all developments and activities.

6. Complaints Process Flow

6.1 Complainant lodges a complaint with the Company staff member.

6.2 If the complaint is not in writing, the Company staff member is to request that the complaint is in writing and to be submitted along with the necessary supporting documentation.

6.3 Complaint received by the staff member and handed to Information Officer. The complaint is validated and logged on the Complaints Register.

6.4 Information Officer acknowledges receipt of the complaint in writing within 3 business days.

6.5 Complaint is assigned to a staff member by Information Officer and investigated.

6.6 Resolve the complaint immediately or take the necessary action and advise the complainant of steps taken and the expected date of resolution.

6.7 Information Officer updates the Complaints Register with all developments/activities.

6.8 Information Officer to inform the Complainant in writing of the resolution of the complaint and the outcome.

6.9 Information Officer to notify the Complainant if the complaint is not resolved within 7 working days - advise the Complainant on the status of the complaint.

6.10 Information Officer to notify the Complainant of the final outcome. This must be within 10 days of receiving the complaint.

6.11 Information Officer to advise the Complainant of other options if complaint could not be resolved e.g. Information Regulator.

SynergERP (Pty) Ltd

Columbia Avenue | International Business Gateway
C/O New Road & 6th Road | Midridge Park | Midrand | 1685

Phone: 010 329 4000 | Website: www.synergerp.com

Postnet Suite 556, Private Bag X29, Gallo Manor, 2052

Directors: A. Regenass | E. van der Merwe | F. van der Westhuizen | P. Spies

Registration Number: 2015/106266/07





7. Information Regulator

The Information Regulator's contact details are as follows:

JD House,
27 Stiemens Street
Braamfontein
Johannesburg
2001
infoereg@justice.gov.za

SynergERP (Pty) Ltd

Columbia Avenue | International Business Gateway
C/O New Road & 6th Road | Midridge Park | Midrand | 1685

Phone: 010 329 4000 | Website: www.synergerp.com

Postnet Suite 556, Private Bag X29, Gallo Manor, 2052

Directors: A. Regenass | E. van der Merwe | F. van der Westhuizen | P. Spies

Registration Number: 2015/106266/07

