



Complaints Policy

1. Purpose

- 1.1 We respect your privacy and take the protection of personal data very seriously. The purpose of this policy is to set out the necessary steps to effectively and efficiently identify and report potential issues in how we have processed your personal data.
- 1.2 For more information on how we collect, use and process your personal data, please see our [Privacy Policy](http://www.cognitionholdings.co.za/files/privacy_policy.pdf) on our website available at - http://www.cognitionholdings.co.za/files/privacy_policy.pdf
- 1.3 This policy is intended for our customers and our employees who are our data subjects.

2. Legislation

This policy gives effect to many of our responsibilities as a responsible party in terms of the Protection of Personal Information Act 4 of 2013 (POPIA) and should be read in conjunction with that Act where applicable.

3. Types of complaints

You should use this policy where you have a concern about the way we are handling your information, for example if you feel that we:

- are unlawfully processing your personal information;
- are not keeping your personal information secure;
- are misusing your personal information;
- are keeping personal information about you for longer than is necessary;
- have unlawfully disclosed your personal information;
- have collected personal information for one reason and are using it for something else;
- have accessed your personal information without your authorisation;

- hold inaccurate personal information about you.

4. How to make a complaint

- 4.1 If you wish to complain about how we have processed your personal information, or how your complaint has been handled, please contact us with the following information by sending an email to privacy@cgn.co.za.
- All necessary information relating to what you think we have done wrong
 - Any evidence in support of the complaint
 - Contact details such as email address and telephone number
 - Full name of the person lodging the complaint
 - How the personal data was collected (if known)
 - The timeframe over which the suspected wrongdoing occurred (if known)
- 4.2 Our Information Officer (IO) will acknowledge receipt of your complaint within 3 (three) business days. While we try to respond as promptly as possible, resolution times will vary depending on the nature of the complaint. Our IO will liaise with our relevant departments to investigate your complaint. You will be notified of the outcome of your complaint as well as any action taken.
- 4.3 If you are unhappy with how your complaint was handled, or the outcome of your complaint, then you may appeal by writing to our IO at privacy@cgn.co.za outlining your reasons.
- 4.4 If you remain unhappy after the appeals process, you may forward your complaint to the Information Regulator at:

The Information Regulator (South Africa)

Physical Address: JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

Postal Address: P.O Box 31533, Braamfontein, Johannesburg, 2017

Email: inforeg@justice.gov.za

More information can be found at www.justice.gov.za/inforeg/

5. Abusive, persistent or vexatious correspondence and complaints

For the purposes of this Complaints Policy, it is the complaint which must be vexatious and not the individual making the complaint.

5.1 We differentiate between people who make numerous complaints because they think things have gone wrong, and people who are simply being difficult. We do understand that sometimes complainants act in distress, and we will make reasonable allowances for that.

5.2 Features of the types of complaint and behaviour that this policy covers can include the following:

- If we determine that your correspondence or complaint is abusive, persistent or vexatious, we will inform you of such decision and of what action is being taken. We will ask you to change your behaviour, if you fail to do so, we may impose restrictions on your correspondence. If your behaviour is so severe or extreme that it threatens our staff, we may consider other legal options.
- Persisting in a complaint after being advised that there are insufficient or no grounds for your complaint or that we are not the appropriate body.
- Refusing to co-operate with the complaints process, without good reason, but still wanting your complaint to be resolved, including a failure or refusal to specify the grounds of a complaint despite offers of assistance, changing the basis of the complaint as inquiries are made and introducing trivial or irrelevant new information and expecting this to be taken into account and commented on.
- Refusing to accept the outcome of the procedure after its conclusion, repeatedly arguing the point, complaining about the outcome, and/or denying that an adequate response has been given.
- Submitting repeat complaints, after the complaints procedure has been completed essentially about the same issues, with additions/variations which the Complainant then insists on being treated as new complaints and put through the full complaints procedure again.

6. Record keeping

Our IO will retain adequate records of the details of the case and the action that has been taken.