

# BarnOwl Compliance Module Overview

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### **1. Introduction**

This document provides a high level overview of the BarnOwl Compliance module:

- BarnOwl is able to import compliance acts (in specified format from Excel) with details (sections, heading, provision, analysis, consequence, compliance questions etc.) into a structured CRMP (compliance risks management plan) as well as import compliance checklists from Excel. With respect to compliance content, you can populate the acts yourself or use a 3rd party service provider such as PaigeLaw. Compliance content is priced separately by the 3rd party compliance provider.
- After importing the acts, you can apply the relevant legislation (provisions) to your organisational structure to create compliance risk registers (CRMPs) to which you can add controls and action plans (which can be updated online by the owners of the action plans)
- You can send out compliance checklists to the relevant respondents to be completed online.
- You can capture non-compliance incidents against compliance risks: e.g. (i.e. loss events, forensics, findings, gifts register, burglaries / robberies, tip offs, allegations, conflict of interest etc. including 'user-defined' fields) and associated action plans.
- You can export compliance registers and generate compliance reports directly into Excel.
- The BarnOwl business intelligence reporting module provides advanced graphical dashboard reporting.

You can find more information on BarnOwl at <u>www.barnowl.co.za</u> and more specifically <u>https://barnowl.co.za/solutions/compliance-software</u>



# 2. Capturing or importing acts from BarnOwl's excel template

You can import various acts (including provisions / obligations, verbatim text, interpretation and survey questions) using BarnOwl's regulatory Excel template. You can (a) purchase pre-populated regulatory content from our 3<sup>rd</sup> party content provider/s and/or (b) capture your own regulatory content into BarnOwl's Excel template for import into BarnOwl and/or (c) capture regulatory acts and associated detail directly into BarnOwl:

#### Example of the BarnOwl's regulatory Excel template:

B	5°°°∓							P	DPI Pagetech BarnOwl_ImportComplianceRequirement_20210506 v5 sample.xlsx -	Excel			
	Home	nsert	Page	Layout		ormulas	Data Review	View ♀ Tel	l me what you want to do				Jonathan Crisp 🛛 🖇 Share
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4 A	в	с	D	Ε	F	G	\$	AE	AF	AG		AO	AP
Source 1 e ld	c Regulatory Requirement	Acron	Type	Year	Vers	i Section Title	Heading Title	Provision Title	Verbatim	Clau	Consequence	Interpretation	Question
2	Protection of Personal Information Act PageTech v5	POPIA	Act of Parliamer	w 2013	1	Chapter 03	028 Part B: Processing of special personal information concerning data subject's political persuasion	Authorisation concerning data subject's policial persuasion	31(1) The probabilition on processing percendent information concerning a data analyset's political persuation, as reference of a section 32, does not paging to processing a minimo not- (b) as methesis or employees or other persons belonging to the institution. If such processing is minimose the main or principles of the institution, or such processing is information. Accident the main or principles of the institution or such processing is information. Acc: 300 and 300 are set to the perposed of -Protection of Personal information. Acc: 300 and 300 are set to the perposed of -Protection of Personal information. Acc: 300 and 300 are set to the perposed of -Protection of Personal information. Acc: 300 are set to the perposed of the perposed of the constraints (b) and as addret if a soluble as constraints of the the perposed of the constraints (b) and a soluble and analysis of the provincial legislature as regulated in terms of the last an electron of the National Accessing of the local Government. Municipal Electroni Act, 2000 (c) a referencement are adjuted in terms of the Local Government. Municipal Electroni Act, 2000 (c) a terms of the analysing of the activities of the Stetenedum Act, 1893 (Ace No. 300 ar 1960) or (B) analysis devices of the data adjute of the information of the data adjute of the state of the information of the data adjute of the state of the information of the data adjute of the data whom the constraint of the data adjute. (B) analysis devices of the data adjute of the data whom the constraint of the data adjute.	3	Any person convicted of an offence in terms of this Act may be liable for a fine- alternatively may be imprisoned for up to 10 years.		28.01 Is the organization an institution founded on political principles, processing subjects personal information in relations to highle membership? If yes, the proi processing in sector 28 does not algoly public public which information may be shu third party without the consent of the data subject.
2	Protection of Personal Information Act PageTech v5	POPIA	Act of Parliamer	w 2013	1	Chapter 03	023 Part B: Processing of special personal information - Authoritation - Authoritation as subject's health or see life	Authorization concerning data subjects health or see life	32.(1) The provision on processing pletons an information concerning a task as support: means on set support the processing by the proc	3; 5	Any person considered of the second se second second sec		caultis the processor one of the reloxing (i) lays, the profilement on processing to device the split of the



### Imported into the BarnOwl regulatory universe (library)

Regulatory Universe	Template Regulat	ory Requirement Register									
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egulatory Universe											
- Regulatory Root	Drag a column head	er here to group by that column.									
> - (2) Broad Based Black Economic Employment Act	Regulatory Requir	ement Title	Acronym	Туре	Year	Category	MI	S	P Ri	sk Rating	
Ompensation For Occupational Injuries and Diseases A	😑 PageTech Protecti	on of Personal Information Act	PT POPIA	Acts OF Parliam	2013		0.00 0.00	0.00	0.00	0.00	
> 🚯 Construction Industry Development Board Act	Section Title	Heading Title	Provisio	n Title	Provision Claus	e Provision Catego	Provision Ve	erbatim Text		Provision Interpretation	Provision Consequen
> - 😢 Electronic Communications And Transactions Act	+ Chapter 1	01. Definitions and Purpose	Definitio	ns	1	Core	1.In this Act,	, unless the co	ntext indi	It is important to understand the wi	Any person convicted
Second Seco	+ Chapter 2	02. Application Provisions	Applicati	on and Interpretation of	the 3	Core		t applies to the		Only legislation which is in excess of	Any person convicted
> -(1) KING IV > -(1) Municipal Finance Management Act	+ Chapter 2	03. Application Provisions - Lawful	P Lawful Pr	ocessing of personal info	orm 4	Core	4.(1) The cor	nditions for the	a lawful p	Processing of personal information	Any person convicted
>	+ Chapter 2	04. Application Provisions - Rights	of Rights o	f Data Subjects	5	Core	5.A data sub	oject has the rig	ht to hav	Data subjects' personal information i	Any person convicted
> (1) PageTech Protection of Personal Information Act	+ Chapter 3	05. Conditions for lawful processin	g Respons	ible party to ensure cond	tio 8	Core	8.The respor	nsible party mu	st ensure	It is the responsible party's obligatio	Any person convicted
> - (ii) Preferential Procurement Policy Framework Act	Chapter 3	06. Processing limitation - Lawfuln	es Lawfulne	ss of processing	9	Core	9.Personal in	nformation mus	t be proc		Any person convicted
> 🛞 Prevention And Combatting of Corrupt Activities Act	+ Chapter 3	07. Processing limitation - Minimal		Y	10	Core	10.Personal	information ma	ay only be		Where the informatio
> - 😢 Protection Of Personal Information Act	+ Chapter 3	08. Processing limitation - Consen	t, j Consent,	justification abd objection	on 11	Core	11.(1) Perso	nal information	n may onl	This section sets out the instances in	Where consent is not
> - 😥 Public Finance Management Act LN	+ Chapter 3	09. Processing limitation - Collection	n Collectio	n directly from data subj	ect 12	Core	12.(1) Perso	nal information	n must be		Personal information
> ((a) Public Financial Management Act	+ Chapter 3	10. Purpose Specification	Collectio	n for specific purpose	13	Core	13.(1) Perso	nal information	n must be	Section 18(4) provides: (4)It is not	Failure to comply with
> -{} Value Added Tax	+ Chapter 3	11. Purpose Specification - Collecti	o Retentio	n and restriction of recor	ds 14	Core	14.(1) Subje	ct to subsectio	ns (2) an		Retention of persona
> - A Water Services Act	+ Chapter 3	12. Further processing limitation -	F Further p	rocessing to be compatib	le 15	Core	15.(1) Furthe	er processing a	f persona		Failure to comply with
	+ Chapter 3	13. Information guality - Quality of	Fi Quality o	finformation	16	Core	16.(1) A resp	ponsible party	must take		Any person convicte
	+ Chapter 3	14. Openness - Documentation	Documer	ntation	17	Core	17.A respons	sible party mus	st maintai		Failure to comply with
	+) Chapter 3	15. Openness - Notification to data	s Notificat	ion to data subject when	col 18	Core	18.(1) If pers	sonal informati	ion is coll		Any person convicted
	+ Chapter 3	16. Security Safeguards - Security	m Security	measures on integrity an	d c 19	Core	19.(1) A resp	ponsible party	must sec		Any person convicted
	+ Chapter 3	17. Security Safeguards - Informat	io Informat	ion processed by operate	ro 20	Core	20.An operat	tororanyonep	rocessin		Any person convicted
	Chapter 3	18. Security Safeguards - Security	m Security	measures regarding info	m 21	Core	21.(1) A resp	ponsible party	must, in t		Any person convicted
	E Chapter 3	19. Security Safeguards - Notificati	o Notificat	ion of security compromi	ses 22	Core	22.(1) Where	e there are rea	sonable g		Any person convicte
	Question										
		e organisation the responsible part	. In the strenger							_	
>		s to 19.01, does the responsible part			that the Degulator as	d the data subject is a	duised as seen	as case as ablue	ossible of		
		s to 19.02, does the responsible par s to 19.02, does the mechanism take					dvised as soon	as resonably p	possible of		
Organisational Structure	19.03. 11 16	s to 19.02, does the mechanism take	s into account	the requirements of sub-	rections 4 and 5 or se	0001221					
Process Tree											
-											
Regulatory Universe											
Risk Category Tree											
Key Indicator Library											
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### 3. Applying acts to your organisational structure

Now you decide which acts and specific provisions apply to your organisation and which business unit/s they apply to. BarnOwl converts these acts into CRMPs (compliance risk management plans) where you are able to rate your compliance risks as well as identify controls and capture 'living' action plans with due dates and ownership. In the following example we have applied a few acts and some specific provisions to the Johannesburg>JHB Compliance unit:

Organisational Structure		quirement Register [Current] -															
nisational Structure	👌 Lock Register	😋 Refresh 🕂 Expand Re	gister 📑 Wrap Text 🔒	Print 🔄 Export R	egister 🤞	🍸 Favourite View 🔻 式 Shov	w Filter 🛛 🙆	Close 👳									
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- S ABC Corporation	Regulatory Reg			-									_				
> 🕕 Cape Town		dustry Development Board A	ct CIDB	Type Acts OF Parliam.	Year . 2000	Category Core	M 8.00	I 6.00	S 8.00	P 5.00	Risk Rating 40.00						
> -(B) Durban		oustry Development Board A ory and Intermediary Service		Acts OF Parliam.	. 2000	Core	9.00	9.00	9.00	6.00	54.00						
> (B) Projects		ealth and Safety Act	0HSA 191118	Acts OF Parliam.	1993	COTE	0.00	0.00	0.00	0.00	0.00						
Assets		ction of Personal Information		Acts OF Parliam.	2013		0.00	0.00	0.00	0.00	0.00						
							0.000					-					-
	Section Ti		Provision Title	Provi	Provi	Provision Verbatim Text			on Interpre			on Consequence	II	IL	IR	RI	RL
	Chapter 1     Chapter 2		Definitions Application and Interpreta	1	Core	1.In this Act, unless the co 3.(1) This Act applies to the				nderstand hich is in ex		son convicted of an offence i son convicted of an offence i	0.00	0.00	0.00	0.00	0.00
() JHB Compliance	Chapter 2     Chapter 2	03. Application Provisions	Application and Interpreta Lawful Processing of perso		Core	4.(1) The conditions for th				onal inform		son convicted of an offence i son convicted of an offence i	0.00	0.00	0.00	0.00	0.00
Materials Management	Chapter 2     Chapter 2	04. Application Provision	Rights of Data Subjects	5	Core	4.(1) The conditions for the 5.A data subject has the r				onalinfor		son convicted of an offence i son convicted of an offence i	0.00	0.00	0.00	0.00	0.00
Procurement	Chapter 2     Chapter 3	05. Conditions for lawful	Responsible party to ensu		Core	8.The responsible party m				eparty's of		son convicted of an offence i	0.00	0.00	0.00	0.00	0.00
> 🕕 Pretoria	Chapter 3	06.Processing limitation	Lawfulness of processing	9	Core	9.Personal information mu		Acto circi	caponaloi	cpurcy sol		son convicted of an offence i	0.00	0.00	0.00	0.00	0.00
- 🕤 BarnOwl	Chapter 3 Chapter 3	07.Processing limitation	Minimality	10	Core	10.Personal information n						he information collected is c	0.00	0.00	0.00	0.00	0.00
	Chapter 3	08.Processing limitation	Consent, justification abd		Core	11.(1) Personal information		This ser	tion sets o	ut the inst		onsent is not properly obtai	0.00	0.00	0.00	0.00	0.00
	+ Chapter 3	09. Processing limitation	Collection directly from da		Core	12.(1) Personal information						al information not collected in	0.00	0.00	0.00	0.00	0.00
	Chapter 3	10. Purpose Specification	Collection for specific pure		Core	13.(1) Personal information		Section	18(4) prov	ides: (4)]		to comply with these provisio	0.00	0.00	0.00	0.00	0.00
	Chapter 3	11. Purpose Specificatio	Retention and restriction of	of records 14	Core	14.(1) Subject to subsect						on of personal information be	0.00	0.00	0.00	0.00	0.00
	Chapter 3	12. Further processing li	Further processing to be co	ompatible 15	Core	15.(1) Further processing	of persona				Failure	o comply with these provisio	0.00	0.00	0.00	0.00	0.00
	Chapter 3	13. Information quality	Quality of information	16	Core	16.(1) A responsible part	y must take				Any per	son convicted of an offence i	0.00	0.00	0.00	0.00	0.00
	Chapter 3	14. Openness - Docume	Documentation	17	Core	17.A responsible party m	ust maintai				Failure	o comply with these provisio	0.00	0.00	0.00	0.00	0.00
	Chapter 3	15. Openness - Notificat	Notification to data subject	t when col 18	Core	18.(1) If personal informa	tion is coll				Any per	son convicted of an offence i	0.00	0.00	0.00	0.00	0.00
	Chapter 3	16. Security Safeguards	Security measures on inter	grity and c 19	Core	19.(1) A responsible party	y must sec				Any per	son convicted of an offence i	0.00	0.00	0.00	0.00	0.00
	Chapter 3	17. Security Safeguards	Information processed by	operator o 20	Core	20. An operator or anyone	processin				Any per	son convicted of an offence i	0.00	0.00	0.00	0.00	0.00
	🛞 Chapter 3	18. Security Safeguards	Security measures regarding	ng inform 21	Core	21.(1) A responsible part	y must, in t				Any per	son convicted of an offence i	0.00	0.00	0.00	0.00	0.00
	🛞 Chapter 3	19. Security Safeguards	Notification of security cor	mpromises 22	Core	22.(1) Where there are re-	asonable g				Any per	son convicted of an offence i	0.00	0.00	0.00	0.00	0.00
	Regulatory Req		Acronym	Туре	Year	Category	M	I	S	P	Risk Rating						
Organisational Structure	T	ersonal Information Act	POPIA 310818	Acts OF Parliam.	. 2013	Core	6.00	6.00	6.00	6.00	36.00						
Process Tree	Public Finance N	1anagement Act LN	PFMA	Acts OF Parliam.	2013	Core	5.00	7.00	7.00	4.00	28.00						
Regulatory Universe																	
Risk Category Tree																	
Key Indicator Library																	
Templates																	



# 4. View and rate your Compliance Risk Management Plans (CRMPs)

Double click on the relevant risk (non-compliance to the provision) to view (Regulatory Detail tab) and rate the risk in terms of inherent (pre controls) and residual rating (after controls):

Ele gidt greate/Link View Beports My Favourite Reports My Favourite Reports My Favourite Reports My Favourite Report My Favourite Report Programe Cognisational Structure     Crganisational Structure     Crganis
Organisational Stucture          Lock Register         Wap Text
Cognisional Structure     Cognisional S
Post         Drag a column header here to group by that column.                • • • • • • • • • • • • •
• @ ABC Corporation         • @ Johannesburg         • @ Jakensb         • @ Jakensb         • @ Johannesburg         • @ Johannesb
> @ Code Iown       @ Construction Industry Develop       Risk Form       -       >         > @ Duban       @ Construction Industry Develop       Risk Form       -       >         > @ Duban       @ Construction Industry Develop       Risk Form       -       >         > @ Duban       @ Construction Industry Develop       Risk Form       -       >         > @ Duban       @ Construction Industry Develop       Risk Form       -       >         > @ Duban       @ Construction Industry Develop       Risk Form       -       >         > @ Duban       @ Construction Industry Develop       Risk Noncompliance Definitions       Risk Unit: JHB Compliance (ABC Corporation/UshannesburgUHB Compliance)       Reassessment *         • @ Inventory       © Ection T.       Heading Tit       Non Wre       RegulatoryDetail       Rating Control Adequacy Owners More       0.00 </td
Note:         Opharmedung         Financial Advisory and Interma         Assets         Save & Save & Close & Delete & History Model + Create / Link + View Linked * ? Help ;           A Assets         PageTech Protection of Person & Assets         PageTech Protection of Person & Edition T.         Risk: Noncompliance-Definitions         Risk: Noncompliance-Definitions         II.         IR.         RI.         RL         RR           If investory         Section T.         Heading Till         Regulatory Details         Regulatory Details         Regulatory Details         II.         II.         IR.         RI.         RL         RR           If Compliance         Chapter 2.         02.Application         Regulatory Details         Regulatory Details         Regulatory Details         0.00         <
Operational Health and Safet         Save & Close         Delete         L History Model < Create / Link < View Linked < ?
Of Fnance         Section T.         Heading Titlet         Resultatory Details         Resultatory Details         Resultatory Details         II.         IR         RI.         RR         R.         R.<
Definition         Section TL         Heading Title         L         R R1         R L         R R1         R L         R R1         R L         R R1         R R1 </td
Internet         Chapter 1         01. Definition         Man         More         Regulatory Octail         Regulatory Octail         Regulatory Octail         0.00
Inst Compliance         Inst Compl
Chapter 2: 03.Application Heading     Chapter 2: 03.Application     Chapter 2: 04.Application     Chapter 2: 04.Applicat
- (a) Materiais Management  (a) Chapter 2 04, Applicatio Purpose Purpose 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.
Chapter 3 05. Condition
Rating: Root High Impact 0 100 0.00 0.00 0.00 0.00 0.00 0.00 0.
Chapter 3 0.7/Processin     Chapter 3 0.8/Processin
(a) Chapter 3 (B,Processin Provision Definitions ∧
Chapter 3 11. Purpose 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.
Chapter 3 13. Informati     Rating: 4.00 - Likely - Hisk certain to occur V 4.00 V 2.00 - Unively - Risk unively to occu V 2.00 0.00 0.00 0.00 0.00 0.00 0.00
Chapter 3 14. Opennes:     Category
Chapter 3 15. Openness     Core     Core
Clause 1
Chapter 3 I.7 Security 5     Control 1.1     Control 2.1     Control 3.1     Control 3.1
the context indicates Control Factor
otherwise—"biometrics" means Value:
Considerational Structure Identification that is based on Rationale:
Protection of Protection of Protection of Protection of Protection of Protection and Physical physiological or     Physical Physical Phase
Process Tree induding blood typing,
Finegulatory Universe         fingerprinting, DNA analysis, retrinti scaming and voice         v
recognition; redid means a patient by any field means a Rating: 16.00 8.00
Risk Category Tree         of IB years who is not leady y         Desired Rating         0.00 ♀           Competent, who the         Competent, who the         0.00 ♀
test Indextor Ubrary     assistance of a competent     fisk Exposure: n.nn     0.00
decision in respect of any
V Decision:
2 C Form Status
Com Sauss     Com Sauss



# 5. Creating and sending out compliance checklists

### Create a checklist / survey

### Create a checklist automatically from the imported act with the questions per provision:

	vey Capture tup categories, subcategories and questions	$\bigcirc$
Template Informatio	n	
emplate Title	April 2021 - PageTech Protection of Personal Information Act v4	
emplate Reference		
igin Reference	PageTech Protection of Personal Information Act	
	Allow Comments	
	Show Supporting Evidence	
	Standard Mode O Weighted Mode	
structions		<u></u>
🗸 📢 Chapter 3	A Rev - Sealate - House	
<ul> <li>(5) 05. Cond</li> <li>(5) 06. Proc</li> <li>(5) 07. Proc</li> <li>(6) 08. Proc</li> <li>(9) 08. Proc</li> </ul>	A Category Title Chapter 3 Chapter 3 Category C	
> •• • • 05. Cont > •• • 06. Proc > •• • 07. Proc • •• • 08. Proc • •• • 08. 08. 08.0 •• • • 08.0 •• • 08.0 •• • 08.0	ditions for lawful processing of persona tessing limitation - Lawfulness of proces tessing limitation - Minimality tessing limitation - Consent, justificatior 01. Has consent been obtained by the 12. Is processing necessary to carry ou 13. Does processing comply with an obl	
<ul> <li>(5) 05. Cont</li> <li>(5) 06. Proc</li> <li>(5) 07. Proc</li> <li>(6) 08. Proc</li> <li>(6) 08. Proc</li> <li>(7) 08. 0</li> <li>(9) 08. 0</li> <li>(9) 08. 0</li> <li>(9) 08. 0</li> </ul>	ditions for lawful processing of persona tessing limitation - Lawfulness of proces tessing limitation - Minimality tessing limitation - Consent, justification 01. Has consent been obtained by the 12. Is processing necessary to carry ou	Weig A
<ul> <li>•••• 05. Cond</li> <li>••• 06. Proc</li> <li>••• 07. Proc</li> <li>••• 08. Proc</li> <li>••• 08. Proc</li> <li>••• 008. Pro</li></ul>	ditions for lawful processing of persona tessing limitation - Lawfulness of processing tessing limitation - Minimality tessing limitation - Consent, justification 01. Has consent been obtained by the 10. Las processing necessary to carry ou 10. Does processing comply with an oble 10. Lose processing protect a legitimat 10. Is processing necessary for the prop- 10. Is processing necessary for pursuin	Weig ▲
<ul> <li>→ ● 05. Cone</li> <li>→ ● 06. Proc</li> <li>→ ● 07. Proc</li> <li>→ ● 08.0</li> <li>→ ● 08.0</li></ul>	ditions for lawful processing of persona cessing limitation - Lawfulness of process cessing limitation - Minimality cessing limitation - Consent, justification D1. Has consent been obtained by the D2. Is processing necessary to carry ou D3. Does processing protect a legitimat D4. Does processing necessary for the prop D6. Is processing necessary for pursuin D7. Is the organisation the responsible cessing limitation - Collection directly frc	-1 🔀 0
<ul> <li>Solution</li> <li>Solution&lt;</li></ul>	ditions for lawful processing of persona tessing limitation - Lawfulness of process tessing limitation - Minimality tessing limitation - Consent, justification 10. Has consent been obtained by the 10. Has consent been obtained by the 10. Has consent been obtained by the 10. Answers Answers Answer Answer N/A No Yes Yes	-1
<ul> <li>S 06. Proc</li> <li>O7. Proc</li> <li>O8. Proc</li> <li>O8. Proc</li> <li>O8. 08. 08. 00.</li> <li>O8.0</li> <li>O8.0</li> <li>O8.0</li> <li>O8.0</li> <li>O8.0</li> <li>O8.0</li> <li>O8.0</li> <li>O8.0</li> <li>O8.0</li> <li>O9. Proc</li> <li>O9. Proc</li> <li>O9. Proc</li> <li>O9. Purp</li> <li>S 11. Purp</li> </ul>	ditions for lawful processing of persona cessing limitation - Lawfulness of process cessing limitation - Minimality cessing limitation - Consent, justification D1. Has consent been obtained by the oppination D2. Is processing necessary to carry ou D3. Does processing protect a legitimation D4. Does processing protect a legitimation D5. Is processing necessary for pursuin D7. Is the organisation the responsible tessing limitation - Collection directly from D5. Specification	-1 <b>X</b> 0 <b>X</b>



### Send out the checklist / survey to the relevant recipients (owners)

The system sends out an email with a web link to each recipient to complete his / her checklist/s online and capture action plans where there is non-compliance:

Home / Survey Form	
📀 🖪 Survey Form: July 2021 - Protection of Pers	sonal Information Act PageTech v6
Actions Export	
Submit Show Answer Options As  Survey Details	ha
Chapter 01	002. Application Provisions
Chapter 02	• 0.2.01. Is the organisation aware of all legislation which applies to the transaction at hand?
Chapter 03	● N/A ○ No ○ Yes ■(0) ⊂(0)
Chapter 04	0 02.02.1 If Yes to 02.01, does any such legislation place more extensive requirements on the processing of personal information? If yes, then more extensive provisions apply and must be
Chapter 05	complied with.
Chapter 06	
Chapter 07	• 02.02.2 If No to 02.01, note that to the extent that there is a piece of legislation applicable to the transaction at hand which places more extensive requirements on the processing of personal information, then more extensive provisions would apply and therefore the organisation needs to implement a mechanism to identify the same.
Chapter 08	● N/A ○ No ○ Yes ■(0) ⊂(0) ┣(0) -
Chapter 09	
Chapter 10	003. Application Provisions - Lawful Processing of personal information
Chapter 11	O3.01. Is the organisation acting as operator in the circumstances? i.e. processing personal information
Chapter 12	N/A         No         ●         Yes           Ξ(0) $O(0)$ $P(0)$ -
	● 03.02. If Yes to 03.01, is the organisation aware of what personal information it is and is not allowed to process? ○ N/A ● No ○ Yes
	- (0 <b>)</b> (0) -
Survey is not ready for submission   Changes will be sa	ved automatically   % Compliance: 50.00%

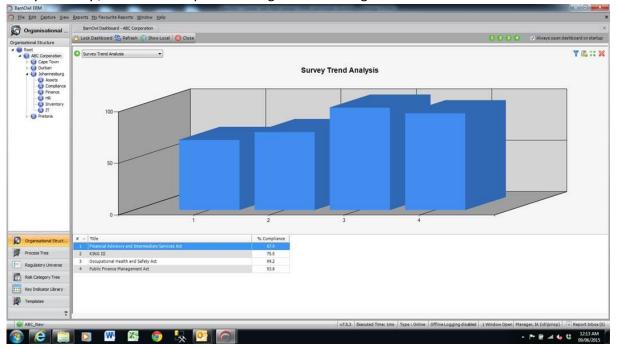
#### The user can click on 'Compliance' to see the verbatim text per question:

Home / Survey Form		Q 🛎 Manager, IA 👻
📀 🖪 Survey Form: July 2021 - Protection of Pers	sonal Information Act PageTech v6	Question Information
Actions Export Submit Show Answer Options As • Survey Details	S	Category Info Subcategory Info Question Info Compliance
Chapter 01	002. Application Provisions	Compliance Detail
Chapter 02	0 02.01. Is the organisation aware of all legislation which applies to the transaction at hand?	Verbatum 3. (1) This Act applies to the processing of personal information—
Chapter 03	● N/A ○ No ○ Yes ■(0) ⊂(0) ┣(0) -	<ul> <li>(a) entered in a record by or for a responsible party by making use of automated pr non-automated means: Provided that when the recorded personal information</li> </ul>
Chapter 04	O 02.02.1 If Yes to 02.01, does any such legislation place more extensive requirements on the processing of personal information? If ye	is processed by non-automated means, it forms part of a filing system or is intended to form part thereof; and
Chapter 05	complied with.      • N/A	
Chapter 06		
Chapter 07	0 02.02.2 If No to 02.01, note that to the extent that there is a piece of legislation applicable to the transaction at hand which places me information, then more extensive provisions would apply and therefore the organisation needs to implement a mechanism to identify the information.	
Chapter 08	● N/A ○ No ○ Yes ■(0) ○(0)	
Chapter 09		
Chapter 10	003. Application Provisions - Lawful Processing of personal information	
Chapter 11	O 03.01. Is the organisation acting as operator in the circumstances? i.e. processing personal information	
Chapter 12	N/A No € Yes ■(0) □(0) ↑ (0) +	
	03.02. If Yes to 03.01, is the organisation aware of what personal information it is and is not allowed to process?     N/A      No Yes	
Survey is not ready for submission 1 Changes will be sa		

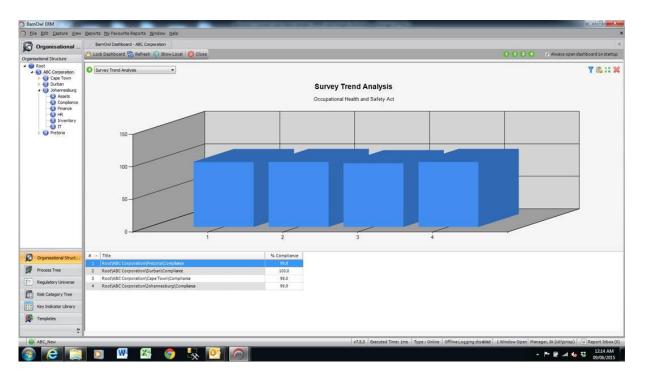


#### Analyse compliance checklist ratings

#### Analyse survey / checklists compliance ratings across the organisation:



With drill down into an act (e.g. OHASA):



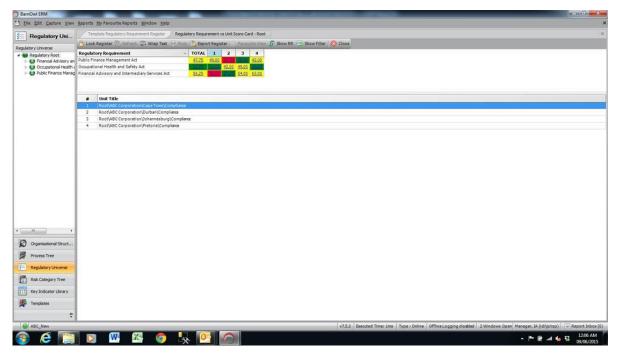


### 6. Reporting

'Rainbow' rating of all acts across your organisation:

BarnOwl ERM	Conservation and Conservation	- 0 <b>X</b>
Ele Edit Capture View	Beports My Favourite Reports Window Help	
Organisational	Regulatory Requirement Register (Current) - Compliance Regulatory Rating Rarbow - Compliance	×
Organisational Structure	🐣 Lock Register 🖏 Refresh 💭 Wrap Toot 🕂 Print 🖓 Scoort Register 🖉 (Ferourite View 🖽 Scoor Filter ) 🚫 Close	
	Image: Drop a column header here to group by that column:       Tate         Risk Rating   Point	ι,
Crypressional Struct Crypressional Struct Process Tree Regulatory Universe Rek Category Tree Kry Industor Library Templates Cryptocology Templates Crypto	Planced Advance and Setery At         95.0         1           Occupational Head of Setery At         49.8         2           Public Finance Management At         93.8         3	ndenn fenn
ABC_New	v7.5.3 Executed Time: 269ms Type : Online Offline Logging disabled 2 Wir	ndows Open Manager, IA (idiljcrisp) Report Inbox (@

Score card of the act ratings as well as the aggregated compliance risk ratings across your organisation:





### Survey analysis

	А	В	С	D	E	F	G	н	1	J	К	L	М	N	0	P
1		BarnOv	wl Evolution													
2		Survey Tre	nd Analysis Report													
3																
4 <b>O</b> I	rigin Reference	KING III														
5 <b>S</b> C	core Origin	Voted Users														
5																
7																
8	Parent Unit	Unit	Survey Title	Start Date	End Date	%	1. Ethical Leadership and Corporate Citizenship	2. Boards and Directors	3. Risk and Audit Committee	3.Risk and Audit Committee	4. The Governance of Risk	The governance o formation Techno	<ol> <li>Compliance with laws, rules, codes and standards</li> </ol>	7. Internal Audit	8. Governing stakeholder relationship	9. Integrated Reporting and Disclosure
9 AB	3C Corporation	Bloemfontein (100.0%)	KING III 2014	17/01/2014	31/12/2014	78.477	66.67	71.43	100	100	80	75	50	100	75	66.67
O AB	BC Corporation	Cape Town (100.0%)	KING III 2014	17/01/2014	31/12/2014	81	100	75	75	0	100	80	100	100	80	100
1 AB	BC Corporation	Durban (100.0%)	KING III 2014	17/01/2014	31/12/2014	67	33.33	70	66.67	0	100	83.33	75	75	66.67	100
2 AB	3C Corporation	Johannesburg (100.0%)	KING III 2014	17/01/2014	25/09/2015	72.166	33.33	83.33	80	100	50	100	75	100	66.67	33.33
3 AB	3C Corporation	Johannesburg (100.0%)	King III 2016	05/03/2019	12/03/2019	68.63	66.67	62.96	100	40	50	100	0	100	100	66.67
4 AB	3C Corporation	Johannesburg (100.0%)	KING III 2016 Q3	09/02/2016	09/09/2016	67.644	66.67	64.29	66.67	0	80	57.14	75	100	100	66.67

А	В	С	D	E	F	G	н	1	J	К	L	м	N	0	
	Barn	Owl Evolution	on												
	Survey T	rend Analysis R	eport												
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						1. Ethical Leadership and Corporate Citizenship	2. Boards and	3. Risk and Audit Committee	3.Risk and Audit Committee	4. The Governance of Risk	5. The governance of Information Technology	6. Compliance with laws, rules, codes and standards	7. Internal Audit	8. Governing stakeholder relationship	Int Re Dis
Parent Unit	Unit	Survey Title	Start Date	End Date	%	1. Ethkal Leadership and Corporate Citizenship	2. Boards and Directors	3. Risk and Audit Committee	3. Risk and Audit Committee	4. The Governance of Rick	5. The Governance of Information Technology	6. Compliance with laws, rules, codes and standards	7. Internal Audit	8. Governing stakeholder relationship	
ABC Corporation	(100.0%)			31/12/2014		66.67	71.43		100.00		75.00	50.00	100.00	75.00	
ABC Corporation	(100.0%)			31/12/2014	81	100.00	75.00				80.00	100.00		80.00	
ABC Corporation	(100.0%)			31/12/2014	67	33.33	70.00		0.00		83.33	75.00		66.67	
ABC Corporation	(100.0%)			25/09/2015		33.33	83.33		100.00		100.00	75.00	100.00	66.67	
ABC Corporation	(100.0%)			12/03/2019		66.67						0.00 75.00		100.00	
ABC Corporation	(100.0%)	KING III 2016 Q3	09/02/2016	09/09/2016	67.64	66.67	64.29	66.67	0.00	80.00	57.14	/5.00	100.00	100.00	4

	А	В	С	D	E	F	G	н	1	J	К	L	М	N	0	P	Q	R	S	Т	U	V	w	Х	Y	Z	AA
1		Bar	nOwl Evolu	ition																							
2		Survey	/ Trend Analysis	s Report																							
3																											
	Reference	KING III																									
5	Score Origin	Voted Users																									
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7							and	cal Lea I Corpo itizensh	ate													2. Board	is and C	irector	s		
8	Parent Unit	Unit	Survey Title	Start Date	End Date	%	01. The board shi provide effective leadership based	02. The board ensure that th is and is seen t	03. The board should ensure that the company's ethics are	. The board the focal po todian of co	10. The board should ensure that there is an effective risk-based	11. The board appreciate tha stakeholders'	1.2. The board s ensure the inte, the company's	13.The report effect	the H	15. The conside proceed	e boar I chairr Who is	board sho the chief	boar e a b	19. Directors should be appointed through a formal nurcess	board sho ite that st formance	20. The induction of an ongoing training and development of	<b>z a</b>	22. The evaluation of the board, its committees and individual directors	board certa s to w	24. A governance framework including strategic objectives of	25. Companies should remunerate directors and everutions fairly and
9	Corporation	(100.0%)	KING III 2014	17/01/2014	31/12/2014	76.32	0	100	100	0	0	100	100	100	100	100											
10	Corporation	(100.0%)	KING III 2014		31/12/2014		100	100	100	100	100		0														
11	Corporation	(100.0%)	KING III 2014		31/12/2014				100	100	100		100	0	0	100										100	C
12	Corporation	(100.0%)	KING III 2014	17/01/2014	25/09/2015	70.59	0	100	0	100	100		100	100	0												
13	Corporation		King III 2016		12/03/2019		100	100	0	100	100		100	100	0	100	100	(	100	0	0	100	100	100	0	100	100
14	Corporation	(100.0%)	KING III 2016 Q3	09/02/2016	09/09/2016	72.13	100	100	0	100	100	100	0	0													

### 'Flat' CRMP export into Excel

A	В	с	D	E	F			G	н		1	J	к	
arnOwl Ev	olution													
ompliance	Dashboard	Report												
		Compliance	o su dan	Marine Prove	Barred Harr									
Jnit	-	Requirement Regulatory	Section	Heading	Provision				1		Risk		Cont	trol
arent Unit Title	Unit Title	Requirement Title	Title	Title	Verbatim		Analysis		Consequence		.	IL IF	Cont	trol Title
				Qualifications of representatives and duties of authorised financial services provider	13: Cubin reactions of represental authorised financial services print (a) carry on business by rendering (a) carry on business by rendering (ii) is not authorised as a financial is (b) so to authorised as a financial is (b) acts a representative of ar services provide; unless such print) (b) able to provide continuent to clients— (a) that a service contract or ot the provide; unless such print) (b) bhat the provider accepts; (a) that a service contract or ot the provide; unless such print) (b) that a service contract or ot the provide; unless such print) (b) that the provider accepts; (a) that a service contract or of, or in the course of implement mandate; (lient (b) substituted by s. 52 (a) (iii) if debarred as contemplates with the requirements determin consultation with the Advisory C Seatette, for the respondent of the classette, for the respondent of the classet (b). Publication of codes of complexity of the respondent of the classette, for the respondent of the respondent of the classette, for the respondent of the respondent of the classette, for the respondent of the respondent of the respondent of the classette, for the respondent of the respondent of the respondent of the classette, for the respondent of the respondent of the respondent of the classette, for the respondent of the respondent o	oviders.—1) A persor or g financial services rson who- lial services provided plication of this Act (a): 30 September, ; (a): 30 September, ; (a): 30 September, ; (a): 30 September, ; (a): 30 September, ; (b): 40 September, ; (b): 40 September, ; (b): 40 September, ; (c):	1. J HEQUIRM     Na authorised     An authorised     alsa til time     time     alsa til     alsa til	IFSP must: be satisfied entatives, duals of ntatives, are act, and e following: est and have est and have duility of the uility of the uilit of the s; the rements y the to fa ion as a e; and able steps to			4.00	5.00		iew quali
					must, after consultation with the	e Advisory Committee	e and							
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Compliance	e Dashboard	Report						BARNOWL						
		Compliance												
Jnit		Requirement	Section	Heading	Control	Risk Acti	ion Plan							
arent Unit Title	e Unit Title	Regulatory Requirement Title	Title	Title	Control Title	RI RL RR Acti	ion Plan Title	Status	Due Date	Action Plan Ow	ners			

Chapter III - Representatives of Qualifications of representatives and Authorized Financial Services duties of authorised financial services providers Or provider Chapter C Review qualifications of all representatives of authorised FSP

alf Way

4.00 4.00

Manager, Risk (Informed); 31 July 2015 Manager, IA (Responsible)

Confidential

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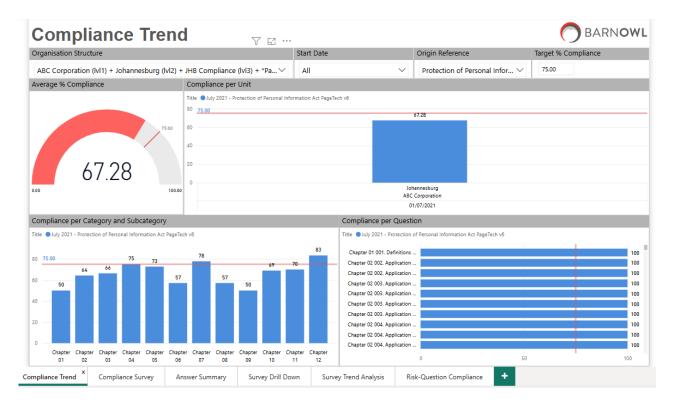
### Action plan monitoring and status reporting:

BARNOWL		BarnOwl Ev tion Plan per				
Filters : Empty Unit Filter Filter out units	with no action plans.					
UnitTitle Compliance		Parent Unit Tit	le Johannesburg	0.		
Action Plan Title	Start Date	End Date	Orig End Date	% Complete	Action Plan Status	
Request investment reports from variou fund managers Reference	s 27 May 2015	30 Jun 2015	30 Jun 2015	50.00 %	Half Way	
	fanager, Risk (Informe fanager, IA	ed): Manager, IA (Res	ponsible)			
	fonitor investment resi	ults				
Action Plan Title Check FSB licenses annually	Start Date 06 Apr 2015	End Date 31 May 2015	Orig End Date 31 May 2015	% Complete 50.00 %	Action Plan Status Half Way	
Reference Description						
Originator	fanager, IA (Responsit fanager, IA	ble)				
Linked Control Title	heck FSB license					
Action Plan Title Test water	Start Date 08 Jan 2014	End Date 31 Jan 2014	Orig End Date 31 Jan 2014	% Complete 25.00 %	Action Plan Status Started	
Reference Description	fanager, IA (Responsit	Mat				
Originator	fanager, IA fanager, IA Vater filters	Ling .				
Action Plan Title	StartDate	End Date	Orig End Date	% Complete	Action Plan Status	
Function and power as specified in poli and procedures not adhered to as per delegated authority rules	ties 17 Feb 2014	26 Mar 2014	26 Mar 2014	0.00 %	Not Started	



# 7. Business Intelligence dashboards

The BarnOwl Power BI compliance reporting provides advanced graphical dashboard reporting:



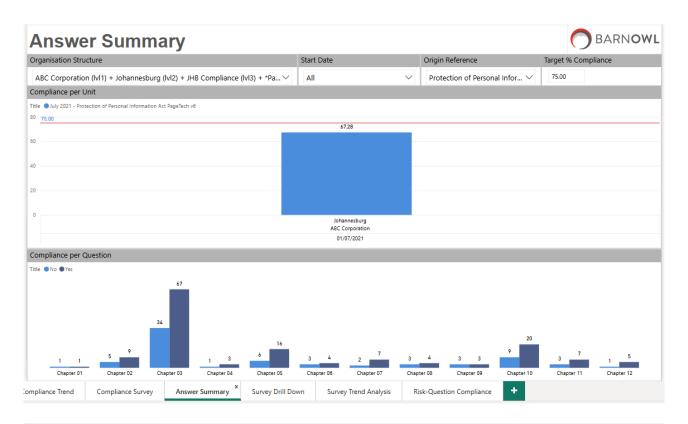
# **Compliance Survey**

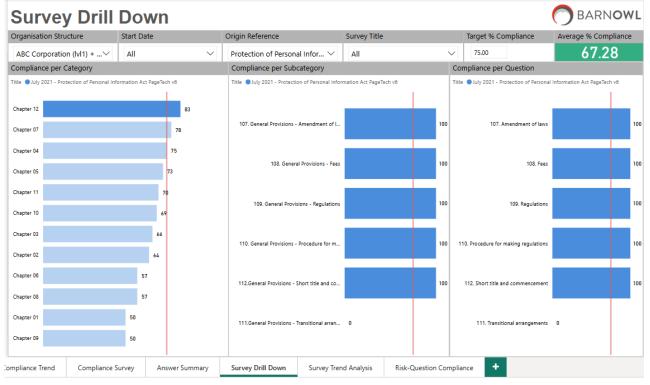
BARNOWL Start Date Origin Reference Target % Com ABC Corporation (IvI1) + Johannesburg (IvI2) + JHB Compliance (IvI3) + \*Pa... >>  $\sim$ Protection of Personal Infor...  $\lor$ 75.00 All Compliance per Unit Compliance per Question Title July 2021 - Protection of Personal Information Act PageTech v6 Chapter 12 75.00 Chapter 07 67.28 Chapter 04 75 Chapter 05 Chapter 11 Chapter 10 Chapter 03 Chapter 02 Chapter 06 57 Chapter 08 57 Chapter 01 Chapter 09 50 ABC Corporation Johannesburg Compliance Survey x Survey Drill Down Risk-Question Compliance ompliance Trend Answer Summary Survey Trend Analysis

BarnOwl Software Solutions (Pty) Ltd

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# **Survey Trend Analysis**

Organisation Structure		Start Da	ate		Ori	gin Referei	nce				Sur	vey Title			
ABC Corporation (IvI1) + Johannesburg	(lvl2) + J.,. 🗸	All			V P	rotection o	f Persona	l Informat	ion Act Pa	igeTec 🗸	A				
	(112) - 511	~													
end Analysis tte	Chapter 01	Chapter 02	Chapter 03 (	Chapter 04	Chapter 05	Chantor 06	Chapter 07	Chapter 02	Charater 00	Chapter 10 C	hanter 11	Chapter 12	Total		
uly 2021 - Protection of Personal Information Act	50.00	64.29	66.34	75.00	72.73	57.14	77.78	57.14	50.00	68.97	70.00		3 67.28		
PageTech v6	50.00	64.23	00.54	75.00	12.15	57.14	11.10	57.14	50.00	66.57	70.00	/ 05.55	61.20		
ABC Corporation	50.00	64.29	66.34	75.00	72.73	57.14	77.78	57.14	50.00	68.97	70.00		3 67.28		
Johannesburg JHB Compliance	50.00	64.29 64.29	66.34 66.34	75.00 75.00	72.73	57.14 57.14	77.78 77.78	57.14 57.14	50.00 50.00	68.97 68.97	70.00		3 67.28 3 67.28		
fotal	50.00	64.29	66.34	75.00	72.73	57.14	77.78	57.14	50.00	68.97	70.00	83.33	3 67.28		
pliance Trend Compliance Survey	Answer Sum	imary	Survey Dri	ill Down	Surv	vey Trend A	x nalysis	Risk-C	Juestion Co	ompliance	+				
Risk-Question		lian	се	ill Down	Surv			Risk-C	Question Co				$\bigcirc$	BAR	NOW
Risk-Question	Comp	lian	CC Start Date	ill Down		Origin R	eference			Su	irvey Tit		$\bigcirc$	<b>,</b>	
Risk-Question	Comp	lian	се	ill Down	Surv	Origin R	eference	Risk-C		Su	irvey Tit	tle 21 - Protec	ction of Pe	<b>,</b>	
Risk-Question Organisation Structure ABC Corporation (Iv11) + Johannesburg	Comp	lian	CC Start Date	ill Down		Origin R	eference			Su	irvey Tit		tion of Pe	<b>,</b>	
Risk-Question Organisation Structure ABC Corporation (Ivl1) + Johannesburg lisk Register	Comp	lian	CC Start Date			Origin R Protec	eference tion of Per			Su	irvey Tit		tion of Pe	ersonal Info	ormati~
Risk-Question Organisation Structure ABC Corporation (IvI1) + Johannesburg Lisk Register UnisPath	Comp (IvI2) + JHB Cor RiskTitle Noncompliance - 01	<b>lian</b> n ~	CC Start Date		~	Origin R Protec	eference tion of Per RiskSt	rsonal Info	ormation A	Su	irvey Tit July 202	1 - Protec	RI RL	ersonal Info	ormati~ 6 Compliance
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