



POPI Act Compliance Manual

PREAMBLE

Columba Leadership is compliant with The Protection of Personal Information Act, 2013, and subscribes and adheres to best practice provisions to ensure the protection of all personal information that we process.

This manual contains all prescribed documents, as well as explanations of key provisions, and sample clauses to be utilised for consent and notification purposes.

Block 1, Oxford Manor, 196 Oxford Rd, Illovo, JHB, 2196

ORGANISATION DETAILS

The details of the Organisation are as follows:

Physical address:

Block 1, Oxford Manor
196 Oxford Road
Illovo, JHB
2196

Postal address:

P.O Box 528
Bramley
2018

Telephone number:

011 440 5790

E-mail address:

info@columba.org.za

CONTACT DETAILS OF THE INFORMATION OFFICER

The Information Officer's contact details are as follows:



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Tracy Hackland (CEO)

Physical address

Block 1, Oxford Manor
196 Oxford Road
Illovo, JHB
2196

Postal address:

P.O Box 528
Bramley
2018

Telephone number:

011 440 5790

E-mail address:

tracy@columba.org.za



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PROTECTION OF PERSONAL INFORMATION THAT IS PROCESSED BY THE ORGANISATION

Chapter 3 of POPIA provides for the minimum Conditions for Lawful Processing of Personal Information by a Responsible Party. These conditions may not be derogated from unless specific exclusions apply as outlined in POPIA.

The Organisation needs Personal Information relating to both individual and juristic persons in order to carry out its business and organisational functions. The manner in which this information is Processed and the purpose for which it is Processed is determined by the Organisation. The Organisation is accordingly a Responsible Party for the purposes of POPIA and will ensure that the Personal Information of a Data Subject:

- is processed lawfully, fairly and transparently. This includes the provision of appropriate information to Data Subjects when their data is collected by the Organisation, in the form of privacy or data collection notices. COLUMBA must also have a legal basis (for example, consent) to process Personal Information;
- is processed only for the purposes for which it was collected;
(will not be processed for a secondary purpose unless that processing is compatible with the original purpose.
- is adequate, relevant and not excessive for the purposes for which it was collected;
- is accurate and kept up to date;
- will not be kept for longer than necessary;
- is processed in accordance with integrity and confidentiality principles; this includes physical and organisational measures to ensure that Personal Information, in both physical and electronic form, are subject to an appropriate level of security when stored, used and communicated by the Organisation , in order to protect against access and acquisition by unauthorised persons and accidental loss, destruction or damage;
- is processed in accordance with the rights of Data Subjects, where applicable. Data Subjects have the right to:
 - be notified that their Personal Information is being collected by the Organisation . The Data Subject also has the right to be notified in the event of a data breach;



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- know whether the Organisation holds Personal Information about them, and to access that information. Any request for information must be handled in accordance with the provisions of this Manual;
- request the correction or deletion of inaccurate, irrelevant, excessive, out of date, incomplete, misleading or unlawfully obtained personal information;
- object to the Organisation 's use of their Personal Information and request the deletion of such Personal Information (deletion would be subject to the Organisation 's record keeping requirements);
- object to the processing of Personal Information for purposes of direct marketing by means of unsolicited electronic communications; and
- complain to the Information Regulator regarding an alleged infringement of any of the rights protected under POPIA and to institute civil proceedings regarding the alleged non-compliance with the protection of his, her or its personal information.



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Columba Leadership – INFORMATION IMPACT ASSESSMENT for POPI ACT COMPLIANCE PURPOSES

Key:

DS - Data Subject

PI - Personal Information

RP – Responsible Party

"Basic Personal Information" – name, address, ID number contact details, age, gender

| DATA SUBJECT | INFORMATION PROCESSED | TYPES OF PROCESSING | RESPONSIBLE PERSONS | RISKS | MEASURES |
|--------------------------------|--|---|---|---|--|
| INDIVIDUAL | | | | | |
| Learners – general | <ul style="list-style-type: none"> •Basic Personal details •Academic information •Attendance information •Socio-economic background •Family situation | Collection Receipt Recording Organisation Collation, storage, updating, retrieval, use Dissemination | <ul style="list-style-type: none"> • Designated Columba Leadership Employees | <ul style="list-style-type: none"> • Unauthorised processing of personal information • Invasion of privacy • Identity theft / fraud • Reputational damage | <ul style="list-style-type: none"> • Obtain signed consent from competent persons • Staff training • Information system safeguards • Physical documentation storage safeguards • Policies |
| Learners – Residential Academy | <ul style="list-style-type: none"> •Basic Personal details •Academic information •Attendance information •Medical Information •Socio-economic background •Family situation | Collection Receipt Recording Organisation Collation, storage, updating, retrieval, use Dissemination | <ul style="list-style-type: none"> • Designated Columba Leadership Employees | <ul style="list-style-type: none"> • Unauthorised processing of personal information • Invasion of privacy • Identity theft / fraud • Reputational damage | <ul style="list-style-type: none"> • Obtain signed consent from competent persons • Staff training • Information system safeguards • Physical documentation storage safeguards • Policies |
| Educators | <ul style="list-style-type: none"> •Basic Personal details •Qualifications and experience •Attendance information | Collection Receipt Recording Organisation Collation, storage, updating, retrieval, use Dissemination | <ul style="list-style-type: none"> • Designated Columba Leadership Employees | <ul style="list-style-type: none"> • Unauthorised processing of personal information • Invasion of privacy • Identity theft / fraud • Reputational damage | <ul style="list-style-type: none"> • Obtain consent • Request forms • Staff training • Information system safeguards • Physical documentation storage safeguards • Policies |
| Principals and Vice Principals | <ul style="list-style-type: none"> •Basic Personal details | Collection Receipt Recording | <ul style="list-style-type: none"> • Designated Columba | <ul style="list-style-type: none"> • Unauthorised processing of | <ul style="list-style-type: none"> • Obtain signed consent • Staff training |



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| | | | | | |
|---|---|---|--|---|---|
| | <ul style="list-style-type: none"> •Qualifications and experience •Attendance information | <p>Organisation Collation, storage, updating, retrieval, use Dissemination</p> | <p>Leadership Employees</p> | <p>personal information</p> <ul style="list-style-type: none"> • Invasion of privacy • Identity theft / fraud • Reputational damage | <ul style="list-style-type: none"> • Information system safeguards • Physical documentation storage safeguards • Policies |
| SGB Members | <ul style="list-style-type: none"> •Basic Personal details •Attendance information | <p>Collection Receipt Recording Organisation Collation, storage, updating, retrieval, use</p> | <ul style="list-style-type: none"> • Designated Columba Leadership Employees | <ul style="list-style-type: none"> • Unauthorised processing of personal information • Invasion of privacy • Identity theft / fraud • Reputational damage | <ul style="list-style-type: none"> • |
| Trustees | <ul style="list-style-type: none"> • Basic Personal details • Attendance information • Profile and CVs | | <ul style="list-style-type: none"> • | <ul style="list-style-type: none"> • | <ul style="list-style-type: none"> • |
| Personnel, freelance personnel and recruitment candidates | <ul style="list-style-type: none"> •Personal details •Banking Details •Employment history (CV) •Qualifications and skills •Information pertaining to work and personal attributes | <p>Collection Receipt Recording Organisation Collation, storage, updating, retrieval, use</p> | <ul style="list-style-type: none"> • Designated HR officers • Designated Finance officers • Other personnel involved in recruitment processes | <ul style="list-style-type: none"> • Unauthorised processing of personal information • Invasion of privacy • Identity theft / fraud • Fraud / financial loss | <ul style="list-style-type: none"> • Information system safeguards • Staff Training • Delegated Authorisation • Policies |
| INSTITUTIONAL | | | | | |
| Partner Schools | <ul style="list-style-type: none"> • Organisational details (contact details, registration details) • Information pertaining to contact persons • Operational details • Historical details • Banking details | <p>Collection, receipt, recording, organisation, updating, use</p> | <ul style="list-style-type: none"> • Designated Columba Leadership Employees • Other designated agents of Columba Leadership?? | <ul style="list-style-type: none"> • Unauthorised processing of personal information • Invasion of privacy • Identity fraud • Financial loss • Reputational loss | <ul style="list-style-type: none"> • Information system safeguards • Staff Training • Delegated Authorisation • POPI compliance clauses in all agreements |
| Suppliers | <ul style="list-style-type: none"> • Organisational details • Financial details | <p>Collection, receipt, recording,</p> | <ul style="list-style-type: none"> • Designated Finance officers | <ul style="list-style-type: none"> • Invasion of privacy • Identity theft / fraud | <ul style="list-style-type: none"> • Information system safeguards • Staff Training |



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| | | | | | |
|---------|--|---|---|---|---|
| | | organisation, updating, use | Designated administration functionaries | | <ul style="list-style-type: none"> • Delegated Authorisation • POPI compliance clauses in all agreements |
| Funders | <ul style="list-style-type: none"> • Organisational details • Policies, RFQs, mandates, funding details, operation details | Collection, receipt, recording, organisation, updating, use | <ul style="list-style-type: none"> • Designated Finance officers • Designated administration functionaries • Other designated Columba Leadership personnel or agents | <ul style="list-style-type: none"> • Unauthorised processing of personal information • Invasion of privacy • Identity fraud • Financial loss • Reputational loss | <ul style="list-style-type: none"> • Information system safeguards • Staff Training • Delegated Authorisation • POPI compliance clauses in all agreements |



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Columba Leadership - POPI Act Compliance Notices

GENERIC NOTICES AND CLAUSES TO BE USED BY Columba Leadership FOR POPI Act COMPLIANCE PURPOSES

Depending on the application these will be:

Integrated into existing pro forma documentation for future use; or

used to amend agreements already in place; or

used as stand alone notices to recipients of Columba Leadership personal information, and providers of others' personal information.

Notice 1:

This is the notice that:

- notifies beneficiaries of Columba Leadership's data processing Activities
- notifies beneficiaries of their rights
- obtains consent through signature

This must be used prior to all data collection Activities.

This is integrated into the Learner Academy registration / consent form and any other point of entry of any beneficiary into any Columba programme.

POPI Act Notice: Beneficiary Consent

1. Columba Leadership is a Responsible Party in terms of the Protection of Personal Information Act 4 of 2013, and has its address at
2. Columba Leadership will take all prescribed and reasonable precautions to ensure that your information is safeguarded
3. I understand and agree that:
 - 3.1. Columba Leadership needs to collect, keep and use my personal information in order to carry out its work.
 - 3.2. my participation in the programme is voluntary, and that providing my personal information is also voluntary, but that I cannot be a beneficiary of the programme without providing my information to Columba Leadership.
 - 3.3. in order for Columba Leadership to do its work in youth engagement and leadership, this personal information will include demographic details (e.g. race , gender), my opinions and access to academic results.
 - 3.4. Columba Leadership will only use the information to carry out its work in terms of the programme.
 - 3.5. Columba Leadership will sometimes need to share this information with funders and donors, and that this sometimes means sending the information outside the borders of South Africa. These funders and donors are also required to safeguard my personal information.



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- 3.6. Columba Leadership partners with certain government departments and needs to share this information with them.
 4. I therefore, by signing this consent form, give my consent to Columba Leadership to process my information knowing all of the above. I am aware that:
 - 4.1. I can withdraw this consent at any time
 - 4.2. I have a right to request access to my data at any time, in the prescribed form
 - 4.3. I have a right to request that my data is corrected or updated, in the prescribed form
 - 4.4. I have the right to complain to the information regulator.
 - 4.5. The necessary information to assist me in exercising these rights in is Columba Leadership's POPI Act Manual, which is available on the Columba Leadership website.
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Notice 2

As above but signed by guardian of the minor

POPI Act Notice: Minor Beneficiary Consent

1. Columba Leadership is a Responsible Party in terms of the Protection of Personal Information Act 4 of 2013, and has its address at
2. Columba Leadership will take all prescribed and reasonable precautions to ensure that the information of the minor in your charge is safeguarded
3. I understand and agree that:
 - 3.1. Columba Leadership needs to collect, keep and use the minor's personal information in order to carry out its work.
 - 3.2. The minor's participation in the programme is voluntary, and that providing such personal information is also voluntary, but that the minor cannot be a beneficiary of the programme without providing such information to Columba Leadership.
 - 3.3. in order for Columba Leadership to do its work to address the effects of HIV and AIDS, this personal information will include details about the minor's sex life, HIV and AIDS status, general health and lifestyle.
 - 3.4. Columba Leadership will only use the information to carry out its work in terms of the programme.
 - 3.5. Columba Leadership will sometimes need to share this information with funders and donors, and that this sometimes means sending the information outside the borders of South Africa. These funders and donors are also required to safeguard my personal information.
 - 3.6. Columba Leadership partners with certain government departments and needs to share this information with them.
4. I therefore, by signing this consent form, give my consent to Columba Leadership to process the minor's information knowing all of the above. I am aware that:
 - 4.1. I can withdraw this consent at any time
 - 4.2. I have a right to request access to the minor's data at any time, in the prescribed form
 - 4.3. I have a right to request that the minor's data is corrected or updated, in the prescribed form
 - 4.4. I have the right to complain to the information regulator.



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- 4.5. The necessary information to assist me in exercising these rights in is Columba Leadership's POPI Act Manual, which is available on the Columba Leadership website.

Notice 3:

This stipulates and describes the requirements that partners and agents doing programme implementation work on behalf of Columba Leadership must comply with in terms of POPI. It also notifies partners / agents of Columba Leadership's processing of the partners' personal information.

For inclusion into future agreements / grant awards / applicable PO's etc.

POPI Act NOTICE 3: Columba Leadership Notice to Implementing agents

Protection of Personal Information of Programme Beneficiaries

1. Columba Leadership is a Responsible Party in terms of the Protection of Personal Information Act 4 of 2013 ("the POPI Act"), and has its address at
2. Columba Leadership takes all prescribed and reasonable precautions to ensure that personal information processed by it is safeguarded and managed subject to the provisions of the POPI Act.
3. *(Name of other contracting party)* understands and agrees that:
 - 3.1. It will be processing the personal information of programme beneficiaries in terms of this agreement, and is therefore subject in its own right to the provisions of the POPI Act and also becomes a Responsible Party as defined in the Act;
 - 3.2. It will comply with the provisions of the POPI Act and undertake the necessary precautions to safeguard the personal information processed;
 - 3.3. It will only use the information for the purposes intended in terms of this agreement;
 - 3.4. It will not forward, transmit or make available in any form whatsoever, the personal information collected to any party other than those directly provided for in this agreement.
 - 3.5. Prior to processing any personal information, it will obtain consent from programme beneficiaries, explaining and using the forms as provided for in Annexure *(add Notice 1 and Notice 2 as annexures to this agreement)*

Protection of Personal Information of *(name of other contracting party)*

1. In order for Columba Leadership to fulfil its obligations in terms of this agreement, it is required to process personal information of *(name of other contracting party)*.
2. Columba Leadership will take all prescribed and reasonable precautions to ensure that personal information processed by it is safeguarded and managed subject to the provisions of the POPI Act.
3. *(Name of other contracting party)* understands and agrees that:
 - 3.1. Columba Leadership needs to collect, keep and use *(Name of other contracting party)*'s personal information in order to carry out its work.



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- 3.2. *(Name of other contracting party)*'s is voluntarily entered into this agreement, and that providing its personal information is also voluntary, but that it cannot effectively be a party to this agreement without providing its information to Columba Leadership.
- 3.3. Columba Leadership will only use the information to carry out its work in terms of the agreement.
- 3.4. Columba Leadership will sometimes need to share this information with funders and donors, and that this sometimes means sending the information outside the borders of South Africa. These funders and donor are also required to safeguard *(Name of other contracting party)*'s personal information.
4. By entering this agreement, *(Name of other contracting party)* consents to Columba Leadership to process its information knowing all of the above, and is aware that:
 - 4.1. It can withdraw this consent at any time, notwithstanding that such withdrawal will render performance in terms of this agreement impossible, and necessarily lead to termination;
 - 4.2. It have a right to request access to my data at any time, in the prescribed form
 - 4.3. It have a right to request that its data is corrected or updated, in the prescribed form
 - 4.4. It has the right to complain to the information regulator.
 - 4.5. The necessary information to assist in exercising these rights in is Columba Leadership's POPI Act Manual, which is available on the Columba Leadership website.

Notice 4

This stipulates the requirements to be met by suppliers who process Columba Leadership's personal information and/or personal information of others held by Columba Leadership.

It also notifies supplies of Columba Leadership's processing of the suppliers personal information.

POPI Act: Columba Leadership Notice to Suppliers

Protection of Personal Information of Columba Leadership or any data subjects in terms of which Columba Leadership is a responsible party.

1. Columba Leadership is a Responsible Party in terms of the Protection of Personal Information Act 4 of 2013 ("the POPI Act"), and in the course of carrying out its work, processes the personal information of various classes of natural and juristic persons, including the personal information of Columba Leadership itself.
2. Columba Leadership takes all prescribed and reasonable precautions to ensure that personal information processed by it is safeguarded and managed subject to the provisions of the POPI Act.
3. *(Name of supplier)* understands and agrees that:
 - 3.1. During the course of providing goods and/or services, it may gain access to, or have sight of, such personal information;
 - 3.2. It will comply with the provisions of the POPI Act and undertake the necessary precautions to safeguard such personal information;
 - 3.3. It will only use the information for the purposes intended in terms of the scope of supply, if applicable;



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- 3.4. It will not forward, transmit or make available in any form whatsoever such personal information to any third parties.

Notice 5

This will accompany all personal information of Columba Leadership and data subjects, provided by Columba Leadership to third parties

POPI Act: Notice to Funders, Government Partners and other recipients of Personal Information of Programme Beneficiaries

1. Columba Leadership is a Responsible Party in terms of the Protection of Personal Information Act 4 of 2013 (“the POPI Act”)
2. Columba Leadership takes all prescribed and reasonable precautions to ensure that personal information processed by it is safeguarded and managed subject to the provisions of the POPI Act.
3. (*Name receiving party*) understands and agrees that:
 - 3.1. It will be processing personal information, which may include the personal information of Columba Leadership, partner bodies and programme beneficiaries, and is therefore subject in its own right to the provisions of the POPI Act and also becomes a Responsible Party as defined in the Act. Attention is specifically drawn to the fact that personal information of programme beneficiaries is highly confidential and requires a high duty of care, in that such information may include the HIV and AIDS status, sex life and lifestyle information of such beneficiaries;
 - 3.2. It will comply with the provisions of the POPI Act and undertake the necessary precautions to safeguard the personal information processed;
 - 3.3. It will only use the information for the purposes intended;
 - 3.4. It will not forward, transmit or make available in any form whatsoever, the personal information collected to any party.

Notice 6

To be added into new employment contracts and letters of appointment

Protection of Personal Information – Personnel and appointees.

1. Columba Leadership is a Responsible Party in terms of the Protection of Personal Information Act 4 of 2013.
2. Columba Leadership will take all prescribed and reasonable precautions to ensure that your information is safeguarded
3. I understand and agree that:



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- 3.1. Columba Leadership needs to collect, keep and use my personal information in order to function effectively in its capacity as my employer. The provision of this information by me is a mandatory aspect of the employment relationship.
 - 3.2. Columba Leadership will only use the information to carry out the necessary administration of the employment contract.
 4. I therefore give my consent to Columba Leadership to process my information knowing all of the above. I am aware that:
 - 4.1. I can withdraw this consent at any time
 - 4.2. I have a right to request access to my data at any time, in the prescribed form
 - 4.3. I have a right to request that my data is corrected or updated, in the prescribed form
 - 4.4. I have the right to complain to the information regulator.
 - 4.5. The necessary information to assist me in exercising these rights in is Columba Leadership's PAIA Manual, which is available on the Columba Leadership website.
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Notice 7

To be added into registration forms for candidates for employment

Protection of Personal Information – Employment candidates

1. Columba Leadership is a Responsible Party in terms of the Protection of Personal Information Act 4 of 2013.
 2. Columba Leadership will take all prescribed and reasonable precautions to ensure that your information is safeguarded
 3. I understand and agree that:
 - 3.1. Columba Leadership needs to collect, keep and use my personal information in order to evaluate me for purposes of potential employment opportunities.
 - 3.2. Columba Leadership will only use the information to carry out the necessary recruitment related activities.
 4. I therefore give my consent to Columba Leadership to process my information knowing all of the above. I am aware that:
 - 4.1. I can withdraw this consent at any time
 - 4.2. I have a right to request access to my data at any time, in the prescribed form
 - 4.3. I have a right to request that my data is corrected or updated, in the prescribed form
 - 4.4. I have the right to complain to the information regulator.
 - 4.5. The necessary information to assist me in exercising these rights in is Columba Leadership's PAIA Manual, which is available on the Columba Leadership website.
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Notice 8



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To be sent to all existing employees to be countersigned by them and such countersigned copy to be retained in personnel files as an addendum to the letter of appointment / employment contracts.

Dear (employee name)

Amendment to Terms and Conditions of Employment

As part of the organisation's measures to become compliant with the Protection of Personal Information Act 4 of 2013 ("POPIA"), we are required to introduce the following notices and obtain your consent in terms your personal information that we process pursuant to administering the employment contract.

By signing this letter, you are acknowledging that you have seen and agree to this notice and its contents; that you are freely and willingly providing the necessary consent; and that you agree that this information and your consent become additional terms and conditions of your employment relationship with Columba Leadership.

1. Columba Leadership is a Responsible Party in terms of the Protection of Personal Information Act 4 of 2013.
2. Columba Leadership will take all prescribed and reasonable precautions to ensure that your information is safeguarded
3. I understand and agree that:
 - 3.1. Columba Leadership needs to collect, keep and use my personal information in order to function effectively in its capacity as my employer. The provision of this information by me is a mandatory aspect of the employment relationship.
 - 3.2. Columba Leadership will only use the information to carry out the necessary administration of the employment contract.
4. I therefore give my consent to Columba Leadership to process my information knowing all of the above. I am aware that:
 - 4.1. I can withdraw this consent at any time
 - 4.2. I have a right to request access to my data at any time, in the prescribed form
 - 4.3. I have a right to request that my data is corrected or updated, in the prescribed form
 - 4.4. I have the right to complain to the information regulator.
 - 4.5. The necessary information to assist me in exercising these rights in is Columba Leadership's PAIA Manual, which is available on the Columba Leadership website.

Notice 9

To go into the footer of all electronic communications

E-Mail Disclaimer



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The content of this message is confidential and is intended for the recipient only. The integrity and security of this email cannot be guaranteed over the Internet. Therefore, the sender will not be held liable for any damage caused by the message. Columba Leadership is compliant with the Protection of Personal Information Act 4 of 2013. It is a Responsible Party and processes the Personal Information of various classes of Data Subjects, all of which are protected by the Act and by the measures we implement in terms of the Act. For this reason you may not transmit or forward any information emanating from Columba Leadership which may constitute personal information without the express prior consent of Columba Leadership.

Notice 10

To be included on all attendance registers. As discussed, this is not fully compliant in that minors will be giving their own consent as oppose to it being given by a competent person (generally parent or guardian).

Attendance Register Consent

1. Columba Leadership is a Responsible Party in terms of the Protection of Personal Information Act 4 of 2013.
2. Columba Leadership will take all prescribed and reasonable precautions to ensure that your information is safeguarded
3. I understand and agree that:
 - 3.1. Columba Leadership needs to collect, keep and use my personal information in order record my attendance at this meeting.
 - 3.2. Columba Leadership will only use the information to carry out the necessary related activities.
4. I therefore give my consent to Columba Leadership to process my information knowing all of the above. I am aware that:
 - 4.1. I can withdraw this consent at any time
 - 4.2. I have a right to request access to my data at any time, in the prescribed form
 - 4.3. I have a right to request that my data is corrected or updated, in the prescribed form
 - 4.4. I have the right to complain to the information regulator.
 - 4.5. The necessary information to assist me in exercising these rights in is Columba Leadership's PAIA Manual, which is available on the Columba Leadership website.



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DS – Data Subject

PI - Personal Information

RP – Responsible Party

“S” on column 1 – Section of the Act

“R” in column 1 – Regulation

Columba Leadership – POPI Act Compliance Framework This needs to be updated if the Act is amended

| PROVISION | DESCRIPTION | MEASURE IMPLEMENTED | PERSON RESPONSIBLE |
|-----------------|---|---|--------------------|
| S5(a) (i) | DS right to be notified that PI is being processed | <ul style="list-style-type: none"> - New DS notified on consent form and by data collector - Existing DS notified by communication | |
| S5(a)(ii) | DS right to be notified in case of unauthorised access | <ul style="list-style-type: none"> - Notify DS by communication if breach occurs - | |
| S5(b) to (i) | DS rights to request, access, object, amend or destroy records, and right to be protected from direct marketing | <ul style="list-style-type: none"> - New DS is notified in consent form and rights are reflected in Manual - Existing DS is notified in communication, referred to Manual | |
| S(10) | Minimum amount of PI to be processed to give effect to RP’s work | <ul style="list-style-type: none"> - Only essential PI is processed | |
| S11 (a) and (b) | PI may only be processed with consent and if it is for legitimate purposes connected to agreement between DS and RP | <ul style="list-style-type: none"> - Agreement, voluntariness and consent obtained in advance from new DS by signature of DS or competent person if DS is minor - Existing DS notified by communication | |
| S12(1) | PI to be collected from DS directly or competent person if DS is a minor | <ul style="list-style-type: none"> - Protocol in place to collect PI only from DS or competent person | |
| S13(1) and (2) | PI to be collected only for purposes required by the relationship | <ul style="list-style-type: none"> - explained to new DS and on consent form - Explained to existing DS via communication | |
| S14 | Retention and restriction on PI – only kept for as long as required | <ul style="list-style-type: none"> - explain to DS in consent form and in manual - protocol established for when records are deleted. | |
| S16 | PI to be processed to a high standard of accuracy and not be misleading | <ul style="list-style-type: none"> - Protocol established to ensure accuracy of PI | |
| S18 | Notify DS of processing and rights | <ul style="list-style-type: none"> - New DS notified on consent form and by data collector - Existing DS notified by communication | |
| S19 | PI security and confidentiality must be safeguarded | <ul style="list-style-type: none"> - protocols established to ensure safeguarding - | |
| S22 | Notification to DS and Regulator in event of a breach | <ul style="list-style-type: none"> - protocol established | |



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|----------------|---|--|--|
| S23 and 24 | Rights of DS to know about and access PI processed by RP, as well as have it corrected or deleted | <ul style="list-style-type: none"> - New DS notified on consent form and by data collector - Existing DS notified by communication - Procedure described in Manual and forms provided | |
| S26, 27 and 32 | Prescribes special provisions for processing special information including health and sex life. | <ul style="list-style-type: none"> - New DS notified on consent form and by data collector - Existing DS notified by communication | |
| S34 and 35 | Processing of PI of children | <ul style="list-style-type: none"> - protocols in place to ensure consent of competent person is obtained | |
| S72 | Provides for special measures if PI is subject cross-border information flows | <ul style="list-style-type: none"> - obtain written confirmation of data protection regime in recipient's country of operation - | |
| R2 | Provides for objection by DS on a prescribed form | <ul style="list-style-type: none"> - Form incorporated into PAIA Manual | |
| R3 | Provides for correction or deletion request by DS on a prescribed form | <ul style="list-style-type: none"> - Form incorporated into PAIA Manual | |