POPIA POLICY DOCUMENT

APPROVALS

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REVISION HISTORY

AUTHOR	*REVISED SECTION/PARAGRAPH*	*REV*	*RELEASED*
[Imraan Varachhia]	**[New Document]**	[00]	See **[Document Control System]**

Draft and archived/Obsolete revisions are not to be used.
Access** [Document Control System] **system to verify revision.

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1. PURPOSE

The purpose of the Protection of Personal Information Act (POPIA) is to protect people from harm by protecting their personal information. To stop their money being stolen, to stop their identity being stolen, and generally to protect their privacy, which is a fundamental human right.

To achieve this, the Protection of Personal Information Act sets conditions for when it is lawful for someone to process someone else's personal information.

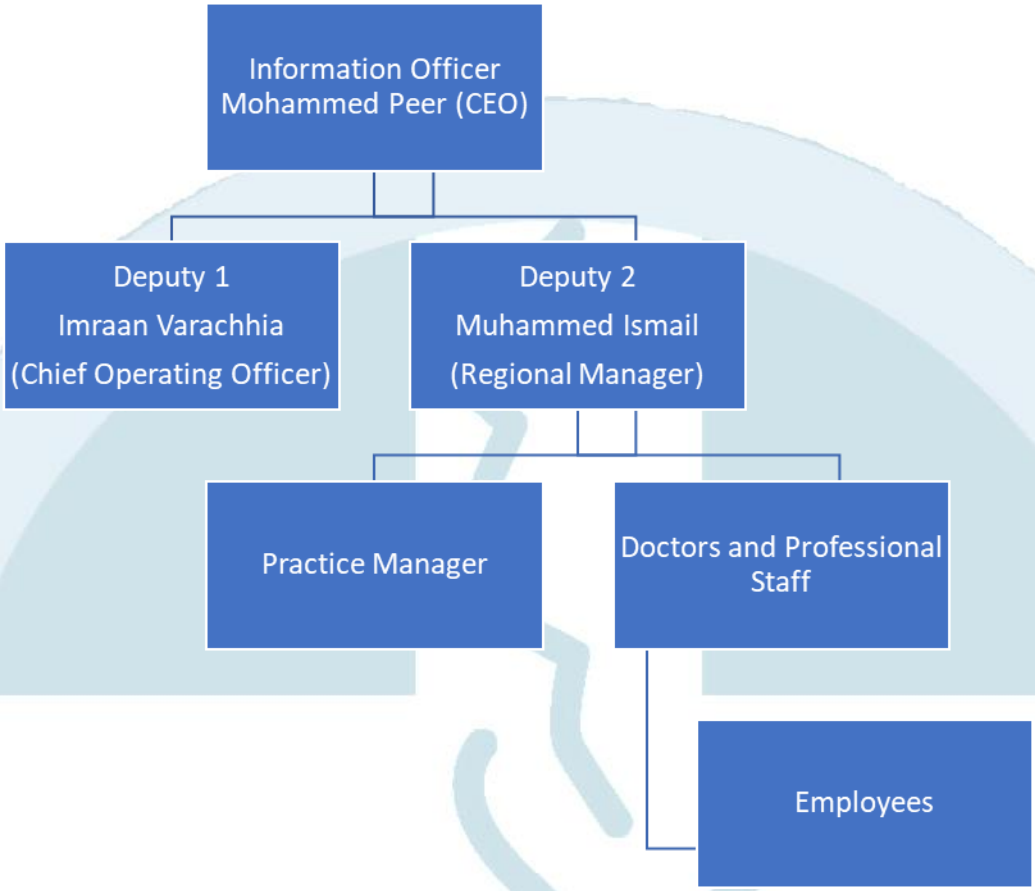
2. SCOPE

- The data subject: the person to whom the information relates.
- The responsible party: the person who determines why and how to process. For example, profit companies, non-profit companies, governments, state agencies and people. Called controllers in other jurisdictions.
- The operator: a person who processes personal information on behalf of the responsible party. For example, an IT vendor. Called processors in other jurisdictions.

3. RESPONSIBILITIES

The Protection of Personal Information Act places various obligations on the responsible party, which is the body ultimately responsible for the lawful processing of personal information. Responsible parties should only use operators that can meet the requirements of lawful personal information processing prescribed by the Protection of Personal Information Act.

4. ROLES



- **Information Officer and deputies** - The officer is an important person because they are responsible for ensuring that the organisation complies with POPIA.
- **Practice Manager** – Will assist the Deputy Information Officer to ensure awareness, compliance and that any breach is handled according to SOP.
- **Doctors, Professional Staff, Employees** – They are the generators of Personal Information and must ensure compliance to POPIA, quality information for the intended purpose.

5. POPIA CONDITIONS

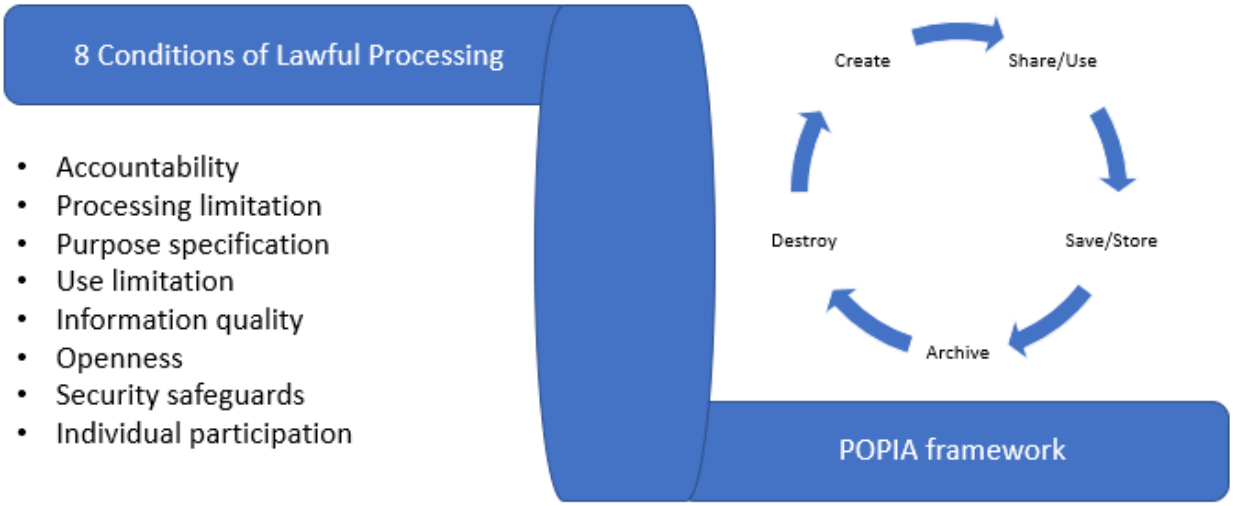
The definition of Personal Information as set out in the POPI Act is as follows:

‘‘personal information’’ means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to:

- Information relating to the race, gender, sex, pregnancy, marital status, national, ethnic, or social origin, colour, sexual orientation, age, physical or 5 mental health, well-being, disability, religion, conscience, belief, culture, language, and birth of the person.
- Information relating to the education or the medical, financial, criminal or employment history of the person.
- Any identifying number, symbol, e-mail address, physical address, telephone 10 number, location information, online identifier, or other assignment to the person.
- The biometric information of the person.
- The personal opinions, views, or preferences of the person.
- Correspondence sent by the person that is implicitly or explicitly of a private 15 or confidential nature or further correspondence that would reveal the contents of the original correspondence.
- The views or opinions of another individual about the person; and
- The name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information 20 about the person.
- The Act ensures that Personal Information of both individuals and juristic entities is sufficiently protected, used in a manner for which it was gathered and that facilitates transparency around the following:
    - What is done with the personal information.
    - Why and how it is processed (from collection, to usage, sharing, disposal, archiving, etc.).
    - Who the personal information is shared with (third parties – both locally and internationally, other legal entities)?
    - What types of personal information is processed and for what purpose.
    - Privacy is about ensuring that both individuals and juristic entities are aware of what is being done with their personal information. The South Africa Constitution emphasizes the right to privacy. This means that ultimate ownership of the personal information resides with the individual/juristic entity concerned.

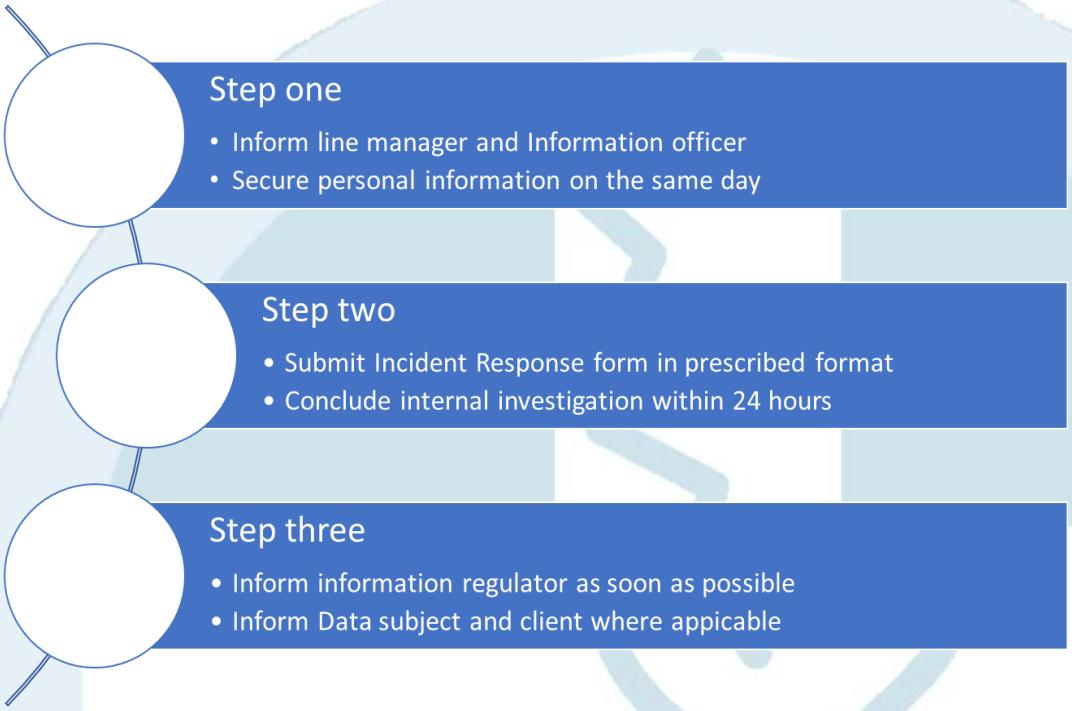
6. POPIA FRAMEWORK

A POPIA compliance framework institutionalizes the enablers of protection for personal information and provides a monitoring capability to manage compliance with the obligations of the Protection of Personal Information Act ensure compliance with the conditions for the lawful processing of personal information.



7. SECURITY

What to do in the event of a breach?



Security Measures

- Apply a clean desk policy.
- Limit different versions and delete what you do not need.
- Store hard copies in rooms or cabinets that can lock.
- Security updates on routers and other devices
- Do not share your Wi-Fi password.
- Passwords protect emails as far as possible.
- Triple check recipients before you send an email.

8. DURATION

All document will be stored securely for a period of 5 years before being responsibly destroyed.