

Inyathelo Organisational Policy

Policy Name	:	Protection of Personal Information Policy
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Applicable Division	:	Operations
Approved by	:	Executive Director
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Policy on the Protection of Personal Information {PoPI}

The purpose of the PoPI Act is to ensure that all South African institutions conduct themselves in a responsible manner when collecting, processing, storing and sharing another entity's personal information by holding them accountable should they abuse or compromise your personal information in any way.

The PoPI legislation basically considers your personal information to be "precious goods" and therefore aims to bestow upon you, as the owner of your personal information, certain rights of protection and the ability to exercise control over:

- ✓ when and how you choose to share your information (requires your consent);
- ✓ the type and extent of information you choose to share (must be collected for valid reasons);
- ✓ transparency and accountability on how your data will be used (limited to the purpose) and notification if/when the data is compromised;
- ✓ providing you with access to your own information as well as the right to have your data removed and/or destroyed should you so wish;
- ✓ who has access to your information, i.e. there must be adequate measures and controls in place to track access and prevent unauthorised people, even within the same company, from accessing your information;
- ✓ how and where your information is stored (there must be adequate measures and controls in place to safeguard your information to protect it from theft, or being compromised);
- ✓ the integrity and continued accuracy of your information (i.e. your information must be captured correctly and once collected, the institution is responsible to maintain it)

Examples of “personal information” for an individual could include:

- Identity and/or passport number
- Date of birth and age
- Phone number/s (including mobile phone number)
- Email address/es
- Online/Instant messaging identifiers
- Physical address
- Gender, Race and Ethnic origin
- Photos, voice recordings, video footage (also CCTV), biometric data
- Marital/Relationship status and Family relations
- Criminal record
- Private correspondence
- Religious or philosophical beliefs including personal and political opinions
- Employment history and salary information
- Financial information
- Education information
- Physical and mental health information including medical history, blood type, details on your sex life
- Membership to organisations/unions

It must however be noted that some personal information, on its own, does not necessarily allow a third party to confirm or infer someone’s identity to the extent that this information can be used/abused for other purposes.

Based on the recognition of the importance of protecting personal information obtained through its activities, Inyathelo is committed to ensuring that all employees observe the “Law Concerning the Protection of Personal Information ”. In addition, Inyathelo has set out the following Basic Policy on the Protection of Personal Information under which Inyathelo strictly manages personal information.

What kind of information do we keep?

- a. Table with categories and fields of information

Categories of Data Subjects	Name & Surname	Company name	Address	Registration numbers or identity numbers	Employment status	Person responsible	Bank details	Vat numbers	Trademarks	Finger prints	Financial statements	Registrations documentation	Lease agreements	Qualifications	Race
Customers / Clients	✓		✓	✓	✓		✓								
Service Providers		✓	✓			✓	✓	✓	✓						
Donors	✓	✓	✓	✓		✓	✓	✓				✓			
Partners	✓	✓	✓	✓		✓	✓					✓			
Conferencing clients	✓	✓	✓	✓		✓						✓			
Clinic clients	✓	✓	✓	✓		✓						✓			
Funding Funder client	✓	✓	✓	✓											
Prospects	✓	✓	✓			✓						✓			
Visitors	✓	✓													
Board of trustees	✓	✓	✓	✓	✓									✓	✓
Capacity building	✓	✓	✓	✓		✓					✓	✓			
Tenants	✓	✓	✓	✓		✓	✓	✓		✓	✓	✓	✓		
Employees	✓		✓	✓			✓			✓				✓	✓

1. Acquisition and Use of Personal Information

Inyathelo will clearly indicate the purpose of use when acquiring personal information and will not use it for any other purpose.

2. Security Measures

Inyathelo will ensure appropriate safeguarding of personal information by taking security measures to prevent loss, leakage or alteration.

3. Provision of Personal Information

Inyathelo will not provide personal information to third parties for any purpose other than the specified purposes of use, unless required by “laws and regulations”.

4. Disclosure, Correction and Suspension of Use of Personal Information

Inyathelo will promptly respond to a request or complaint concerning disclosure, correction or suspension of use of Personal Information it has obtained, by the person who is the subject of personal information.

5. Establishment and Amendment of Rules concerning Protection of Personal Information

Inyathelo will review the Basic Policy on the Protection of Personal Information and other rules it has established from time to time as necessary.

6. Major Purposes of Use

- ✓ To send letters of invitation to various events of Inyathelo;
- ✓ To publish the results of research conducted by Inyathelo;
- ✓ To share important developments of the organisation;
- ✓ For security control on the premises;
- ✓ For health and safety purposes, in compliance with the COVID Health and Safety regulations in terms of Section 27 (2) of the Disaster Management Act, 2002 (Act No. 57 of 2002)
- ✓ To communicate answers, replies and confirmations to the users of the services provided by Inyathelo;
- ✓ Application for subscription to e-mail newsletters, subscription to the Funding Finder database, subscription to the Governance Code, and subscription to any other Inyathelo offerings, the training material, magazines, order for purchasing publications, entry in the events, application for use of images and facilities, application for recruitment, application for access to sponsored research, request for information disclosure/disclosure on personal information protection, etc.
- ✓ For smooth and fair operation of Inyathelo's activities.