

	Title: POPI Act Compliance Manual	Doc No: SHEQ 6.1-6
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POPI ACT COMPLIANCE MANUAL

The right to privacy is an integral human right recognized and protected in the South African Constitution and in the Protection of Personal Information Act 4 of 2013 (POPIA).

POPIA aims to promote the protection of personal information by introducing certain guidelines in processing of personal information in a context-sensitive manner.

At **ILIFA AFRICA ENGINEERS** we are committed to protect the privacy of customers, employees and other stakeholders and to ensure that personal information is collected and used properly, lawfully and transparently in accordance with POPIA.

Information Officers

Ilifa will appoint an Information Officer and where necessary, Deputy Information Officers to assist the Information Officer. The Information Officer will be responsible for compliance with POPIA as per the duties set out in the appointment letter. The Information Officer upon appointment will be registered with the South African Information Regulator as established under POPIA.

The information we collect

Employees and other persons acting on behalf of Ilifa will during the course of their performance/services, gain access to and become acquainted with the personal information of certain clients, suppliers and other employees. The collection and process of personal information is mainly to contact customers, employees and other stakeholders for the purposes of understanding their requirements, and delivering services accordingly.

For this purpose Ilifa seeks to process personal information only for specific explicitly defined and legitimate reasons.

Ilifa will under no circumstances distribute or share personal information with other legal entities or with any other individuals that are not directly involved with facilitating the purpose for which the information was originally collected.

How we use your information

Ilifa will use personal information only for the purposes for which it was collected and agreed upon. In addition, where necessary personal information may be retained for legal or research purposes.

For example:

- To carry out actions for the conclusion or performance of a contract to which the personal information is required;
- To pursue legitimate interests of the organisation or of a third party to whom the information is supplied;

	Title: POPI Act Compliance Manual	Doc No: SHEQ 6.1-6
	Issued: 20 Oct 2022	Rev: 4

- To confirm and verify your identity or to verify that you are an authorised user for security purposes;
- For the detection and prevention of fraud, crime, money laundering or other malpractice;
- To conduct market or customer satisfaction research or for statistical analysis;
- For audit and record keeping purposes;
- To verify the identity of a Client.

Disclosure of information

Ilifa may disclose personal information to our service providers who are involved in the delivery of products or services to us. Ilifa will ensure that the necessary agreements are in place to ensure that all parties comply with the privacy requirements as required by the POPIA.

Ilifa may also disclose personal information:

- Where we have a duty or a right to disclose in terms of law or industry codes;
- Where we believe it is necessary to protect our rights;
- Third parties for the purpose of conducting daily operations;
- Proposals/Tenders.


Ilifa shall, in all of its proposals and tender submissions where private information is required to be disclosed, make the recipients aware of the requirements for the protection of private information, and use of such personal information, may only be used for the specific purpose. Please refer to “DISCLOSURE OF INFORMATION - ANNEXURE D”.

Information Security

Ilifa are legally obliged to provide adequate protection for the personal information we hold and to stop unauthorized access and use of personal information. We will, on an on-going basis, continue to review our security controls and related processes to ensure that your personal information remains secure.

Our security policies and procedures cover:

- Physical security;
- Computer and network security;
- Access to personal information;
- Secure communications;
- Security in contracting out activities or functions;
- Retention and disposal of information;
- Acceptable usage of personal information;
- Governance and regulatory issues;
- Monitoring access and usage of private information;
- Investigating and reacting to security incidents.

	Title: POPI Act Compliance Manual	Doc No: SHEQ 6.1-6
	Issued: 20 Oct 2022	Rev: 4

When Ilifa contract with third parties, we impose appropriate security, privacy and confidentiality obligations on them to ensure that personal information that we remain responsible for, is kept secure.

Ilifa will ensure that personal information that is passed on be treated with the same level of protection as what Ilifa are obliged to do.

Ilifa employees and/or other persons acting on behalf of Ilifa are responsible to:

- Keeping all personal information that they come into contact with secure, by taking sensible precautions and following the guidelines set out in this document;
- Ensuring that all personal information is held in as few places as is necessary and no unnecessary data sets should be created;
- Ensuring that personal information is encrypted prior or consent given to sending or sharing the information electronically;
- All computers, laptops and any other mobile devices that store personal information are password protected and never left unattended. Password may not be shared with unauthorised persons;
- Ensuring that computer screens and other devices are switched off or locked when not in use or when away from their desks;
- When personal information is stored on removable storage medias such as external devices to be locked away securely when not being used;
- When personal information is stored on paper, that such hard copy records are kept in secure place where unauthorised people cannot access it;
- Where personal information is printed out, that the paper printouts are not left unattended where unauthorised individuals could see or copy them;
- To ensure that personal information is stored for only as long as needed in terms of the purpose for which it was originally collected;
- Authorisation must first be obtained from Information Officer of Deputy Information Officers before information that is no longer required be deleted or dispose in an appropriate manner.

No employee from Ilifa or other persons acting on behalf of Ilifa may:

- Process or have access to personal information where such processing or access is not a requirement to perform their respective work-related tasks or duties;
- Save copies of personal information directly to their own private computers, laptops or any other mobile devices. All personal information shall be accessed and updated from Ilifa's dedicated server;
- Share personal information informally.

Should an employee or person acting on behalf of Ilifa becomes aware or suspicious of any security breach, such as unauthorized access, interference, modification or unsanctioned disclosure of personal information, he/she must immediately report the matter to the Information Officer of the Deputy Information Officer.

	Title: POPI Act Compliance Manual	Doc No: SHEQ 6.1-6
	Issued: 20 Oct 2022	Rev: 4

Customers, Employees and Stakeholder Rights: Access to information

Customers, Employees or Stakeholders, has the right to request a copy of their personal information that is hold by Ilifa. To obtain these kindly contact Ilifa at the numbers/addresses as provided on our website and specify what information is required. Ilifa will need a copy of your ID document to confirm your identity before providing details of your personal information.

Please note that any such access request may be subject to a payment of a legally allowable fee.

Correction of information

Customers, Employees or Stakeholders has the right to ask us to update, correct or delete personal information. Ilifa will require a copy of your ID document to confirm your identity before making changes to personal information that is hold by Ilifa.

Ilifa will take reasonable steps to ensure that personal information is complete, accurate, not misleading and will appreciate it if personal information can be updated by our Customers, Employees or Stakeholders should any changes take place – please refer to annexure A.

Definition of personal information

According to the Act “**personal information**” means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person. Further to the POPI Act, Ilifa also includes the following items as personal information:

- All addresses including residential, postal and email addresses as well as telephone and cell phone numbers;
- Change of name – for which we require copies of the marriage certificate or official change of name document issued by the state department;
- Any information that can be used to reveal a person’s identity and relates to a natural person and/or juristic person;
- Religious or philosophical beliefs, race or ethnic origin, trade union membership, persuasion and health.

Right to Complain

Customers, Employees or Stakeholders has the right to complain in instances where any of their rights under POPIA have been infringed upon. Ilifa will take all complaints very seriously and will address all POPIA related complaints in accordance with the following procedure:

- POPIA complaint must be submitted to the Information Officer on the POPIA Complaint Form as per annexure B;
- The Information Officer will provide the complainant with a written acknowledgement of receipt within 2 working days;
- The Information Officer will endeavor to resolve the complaint in a fair manner as outlined in the POPIA;

	Title: POPI Act Compliance Manual	Doc No: SHEQ 6.1-6
	Issued: 20 Oct 2022	Rev: 4

- Information Officer will determine whether the complaint relates to an error or breach of confidentiality that has occurred and which may have a wider impact on the organisation's data;
- Should there be reason as determined by the Information Officer that personal information of data has been accessed or acquired illegally, the Information Officer will inform the Information Regulator of such breach.

The Information Officer's response to the complaint may comprise of the following:

- A suggested remedy for the complaint;
- A dismissal of the complaint and the reasons as to why it was dismissed;
- An apology (if applicable) and any disciplinary action to be taken against employees involved.

Ilifa contact details

If you have any queries about this notice; you need further information about our privacy practices; wish to withdraw consent; exercise preferences or access or correct your personal information, please contact us at the numbers/addresses listed on our website.

	Title: POPI Act Compliance Manual	Doc No: SHEQ 6.1-6
	Issued: 20 Oct 2022	Rev: 4

POPIA NOTICE TO UPDATE/DELETE PERSONAL INFORMATION ANNEXURE A

We understand that your personal information is important to you and that you may be apprehensive about disclosing it. We are committed to safeguard and process your information in a lawful manner.

Personal information can be collected at any time and if you think that we have outdated information, you can request that we must update and/or correct it.

Information Officer's Contact Details	
Name	Vincent Knox
Contact Number	083 676 0124
E-mail Address	v.knox@ilifa.biz

Some of your information that we hold may include, your first and last name, home and postal address, contact information, birth date, gender, occupation, qualifications, income and banking details.

We may need to share your information to provide reports, analyses, products or services that you have requested. We will ensure that all precautions will be in place and when necessary, any third party will treat your information with the same level of protection as required by us.

I hereby authorise and consent that my personal information be updated/deleted with the following	
Name	
Surname	
ID Number	(Please attach a certified copy of your ID)
Date	
Signature	
Information to be used, updated, corrected and/or deleted (clearly indicated selection)	

	Title: POPI Act Compliance Manual	Doc No: SHEQ 6.1-6
	Issued: 20 Oct 2022	Rev: 4

POPIA COMPLAINT FORM – ANNEXURE B

We are committed to safeguarding your privacy and the confidentiality of your personal information as prescribed by the POPIA.

Information Officer's Contact Details	
Name	Vincent Knox
Contact Number	083 676 0124
E-mail Address	v.knox@ilifa.biz

Particulars of Complaint	
Name	
ID Number	(Please attach a certified copy of your ID)
Contact Number	
E-mail Address	
Details of the Complaint	
Desired Outcome	

	Title: POPI Act Compliance Manual	Doc No: SHEQ 6.1-6
	Issued: 20 Oct 2022	Rev: 4

SERVICE PROVIDER CONSENT DECLARATION – ANNEXURE C

I/We the Service Provider indicated below, hereby agree to comply with the Protection of Personal Information Act (POPI Act) regulations and all personal information and/or personal data of Ilifa Africa Engineers in our possession will be deemed to be private and confidential.

In respect of the services being rendered such personal information and/or personal data will not be made available on any public domain and the necessary precautions will be taken to ensure that any information provided is only used for the purpose it has been provided.

Should there a breach of confidentiality in the operations or activities of the services being rendered whether or not by automatic and/or individual means, the Information Officer of Ilifa Africa Engineers will be informed immediately.

Ilifa Africa Engineers' Information Officer's Contact Details	
Name	Vincent Knox
Contact Number	083 676 0124
E-mail Address	v.knox@ilifa.biz

By signature hereunder, the service provider irrevocably agrees to abide by the terms and conditions as set out above.

Name of Service Provider	
Contact Number	
E-mail Address	
Service Provider's Information Officer	
Date	
Signature	

	Title: POPI Act Compliance Manual	Doc No: SHEQ 6.1-6
	Issued: 20 Oct 2022	Rev: 4

DISCLOSURE OF INFORMATION – ANNEXURE D

Where Ilifa discloses any personal information (as defined in the POPI Act) as part of a proposal or tender submission, the recipients of such information undertake to ensure that they shall comply with the protection and privacy conditions as required by the POPI Act. Furthermore, by acceptance of Ilifa’s proposal / tender submission and the appointment of Ilifa, the recipient acknowledges that it is conversant with the POPI Act and shall only make use of such disclosed personal information for the specific purpose it was given and intended. Ilifa may require the recipient to complete the SERVICE PROVIDER / RECIPIENT CONSENT DECLARATION – ANNEXURE C.”

	Title: POPI Act Compliance Manual	Doc No: SHEQ 6.1-6
	Issued: 20 Oct 2022	Rev: 4

POPI ACT: DATA SUBJECT CONSENT FORM – ANNEXURE E

Ilifa is committed to protect the privacy of our employees and therefore will ensure that all personal information is used properly, lawfully and transparently in accordance with the Protection of Personal Information Act (POPIA) that came into effect on 01 July 2021.

As an employee you need to know that Ilifa will disclose personal information of employees to various 3rd parties as indicated in the table below in the delivery of products and services to us.

Your permission to use/share your personal information to enable ILIFA to fulfil its duties and obligations as a professional service provider, is hereby requested.

Employee Consent Form			
Name			
Surname			
ID No			
I hereby give permission that			
Description	Yes	No	
My personal information may be used/disclosed for the required daily operations of Ilifa			
My personal information may be used/disclosed to 3 rd parties in accordance with POPIA (e.g. SARS, UIF & Pension Fund Administrators)			
My Ilifa CV and personal information may be included in tenders where applicable			
My payslip may be distributed in pdf format to my e-mail address			
My IRP5 may be distributed in pdf format to my e-mail address			
My personal correspondence regarding my employment with Ilifa be sent in pdf format to my e-mail address			

I further take note that;

- No personal information may be shared without the permission of the Office Manager;
- No copies of personal information of other employees may be saved directly on my own private computer, laptop or other mobile devices;
- All personal information of other employees shall only be accessed for legitimate purposes and updated on ILIFA's dedicated server; and
- I will adhere to the conditions set out in ILIFA's POPIA policy.

EMPLOYEE SIGNATURE

DATE

	Title: POPI Act Compliance Manual	Doc No: SHEQ 6.1-6
	Issued: 20 Oct 2022	Rev: 4

POPI ACT: DATA SUBJECT CONSENT FORM CORPORATE – ANNEXURE E

Ilifa is committed to protect the privacy of our employees and therefore will ensure that all personal information is used properly, lawfully and transparently in accordance with the Protection of Personal Information Act (POPIA) that came into effect on 01 July 2021.

As an employee you need to know that Ilifa will disclose personal information of employees to various 3rd parties as indicated in the table below in the delivery of products and services to us.

Your permission to use/share your personal information to enable ILIFA to fulfil its duties and obligations as a professional service provider, is hereby requested.

Employee Consent Form			
Name			
Surname			
ID No			
I hereby give permission that			
Description	Yes	No	
My personal information may be used/disclosed for the required daily operations of Ilifa			
My personal information may be used/disclosed to 3 rd parties in accordance with POPIA (e.g. SARS, UIF & Pension Fund Administrators)			
My Ilifa CV and personal information may be included in tenders where applicable			
My payslip may be distributed in pdf format to my e-mail address			
My IRP5 may be distributed in pdf format to my e-mail address			
My personal correspondence regarding my employment with Ilifa be sent in pdf format to my e-mail address			

I further take note that;

- No personal information may be shared without the permission of the Executive Manager (EXCO);
- If copies of personal information of other employees is saved directly on my private/work computer, laptop or other mobile devices, such devices must be password protected;
- All personal information of other employees shall only be accessed for legitimate purposes and shall accordingly be updated on ILIFA's dedicated server; and
- I will adhere to the conditions set out in ILIFA's POPIA policy.

EMPLOYEE SIGNATURE

DATE

	Title: POPI Act Compliance Manual	Doc No: SHEQ 6.1-6
	Issued: 20 Oct 2022	Rev: 4

Description	Name	Designation	Signature
Compiled by	A Swanepoel	HR Officer	
Reviewed by	Commercial, Risk and Ethics Committee		
Approved by	V Knox	Committee Chairperson	

DOCUMENT REVISION HISTORY

Rev	Changes	Date	Approved by:
1	First approval of this document	25/06/2021	V Knox
2	Definition of personal information updated (Page 4)	19/07/2021	V Knox
3	Updated to comply with POPIA regulations	30/05/2022	V Knox
4	Annexure C, D and E included	20/10/2022	V Knox

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