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IIG Privacy Procedure			
Subject: These procedures were developed to provide practical direction and guidance on the implementation of the privacy policy.			
Impacted System: Website Outlook CPD Vault Sage	**Responsible source:** Information Officer	**Effective date:** 1 July 2021	**Authorised by:** Executive Committee
Scope: The effective management and conduct when collecting, processing, storing and sharing any personal information as it relates to employees and members			

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1. PROCEDURE DRIVER

This procedure is developed to give guidance on the privacy, collection, protection and storing of data, information and records in any media or format.

2. PURPOSE

The purpose of this procedure is to ensure all IIG employees and council members conduct themselves in a responsible manner when collecting, processing, storing and sharing third party's personal information by guiding them and holding them accountable should they abuse or compromise the third party's personal information in any way

3. REGULATORY FRAMEWORK

The regulatory framework for the Information Privacy policy and procedure:

- Constitution of the Republic of South Africa, 1996
- Protection of Personal Information Act, No. 4 of 2013
- Promotion of Access to Information Act, No. 2 of 2000
- King IV Report on Corporate Governance for South Africa, 2016
- Electronic Communications and Transactions Act, No. 25 of 2002
- National Archives and Records Services of South Africa Act, No. 43 of 1996
- Legal Deposits Act, No. 54 of 1997
- Public Finance Management Act, No. 1 of 1999
- Promotion of Administrative Justice Act, No. 3 of 2000
- Consumer Protection Act, No. 68 of 2008
- Auditing Profession Act, No. 26 of 2005
- Financial Advisory and Intermediary Services Act, No. 37 of 2002
- Financial Intelligence Centre Act, No. 38 of 2001
- Compensation for Occupational Health and Diseases Act, No. 130 of 1993
- Occupational Health and Safety Act, No. 85 of 1993
- Basic Conditions of Employment Act, No. 75 of 1997
- Employment Equity Act, No. 55 of 1998
- Labour Relations Act, No. 66 of 1995
- Unemployment Insurance Act, No. 63 of 2002
- Tax Administration Act, No. 28 of 2011
- Income Tax Act, No. 58 of 1962
- Value Added Tax, No. 89 of 1991
- Transfer Duty Act, No. 40 of 1949
- Securities Transfer Tax Administration Act, No. 26 of 2007
- ISO 15489-1:2001, clause 6.2.

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4. DEFINITIONS AND ABBREVIATIONS

"biometrics'' means a technique of personal identification that is based on physical, physiological or behavioural characterisation including blood typing, fingerprinting, DNA analysis, retinal scanning and voice recognition.

"child" means a natural person under the age of 18 years who is not legally competent, without the assistance of a competent person, to take any action or decision in respect of any matter concerning him or herself.

"Competent person" means any person who is legally competent to consent to any action or decision being taken in respect of any matter concerning a child.

"consent'' means any voluntary, specific and informed expression of will in terms of which permission is given for the processing of personal information.

"data subject" means the person to whom personal information relates.

"Data breach" means a security incident in which sensitive, protected or confidential data is copied, transmitted, viewed, stolen or used by an unauthorised individual.

"de-identify'', in relation to personal information of a data subject, means to delete any information that—
(a) identifies the data subject;
(b) can be used or manipulated by a reasonably foreseeable method to identify the data subject; or
(c) can be linked by a reasonably foreseeable method to other information that identifies the data subject, and ''de-identified'' has a corresponding meaning;

"electronic communication" means any text, voice, sound, or image message sent over an electronic communications network which is stored in the network or in the recipient's terminal equipment until it is collected by the recipient.

''filing system'' means any structured set of personal information, whether centralised, decentralised or dispersed on a functional or geographical basis, which is accessible according to specific criteria.

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''information officer'' of, or in relation to, a—
(a) public body means an information officer or deputy information officer as contemplated in terms of section 1 or 17; or
(b) private body means the head of a private body as contemplated in section 1, of the Promotion of Access to Information Act;

"operator" means a person who processes personal information for a responsible party in terms of a contract or mandate, without coming under the direct authority of that party.

''person'' means a natural person or a juristic person.

''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—

(a)information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;
(b) information relating to the education or the medical, financial, criminal or employment history of the person;
(c) any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
(d) the biometric information of the person;
(e) the personal opinions, views or preferences of the person;
(f) correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
(g) the views or opinions of another individual about the person; and
(h) 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 about the person;

''private body'' means—
(a) a natural person who carries or has carried on any trade, business or profession, but only in such capacity;

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(b) a partnership which carries or has carried on any trade, business or profession; or
(c) any former or existing juristic person, but excludes a public body

''processing'' means any operation or activity or any set of operations, whether or not by automatic means, concerning personal information, including—
(a) the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;
(b) dissemination by means of transmission, distribution or making available in any other form; or
(c) merging, linking, as well as restriction, degradation, erasure or destruction of information;

''Promotion of Access to Information Act'' means the Promotion of Access to Information Act, 2000 (Act No. 2 of 2000);

''public body'' means—
(a) any department of state or administration in the national or provincial sphere of government or any municipality in the local sphere of government; or
(b) any other functionary or institution when—
(i) exercising a power or performing a duty in terms of the Constitution or a provincial constitution; or
(ii) exercising a public power or performing a public function in terms of any legislation;

''public record'' means a record that is accessible in the public domain and which is in the possession of or under the control of a public body, whether or not it was created by that public body.

''record'' means any recorded information—
(a) regardless of form or medium, including any of the following:
Writing on any material;
(ii) information produced, recorded or stored by means of any tape-recorder, computer equipment, whether hardware or software or both, or other device, and any material subsequently derived from information so produced, recorded or stored;

''Regulator'' means the Information Regulator established in terms of section 39.

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''re-identify'', in relation to personal information of a data subject, means to resurrect any information that has been de-identified, that—
(a) identifies the data subject; can be used or manipulated by a reasonably foreseeable method to identify the data subject; or
(c) can be linked by a reasonably foreseeable method to other information that identifies the data subject, and ''re-identified'' has a corresponding meaning;

''responsible party'' means a public or private body or any other person which, alone or in conjunction with others, determines the purpose of and means for processing personal information.

''restriction'' means to withhold from circulation, use or publication any personal information that forms part of a filing system, but not to delete or destroy such information.

''unique identifier'' means any identifier that is assigned to a data subject and is used by a responsible party for the purposes of the operations of that responsible party and that uniquely identifies that data subject in relation to.

5. PROCEDURE DETAILS

5.1. Training

Proactive training must take place in the organisation during the implementation of the policy. The IIG council needs to identify areas of improvement regarding the privacy policy and procedure.

5.2. Collection

The privacy policy explains the organisation's information practices when data subjects provide personal information to the IIG, whether collected online or offline, or when they visit the website to browse or conduct a transaction. Personal information must be collected directly from the data subject for a specific, explicitly defined, and lawful purpose related to a function or activity of the IIG, and not excessively so. In terms of section 18(1) of POPIA, if personal information is collected, the IIG must take reasonably practicable steps to ensure that the data subject is aware of this. A data subject may object, at any time, to the collection in terms of subsection (1)(d) to (f) (processing protects a legitimate interest of the data subject; processing is necessary for the proper performance of a public law duty by a

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public body; processing is necessary for pursuing the legitimate interests of the responsible party or of a third party to whom the information is supplied), and for direct marketing in the prescribed form (see annexure A), on reasonable grounds relating to his, her or its particular situation, unless legislation provides for such processing as well as for purposes of direct marketing.

5.2.1. Collection: Roles and responsibilities

	Process	Process Documentation	Process Owner Responsibility
5.2.1.1.	Collect personal information	Collect personal information for a specific, lawful purpose related to a function or activity of the IIG. The data subject or a competent person where the data subject is a child, a parent must consent to the processing.	The IIG Office Manager
5.2.1.2.	Notification of data subject	The data subject is notified to ensure that he/she is aware of the collection. a) For online browsing, the collection notice can be accessed by the data subject before capturing the required personal information or through internet cookies. b) For collection of personal information conducted through a manual transaction (e.g. collection at main gate entrance), a privacy notice should be provided to the data subject to give consent regarding the collection of personal information. c) No consent is required from the data subject if the collection complies with an obligation imposed by law on The IIG	The IIG collector
		a) Please note: When notifying the relevant parties of the intention of	

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	Process	Process Documentation	Process Owner Responsibility
		the collection of personal information, records and data, such notice must be clear, understandable, and include the following: b) Name and address of the IIG c) What personal information, records and data are being collected. d) How the information, records and data are to be collected and the source of the information. e) Why the personal information, records and data are being collected. f) Whether the supply of the personal information, records and data is mandatory or voluntary. g) The consequences of failing to supply the information. h) Any laws that authorise or require the collection of the personal information, records, and data. i) Whether the information, records and data will be transferred across borders to another country or to an international organisation and the level of protection afforded to the information, records, and data by that country or international organisation. j) Whether the personal information, records and data are to be shared with third parties. k) The right of the data subject, service provider or stakeholder to object to the processing of their personal	

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	Process	Process Documentation	Process Owner Responsibility
		information, records and data by the IIG l) The right of the data subject, service provider or stakeholder to access, correct or delete their personal information, records and data held by the IIG m) How a data subject, service provider or stakeholder can lodge a complaint with The IIG and the Information Regulator in respect of the unlawful processing of their personal information, records, and data.	
5.2.1.3.	Objection by data subject	A data subject may object in writing on a prescribed form (see attached annexure A) to the processing of personal information as contemplated in section 11(3)(a) of POPIA, and submit such objection to the IIG	Data subject
		The IIG must assist, to the best of its ability, any data subject who requires assistance with the completion of the prescribed form (see attached annexure A).	The IIG Office
5.2.1.4.	Ensure accuracy and completeness of information, records, and data at the point of collection	Ensure the accuracy and completeness of information, records, and data at the point of collection.	The IIG collector

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5.3. Storage, retention, and protection

5.3.1. All classified information, records and data must be kept in storage facilities (both electronic and physical) that meet the requirements as prescribed by the Minimum Information Security Standards, 1996.

5.3.2. The information security policy and procedures must be consulted on how to protect data, information and records in any storage media or format against unauthorised access.

5.3.3. The information and records management procedures must be consulted when dealing with the storage and protection of personal information, records, and data.

5.4. Breach and response

Where there are reasonable grounds to believe that there has been a data breach or that the personal information of a data subject has been accessed or acquired by any unauthorised person, the IIG must notify:

(a) the Information Regulator

(b) the data subject unless the identity of such data subject cannot be established.

5.4.1. Breach and response: Roles and responsibilities

	Process	Process Documentation	Process Owner Responsibility
5.4.1.1.	Identify and report breach	Everyone is responsible to identify breaches and report them to the Information Officer/deputy information officer.	Employees/Council Members
5.4.1.2.	Receive and report breach	Report the breach to the information officer and the legal advisor.	Deputy information officer
5.4.1.3.	Description of data breaches	Assess possible consequences of the security incident.	IIG Office Manager
		Identify measures the IIG intends to take to address the security incident.	IIG Office Manager

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		Compile a consolidated report regarding the data breach.	IIG Office Manager
5.4.1.4.	Receive report and notify relevant parties (Information Regulator and data subject)	Receive the report and notify the relevant parties. The notification must include: • a description of the possible consequences of the security incident • a description of the measures The IIG intends to take to address the security incident • recommended measures that the affected data subjects, service providers or stakeholders may take to mitigate the possible adverse effects of the security incident, such as identity theft protection.	Information officer
	Feedback	Provide feedback to The IIG regarding the reported data breaches.	Information Regulator
5.4.1.5.	Receive report	After the report is received and reviewed, a decision must be made on whether to take disciplinary action or not.	Executive Committee
5.4.1.6.	Disciplinary action	If a decision is taken to follow disciplinary action, the LRA, BCoEA, Labour Law Codes of Good Practice will be followed.	Executive
		If a decision is taken not to follow disciplinary action, the process terminates.	

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5.4.1.7.	Consolidate all breach reports	The IIG Office Manager must submit all breach reports after the above process has been finalised to the Executive.	IIG Office Manager

5.5. Disposal

5.8.1. The destruction of personal information, records and data must be done in accordance with the applicable laws and regulations. As a standard, the IIG shall only store personal information for five years after the record has been inactivated.

5.6. Information risk assessments

The Information Risk Assessment is stored in the POPIA folder of the IIG's electronic filing system. It will be reviewed annually and updated as and when necessary.

5.7. Non-compliance and corrective action

Non-compliance with these procedures will result in action being taken in line with the disciplinary policy.

5.8. Application of this procedure

These procedures are applicable to all information, records and data created and received by the IIG. These procedures are applicable to all the IIG employees and council members.

5.9. Delegations of authority

All deviations from the policy and procedure must be approved by the information officer.

5.10. Access and use

Access to personal information, records and data must be processed in accordance with the Promotion of Access to Information Act (PAIA) manual.
Personal information processed for secondary purposes must be recorded in an applicable register.
Personal information must always be protected and retained for not longer than it is required (see annexure A: The IIG records retention schedule, of Information and records management procedures).

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5.11. Request for the correction of personal information by the data subject

A data subject may, in the prescribed form (see annexure B), request the IIG to correct, destroy or delete personal information about the data subject in its custody.

6. ROLES AND RESPONSIBILITIES

List the high-level responsibilities such as capturing, processing, review, and authorisation of transactions on a RACI matrix as shown

	Job Title	Job Title	Job Title	Job Title	Job Title	Job Title
High Level Activity	IIG Office Administrator	IIG Office Manager	Information Officer	Deputy Information Officer	Executive	Council
Collection	R	C	I	I	I	I
Reporting	I	R	A	R	I	I
Processing	A	R	I	I	I	I
Training	I	R	A	A	C	I

R Responsible, A Accountable, C Consulted, I Informed

7. HANDLING OF CUSTOMER COMPLAINTS

a) All complaints received by IIG office, including phone calls and e-mails, will be acknowledged within 2 working days.

b) Resolve all complaints within 4 working days, should this timeframe not be achievable, the complainant will be informed, and a new timeframe suggested and agreed.

c) If it is not resolved within the agreed time the complainant may escalate the complaint and direct the complaint to the Deputy Information Officer (DIO).

d) All complaints received by the DIO, including phone calls and e-mails, will be acknowledged within 2 working days.

e) The DIO will resolve all complaints within 4 working days, should this timeframe not be achievable, the complainant will be informed, and a new timeframe suggested and agreed.

f) If it is not resolved within the agreed time the complainant may escalate the complaint and direct the complaint to the Information Officer (IO).

g) All complaints received by the IO, including phone calls and e-mails, will be acknowledged within 2 working days.

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h) The IO will resolve all complaints within 4 working days; should this timeframe not be achievable; the complainant will be informed, and a new timeframe suggested and agreed.

i) A background will be provided in all Information Management related complaints and procedures will be updated if required to avoid similar complaints.

8. HANDLING OF CUSTOMER QUERIES

a) All queries received by IIG Office, including phone calls and e-mails, will be acknowledged within 2 working days.

b) Urgent queries will be addressed within 2 workings days.

c) Resolve all queries within 4 working days.

d) If it is not resolved within the agreed time the requester may escalate the complaint and direct the complaint to the DIO.

e) All queries received by the Information and DIO, including phone calls and e-mails, will be acknowledged within 2 working days.

f) The DIO will resolve all queries within 4 working days.

9. MONITORING, EVALUATION AND REVIEW

This procedure will be reviewed on an annual basis or when there are changes to the drivers or other documents associated with this procedure.

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ANNEXURES

Annexure A: FORM 1

OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION IN TERMS OF SECTION 11(3) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013)

REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2017
[Regulation 2(1)]

Note:
1. Affidavits or other documentary evidence in support of the objection must be attached.
2. If the space provided for in this form is inadequate, submit information as an annexure to this form and sign each page.

Reference number:

A	**DETAILS OF DATA SUBJECT**
Name and surname of data subject:	
Residential, postal or business address:	
	Code:
Contact number(s):	
Fax number:	
Email address:	
B	**DETAILS OF RESPONSIBLE PARTY**
Name and surname of responsible party*(if the*	
Residential, postal or business address:	

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	Code:
Contact number(s):	
Fax number:	
Email address:	
Name of public or private body*(if the responsible party is not a natural*	
Business address:	
	Code:
Contact number(s):	
Fax number:	
Email address:	

C	**REASONS FOR OBJECTION** *(please provide detailed reasons for the objection)*

Signed at ..... on this ..... day of .....20.....

.....

Signature of data subject (applicant)

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Annexure B: FORM 2

REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION, OR DESTROYING OR DELETION OF RECORD OF PERSONAL INFORMATION, IN TERMS OF SECTION 24(1) OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013)

REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2017
[Regulation 3(2)]
Note:
1. Affidavits or other documentary evidence in support of the request must be attached.
2. If the space provided for in this form is inadequate, submit information as an annexure to this form and sign each page.

Reference number:

Mark the appropriate box with an 'X':
Request for:

☐ Correction or deletion of the personal information about the data subject that is in possession or under the control of the responsible party

☐ Destroying or deletion of a record of personal information about the data subject that is in possession or under the control of the responsible party and who is no longer authorised to retain the record of information

A	**DETAILS OF DATA SUBJECT**
Surname:	
Full names:	
Identity number:	
Residential, postal or business address:	
	Code:
Contact number(s):	
Fax number:	
Email address:	
B	**DETAILS OF RESPONSIBLE PARTY**

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Name and surname of responsible party *(if the responsible party is a natural person)*:	
Residential, postal or business address:	
	Code:
Contact number(s):	
Fax number:	
Email address:	
Name of public or private body *(if the responsible party is not a natural person)*:	
Business address:	
	Code:
Contact number(s):	
Fax number:	
Email address:	

C	**REASONS FOR *CORRECTION OR DELETION OF THE PERSONAL INFORMATION ABOUT THE DATA SUBJECT / *DESTRUCTION OR DELETION OF A RECORD OF PERSONAL INFORMATION ABOUT THE DATA SUBJECT THAT IS IN POSSESSION OR UNDER THE CONTROL OF THE RESPONSIBLE PARTY** *(please provide detailed reasons for the request)*

**Delete whichever is not applicable*

Signed at ..... this ..... day of .....20.....

.....

Signature of data subject

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Annexure C: FORM 5

COMPLAINT REGARDING INTERFERENCE WITH THE PROTECTION OF PERSONAL INFORMATION / COMPLAINT REGARDING DETERMINATION OF AN ADJUDICATOR IN TERMS OF SECTION 74 OF THE PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT NO. 4 OF 2013)

REGULATIONS RELATING TO THE PROTECTION OF PERSONAL INFORMATION, 2017
[Regulation 7]

Note:
1. Affidavits or other documentary evidence in support of the request must be attached.
2. If the space provided for in this form is inadequate, submit information as an annexure to this form and sign each page.

Reference number:

Mark the appropriate box with an 'X':

Complaint regarding:

☐ Alleged interference with the protection of personal information

☐ Determination of an adjudicator

PART I **A**	**ALLEGED INTERFERENCE WITH THE PROTECTION OF PERSONAL INFORMATION** ***(Section 74(1) of the Protection of Personal Information Act, 2013 (Act No. 4 of 2013)*** **PARTICULARS OF COMPLAINANT**
Surname of complainant:	
Full names of complainant:	
Identity number of complainant:	

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Residential, postal or business address:	Code:
Contact number(s):	
Fax number:	
Email address:	

B	**PARTICULARS OF BODY / RESPONSIBLE PARTY INTERFERING WITH PERSONAL INFORMATION**
Full names and surname of person interfering with personal information *(if the person is a*	
Name of public or private body *(if not a natural person)*:	
Residential address *(if applicable),* postal address or business address:	Code:
Contact number(s):	
Fax number:	
Email address:	

C	**REASONS FOR COMPLAINT***(please provide detailed reasons for the complaint)*

PART II	**GRIEVANCE REGARDING DETERMINATION OF ADJUDICATOR** ***(Section 74(2) of the Protection of Personal Information Act, 2013 (Act No. 4 of 2013)***
A	**PARTICULARS OF COMPLAINANT**

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Surname of complainant:	
Full names of complainant:	
Identity number of complainants:	
Residential, postal, or business address:	
	Code:
Contact number(s):	
Fax number:	
Email address:	
B	**PARTICULARS OF ADJUDICATOR**
Full names and surname of adjudicator:	
Name and surname of responsible party (*if it is not a public or*	
Name of responsible party (*if it is a public or private body)*:	
Residential, postal or business address:	
	Code:
Contact number(s):	
Fax number:	
Email address:	
C	**REASONS FOR COMPLAINT** *(please provide detailed reasons for the grievance)*

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Signed at ..... this ..... day of .....20.....

.....

Signature of complainant / person aggrieved

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ANNEXURE D: CHECKLIST FOR PROCESSING PERSONAL INFORMATION FOR SECONDARY PURPOSES

No.	Indicator	Compliance (yes/no)	Evidence/ comments
1.	Was processing for secondary purpose compatible with the purpose for which it was first collected?		
2.	Was processing for secondary purpose done to avoid prejudice such as prevention, detection and investigation?		
3.	Was processing for secondary purpose done to comply with obligation imposed by the law, e.g. Sars?		
4.	Was processing for secondary purpose done for proceedings in a court of law or tribunal?		
5.	Was further processing done in the interest for national security?		
6.	Did the information regulator grant exemption to the responsibility party to processing personal information?		
7.	Did the data subject give consent for further processing? *(This applies only if the above criteria are not applicable)*		

Please note: any secondary processing inconsistent with the above criteria or standards should be considered unlawful and a risk to the IIG.