

## **POLICY**

<b>Subject</b>	<b>DATA PROTECTION AND INFORMATION SHARING</b>
<b>Functional Area</b>	<b>Rand Aid, which in this policy includes Rand Aid Association, Max Ordman Deaf Association and The RA Welfare Development Trust</b>
<b>Purposes</b>	To provide a framework for confidentiality and information security standards and the process of sharing information
<b>Authority</b>	Exco
<b>Responsibility</b>	Top Management
<b>Applicable to</b>	All staff
<b>Effective date</b>	1 June 2021

### **1. INTRODUCTION**

The purpose of this policy is to provide a framework to guide Rand Aid to meet its legal obligations and requirements concerning confidentiality and information security standards while processing personal information in order to operate effectively.

### **2. LEGAL FRAMEWORK**

The right to privacy is a basic human right. Ensuring confidentiality of personal information and security standards in dealing with personal information is to be done in terms of the applicable legal framework, namely

- Constitution of the Republic of South Africa, 1996 (Const)
- Protection of Personal Information Act, 2013 (POPIA)
- Promotion of Access to Information Act, 2000 (PAIA)

### **3. OBJECTIVES**

The objective of the policy is to ensure that the personal information processed by Rand Aid, i.e. information collected, recorded, organized, stored, modified, transmitted or destroyed, is done in a confidential and secure manner as envisaged in POPIA. The personal information Rand Aid processes from time to time, includes the personal information of employees, residents, clients, contractors, suppliers, and other data subjects.



To this end, Rand Aid must:

- 3.1 Obtain consent of any person of whom it processes information, or have a justifiable reason to process the information;
- 3.2 Prepare manuals and or procedures regarding the processing of information; and
- 3.3 Train employees in this regard.

#### **4. SCOPE**

This policy applies to all staff within Rand Aid, and includes but is not limited to all employees, board members, contractors, consultants and appointees. The provisions of this policy are applicable to both on and off-site processing of personal information.

#### **5. DEFINITIONS**

In this policy:

“consent” means the voluntary, specific and informed expression of will;

“data subjects” means a person whose personal information is processed as defined in the POPIA;

“employees” for purposes of this policy only, will include board members, trustees of The RA Welfare Development Trust, and volunteers;

“personal information” means information relating to identifiable persons, as defined in the POPIA; and

“process” means any operation or activity or any set of operations, whether or not by automatic means, concerning person information and as defined in the POPIA, including but not limited to collection, recording, organisation, storage, modification and transmission.

#### **6. GENERAL PRINCIPLES**

6.1 The framework underpins the following principles:

- Confidentiality
- Transparency
- Security
- Accountability

6.2 Rand Aid is committed to the promotion of the following:

6.2.1 The creation of an institution that respects the rights of its employees, residents, clients, contractors, suppliers, and other data subjects in relation to the processing of personal information.

6.2.2 The protection of the privacy of its employees, residents, clients, contractors, and suppliers; and ensuring that their personal information is used in accordance with applicable laws, appropriately, transparently, and securely.



Rand Aid's commitment to protecting privacy is based on the following:

- 6.3 A person's right to privacy which includes having control over personal information and being able to conduct affairs free from unwanted and unsolicited intrusions.
- 6.4 Given the importance of privacy, Rand Aid is committed to effectively managing personal information in accordance with the provisions of the POPIA.

The protection of personal information during the processing thereof is set out in a Rand Aid manual prepared for this purpose.

## 7. INFORMATION OFFICER

Rand Aid must appoint an Information Officer who is responsible for the encouragement of compliance with the conditions of the lawful processing of personal information and other provisions of the POPIA.

## 8. REVIEW AND AMENDMENT OF THIS POLICY

- 8.1 The policy will be subject to periodic review, at least every five years or more frequently if required, to ensure awareness and it remains relevant to changed circumstances.
- 8.2 Policy amendments will be subject to the discretion of Rand Aid and pursuant to any changes in law and will be approved by the Executive Committee.
- 8.3 Implementation and execution of the policy is the responsibility of executive and senior management and changes will be brought to the attention of employees, residents, clients, contractors, and suppliers or any other persons where it affects them.

APPROVED, THIS 2<sup>nd</sup> DAY OF JUNE 2021



Chief Executive Officer

RAND AID ASSOCIATION