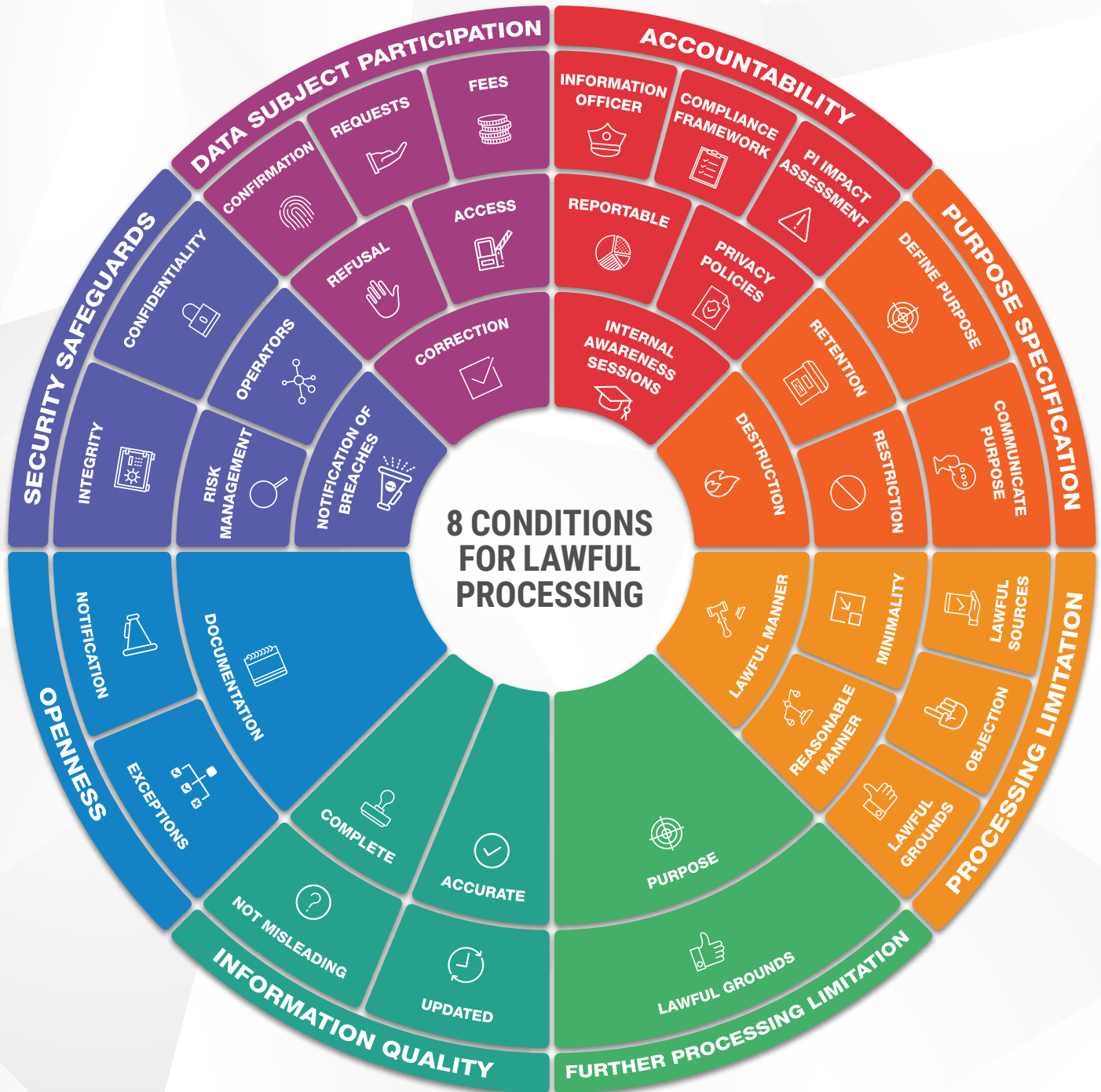




PROTECTION OF PERSONAL INFORMATION

Implementation of the Conditions for Lawful Processing

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ABBREVIATIONS & ROLES

- PI Personal Information
- DS Data Subject
- RP Responsible Party
- IO Information Officer
- DIO Deputy Information Officer
- IR Information Regulator
- LIA Legitimate Interest Assessment
- PIIA Personal Information Impact Assessment
- NDA Non-Disclosure Agreement

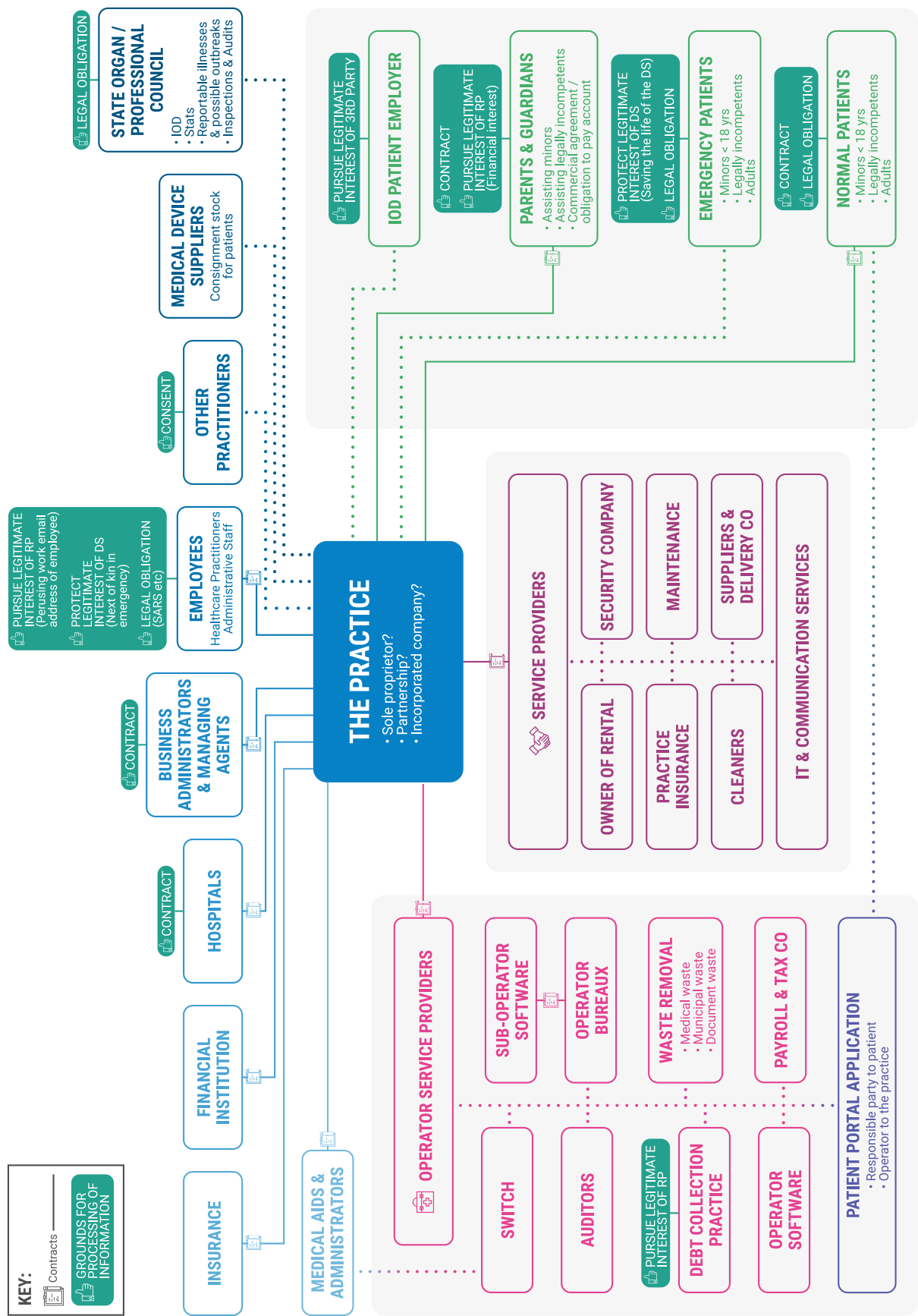


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RELATIONSHIPS

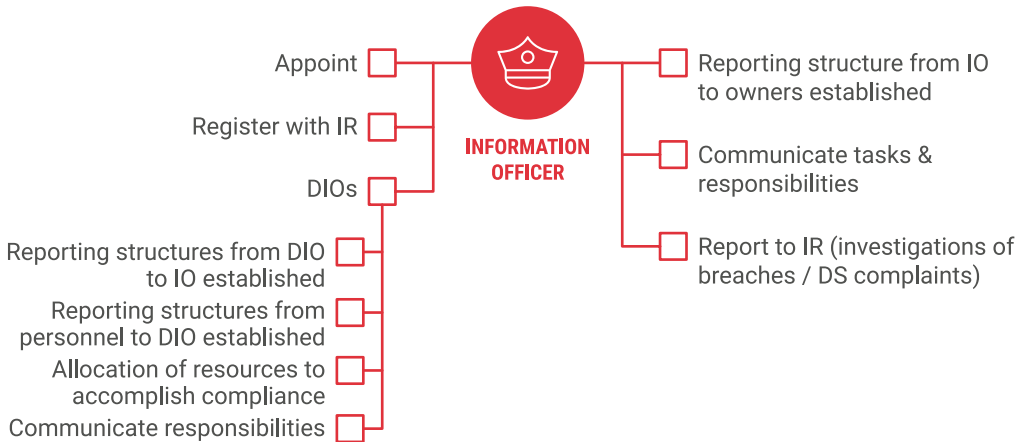
COMPLIANCE FRAMEWORK



STAGE 1: ESTABLISH COMPLIANCE

INFORMATION OFFICER

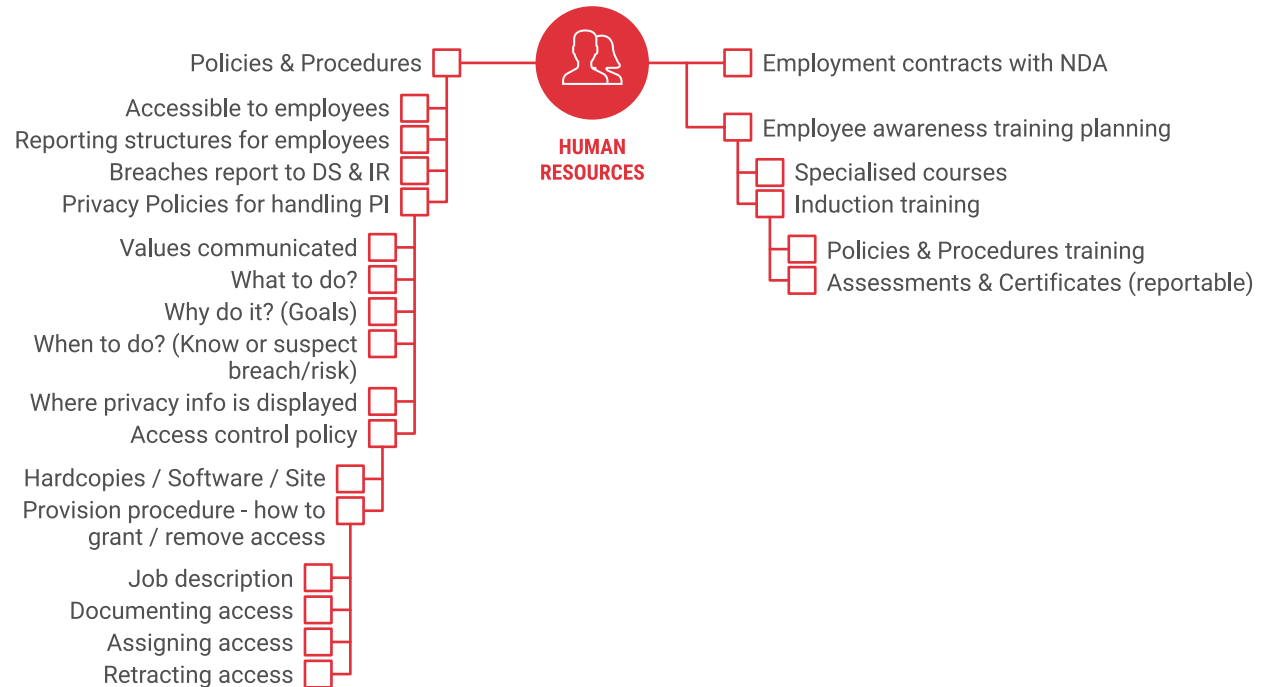
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INFORMATION OFFICER	HUMAN RESOURCES	CONTRACTS	PI SECURITY
PI PROCESSING PLANNING	DS PARTICIPATION PLANNING	PUBLICATION OF INFO OF RP	RISK MANAGEMENT



STAGE 1: ESTABLISH COMPLIANCE

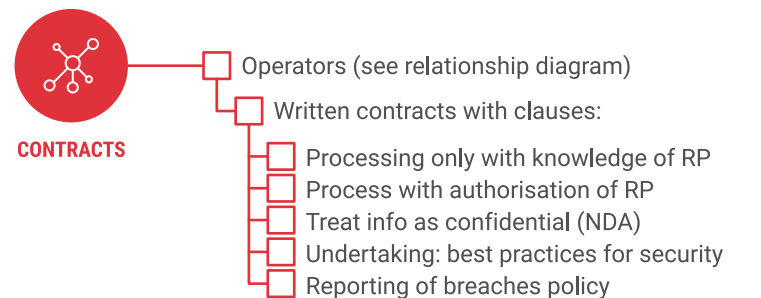
HUMAN RESOURCES

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INFORMATION OFFICER	HUMAN RESOURCES	CONTRACTS	PI SECURITY
PI PROCESSING PLANNING	DS PARTICIPATION PLANNING	PUBLICATION OF INFO OF RP	RISK MANAGEMENT



CONTRACTS

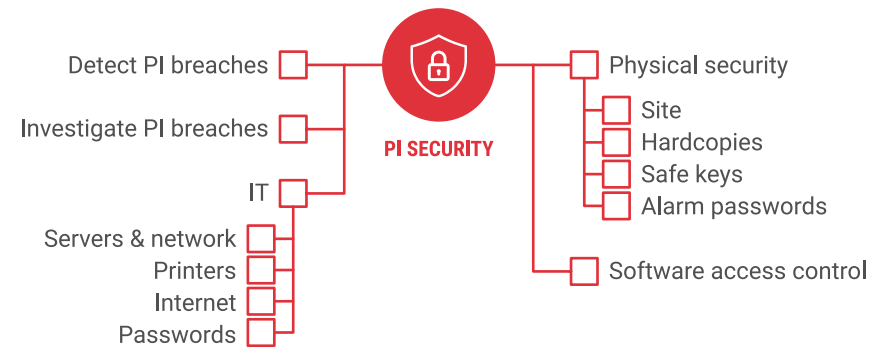
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INFORMATION OFFICER	HUMAN RESOURCES	CONTRACTS	PI SECURITY
PI PROCESSING PLANNING	DS PARTICIPATION PLANNING	PUBLICATION OF INFO OF RP	RISK MANAGEMENT



STAGE 1: ESTABLISH COMPLIANCE

PI SECURITY

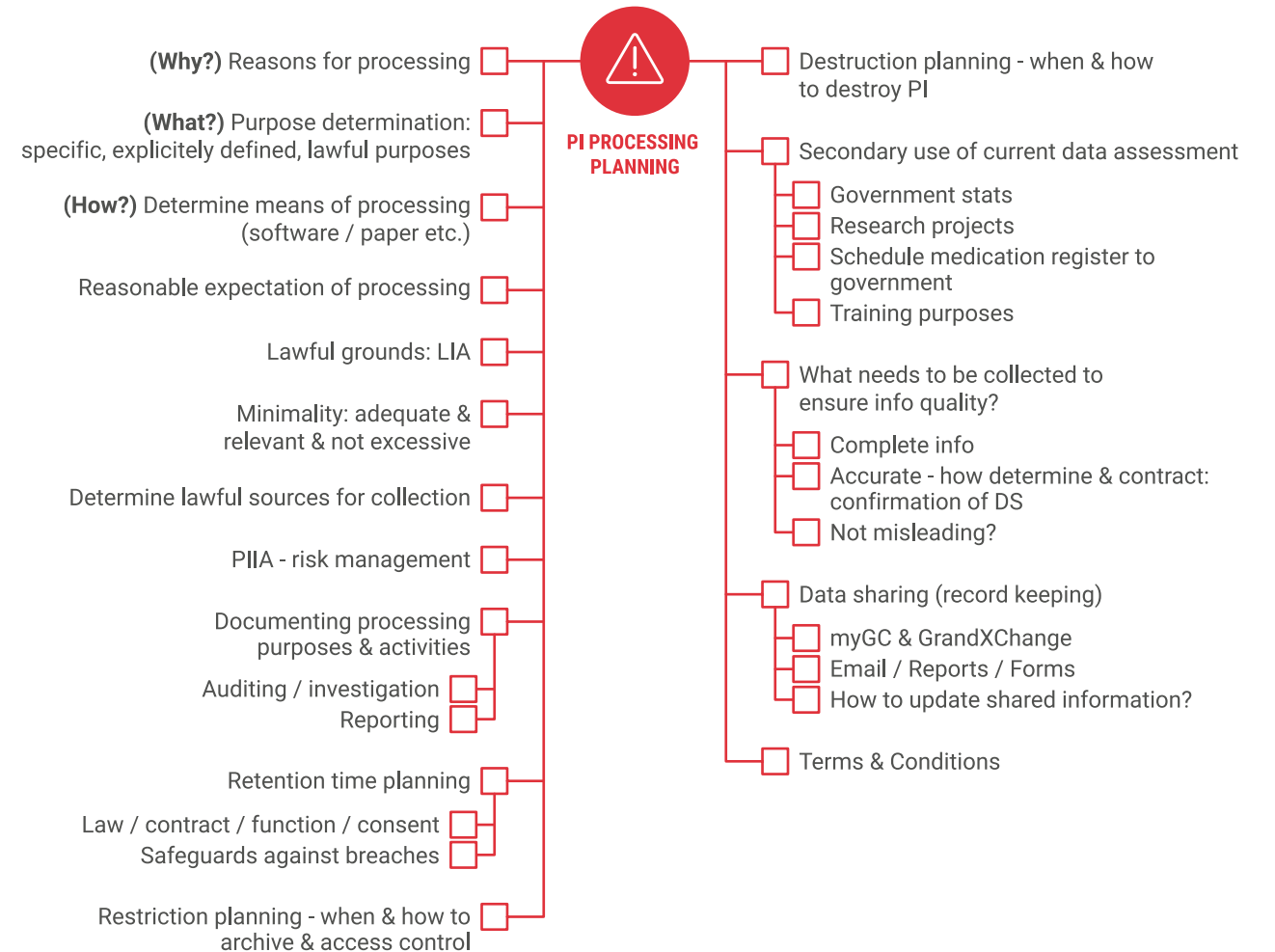
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INFORMATION OFFICER	HUMAN RESOURCES	CONTRACTS	PI SECURITY
PI PROCESSING PLANNING	DS PARTICIPATION PLANNING	PUBLICATION OF INFO OF RP	RISK MANAGEMENT



STAGE 1: ESTABLISH COMPLIANCE

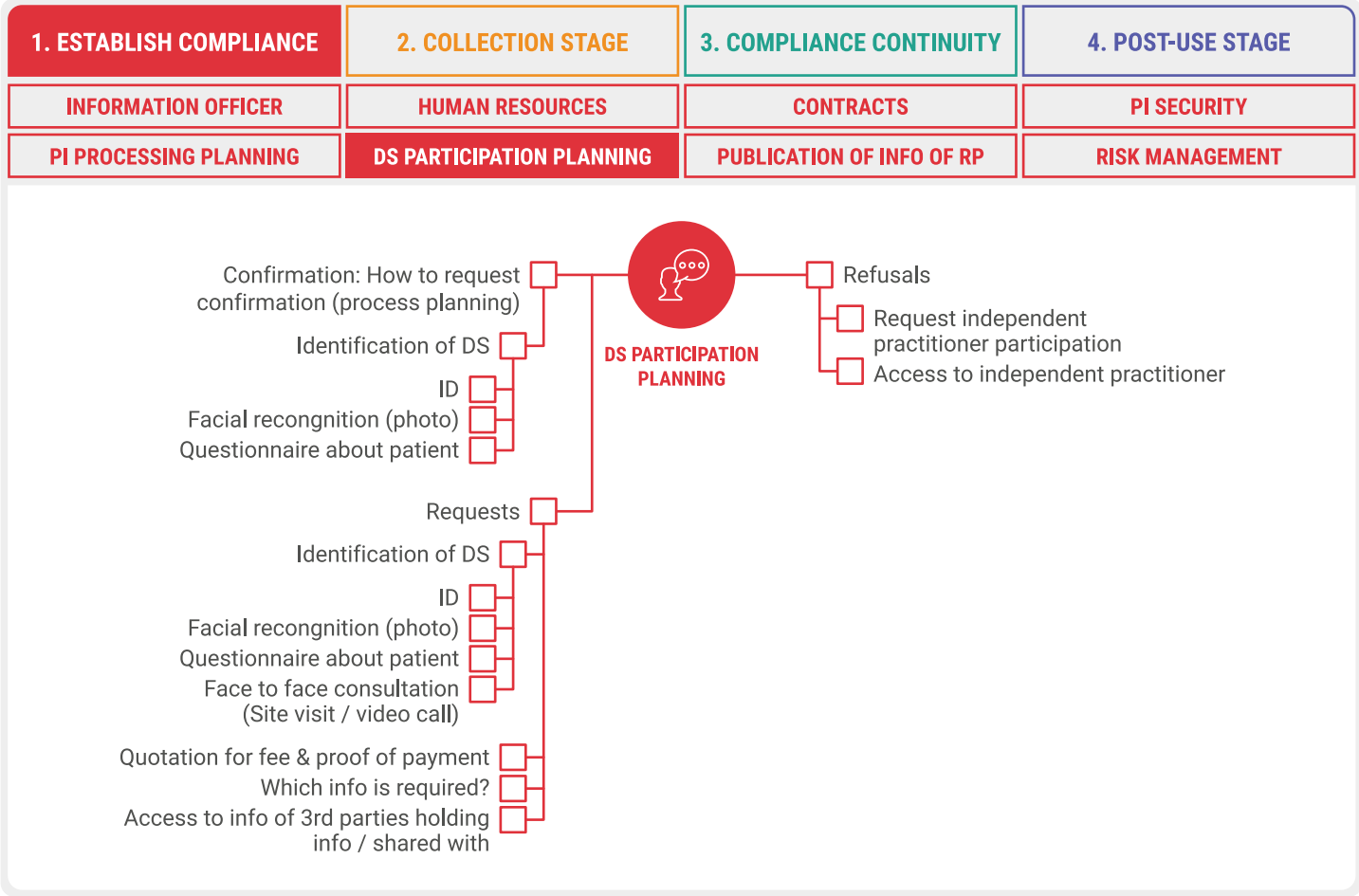
PI PROCESSING PLANNING

1. ESTABLISH COMPLIANCE	2. COLLECTION STAGE	3. COMPLIANCE CONTINUITY	4. POST-USE STAGE
INFORMATION OFFICER	HUMAN RESOURCES	CONTRACTS	PI SECURITY
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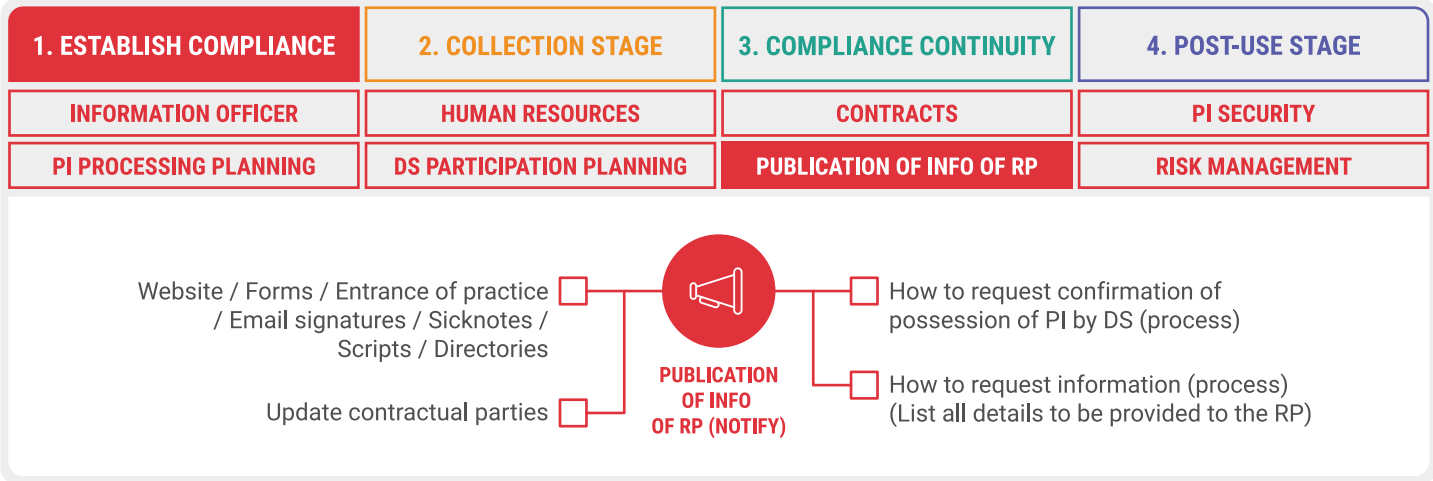


STAGE 1: ESTABLISH COMPLIANCE

DS PARTICIPATION PLANNING

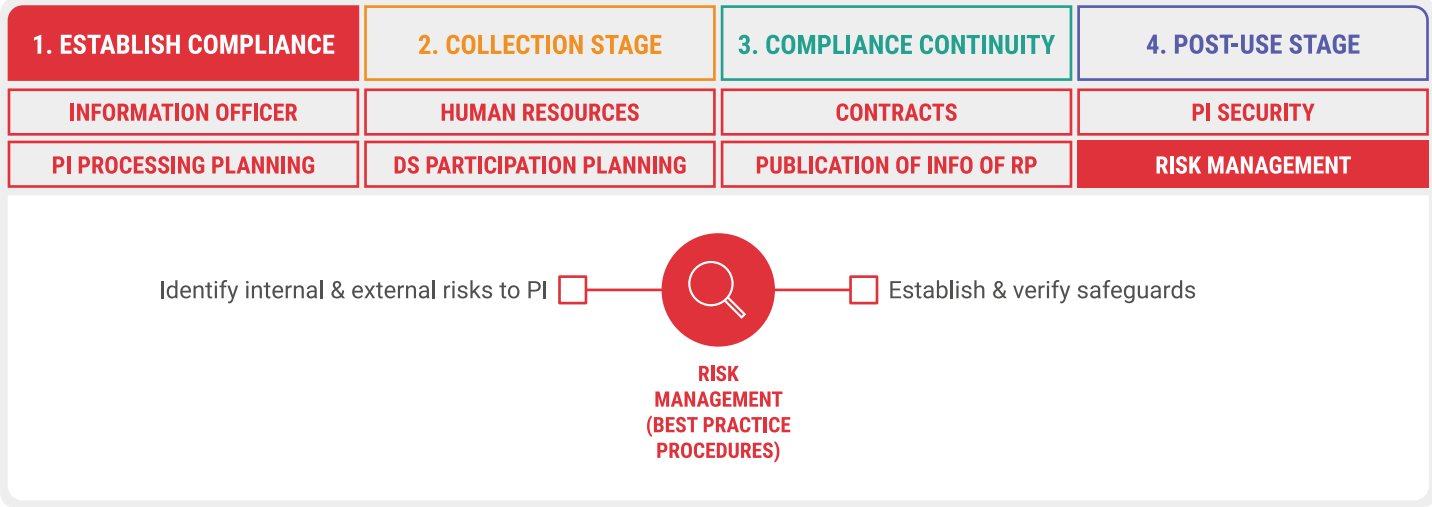


PUBLICATION OF INFO OF RP (NOTIFY)



STAGE 1: ESTABLISH COMPLIANCE

RISK MANAGEMENT (BEST PRACTICE PROCEDURES)



STAGE 2: COLLECTION STAGE

INFORMATION QUALITY

1. ESTABLISH COMPLIANCE

2. COLLECTION STAGE

3. COMPLIANCE CONTINUITY

4. POST-USE STAGE

INFORMATION QUALITY

COMMUNICATION TO DS

INFORMATION QUALITY

Complete (forms guide completion)

COMMUNICATION TO DS

1. ESTABLISH COMPLIANCE

2. COLLECTION STAGE

3. COMPLIANCE CONTINUITY

4. POST-USE STAGE

INFORMATION QUALITY

COMMUNICATION TO DS

Purpose of processing: forms etc (T&C)
Exception?

That info is being collected - T&C validations

Notify DS of source of info

PI collection = mandatory / voluntary

Consequences of failure to provide info (T&C)

Reason for collection - law?
Other? (T&C)

COMMUNICATION TO DS

Transborder flow

Sharing - with whom? what?

Rights of DS

- access
- rectification
- objection
- complaints

GoodX

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STAGE 3: COMPLIANCE CONTINUITY

HUMAN RESOURCES

1. ESTABLISH COMPLIANCE

2. COLLECTION STAGE

3. COMPLIANCE CONTINUITY

4. POST-USE STAGE

HUMAN RESOURCES

INTEGRITY

BREACHES

DS OBJECTIONS & CORRECTIONS

REVIEW & UPDATE

RISK MANAGEMENT

UPDATED INFORMATION

CONFIDENTIALITY MEASURES

Employee awareness sessions

- Induction training - new employees
- Introductory courses
- Specialised courses

Refresher training - current employees

- Introductory courses
- Specialised courses

Filing of employee training certificates

Reporting: non-compliance of employees

HUMAN RESOURCES

HR disciplinary procedures for non-compliance by employees

INTEGRITY

1. ESTABLISH COMPLIANCE

2. COLLECTION STAGE

3. COMPLIANCE CONTINUITY

4. POST-USE STAGE

HUMAN RESOURCES

INTEGRITY

BREACHES

DS OBJECTIONS & CORRECTIONS

REVIEW & UPDATE

RISK MANAGEMENT

UPDATED INFORMATION

CONFIDENTIALITY MEASURES

Prevent loss

- Backup regime
- Document safe
- Document scanning

Prevent damage

- Organisational: Updated hardware
- Backup regime
- Risk management

INTEGRITY

Prevent unauthorised destruction

- Backup regime
- Access control

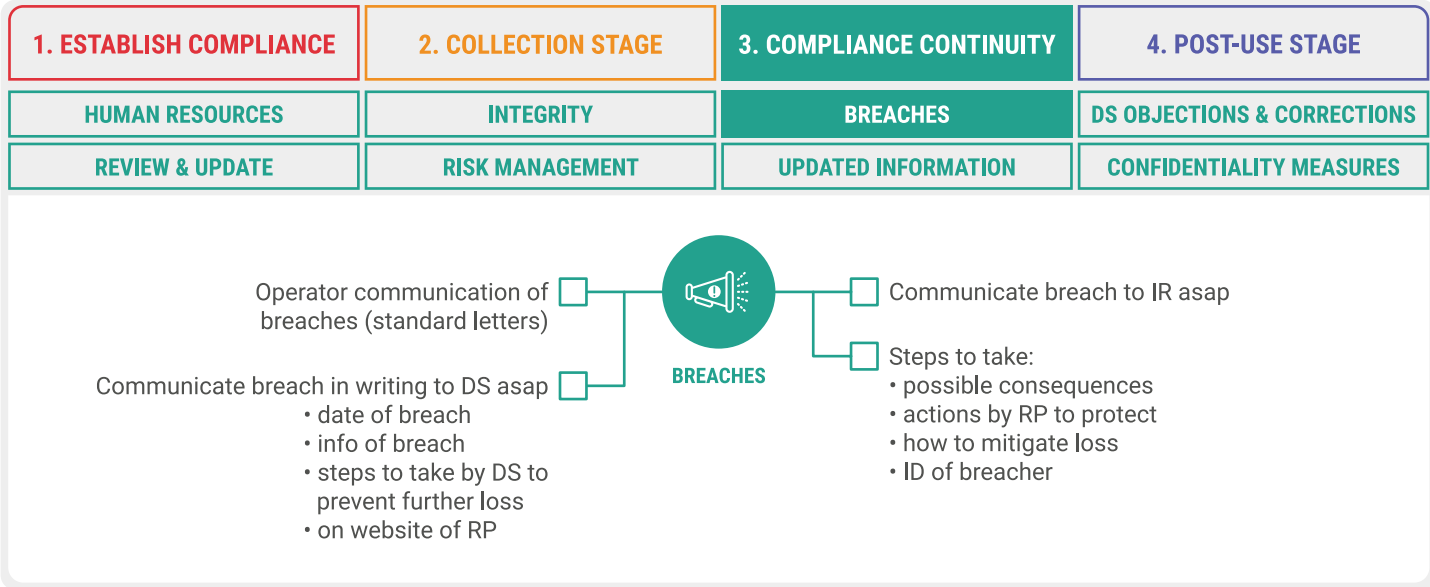
Organisational process for destruction of PI

GoodX

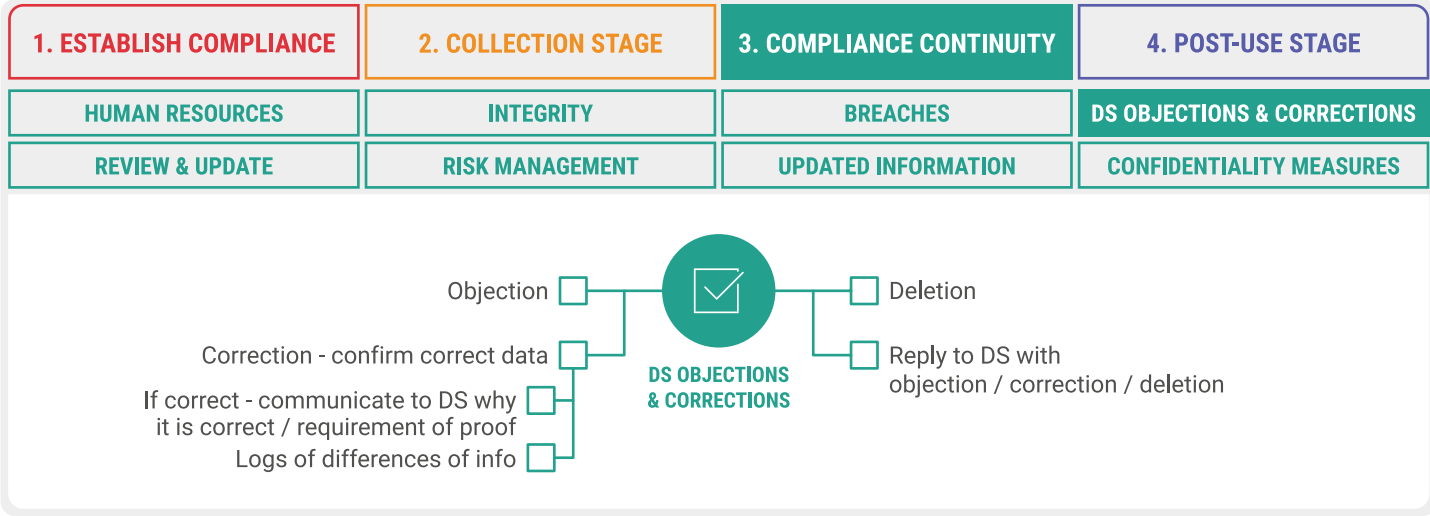
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STAGE 3: COMPLIANCE CONTINUITY

BREACHES

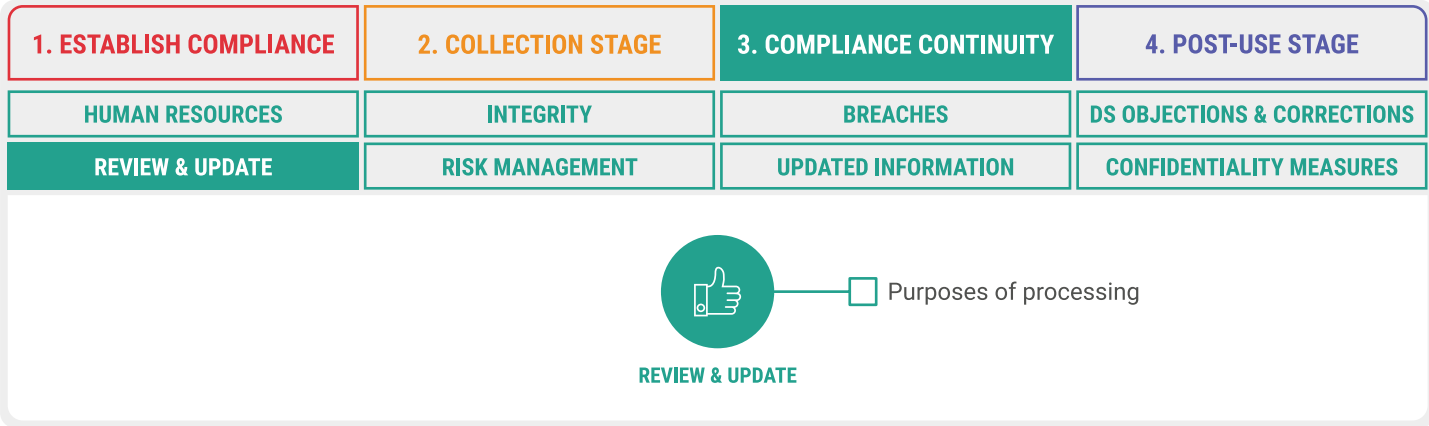


DS OBJECTIONS & CORRECTIONS

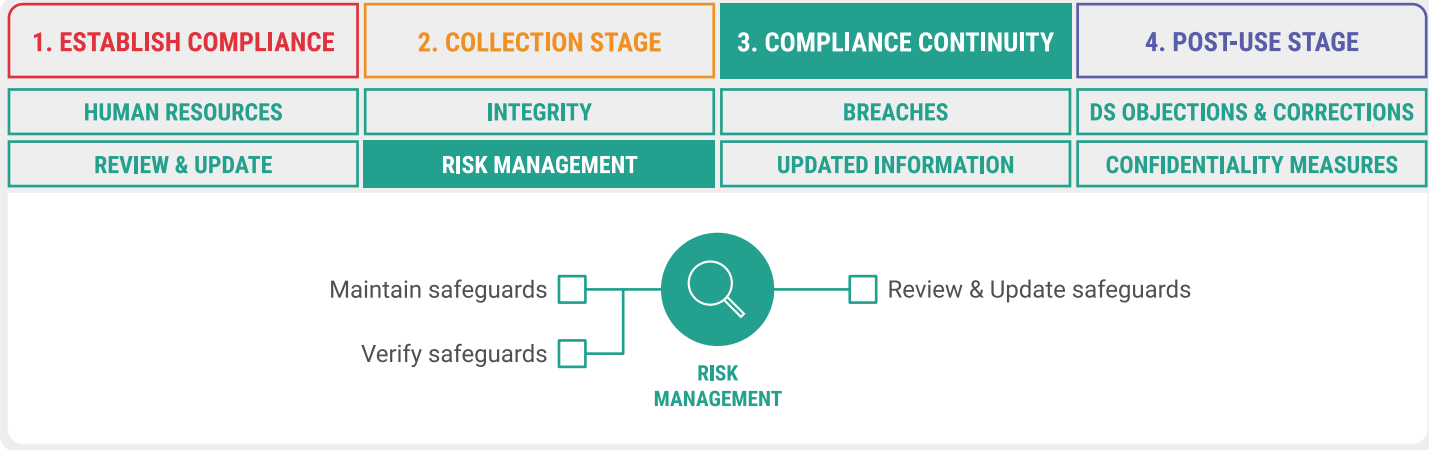


STAGE 3: COMPLIANCE CONTINUITY

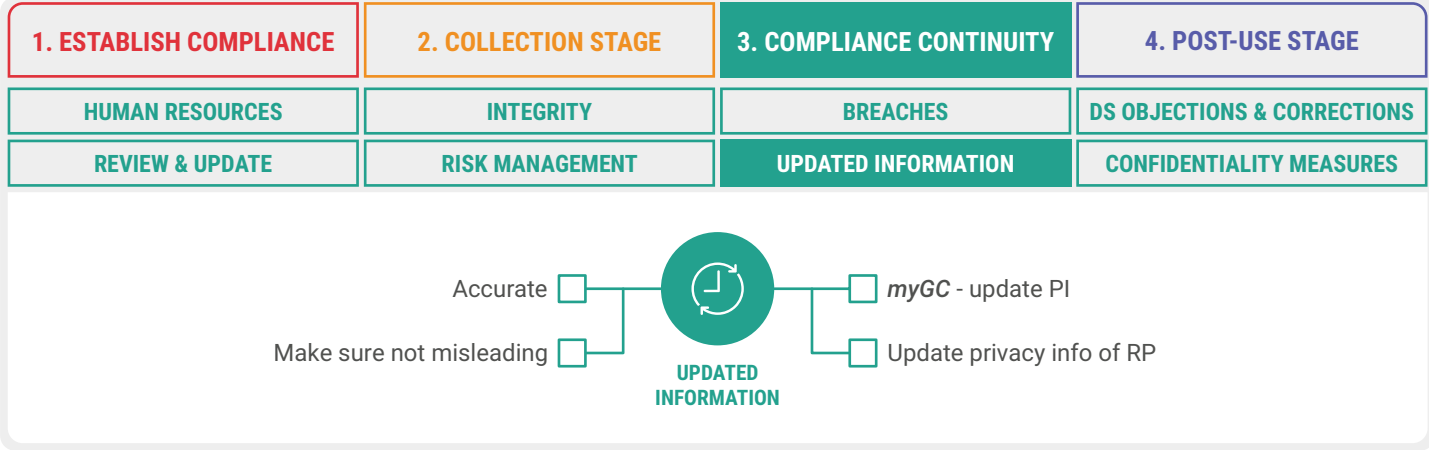
REVIEW & UPDATE



RISK MANAGEMENT

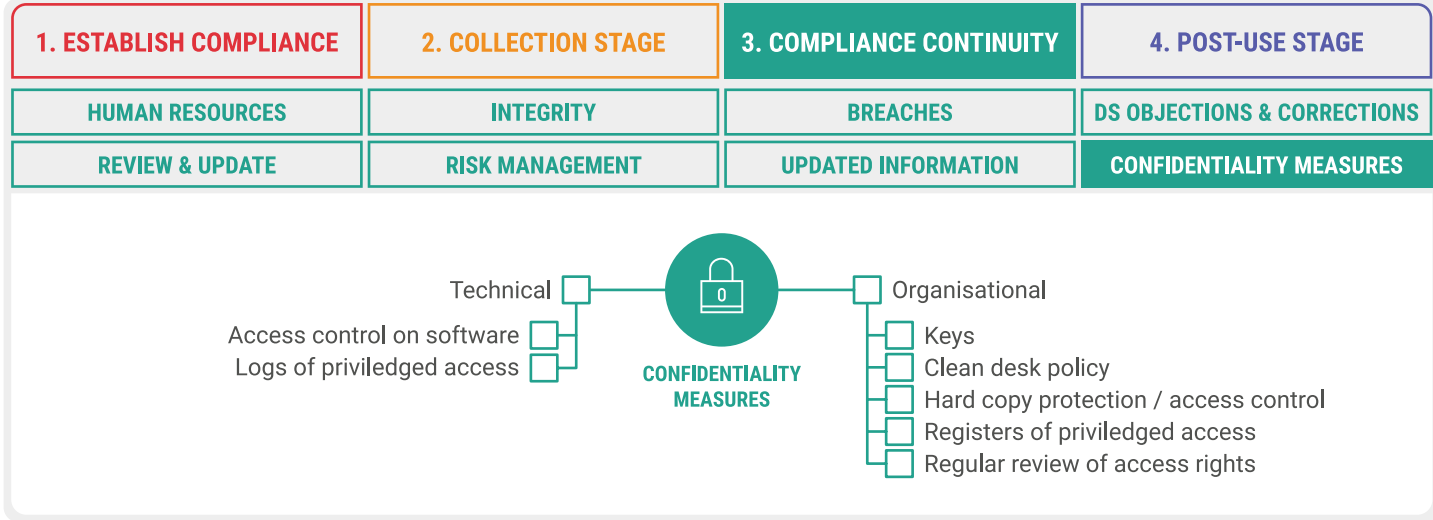


UPDATED INFORMATION



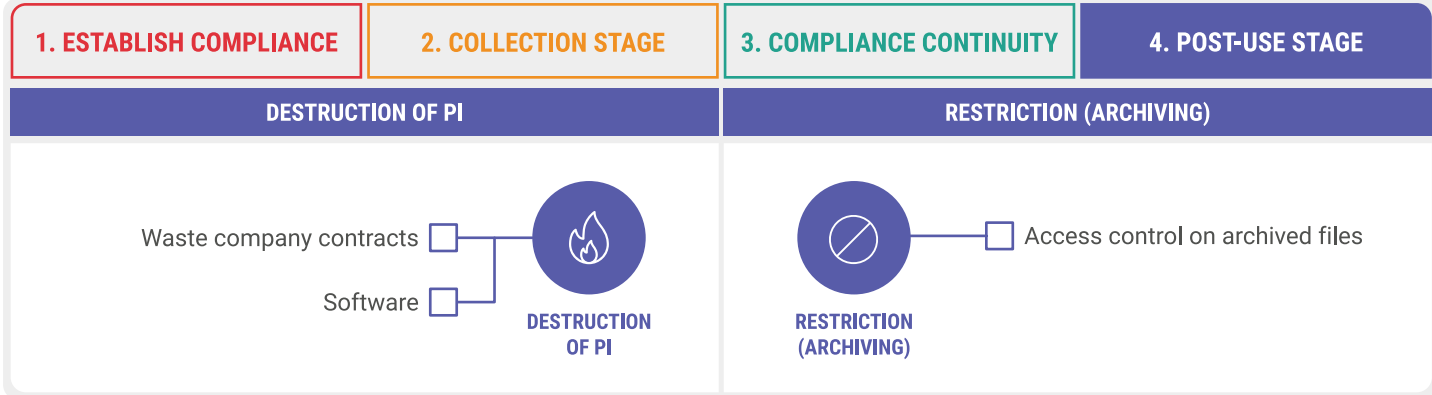
STAGE 3: COMPLIANCE CONTINUITY

CONFIDENTIALITY MEASURES



STAGE 4: POST-USE STAGE

DESTRUCTION OF PI





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