



**OVERBERG RENOSTERVELD CONSERVATION TRUST  
("ORCT")**

**POLICY NAME:** Protection of Personal Information Policy

**POLICY & VERSION NUMBER:** 6 Version 1

**APPROVED BY BOARD:** DATE: 15 September 2023

**EFFECTIVE FROM:** DATE: 1 October 2023

**1. PURPOSE**

The purpose of this policy is to give effect to the provisions of the Protection of Personal Information Act 4 of 2013 (POPIA) to safeguard personal information.

All employees, trustees, contractors volunteers and representatives shall adhere to this policy concerning the management of all personal information received from, but not limited to natural persons, employees, clients, suppliers, agents, representatives and partners of the ORCT, to ensure compliance with POPIA.

**2. POLICY OBJECTIVES**

- 2.1 To safeguard personal information;
- 2.2 To regulate and process personal information;

- 2.3 To execute the prescribed requirements for the legal processing of personal information;
- 2.4 To protect the free flow of personal information.

### 3. **REGULATORY FRAMEWORK**

Protection of Personal Information Act 4 of 2013. (POPIA)

### 4. **ROLES AND RESPONSIBILITIES**

The Director will delegate to a senior manager to institute systems and procedures as per this policy to meet the requirements of POPIA.

### 5. **PROCEDURE**

The ORCT may collect personal information in conducting ordinary business operations, including use of the ORCT website. The provisions of POPIA will be complied with in the processing of such personal information and to ensure that personal information is used for legitimate business purposes only.

The use and disclosure of personal information will include only what is permitted in terms of POPIA, where consumers have consented to such collection, use and disclosure.

#### 5.1 **Obtaining Consent**

The ORCT does not, except where otherwise permitted by law, collect, use, or disclose personal information without consent.

#### 5.2 **Use and Disclosure of Personal Information**

- 5.2.1 Personal information will only be used for the purposes for which it was collected and agreed;
- 5.2.2 Personal information may be disclosed where ORCT has a duty or a right to disclose it in terms of applicable laws;
- 5.2.3 Personal information may be disclosed to service providers who are involved in the delivery of products or services.

#### 5.3 **Retention of Personal Information**

- 5.3.1 All personal information retained on the ORCT database, including such information obtained using the ORCT website, is in accordance with the retention provisions set out in the laws and regulations of South Africa, including those set out in POPIA.
- 5.3.2 Personal information is retained for as long as reasonably necessary to fulfil the purpose for which it was collected and to comply with laws.

#### 5.4 **Rights of a Data Subject** (the person to whom the personal information is relative to)

A data subject has the right to contact ORCT at any time to ask ORCT to:

- 5.4.1 Confirm it holds their personal information;
- 5.4.2 Provide access to any records containing their personal information or a description of the personal information that ORCT holds about them;
- 5.4.3 Confirm the identity or categories of third parties who have had, or currently have, access to their personal information;
- 5.4.4 To request the ORCT to correct or delete personal information in its possession or under its management which is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or has been obtained illegally.

## 5.5 **Security Safeguards**

- 5.5.1 The ORCT will secure the integrity and confidentiality of personal information in its possession or under its control by taking appropriate, reasonable, technical and organisational measures to prevent loss of, damage to, or unauthorised destruction of personal information, and unlawful access to or processing of personal information.
- 5.5.2 The ORCT will take responsible measures to:
  - identify all reasonable predictable internal and external risks to personal information in its possession or under its management;
  - establish and maintain appropriate safeguards against the risks identified;
  - regularly verify that the safeguards are effectively implemented; and
  - ensure that the safeguards are continually updated in response to new risks or deficiencies in previously implemented safeguarding methods.

## 6. **MONITOR AND REVIEW**

The policy will be reviewed every 3 years on the anniversary of first approval.