



# Putprop



22 Impala  
Road  
Chislehurst  
Sandton  
Johannesburg  
2196

+27 11 883 8650

info@putprop.co.za

www.putprop.co.za



## PROTECTION OF PERSONAL INFORMATION (POPI) POLICY

---

Protection of Personal Information Policy Version: 1

Publishing Date: 6 June 2024

Last Review Date: 17/02/2026

Frequency of Review: As Required

Next Review Date: As Required

Policy Owner: Darryl Mayers

Responsible Business Unit: Administration

### POLICY STATEMENT

This policy forms part of the policy owner's internal business processes and procedures.

Any reference to the "organisation" shall be interpreted to include the "policy owner." The organisation's governing body, its employees, volunteers, contractors, suppliers and any other persons acting on behalf of the organisation are required to familiarise themselves with the policy's requirements and undertake to comply with the stated processes and procedures.

Risk owners and control owners are responsible for overseeing and maintaining control procedures and activities.

---

#### Directors:

Darryl Mayers\* | Alicia Nolte® | Hayden Hartley## | René Styber##

\*Chief Executive Officer | ®Chief Financial Officer | ^Chairman | #Executive director | ##Independent non-executive





## Table of Contents

POLICY STATEMENT .....	1
1. INTRODUCTION.....	4
2. DEFINITIONS .....	4
2.1 Personal Information .....	4
2.2 Data Subject .....	4
2.3 Responsible Party.....	4
2.4 Operator .....	4
2.5 Information Officer .....	4
2.6 Processing .....	5
2.7 Record.....	5
2.8 Filing System .....	5
2.9 Unique Identifier.....	5
2.10 De-Identify .....	5
2.11 Re-Identify .....	5
2.12 Consent.....	5
2.13 Direct Marketing .....	6
2.14 Biometrics .....	6
3. POLICY PURPOSE .....	6
4. POLICY APPLICATION .....	6
5. RIGHTS OF DATA SUBJECTS .....	7
5.1 The Right to Access Personal Information.....	7
5.2 The Right to have Personal Information Corrected or Deleted .....	7
5.3 The Right to Object to the Processing of Personal Information.....	7
5.4 The Right to Object to Direct Marketing.....	7
5.5 The Right to Complain to the Information Regulator .....	7
5.6 The Right to be Informed .....	7
6. GENERAL GUIDING PRINCIPLES.....	7
6.1 Accountability .....	8
6.2 Processing Limitation .....	8
6.3 Purpose Specification .....	8
6.4 Further Processing Limitation .....	8
6.5 Information Quality.....	8
6.6 Open Communication .....	9
6.7 Security Safeguards.....	9

---

Directors:

Darryl Mayers\* | Alicia Nolte® | Hayden Hartley## | René Styber##

\*Chief Executive Officer | ®Chief Financial Officer | ^Chairman | #Executive director | ##Independent non-executive





6.8	<a href="#">Data Subject Participation</a>	9
7.	<a href="#">INFORMATION OFFICERS</a>	9
8.	<a href="#">SPECIFIC DUTIES AND RESPONSIBILITIES</a>	10
8.1	<a href="#">Governing Body</a>	10
8.2	<a href="#">Information Officer</a>	10
8.3	<a href="#">IT Manager</a>	11
8.4	<a href="#">Marketing &amp; Communications Manager</a>	11
8.5	<a href="#">Employees and other Persons acting on behalf of Organization</a>	11
9.	<a href="#">REQUEST TO ACCESS PERSONAL INFORMATION PROCEDURE</a>	13
10.	<a href="#">POPI COMPLAINTS PROCEDURE</a>	13
11.	<a href="#">DISCIPLINARY ACTION</a>	13
	<a href="#">ANNEXURE A: PERSONAL INFORMATION REQUEST FORM</a>	15
	<a href="#">ANNEXURE B: POPI COMPLAINT FORM</a>	16

---

Directors:

Darryl Mayers\* | Alicia Nolte@ | Hayden Hartley## | René Styber##

\*Chief Executive Officer | @Chief Financial Officer | ^Chairman | #Executive director | ##Independent non-executive





## 1. INTRODUCTION

The right to privacy is an integral human right recognised 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 privacy through providing guiding principles that are intended to be applied to the processing of personal information in a context-sensitive manner.

Through the provision of quality goods and services, the organisation is necessarily involved in the collection, use and disclosure of certain aspects of the personal information of clients, customers, employees, and other stakeholders. A person’s right to privacy entails having control over his or her personal information and being able to conduct his or her affairs relatively free from unwanted intrusions. Given the importance of privacy, the organisation is committed to effectively managing personal information in accordance with POPIA’s provisions.

## 2. DEFINITIONS

### 2.1 Personal Information

Personal information is any information that can be used to reveal a person’s identity. Personal information relates to an identifiable, living, natural person, and where applicable, an identifiable, existing juristic person (such as a company), including, but not limited to information concerning:

- race, gender, sex, pregnancy, marital status, national or ethnic origin, colour, sexual orientation, age, physical or mental health, disability, religion, conscience, belief, culture, language, and birth of a person;
- information relating to the education or the medical, financial, criminal or employment history of the person;
- any identifying number, symbol, email address, physical address, telephone number, location information, online identifier, or other particular assignment to the person;
- the biometric information of the person;
- the personal opinions, views, or preferences of the person;
- 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;
- the views or opinions of another individual about the person;
- 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.

### 2.2 Data Subject

This refers to the natural or juristic person to whom personal information relates, such as an individual client, customer or company that supplies the organisation with products or other goods.

### 2.3 Responsible Party

The responsible party is the entity that needs the personal information for a particular reason and determines the purpose of and means for processing the personal information. In this case, the organisation is the responsible party.

### 2.4 Operator

An 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. For example, a third-party service provider that has contracted with the organisation to shred documents containing personal information. When dealing with an operator, it is considered good practice for a responsible party to include an indemnity clause.

### 2.5 Information Officer

The Information Officer is responsible for ensuring the organisation’s compliance with POPIA.

---

Directors:

Darryl Mayers\* | Alicia Nolte® | Hayden Hartley## | René Styber##

\*Chief Executive Officer | ®Chief Financial Officer | ^Chairman | #Executive director | ##Independent non-executive





Where no Information Officer is appointed, the head of the organisation will be responsible for performing the Information Officer's duties.

Once appointed, the Information Officer must be registered with the South African Information Regulator established under POPIA prior to performing his or her duties. Deputy Information Officers can also be appointed to assist the Information Officer.

## 2.6 Processing

The act of processing information includes any activity or any set of operations, whether or not by automatic means, concerning personal information and includes:

- the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation, or use;
- dissemination by means of transmission, distribution or making available in any other form; or
- merging, linking, as well as any restriction, degradation, erasure, or destruction of information.

## 2.7 Record

Means any recorded information, regardless of form or medium, including:

- writing on any material;
- 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;
- label, marking or other writing that identifies or describes anything of which it forms part, or to which it is attached by any means;
- book, map, plan, graph, or drawing;
- photograph, film, negative, tape or other device in which one or more visual images are embodied so as to be capable, with or without the aid of some other equipment, of being reproduced.

## 2.8 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.

## 2.9 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 that responsible party.

## 2.10 De-Identify

This means to delete any information that identifies a data subject, or which can be used by a reasonably foreseeable method to identify, or when linked to other information, that identifies the data subject.

## 2.11 Re-Identify

In relation to personal information of a data subject, means to resurrect any information that has been de-identified that identifies the data subject, or can be used or manipulated by a reasonably foreseeable method to identify the data subject.

## 2.12 Consent

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

---

Directors:

Darryl Mayers\* | Alicia Nolte® | Hayden Hartley## | René Styber##

\*Chief Executive Officer | ®Chief Financial Officer | ^Chairman | #Executive director | ##Independent non-executive





## 2.13 Direct Marketing

Means to approach a data subject, either in person or by mail or electronic communication, for the direct or indirect purpose of:

- promoting or offering to supply, in the ordinary course of business, any goods or services to the data subject; or
- requesting the data subject to make a donation of any kind for any reason.

## 2.14 Biometrics

Means a technique of personal identification that is based on physical, physiological, or behavioral characterization including blood typing, fingerprinting, DNA analysis, retinal scanning, and voice recognition.

## 3. POLICY PURPOSE

This purpose of this policy is to protect the organisation from the compliance risks associated with the protection of personal information which includes:

- breaches of confidentiality. For instance, the organisation could suffer loss in revenue where it is found that the personal information of data subjects has been shared or disclosed inappropriately.
- failing to offer choice. For instance, all data subjects should be free to choose how and for what purpose the organisation uses information relating to them.
- reputational damage. For instance, the organisation could suffer a decline in shareholder value following an adverse event such as a computer hacker deleting the personal information held by the organisation.

This policy demonstrates the organisation's commitment to protecting the privacy rights of data subjects in the following manner:

- Through stating desired behaviour and directing compliance with the provisions of POPIA and best practice.
- By cultivating an organisational culture that recognises privacy as a valuable human right.
- By developing and implementing internal controls for the purpose of managing the compliance risk associated with the protection of personal information.
- By creating business practices that will provide reasonable assurance that the rights of data subjects are protected and balanced with the legitimate business needs of the organisation.
- By assigning specific duties and responsibilities to control owners, including the appointment of an Information Officer and where necessary, Deputy Information Officers in order to protect the interests of the organisation and data subjects.

By raising awareness through training and providing guidance to individuals who process personal information so that they can act confidently and consistently.

## 4. POLICY APPLICATION

This policy and its guiding principles applies to:

- the organisation's governing body,
- all branches, business units and divisions of the organization,
- all employees and volunteers,
- all contractors, suppliers and other persons acting on behalf of the organization.

The policy's guiding principles find application in all situations and must be read in conjunction with POPIA as well as the organisation's PAIA Policy as required by the Promotion of Access to Information Act (Act No 2 of 2000).

The legal duty to comply with POPIA's provisions is activated in any situation where there is a processing of personal information entered into a record-by or for a responsible person who is domiciled in South Africa.

POPIA does not apply in situations where the processing of personal information is concluded in the course of purely personal or household activities, or where the personal information has been de-identified.

---

Directors:

Darryl Mayers\* | Alicia Nolte® | Hayden Hartley## | René Styber##

\*Chief Executive Officer | ®Chief Financial Officer | ^Chairman | #Executive director | ##Independent non-executive





## 5. RIGHTS OF DATA SUBJECTS

Where appropriate, the organisation will ensure that its clients and customers are made aware of the rights conferred upon them as data subjects.

The organisation will ensure that it gives effect to the following seven rights.

### 5.1 The Right to Access Personal Information

The organisation recognises that a data subject has the right to establish whether the organisation holds personal information related to him, her, or it including the right to request access to that personal information.

An example of a “Personal Information Request Form” can be found under Annexure A.

### 5.2 The Right to have Personal Information Corrected or Deleted

The data subject has the right to request, where necessary, that his, her, or its personal information must be corrected or deleted where the organisation is no longer authorised to retain the personal information.

### 5.3 The Right to Object to the Processing of Personal Information

The data subject has the right, on reasonable grounds, to object to the processing of his, her or its personal information.

In such circumstances, the organisation will give due consideration to the request and the requirements of POPIA.

The organisation may cease to use or disclose the data subject’s personal information and may, subject to any statutory and contractual record keeping requirements, also approve the destruction of the personal information.

A data subject may make an objection at any time during office hours.

Objections will be made free of charge, in an expedient manner & through any accessible channel (including telephonically).

### 5.4 The Right to Object to Direct Marketing

The data subject has the right to object to the processing of his, her or its personal information for purposes of direct marketing by means of unsolicited electronic communications.

### 5.5 The Right to Complain to the Information Regulator

The data subject has the right to submit a complaint to the Information Regulator regarding an alleged infringement of any of the rights protected under POPIA and to institute civil proceedings regarding the alleged non-compliance with the protection of his, her, or its personal information.

An example of a “POPI Complaint Form” can be found under Annexure B.

### 5.6 The Right to be Informed

The data subject has the right to be notified that his, her, or its personal information is being collected by the organisation.

The data subject also has the right to be notified in any situation where the organisation has reasonable grounds to believe that the personal information of the data subject has been accessed or acquired by an unauthorised person.

## 6. GENERAL GUIDING PRINCIPLES

All employees and persons acting on behalf of the organisation will at all times be subject to, and act in accordance with, the following guiding principles:

---

Directors:

Darryl Mayers\* | Alicia Nolte® | Hayden Hartley## | René Styber##

\*Chief Executive Officer | ®Chief Financial Officer | ^Chairman | #Executive director | ##Independent non-executive





## 6.1 Accountability

Failing to comply with POPIA could potentially damage the organisation's reputation or expose the organisation to a civil claim for damages. The protection of personal information is therefore everybody's responsibility.

The organisation will ensure that the provisions of POPIA and the guiding principles outlined in this policy are complied with through the encouragement of desired behaviour. However, the organisation will take appropriate sanctions, which may include disciplinary action, against those individuals who, through their intentional or negligent actions and/or omissions, fail to comply with the principles and responsibilities outlined in this policy.

## 6.2 Processing Limitation

The organisation will ensure that personal information under its control is processed:

- in a fair, lawful, and non-excessive manner, and
- only with the informed consent of the data subject, and
- only for a specifically defined purpose.

The organisation will inform the data subject of the reasons for collecting his, her, or its personal information and obtain written consent prior to processing personal information. (Form 4)

Alternatively, where services or transactions are concluded over the telephone or electronic video feed, the organisation will maintain a voice recording of the stated purpose for collecting the personal information followed by the data subject's subsequent consent.

The organisation will under no circumstances distribute or share personal information between separate legal entities, associated organisations (such as subsidiary companies) or with any individuals that are not directly involved with facilitating the purpose for which the information was originally collected.

Where applicable, the data subject must be informed of the possibility that their personal information will be shared with other aspects of the organisation's business and be provided with the reasons for doing so.

## 6.3 Purpose Specification

All of the organisation's business units and operations must be informed by the principle of transparency.

The organisation will process personal information only for specific, explicitly defined and legitimate reasons.

The organisation will inform data subjects of these reasons prior to collecting or recording the data subject's personal information.

## 6.4 Further Processing Limitation

Personal information will not be processed for a secondary purpose unless that processing is compatible with the original purpose.

Therefore, where the organisation seeks to process personal information it holds for a purpose other than the original purpose for which it was originally collected, and where this secondary purpose is not compatible with the original purpose, the organisation will first obtain additional consent from the data subject.

## 6.5 Information Quality

The organisation will take reasonable steps to ensure that all personal information collected is complete, accurate and not misleading.

The more important it is that the personal information be accurate (for example, the beneficiary details of a life insurance policy are of the utmost importance), the greater the effort the organisation will put into ensuring its accuracy.

Where personal information is collected or received from third parties, the organisation will take reasonable steps to confirm that the information is correct by verifying the accuracy of the information directly with the data subject or by way of independent sources.

---

### Directors:

Darryl Mayers\* | Alicia Nolte® | Hayden Hartley## | René Styber##

\*Chief Executive Officer | ®Chief Financial Officer | ^Chairman | #Executive director | ##Independent non-executive





## 6.6 Open Communication

The organisation will take reasonable steps to ensure that data subjects are notified (are at all times aware) that their personal information is being collected, including the purpose for which it is being collected and processed.

The organisation can be contacted on the following email addresses:

[darryl@putprop.co.za](mailto:darryl@putprop.co.za) or [alicia@putprop.co.za](mailto:alicia@putprop.co.za)

- enquire whether the organisation holds related personal information, or
- request access to related personal information, or
- request the organisation to update or correct related personal information, or
- make a complaint concerning the processing of personal information.

## 6.7 Security Safeguards

The organisation will manage the security of its filing system to ensure that personal information is adequately protected. To this end, security controls will be implemented in order to minimise the risk of loss, unauthorised access, disclosure, interference, modification, or destruction.

Security measures also need to be applied in a context-sensitive manner. For example, the more sensitive the personal information, such as medical information or credit card details, the greater the security required.

The organisation will continuously review its security controls, which will include regular testing of protocols and measures put in place to combat cyber-attacks on the organisation's IT network.

The organisation will ensure that all paper and electronic records comprising personal information are securely stored and made accessible only to authorised individuals.

All new employees will be required to sign employment contracts containing contractual terms for the use and storage of employee information. Confidentiality clauses will also be included to reduce the risk of unauthorised disclosures of personal information for which the organisation is responsible.

All existing employees will, after the required consultation process has been followed, be required to sign an addendum to their employment containing the relevant consent and confidentiality clauses.

The organisation's operators and third-party service providers will be required to enter into service level agreements with the organisation where both parties pledge their mutual commitment to POPIA and the lawful processing of any personal information pursuant to the agreement.

## 6.8 Data Subject Participation

A data subject may request the correction or deletion of his, her, or its personal information at any time if their personal information is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully. A data subject may request the deletion or destruction of a record of their personal information if the responsible part is no longer authorised to retain such data.

The organisation will ensure that it provides a facility for data subjects who want to request the correction or deletion of their personal information. (by downloading Form 2 from the Information Regulator's website).

The responsible parties have 30 days after receipt of the outcome of the request to inform the data subject in writing of any action taken as a result of the request.

Where applicable, the organisation will include a link to unsubscribe from any of its electronic newsletters or related marketing activities.

## 7. INFORMATION OFFICERS

The organisation will appoint an Information Officer and where necessary, a Deputy Information Officer to assist the Information Officer.

The organisation's Information Officer is responsible for ensuring compliance with POPIA.

---

### Directors:

Darryl Mayers\* | Alicia Nolte@ | Hayden Hartley## | René Styber##

\*Chief Executive Officer | @Chief Financial Officer | ^Chairman | #Executive director | ##Independent non-executive





There are no legal requirements under POPIA for an organisation to appoint an Information Officer. Appointing an Information Officer is, however, considered to be good business practice, particularly within larger organisations. Where no Information Officer is appointed, the head of the organisation will assume the role of the Information Officer. Consideration will be given on an annual basis to the re-appointment or replacement of the Information Officer and the re-appointment or replacement of any Deputy Information Officers. Once appointed, the organisation will register the Information Officer with the South African Information Regulator established under POPIA prior to performing his or her duties.

## 8. SPECIFIC DUTIES AND RESPONSIBILITIES

### 8.1 Governing Body

The organisation's governing body cannot delegate its accountability and is ultimately answerable for ensuring that the organisation meets its legal obligations in terms of POPIA.

The governing body may, however, delegate some of its responsibilities in terms of POPIA to management or other capable individuals.

The governing body is responsible for ensuring that:

- the organisation appoints an Information Officer, and where necessary, a Deputy Information Officer.
- all persons responsible for the processing of personal information on behalf of the organisation:
  - are appropriately trained and supervised to do so,
  - understand that they are contractually obligated to protect the personal information they come into contact with, and
  - are aware that a willful or negligent breach of this policy's processes and procedures may lead to disciplinary action being taken against them.
- data subjects who want to make enquires about their personal information are made aware of the procedure that needs to be followed should they wish to do so.
- the scheduling of a periodic POPI Audit in order to accurately assess and review the ways in which the organisation collects, holds, uses, shares, discloses, destroys, and processes personal information.

### 8.2 Information Officer

The organisation's Information Officer is responsible for:

- taking steps to ensure the organisation's reasonable compliance with the provision of POPIA.
- keeping the governing body updated about the organisation's information protection responsibilities under POPIA. For instance, in the case of a security breach, the Information Officer must inform and advise the governing body of their obligations pursuant to POPIA.
- continually analysing privacy regulations and aligning them with the organisation's personal information processing procedures. This will include reviewing the organisation's information protection procedures and related policies.
- ensuring that POPI Audits are scheduled and conducted on a regular basis.
- ensuring that the organisation makes it convenient for data subjects who want to update their personal information or submit POPI related complaints to the organisation. For instance, maintaining a "Contact Us" facility on the organisation's website.
- approving any contracts entered into with operators, employees, and other third parties which may have an impact on the personal information held by the organisation. This will include overseeing the amendment of the organisation's employment contracts and other service level agreements.
- encouraging compliance with the conditions required for the lawful processing of personal information.
- ensuring that employees and other persons acting on behalf of the organisation are fully aware of the risks associated with the processing of personal information and that they remain informed about the organisation's security controls.

---

Directors:

Darryl Mayers\* | Alicia Nolte® | Hayden Hartley## | René Styber##

\*Chief Executive Officer | ®Chief Financial Officer | ^Chairman | #Executive director | ##Independent non-executive





- organising and overseeing the awareness training of employees and other individuals involved in the processing of personal information on behalf of the organisation.
- addressing employees' POPIA related questions.
- addressing all POPIA-related requests and complaints made by the organisation's data subjects.
- working with the Information Regulator in relation to any ongoing investigations. The Information Officers will therefore act as the contact point for the Information Regulator authority on issues relating to the processing of personal information and will consult with the Information Regulator where appropriate, with regard to any other matter.

The Deputy Information Officer will assist the Information Officer in performing his or her duties.

### 8.3 IT Manager

The organisation's IT Manager is responsible for:

- ensuring that the organisation's IT infrastructure, filing systems and any other devices used for processing personal information meet acceptable security standards.
- ensuring that all electronically held personal information is kept only on designated drives and servers and uploaded only to approved cloud computing services.
- ensuring that servers containing personal information are sited in a secure location, away from the general office space.
- ensuring that all electronically stored personal information is backed up and tested on a regular basis.
- ensuring that all back-ups containing personal information are protected from unauthorised access, accidental deletion and malicious hacking attempts.
- ensuring that personal information being transferred electronically is encrypted.
- ensuring that all servers and computers containing personal information are protected by a firewall and the latest security software.
- performing regular IT audits to ensure that the security of the organisation's hardware and software systems are functioning properly.
- performing regular IT audits to verify whether electronically stored personal information has been accessed or acquired by any unauthorised persons.
- performing a proper due diligence review prior to contracting with operators or any other third-party service providers to process personal information on the organisation's behalf. For instance, cloud computing services.

### 8.4 Marketing & Communications Manager

The organisation's Marketing & Communication Manager is responsible for:

- approving and maintaining the protection of personal information statements and disclaimers that are displayed on the organisation's website, including those attached to communications such as emails and electronic newsletters.
- addressing any personal information protection queries from journalists or media outlets such as newspapers.
- where necessary, working with persons acting on behalf of the organisation to ensure that any outsourced marketing initiatives comply with POPIA.

### 8.5 Employees and other Persons acting on behalf of Organization

Employees and other persons acting on behalf of the organisation will, during the course of the performance of their services, gain access to and become acquainted with the personal information of certain clients, suppliers and other employees.

Employees and other persons acting on behalf of the organisation are required to treat personal information as a confidential business asset and to respect the privacy of data subjects.

---

Directors:

Darryl Mayers\* | Alicia Nolte® | Hayden Hartley## | René Styber##

\*Chief Executive Officer | ®Chief Financial Officer | ^Chairman | #Executive director | ##Independent non-executive





Employees and other persons acting on behalf of the organisation may not directly or indirectly, utilise, disclose or make public in any manner to any person or third party, either within the organisation or externally, any personal information, unless such information is already publicly known or the disclosure is necessary in order for the employee or person to perform his or her duties.

Employees and other persons acting on behalf of the organisation must request assistance from their line manager or the Information Officer if they are unsure about any aspect related to the protection of a data subject's personal information.

Employees and other persons acting on behalf of the organisation will only process personal information where:

- the data subject, or a competent person where the data subject is a child, consents to the processing; or
- the processing is necessary to carry out actions for the conclusion or performance of a contract to which the data subject is a party; or
- the processing complies with an obligation imposed by law on the responsible party; or
- the processing protects a legitimate interest of the data subject; or
- the processing is necessary for pursuing the legitimate interests of the organisation or of a third party to whom the information is supplied.

Furthermore, personal information will only be processed where the data subject:

- clearly understands why and for what purpose his, her, or its personal information is being collected; and
- has granted the organisation with explicit written or verbally recorded consent to process his, her, or its personal information.

Employees and other persons acting on behalf of the organisation will consequently, prior to processing any personal information, obtain a specific and informed consent from the data subject, in terms of which permission is given for the processing of personal information.

Informed consent is therefore when the data subject clearly understands for what purpose his, her, or its personal information is needed and who it will be shared with.

Consent can be obtained in written form which includes any appropriate electronic medium that is accurately and readily reducible to printed form. Alternatively, the organisation will keep a voice recording of the data subject's consent in instances where transactions are concluded telephonically or via electronic video feed.

Consent to process a data subject's personal information will be obtained directly from the data subject, except where:

- the personal information has been made public, or
- where valid consent has been given to a third party, or
- the information is necessary for effective law enforcement.

Employees and other persons acting on behalf of the organisation will under no circumstances:

- 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 other mobile devices like tablets or smart phones. All personal information must be accessed and updated from the organisation's central database or a dedicated server.
- share personal information informally. In particular, personal information should never be sent by email, as this form of communication is not secure. Where access to personal information is required, this may be requested from the relevant line manager or the Information Officer.
- transfer personal information outside of South Africa without the express permission from the Information Officer.

Employees and other persons acting on behalf of the organisation are responsible for:

- keeping all personal information that they come into contact with secure, by taking sensible precautions and following the guidelines outlined within this policy.
- ensuring that personal information is held in as few places as is necessary. No unnecessary additional records, filing systems and data sets should therefore be created.

---

Directors:

Darryl Mayers\* | Alicia Nolte® | Hayden Hartley## | René Styber##

\*Chief Executive Officer | ®Chief Financial Officer | ^Chairman | #Executive director | ##Independent non-executive





- ensuring that personal information is encrypted prior to sending or sharing the information electronically. The IT Manager will assist employees and where required, other persons acting on behalf of the organisation, with the sending or sharing of personal information to or with authorised external persons.
- ensuring that all computers, laptops and devices such as tablets, flash drives, and smartphones that store personal information are password protected and never left unattended. Passwords must be changed regularly and may not be shared with unauthorised persons.
- ensuring that their computer screens and other devices are switched off or locked when not in use or when away from their desks.
- ensuring that, where personal information is stored on removable storage medias such as external drives, CDs or DVDs, these are kept locked away securely when not being used.
- ensuring that where personal information is stored on paper, that such hard copy records are kept in a secure place where unauthorised people cannot access it. For instance, in a locked drawer of a filing cabinet.
- ensuring that where personal information has been printed out, that paper printouts are not left unattended where unauthorised individuals could see or copy them. For instance, close to the printer.
- taking reasonable steps to ensure that personal information is kept accurate and up to date. For instance, confirming a data subject's contact details when the client or customer phones or communicates via email. Where a data subject's information is found to be out of date, authorisation must first be obtained from the relevant line manager or the Information Officer to update the information accordingly.
- taking reasonable steps to ensure that personal information is stored only for as long as it is needed or required in terms of the purpose for which it was originally collected. Where personal information is no longer required, authorisation must first be obtained from the relevant line manager or the Information Officer to delete or dispose of the personal information in the appropriate manner.
- undergoing POPI Awareness training from time to time.

Where an employee, or a person acting on behalf of the organisation, becomes aware or suspicious of any security breach such as the unauthorised access, interference, modification, destruction or the unsanctioned disclosure of personal information, he or she must immediately report this event or suspicion to the Information Officer or the Deputy Information Officer.

## 9. REQUEST TO ACCESS PERSONAL INFORMATION PROCEDURE

Data subjects have the right to:

- request what personal information the organisation holds about them and why.
- request access to their personal information.
- be informed how to keep their personal information up to date.

Access to information requests can be made by email, addressed to the Information Officer. The Information Officer will provide the data subject with a "Personal Information Request Form".

Once the completed form has been received, the Information Officer will verify the identity of the data subject prior to handing over any personal information. All requests will be processed and considered against the organisation's PAIA Policy. The Information Officer will process all requests within a reasonable time period.

## 10. POPI COMPLAINTS PROCEDURE

Complaints may be filed via email to [info@putprop.co.za](mailto:info@putprop.co.za)

## 11. DISCIPLINARY ACTION

Where a POPI complaint or a POPI infringement investigation has been finalised, the organisation may recommend any appropriate administrative, legal, and/or disciplinary action to be taken against any employee reasonably suspected of being implicated in any non-compliant activity outlined within this policy.

---

Directors:

Darryl Mayers\* | Alicia Nolte® | Hayden Hartley## | René Styber##

\*Chief Executive Officer | ®Chief Financial Officer | ^Chairman | #Executive director | ##Independent non-executive





In the case of ignorance or minor negligence, the organisation will undertake to provide further awareness training to the employee.

Any gross negligence or the willful mismanagement of personal information, will be considered a serious form of misconduct for which the organisation may summarily dismiss the employee. Disciplinary procedures will commence where there is sufficient evidence to support an employee's gross negligence.

Examples of immediate actions that may be taken subsequent to an investigation include:

- Recommendations to commence with disciplinary action.
- A referral to appropriate law enforcement agencies for criminal investigation.

Recovery of funds and assets in order to limit any prejudice or damage caused.

---

Directors:

Darryl Mayers\* | Alicia Nolte® | Hayden Hartley## | René Styber##

\*Chief Executive Officer | ®Chief Financial Officer | ^Chairman | #Executive director | ##Independent non-executive





## ANNEXURE A: PERSONAL INFORMATION REQUEST FORM

Please download, complete and email to: [info@putprop.co.za](mailto:info@putprop.co.za)

Please submit the completed form to the Information Officer:	
Name	
Contact Number	
Email Address	

Please be aware that we may require you to provide proof of identification prior to processing your request.

There may also be a reasonable charge for providing copies of the information requested.

A. Particulars of Data Subject:	
Name & Surname	
Identity No	
Postal Address	
Contact Number	
Email Address	
B. Request:	
I request the organisation to:	
(a) Inform me whether it holds any of my personal information	
(b) Provide me with a record or description of my personal information	
(c) Correct or update my personal information	
(d) Destroy or delete a record of my personal information	
C. Instructions	
D. Signature	
Signature:                      Date:	





## ANNEXURE B: POPI COMPLAINT FORM

Please download, complete and email to: [info@putprop.co.za](mailto:info@putprop.co.za)

We are committed to safeguarding your privacy and the confidentiality of your personal information and are bound by the Protection of Personal Information Act.

Please submit the completed form to the Information Officer:	
Name	
Contact Number	
Email Address	

Where we are unable to resolve your complaint to your satisfaction, you have the right to complain to the Information Regulator.

Physical Address: SALU Building, 316 Thabo Sehume Street, Pretoria

Email: [inforeg@justice.gov.za](mailto:inforeg@justice.gov.za)

Website: <http://www.justice.gov.za/inforeg/index.html>

A. Particulars of Complainant	
Name & Surname	
Identity No	
Postal Address	
Contact Number	
Email Address	
B. Details of Complaint	
C. Desired Outcome	
D. Signature	
Signature:	Date:

Directors:

Darryl Mayers\* | Alicia Nolte@ | Hayden Hartley## | René Styber##

\*Chief Executive Officer | @Chief Financial Officer | ^Chairman | #Executive director | ##Independent non-executive

