

POPIA Policy and Procedures

1. Purpose

The purpose of this Policy is to:

- 1.1. Give effect to the constitutional right to privacy in line with the requirements of the Popi Act by safeguarding all personal information, subject to justifiable limitations that are aimed at balancing the right to privacy against other rights, particularly the right of access to information; and protecting important interests.
 - 1.2. Regulate the manner in which personal information may be processed, by establishing conditions, in harmony with legislative and organisational standards, that prescribe the minimum threshold requirements for the lawful processing of personal information; provide persons with rights and remedies to protect their personal information from processing that is not in accordance with the POPI Act; and establish voluntary and compulsory measures, including the establishment of an Information Regulator, to ensure respect for and to promote, enforce and fulfil the rights protected by the POPI Act
2. This policy applies to all custodians of Mabalingwe Common Property Association and their subsidiaries responsible for the collection and processing of personal information.

3. Legislation

- 3.1. The POPI Act aims to strengthen this right with conditions intended to protect everyday people from things like identity theft and the unauthorised use or sale of personal information for any purpose, including the creation of databases for marketing and sales campaigns.
- 3.2. As a mandatory requirement of the POPI Act, the Chairman will appoint an Information Officer for the Body Corporate.
- 3.3. The Information Officer may appoint a Deputy Information Officers to support him in his duties as the Information Officer.

4. Information collected, processed and the uses thereof

- 4.1 All information collected and/or processed is available to and used only by designated persons in the Scheme exclusively for the purposes of complying with the responsibilities for which they were employed.
- 4.2 All data subjects are required to complete a POPI Act consent form, together with personal information/documentation submitted.
- 4.3 All contracted third parties, are required to submit confirmation of compliance to the POPI Act where data access is granted/required in the furtherance of contracted obligations.
- 4.4 Homeowner, guests, visitor, contractor's personal information collected:
 - 4.4.1 Full Names and Contact details

- 4.4.2 All member or company details, and contact details of person/s responsible for the administration of the Levy, Utility or other relevant account/s (as above) when applicable
- 4.5 Finance/ Admin Department
 - 4.5.1 Contact information used for correspondence and communications with Homeowners regarding the effective management of Mabalingwe Common Property Association which includes, but not limited to sending account statements and related communication, insurance claims management, upgrade information, budgets, general meetings etc.
 - 4.5.2 Physical addresses and other such info, may also be used for the legal recovery of debt.
 - 4.5.3 Relevant visitors, contractors and homeowner info also requested and stored with regard to indemnities required for equipment rental, security and access control policies and procedures and other such related reasons only.
 - 4.5.4 Property data, plans, upgrades costs, values and other such information is compiled and stored for reference with regard to effectively managing the Reserve.
- 4.6 Rentals
 - 4.6.1 Homeowner and guests reservations information processed on Access Control system.
 - 4.6.2 All relevant booking information might be processed for the effective management of the rental and guest satisfaction.
- 4.7 Marketing
 - 4.7.1 Email - Periodic newsletters, updating homeowners of matters on the Reserve eg. Water issues, routine maintenance plans etc.
 - 4.7.2 WhatsApp Group – internal correspondence regarding adhoc issues, only relating to matters of the Reserve.
- 4.8 Security

Outsourced or on-site security management teams have access to some personal information/ details of a homeowners, employee, and their subsidiaries, inclusive of all contractors and other such persons visiting and or entering the reserve. All relevant personal info, including vehicle registration and licence info are captured on computerised systems. This information is used exclusively for the purposes of safety and security on the Reserve.
- 4.9 Supplier Information

All legal company information inclusive of registered company names, Vat numbers, banking details, BEE documents, invoices etc.
- 4.10 Human Resources

All employee information, inclusive of full names, Id copies, banking details, tax numbers, marital status, equity details, remuneration, disciplinary and contract information, contact



numbers and residential addresses etc. Information collected for statutory, legal, contractual, record keeping, statistical, health and safety and other such requirements.

5. Storage of Information

- 5.1 All data required by the above departments are stored on the applicable computer systems and access to same will be carefully monitored and regulated to prevent unauthorised persons accessing the information.
- 5.2 Any manually completed documents as well as supporting copy documents are filed in the designated departments and access to same will be carefully monitored and regulated to prevent unauthorised persons accessing the information.

6. Access and security controls

- 6.1 Passwords are set up on all computerised systems and changed frequently.
- 6.2 Only authorised persons are in possession of passwords.
- 6.3 Firewalls and relevant system virus protections have been installed on all IT systems.
- 6.4 IT security assessments are reviewed annually.
- 6.5 Access to all manual records is safeguarded by use of key access restrictions, CCTV footage monitoring, locked filing archive and the like.

7. Disclosure of Information

- 7.1 The scheme wishes to reiterate that only relevant information that is in the interests of effective management of the scheme will be disclosed to third parties.
- 7.2 As an example, personal contact details can be made available to a contracted company onsite, as well as the onsite security company.
- 7.3 We may also disclose your personal information in the furtherance of law or legal obligations.
- 7.4 A data subject has the right to query if personal information is being held and the entity will comply with this request if it is made in writing and addressed to the Information Officer.
- 7.5 Any personal information that is no longer required by the entity will be kept for a period of 3 years and then it will be destroyed, unless there is a legal obligation imposed on the Scheme such as with details required by the South African Revenue Service.