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Table of Contents

1. GLOSSARY OF ABBREVIATIONS	3
2. RATIONALE	3
3. SCOPE	3
4. PURPOSE	3
5. POPIA PROCEDURES	4
5.1. Further Processing of Personal Information Process.....	4
5.2. Obtaining Consent Process	7
5.3. Data Quality Process.....	9
5.4. Correction of Personal Information Process	11
5.5. Privacy Complaints and Incidents Response Process	13
5.6. Data Classification and Handling Criteria Process	16
5.7. Objections to the Processing of Personal Information Process	17
5.8. Notification to the Data Subjects and Information Regulator Process	20
5.9. Access Requests to Personal Information – Data Subjects Request Process	23
5.10. Access Requests to Personal Information – Third Parties Request Process	26
6. OVERSIGHT OF PRIVACY GOVERNANCE	29
7. PRIVACY IMPACT ASSESSMENTS	29
8. POPIA FORMS PRESCRIBED BY THE INFORMATION REGULATOR	29

1. GLOSSARY OF ABBREVIATIONS

Term	Definition
BoD	Board of Directors
CEO	Chief Executive Officer
NEMISA	National Electronic Media Institute of South Africa
PAIA	Promotion of Access to Information Act, No 2 of 2000
POPIA	Protection of Personal Information Act, No. 4 of 2013
PSC	POPIA Steering Committee

2. RATIONALE

The Protection of Personal Information Act (POPIA) no. 4 of 2013 gives effect to the constitutional right to privacy in terms of Section 14 of the Bill of Rights of the Constitution of South Africa. Non-compliance with the Act can result in penalties and damage to the National Electronic Media Institute of South Africa (NEMISA)'s reputation and brand. NEMISA, by its nature of operations, collects and processes personal information of stakeholders such as employees, service providers and other third parties during its normal day-to-day operations. As such, NEMISA is considered a "responsible party" in terms of POPIA and is required to comply with the conditions and requirements that govern the processing of personal information.

3. SCOPE

This procedures manual applies to all NEMISA's employees, service providers, contractors, consultants, and other stakeholders of NEMISA.

4. PURPOSE

4.1 The purpose of this procedure manual is to enable NEMISA to achieve operational compliance with POPIA by:

4.1.1 Defining privacy related procedures for the processing and handling of personal information; and

4.1.2 Integrating privacy with existing NEMISA policies and procedures related to or affecting the processing of personal information and interactions with Data Subjects.

5. POPIA PROCEDURES

5.1. Further Processing of Personal Information Process

5.1.1 Procedure Overview

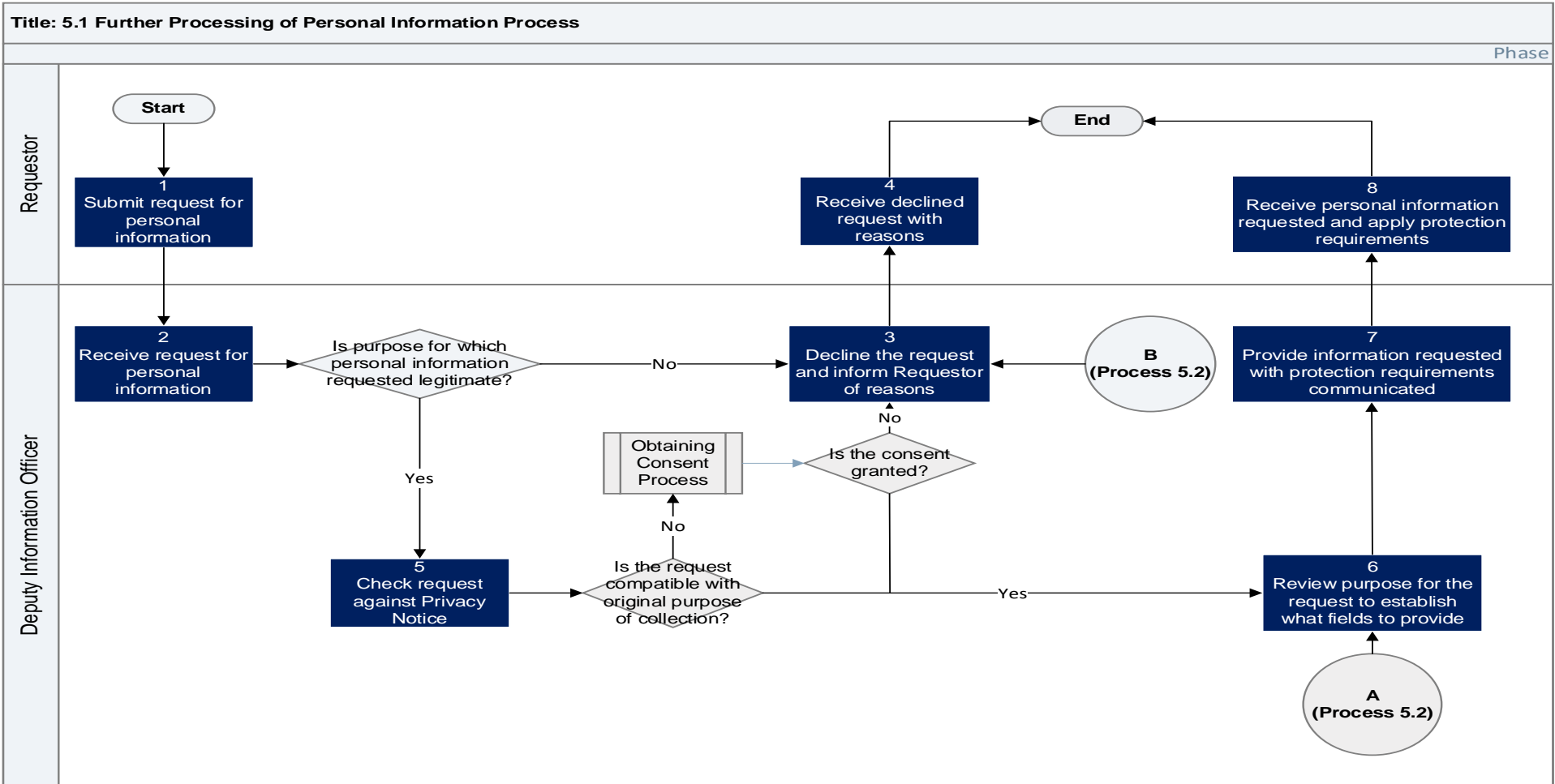
This procedure outlines the steps to be followed to determine whether further processing of personal information is compatible or incompatible with the original purpose for which personal information was collected from data subjects for processing.

5.1.2 Procedure Description

- (a) The Requester should submit the request for personal information to the POPIA Deputy Information Officer.
- (b) On receipt of the request, the POPIA Deputy Information Officer should assess whether the purpose for which the personal information is requested is legitimate. The Deputy Information Officer declines the request which is found to be illegitimate and informs the Requester for reasons for decline.
- (c) If the purpose is legitimate, the POPIA Deputy Information Officer checks the request against the privacy notice to confirm that it is compatible with the original purpose for which the personal information was collected.
- (d) If the request is not compatible with the original purpose of collection, consent should be obtained from the Data Subject prior to processing the request. The processing can only be performed

if the Data Subject grants the consent. If no consent is granted, the request should be declined, and the Requester should be informed of the decline.

- (e) For requests which are aligned with the original purpose or where consent is granted by the Data Subject, the Deputy Information Officer reviews purpose for the request to establish what fields should be provided considering the purpose of the request.
- (f) The Deputy Information Officer then provides the Requester with the personal information requested with protection requirements communicated.
- (g) The Requester receives the relevant personal information requested from the POPIA Deputy Information Officer and apply protection requirements.



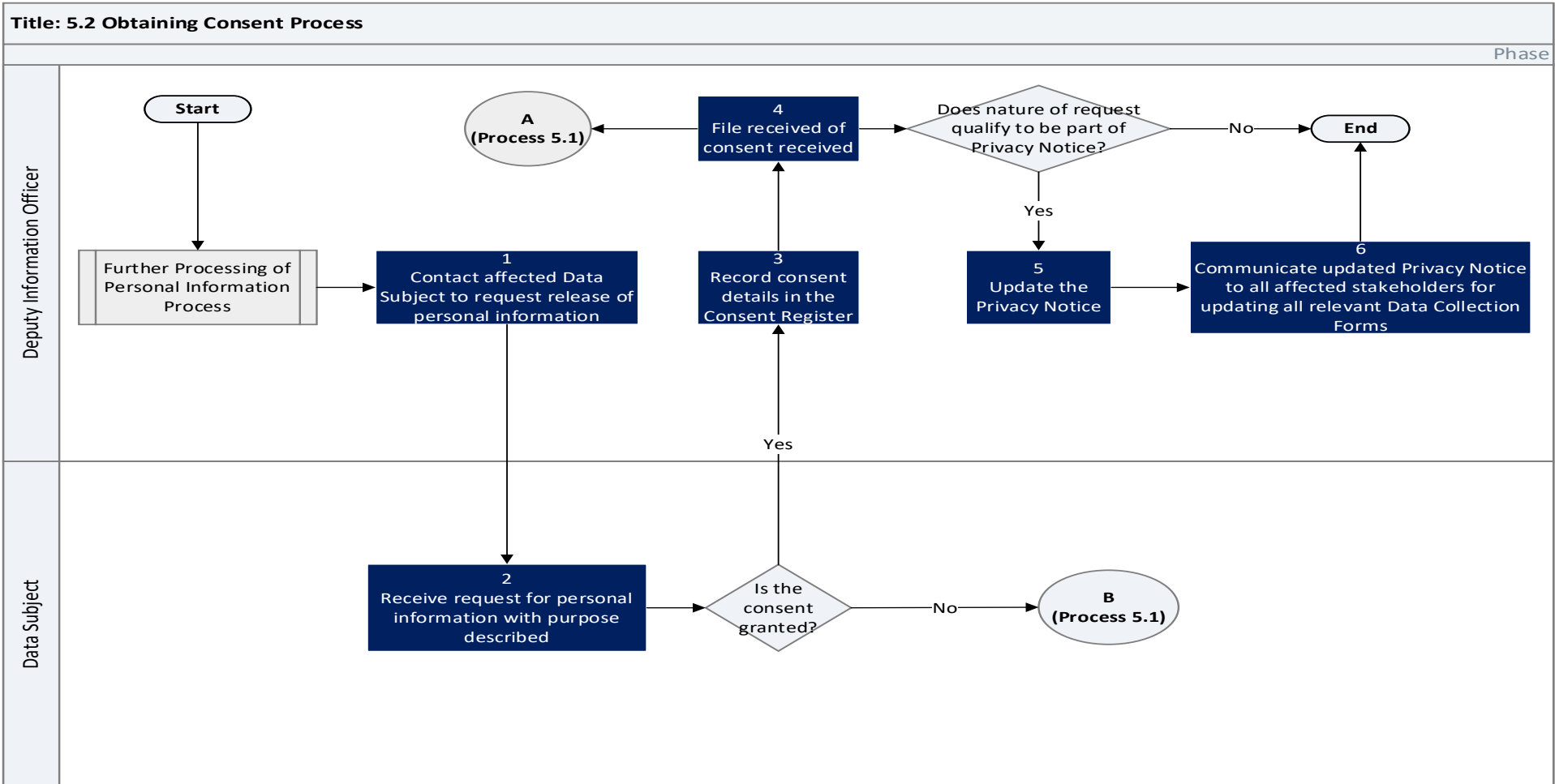
5.2. Obtaining Consent Process

5.2.1. Procedure Overview

This procedure outlines the steps to be followed in order to obtain consent from the Data Subject for further processing if the personal information request is found to be not compatible with the original purpose for which the personal information was collected.

5.2.2. Procedure Description

- (a) The POPIA Deputy Information Officer contacts the affected Data Subject to request consent to release his or her personal information to the Requester of the information.
- (b) On receipt of the request, the Data Subject decides whether to grant the consent or not.
- (c) If the Data Subject objects to provide the consent, the Deputy Information Officer should decline the request for processing of personal information and inform the Requester about reasons for decline.
- (d) If the Data Subject has granted the consent for further processing of the personal information, the Deputy Information Officer should record the consent details in the Consent Register and file the evidence of the consent granted for control and future reference purposes.
- (e) The Deputy Information Officer assesses the nature of personal information request to establish if it qualifies to be part of private notice.
- (f) If the request qualifies, the POPIA Deputy Information Officer updates the private notice accordingly and communicate the updated privacy notice to all affected Stakeholders for the purpose of updating all relevant data collection forms affected.



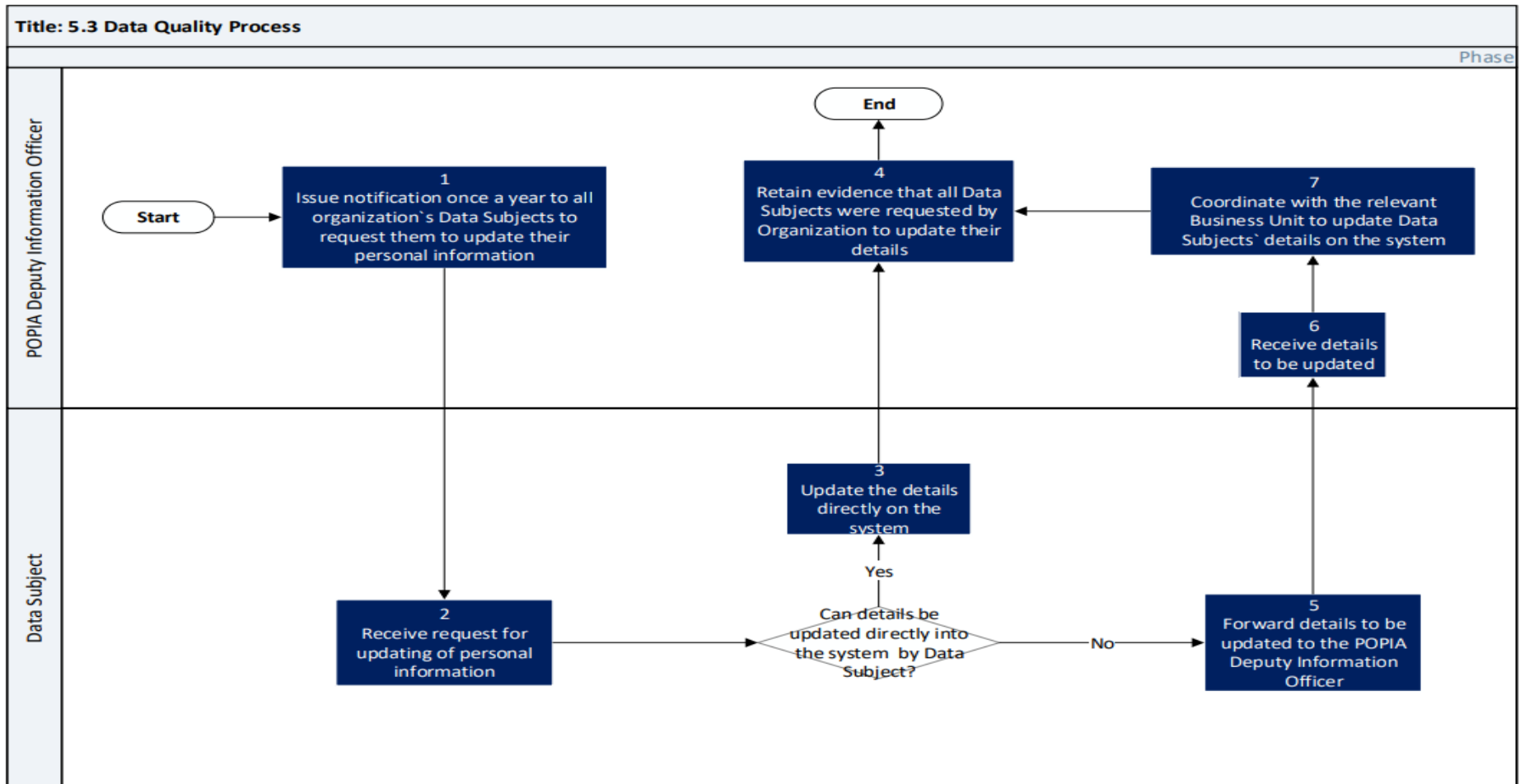
5.3. Data Quality Process

5.3.1. Procedure Overview

This procedure outlines steps to be followed to notify Data Subjects that their personal information requires review and updating. The process includes steps to follow to update personal information in all instances where such updates are received.

5.3.2. Procedure Description

- (a) The POPIA Deputy Information Officer issue notifications once a year to all NEMISA's Data Subjects to request them to update their personal information.
- (b) The Data Subjects receive the request for updating personal information and update their details directly into the system if they have access into NEMISA's systems.
- (c) If Data Subjects don't have access to NEMISA's systems, the Data Subjects forward the personal information details to be updated to the relevant POPIA Deputy Information Officer.
- (d) The POPIA Deputy Information Officer receive the personal information details to be updated from the Data Subjects and coordinate with the relevant Business Units for the updating of the details.
- (e) Once the personal information has been updated, the relevant POPIA Deputy Information Officer should retain evidence that all Data Subjects were requested by NEMISA to update their details.



5.4. Correction of Personal Information Process

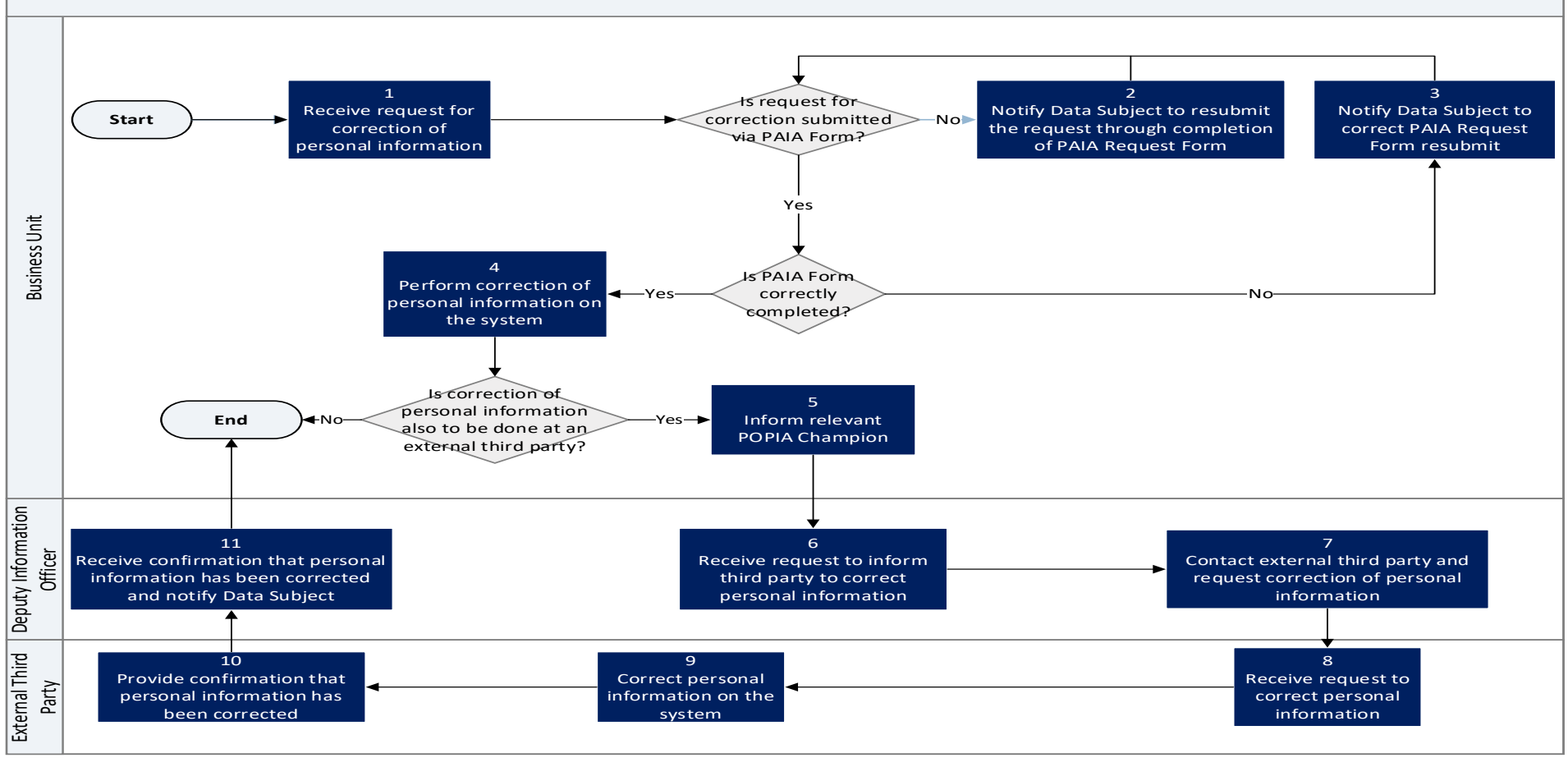
5.4.1. Procedure Overview

This procedure outlines the steps to be followed in order to handle requests for the correction of a Data Subject's personal information.

5.4.2. Procedure Description

- (a) The Business Unit receives a request for correction of personal information from the Data Subject through the completed relevant POPIA Form and verifies the Data Subject to confirm that the request is indeed done by the owner of the personal information.
- (b) If the Data Subject has been verified, the Business Unit performs correction of personal information on the relevant system.
- (c) If personal information also needs to be corrected at any third parties' platform, the Business Unit notifies the POPIA Deputy Information Officer to liaise with the relevant external third party.
- (d) The external third party corrects the relevant personal information as per the request and provides confirmation to NEMISA that the information has been corrected.
- (e) On receipt of the confirmation, the POPIA Deputy Information Officer informs the Business Unit that the personal information has been corrected.

Title: 5.4 Correction of Personal Information Process



5.5. Privacy Complaints and Incidents Response Process

5.5.1. Procedure Overview:

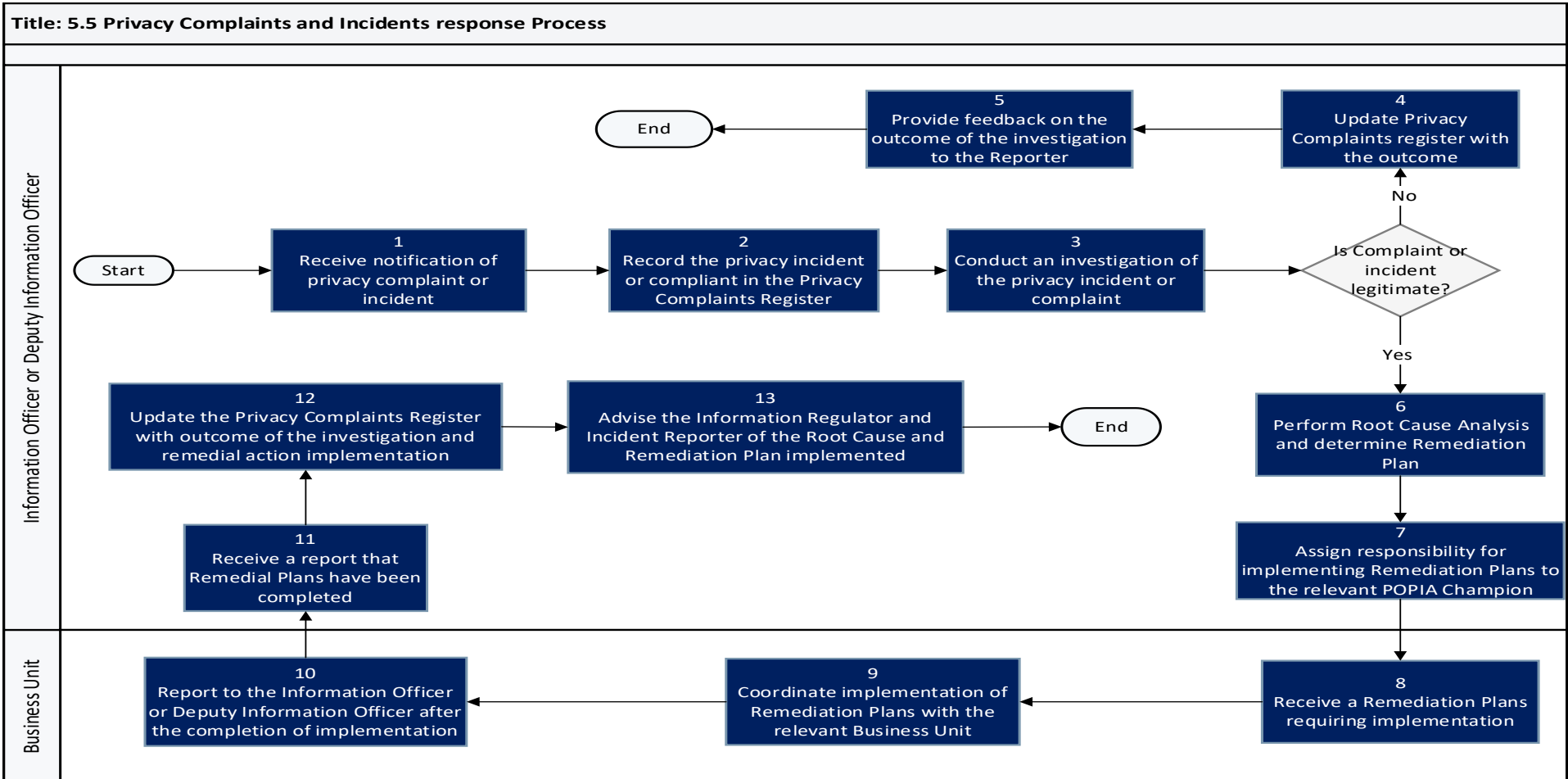
This procedure outlines the process to be followed in order to handle privacy complaints and incidents.

5.5.2. Procedure Description:

- (a) The Information Officer or Deputy Information Officer receives notification of privacy complaint or incident, records it in the Privacy Complaints Register and conduct an investigation.
- (b) If the complaint or incident is found not to be legitimate, the Information Officer or Deputy Information Officer updates the Privacy Complaints Register with the outcome of the investigation and provide the feedback to the Reporter of the complaint or incident.
- (c) If the complaint or incident is found to be legitimate, the Information Officer or Deputy Information Officer performs a Root Cause Analysis and determines remediation plan.
- (d) The Information Officer or Deputy Information Officer assigns the responsibility for implementation of remediation plan to the relevant Business Unit.
- (e) The relevant Business Unit receives the remediation plans requiring implementation from the Information Officer or Deputy Information Officer and coordinates implementation of remediation plans with the Business Unit.
- (f) The relevant Business Unit reports to the Information Officer or Deputy Information Officer after the remedial actions have been implemented.

- (g) The Information Officer or Deputy Information Officer receives a report from the relevant Business Unit that the remedial plans have been implemented and updates the Privacy Complaints Register accordingly with the outcome of the investigation and remedial action implementation.

- (h) The Information Officer or Deputy Information Officer advise the Information Regulator and Incident Reporter of the root causes and remediation plan implemented.



5.6. Data Classification and Handling Criteria Process

5.6.1. Procedure Overview

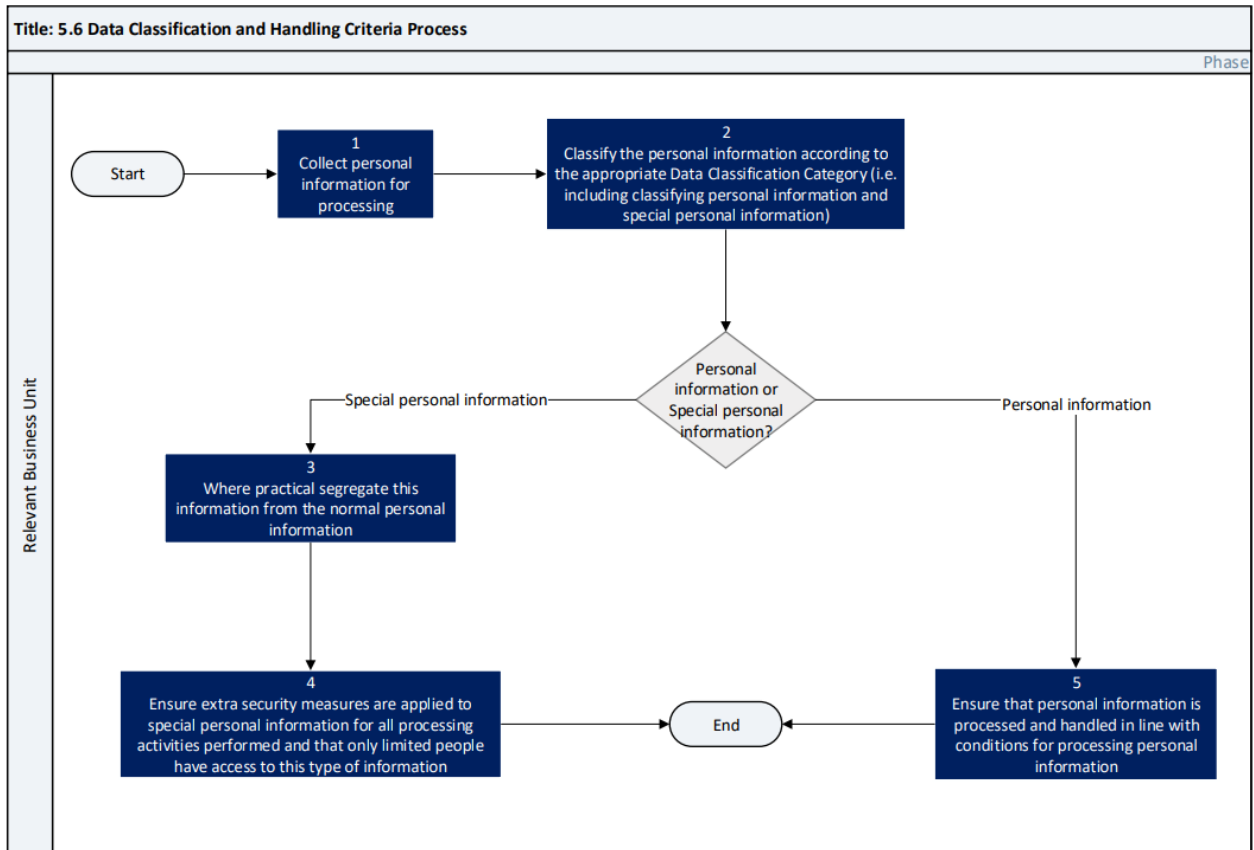
This procedure outlines the steps to be followed in order to handle data classifications and criteria process.

5.6.2. Procedure Description

- (a) The relevant Business Unit collects personal information for processing purposes and classify the personal information according to the appropriate Data Classification Category, including classifying personal information and special personal information.

- (b) Where practical the relevant Business Unit should segregate special personal information from the normal personal information and ensure that extra security measures are applied to the special personal Information for all processing activities performed and that only limited people have access to this type of information.

- (c) The relevant Business Unit should ensure that personal information is processed and handled in line with the conditions for processing personal information.



5.7. Objections to the Processing of Personal Information Process

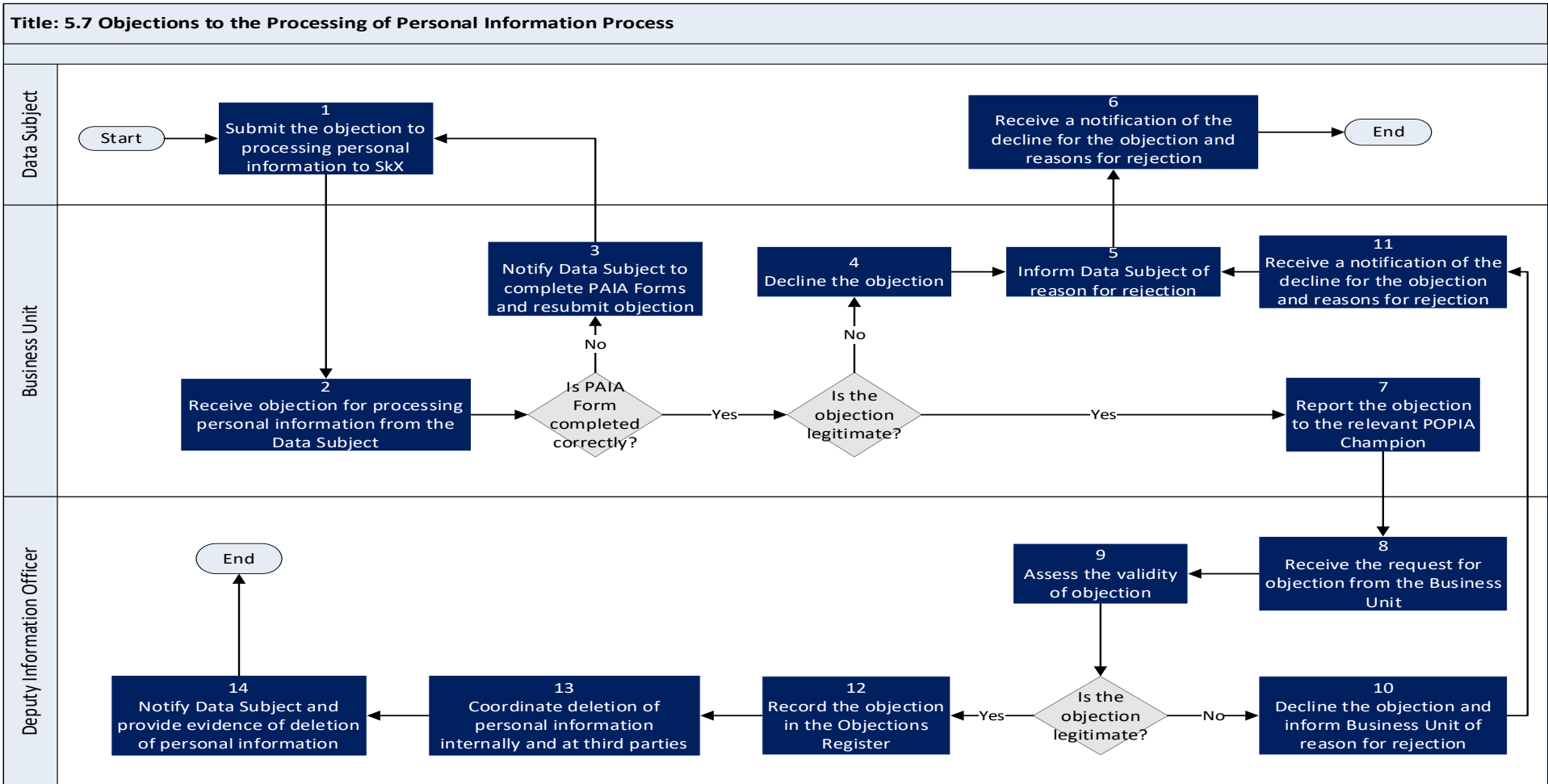
5.7.1. Procedure Overview

This procedure outlines the steps to be followed to address objections raised by Data Subjects to the processing of their personal information by NEMISA.

5.7.2. Procedure Description

- (a) The Data Subject submits the objection to the processing of personal information to NEMISA to the relevant Business Unit using the completed relevant POPIA Form.

- (b) On receipt of the objection, the Business Unit assesses the legitimacy of the objection and declines the request if it is found not to be legitimate.
- (c) If the objection is legitimate, the Business Unit reports the objection to the POPIA Deputy Information Officer for review and approval.
- (d) The POPIA Deputy Information Officer receives the request and assess the legitimacy of the objection.
- (e) The POPIA Deputy Information Officer declines the request and inform the Business Unit of the reasons for rejection if the request is found not to be legitimate.
- (f) If the objection is legitimate, the POPIA Deputy Information Officer records the objection in the Objections Register and coordinates the deletion of personal information internally and at the third parties, if applicable.
- (g) The POPIA Deputy Information Officer notifies the Data Subject that the personal information has been deleted and provide evidence of the deletion of the information.



5.8. Notification to the Data Subjects and Information Regulator Process

5.8.1. Procedure Overview

This procedure outlines the steps to be followed for notification to the Data Subjects and Information Regulator process about the leakage or unauthorised access by external third parties to the personal information occurred within NEMISA.

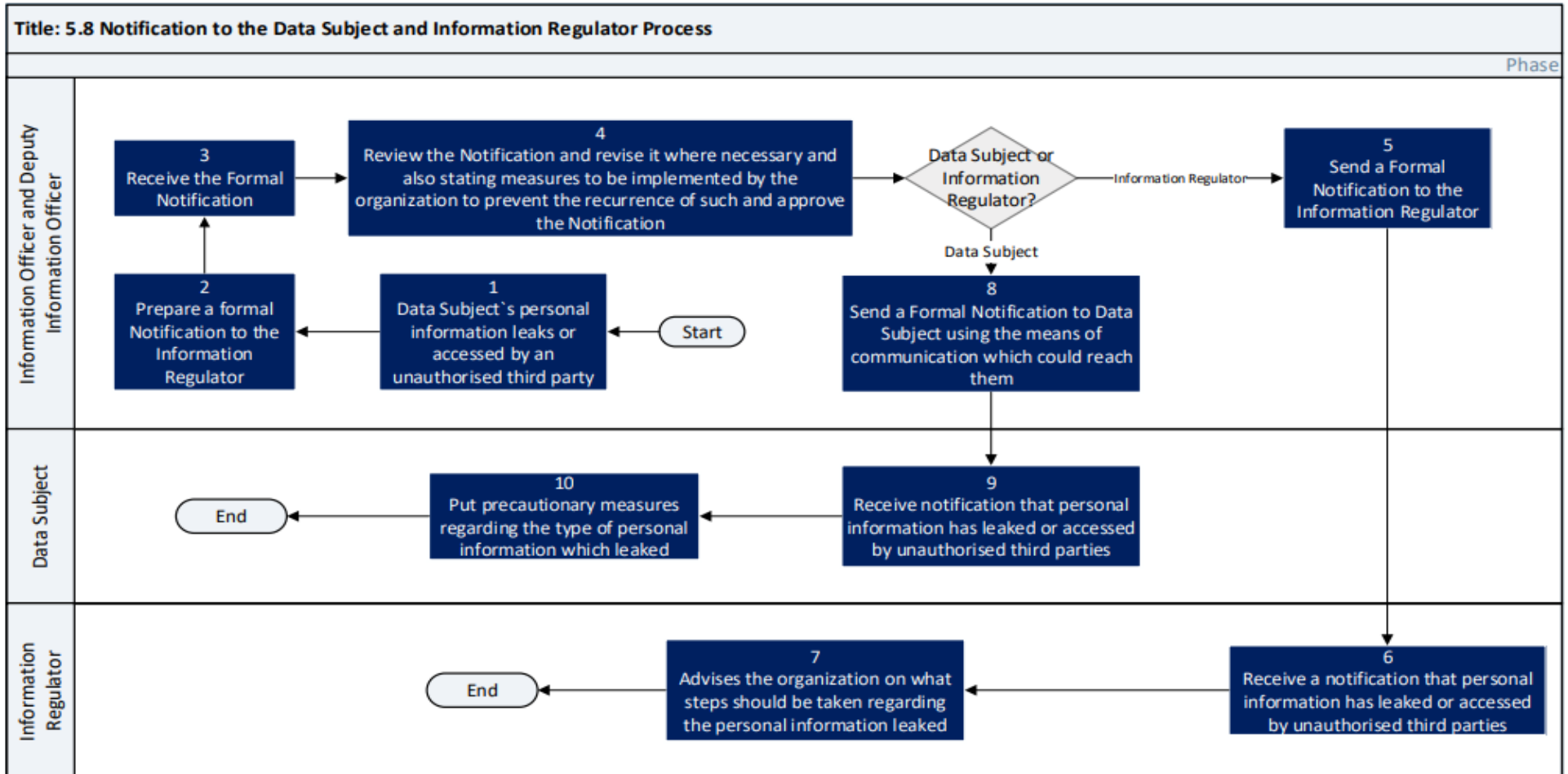
5.8.2. Procedure Description

- (a) The Data Subject's personal information leaks or is accessed by unauthorised third parties.
- (b) The POPIA Deputy Information Officer prepares a formal notification to the Information Regulator and submit to the Information Officer or Deputy Information Officer for review and approval.
- (c) The Information Officer or Deputy Information Officer reviews the notification and revise it where necessary and also state measures to be implemented by NEMISA to prevent the recurrence of such and approve the notification.
- (d) The Information Officer or Deputy Information Officer send a formal notification to both the Information Regulator and the affected Data Subjects.
- (e) The Information Regulator and affected Data Subjects receive a notification from NEMISA that the personal information has leaked or accessed by unauthorised third parties.



- (f) On receipt of the notification from NEMISA, the Information Regulator advises NEMISA on what steps to be taken regarding the leaked information.

- (g) The Information Officer or Deputy Information Officer should cooperate with the Information Regulator to facilitate the process of implementing the advises provided.



5.9. Access Requests to Personal Information – Data Subjects Request Process

5.9.1. Procedure Overview

This procedure outlines the steps to be followed in order to assess requests of personal information by NEMISA Data Subjects, i.e. the process where Data Subjects are requesting their own personal information.

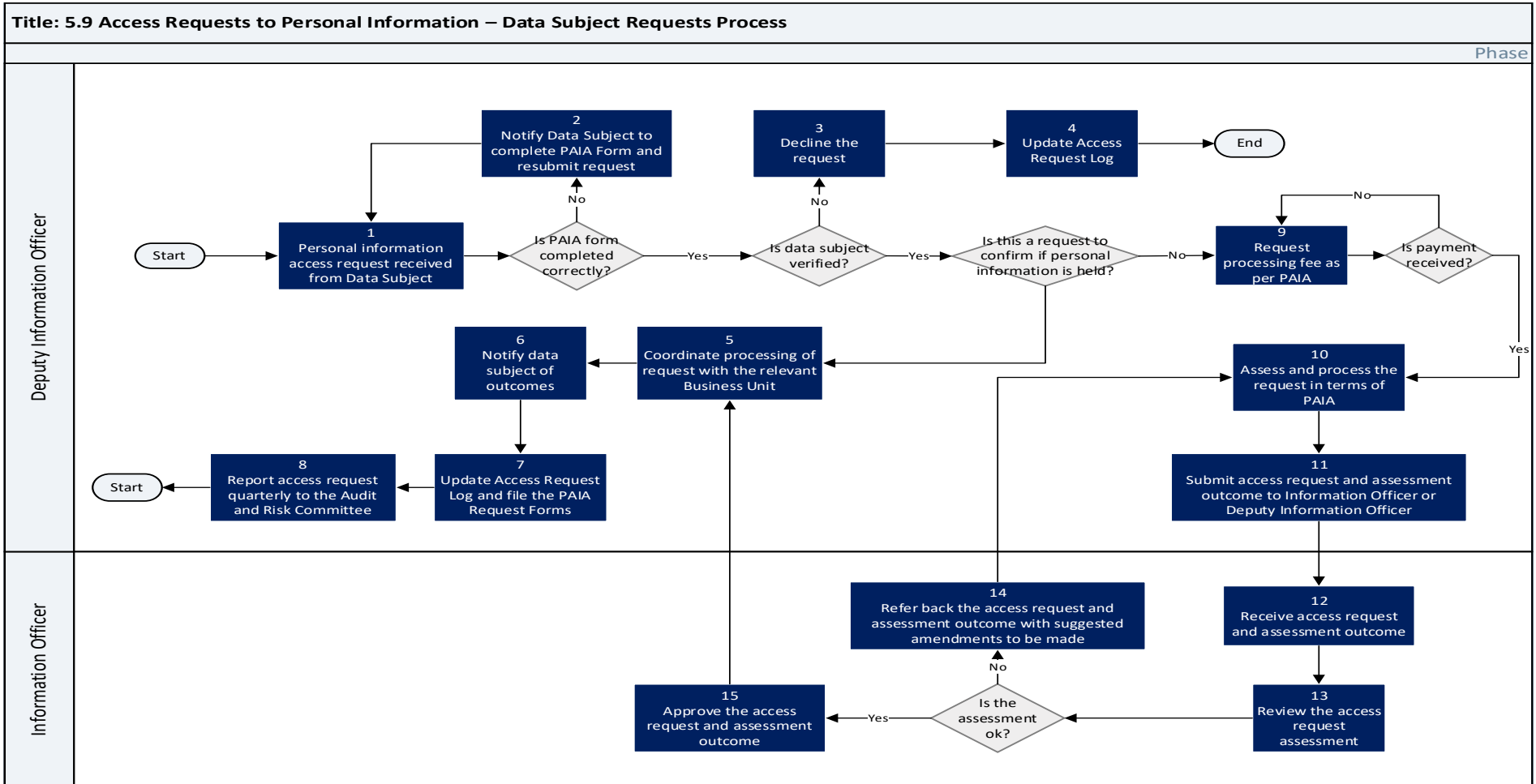
5.9.2. Procedure Description

- (a) The POPIA Deputy Information Officer receives request for personal information from the Data Subject using the completed PAIA Form.
- (b) The Deputy Information Officer verifies the Data Subject to confirm that the Requester of the personal information is indeed the owner of the information.
- (c) If the Data Subject's request is just to confirm if personal information is held about them, there is no processing fee charged as per PAIA.
- (d) If the request is to get access to personal information, the POPIA Deputy Information Officer requests the processing fee as per PAIA from the Requester (Data Subject) of the personal information.
- (e) After the payment has been received by NEMISA, the Deputy Information Officer assesses the request and submits the assessment outcome to the Information Officer for review and approval.
- (f) The Information Officer reviews the request assessment outcome and either approves or declines the request for information.
- (g) On receipt of the approval, the POPIA Deputy Information Officer coordinates the processing of the request with the relevant Business



Unit and notifies the Requester accordingly of the outcome of the request.

- (h) The Deputy Information Officer records the request for personal information in the Access Requests Register and file the PAIA Form for control and future reference purposes.



5.10. Access Requests to Personal Information – Third Parties Request Process

5.10.1. Procedure Overview

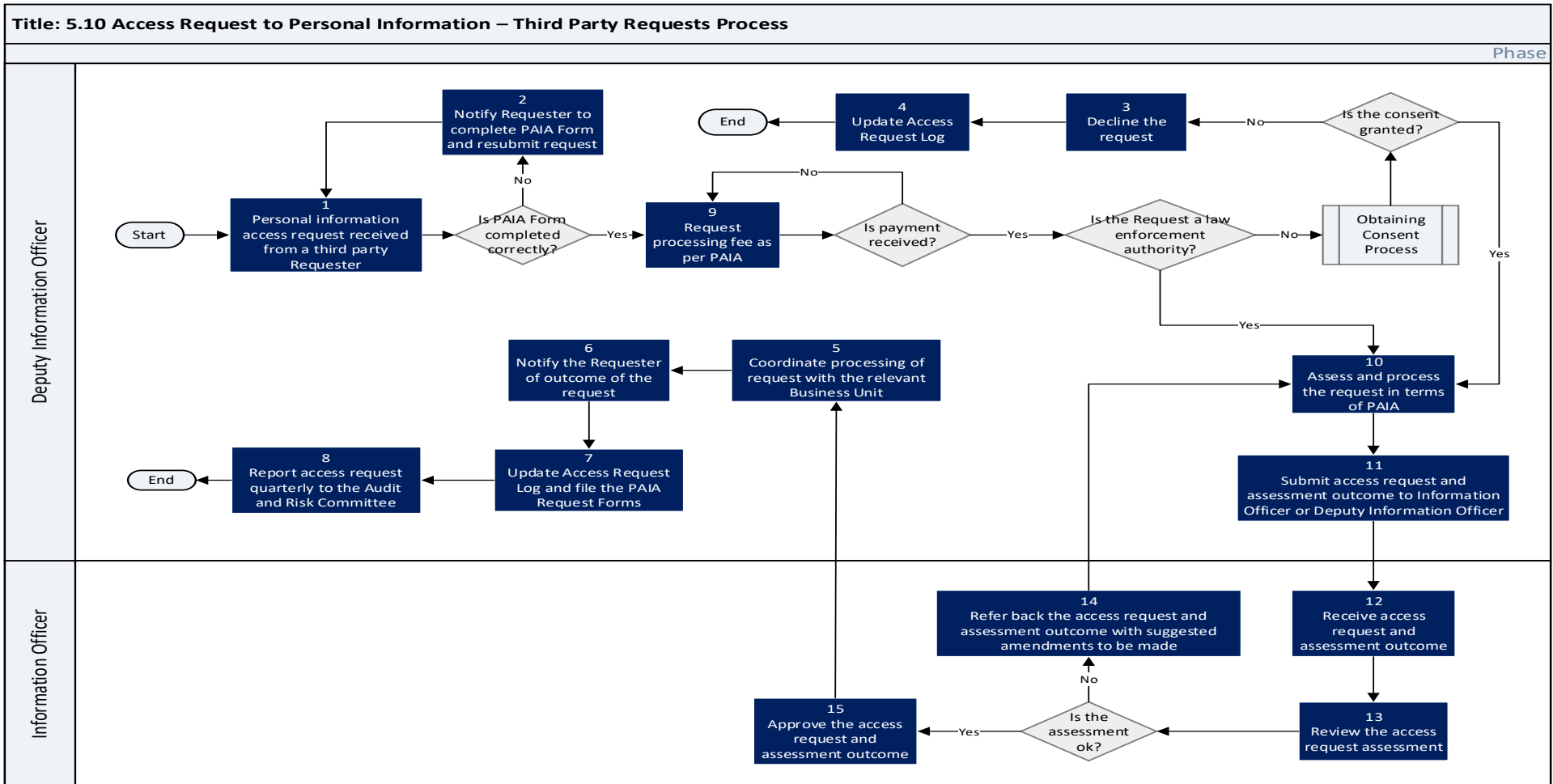
This procedure outlines the steps to be followed in order to assess requests of personal information of NEMISA's Data Subjects by external third parties.

5.10.2. Procedure Description

- (a) The POPIA Deputy Information Officer receives request for personal information of NEMISA's Data Subjects from a third-party Requester using the completed PAIA Form.
- (b) The POPIA Deputy Information Officer requests the processing fee as per PAIA from the Requester of the personal information.
- (c) The Deputy Information Officer checks if the Requester is one of the law enforcement authorities and if not, facilitate the process of obtaining consent from the affected Data Subject. The Deputy Information Officer declines the request if the consent is not granted and updates the Access Request Register accordingly.
- (d) If the request is from the law enforcement authority or the Data Subject has granted the consent, the Deputy Information Officer assesses the request and submits the assessment outcome to the Information Officer for review and approval.
- (e) The Information Officer reviews the request assessment outcome and either approves or declines the request for information.

- (f) The POPIA Deputy Information Officer coordinates the processing of the request with the relevant Business Unit and notifies the Requester accordingly of the outcome of the request.

- (g) The Deputy Information Officer records the request for personal information in the Access Requests Register and file the PAIA Form for control and future reference purposes.



6. OVERSIGHT OF PRIVACY GOVERNANCE

The POPIA Steering Committee (PSC) is responsible for providing oversight on POPIA Compliance. The Deputy Information Officer submits quarterly reports to the PSC relating to ongoing monitoring of compliance with the conditions and requirements of POPIA. The reporting will include, amongst others, the following aspects:

- (a) Ongoing compliance monitoring with conditions and requirements of POPIA
- (b) Investigation of allegations of privacy breaches reported to NEMISA
- (c) Ongoing POPIA training and awareness

7. PRIVACY IMPACT ASSESSMENTS

The Deputy Information Officers have been delegated the responsibility to review the requests for personal information for further processing in order to:

- Identify the purpose of the disclosure and ensure it is legitimate and lawful;
- Identify the recipient of the personal information, obtain consent from the relevant Data Subject(s) and obtain written agreement to the terms and conditions of processing; and
- Only transfer or disclose the minimal information required for the specified purpose.

8. POPIA FORMS PRESCRIBED BY THE INFORMATION REGULATOR

- **Form 1:** [Objection to the Processing of Personal Information](#)
- **Form 2:** [Request for Correction or Deletion of Personal Information or Destroying or Deletion of Record of Personal Information](#)



- **Form 3:** [Application for the Issue of a Code of Conduct](#)
- **Form 4:** [Application for the Consent of a Data Subject for the Processing of Personal Information for the Purpose of Direct Marketing](#)
- **Form 5:** [Complaint Regarding Interference with the Protection of Personal Information/Complaint Regarding Determination of an Adjudicator](#)