

PROTECTION OF PERSONAL INFORMATION (POPIA) POLICY

1. Statement:

- 1.1 DementiaSA acknowledges 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").
- 1.2 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.
- 1.3 A person's right to privacy entails having control over his or her personal information and being able to conduct his or her affairs free from unwanted intrusions. Given the importance of privacy, DementiaSA committed to effectively managing personal information in accordance with POPIA's provisions.

2 Purpose:

- 2.1 The purpose of this policy is to inform employee and consumers and enable DementiaSA to comply with:
 - 2.1.1 The laws in respect of personal information, it holds about data subjects.
 - 2.1.2 Follow good practice.
 - 2.1.3 Protect DementiaSA reputation.
 - 2.1.4 Protect DementiaSA from a breach of its responsibilities.
 - 2.1.5 Protect our consumers and employees against loss or breach of their personal information.

3 Data Collection:

- 3.1 Data subjects have the following rights:
 - 3.1.1 Objection to the use of personal information.
 - 3.1.2 Notification if information is being used for something other than it was consented for.
 - 3.1.3 Establishing that information can be corrected, destructed, or deleted.
 - 3.1.4 Refuse processing for direct marketing by unsolicited electronic communication.
 - 3.1.5 Lodge a complaint with the information regulator.
 - 3.1.6 Institute civil proceedings.

3.2 Personal information includes:

- 3.2.1 Identity or passport number.
- 3.2.2 Date of birth and age.
- 3.2.3 Phone numbers – including cell phone number.
- 3.2.4 Email address.
- 3.2.5 Online or instant messaging identifiers.
- 3.2.6 Physical address.
- 3.2.7 Gender, race and ethnic origin.
- 3.2.8 Marital relationship status and family relations.
- 3.2.9 Criminal record.
- 3.2.10 Private correspondence.
- 3.2.11 Religious or philosophical beliefs – this includes personal and political opinions.
- 3.2.12 Employment history and salary.
- 3.2.13 Financial information.
- 3.2.14 Education information.
- 3.2.15 Physical and mental health information – this includes medical history and blood type.

3.3 You may only collect personal information for a specific, explicitly defined, and lawful purpose and the subject must be aware of the purpose for which the information is being collected.

3.4 Once the personal information is no longer needed for the specific purpose, it must be disposed of (the subject must be “de-identified”), unless you need to keep it (or can keep it) by law, or you need to keep the record for your own lawful purpose or in accordance with the contract between yourself and the subject, or the subject has consented to you keeping the records.

3.5 DementiaSA is entitled to keep records of personal information for historical, statistical or research purposes if established safeguards are in place to prevent the records being used for any other purposes.

3.6 Documentation relating to personal information and how it has been processed must be maintained as referred to in section 14 or 51 of the Promotion of Access to Information Act.

3.7 All information is to be stored on the DementiaSA IT network, no data may be saved or stored elsewhere.

3.8 DementiaSA is legally obliged to provide adequate protection for the personal information we hold and to stop unauthorized access and use of personal information. We will, on an on-going basis, continue to review our security

controls and related processes to ensure that your personal information remains secure.

3.9 Our security policies and procedures cover:

- 3.9.1 Physical security.
- 3.9.2 Computer and network security.
- 3.9.3 Access to personal information.
- 3.9.4 Secure communications.
- 3.9.5 Security in contracting out activities or functions.
- 3.9.6 Retention and disposal of information.
- 3.9.7 Acceptable usage of personal information.
- 3.9.8 Governance and regulatory issues.
- 3.9.9 Monitoring access and usage of private information.
- 3.9.10 Investigating and reacting to security incidents.

4 Responsibilities of the Information Officer:

- 4.1 Encourage compliance with the information protection conditions in terms of Section 55 of POPIA.
- 4.2 Developing, publishing, and maintaining the POPIA Policy which addresses all relevant provisions of the POPIA Act.
- 4.3 Reviewing the POPIA Act and periodic updates as published.
- 4.4 Ensuring that POPIA Act induction training takes place for all staff.
- 4.5 Ensuring that periodic communication awareness on POPIA Act responsibilities takes place.
- 4.6 Ensuring that Privacy Notices for internal and external purposes are developed and published.
- 4.7 Ensuring that appropriate policies and controls are in place for ensuring the Information Quality of personal information.
- 4.8 Ensuring that appropriate Security Safeguards in line with the POPIA Act for personal information are in place.
- 4.9 Identify and govern all privacy related risks.
- 4.10 If applicable, know, understand, and ensure corporate compliance with all relevant laws of foreign jurisdictions in which we conduct business.

- 4.11 Liaise with Human Resources and Legal Departments to ensure standards of disciplinary action and sanction for non-compliance.
- 4.12 Manage breach and incident investigation processes.
- 4.13 Create standards and procedures to manage any compromise in the security of the stored personal information correctly and appropriately.
- 4.14 Annually submit to the Regulator, in terms of section 32 of PAIA the following:
 - 4.14.1 The number of requests for access received.
 - 4.14.2 The number of requests for access granted in full.
 - 4.14.3 The number of requests for access granted in terms of section 46 of PAIA.
 - 4.14.4 The number of requests for access refused in full and refused partially and the number of times each provision of PAIA was relied on to refuse access in full or partially.
 - 4.14.5 The number of cases in which the periods stipulated in section 25(1) of PAIA were extended in terms of section 26 (1) of PAIA.
 - 4.14.6 The number of internal appeals lodged with the relevant authority and the number of cases in which, as a result of an internal appeal, access was given to a record.
 - 4.14.7 The number of internal appeals which were lodged on the ground that a request for access was regarded as having been refused in terms of section 27 of PAIA.
 - 4.14.8 The number of applications to a court which were lodged on the ground that an internal appeal was regarded as having been dismissed in terms of section 77 (7) of PAIA.
 - 4.14.9 The Regulator may, annually, request an Information Officer of a private body, in terms of section 83 (4) of PAIA, to furnish to the Regulator with information about requests for access to records of that body.

4.14.10 In the case of health records, if the Information Officer is of the opinion that the disclosure of the record to the relevant person would be likely to cause serious harm to their physical or mental health, or well-being, the Information Officer may only give access to the record if the requester proves to the satisfaction of the information officer that adequate provision is made for such counselling or arrangements as are reasonably practicable before, during or after the disclosure of the record to limit, alleviate or avoid such harm to the relevant person.

4.14.11 Registration of Information Officers with the Regulator is not only the prerequisite for an Information Officer to take up their duties in terms of POPIA but is a compulsory requirement for every person identified in paragraph 5.1 above.

4.14.12 The Information Officers of public bodies and heads of private bodies under PAIA will have to register to perform their duties and responsibilities in terms of POPIA.

4.14.13 It is a duty of the responsible party to ensure that the Information Officer is registered with the Regulator.