

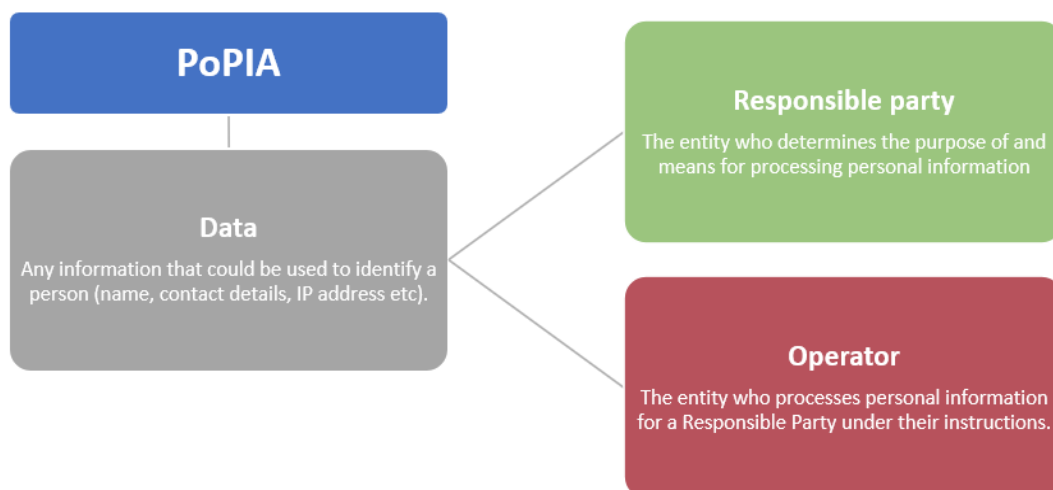
DevMan and POPIA

The Protection of Personal Information Act (POPIA) commenced on 1 July 2020. Organisations have a one-year grace period to ensure compliance with POPIA.

There is a considerable amount of information available on the subject from respected sources. The information provided in this document is merely an interpretation of the rule and we recommend you augment this by doing your own research. We have also included a summary of the eight principles of POPIA.

POPIA overview

- POPIA:** Legislation designed to give every individual control of their personal data. POPIA will change the way we process and store personal data.
- Personal information:** Information relating to an identifiable, living, natural person, and where applicable an identifiable, existing juristic person.
- Data subject:** The person whose data is being collected, held or processed.
- You the client:** In the capacity of data owner and data processor, you are responsible for this information – why it is processed, how it is stored and how it will be used. In terms of POPIA, this is the **'Responsible Party'**.
- DevMan:** As a CRM database provider we process personal data according to services agreed in line with your instructions and your responsibility. We aim to help you comply. In terms of POPIA, this is the **'Operator'**.
- What is required?** All parties must be able to clearly show responsibility and compliance.



Eight principles of PoPIA

1. **Accountability**

Each organisation must appoint an Information Officer who will be responsible for ensuring that the principles within POPIA are complied with and that controls are in place to enforce them. The Information Officer must be registered with the Information Regulator when the Act goes live.

2. **Processing Limitation**

The second principle deals with the lawfulness of processing, minimality of information collected, consent, justification and objection, and the collection of personal information directly from the data subject.

3. **Purpose Specification**

Personal information must be collected for a specific purpose and the data subject must be made aware of the purpose for which it was collected.

4. **Further processing limitation**

There is a limitation on the further processing of personal information. Additional processing of personal information must be compatible with the purpose for collection in principle 3.

5. **Information quality**

The responsible party must take reasonable steps to ensure that the personal information that has been collected is complete, accurate, not misleading, and up to date. Consideration should be given to the purpose for which the personal information was collected.

6. **Openness**

The responsible party will need to inform data subjects of the reasons why their information is being used. They also need to inform them if their personal information will be shared with other companies, including those that process on behalf of the responsible party. Notifications should happen before the information is collected or as soon as reasonably possible after it is collected.

7. **Security Safeguards**

The responsible party must ensure that the integrity of the personal information in its control is secured through technical and organisational measures.

8. **Data Subject Participation**

Data subjects have the right to request whether a responsible party holds personal information about the data subject, including a description of such information. The responsible party may not charge for this request and must supply the report in a reasonable amount of time.

How DevMan will assist you

DevMan, as an *Operator*, has put the following in place to meet compliance requirements:

- We endeavour to follow industry standard best practice for security (See our Technical and security document).
- The DevMan team has been made aware of POPIA requirements, and all are bound by confidentiality agreements.
- We regularly carry out assessments of technical and organizational safeguards.
- As a POPIA specialist, Gregg Abrahams has been appointed as the Information Officer for DevMan.

The following are key areas that you as the *Responsible party* could give attention to:

- Confirm who your information officer is and make your team aware of POPIA requirements.
- POPIA covers structured (i.e. DevMan database) and unstructured (i.e. spreadsheets, etc.) data. Unstructured data is very difficult to manage and secure, however DevMan provides the means to have accurate data stored in one structured place. Begin the process of storing relevant unstructured data in DevMan.
- Identify groups of people on your database (e.g. Donor, Alumni etc) including:
 - The reason for each group;
 - The information you can legally keep per group.
- You must allow data subjects to actively opt-in to direct marketing communication, this should not be pre-selected. And allow for a simple opt-out.
- Give attention to information quality and data processes.

In the year ahead, we will implement further DevMan tools to help you to be compliant and will communicate these to you on a regular basis.

Read what the act entails at <https://popia.co.za/>.