

POPIA MANUAL 2021

1 June 2021

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1. POPIA Compliance

Kibo Connect (Pty) Ltd takes the right to privacy very seriously and will strive to safeguard all client and employee personal information to the best of our ability. This manual will be made available to all stakeholders in order provide transparency and ensure best practices are always followed when dealing with personal information.

Terms used when discussing personal information:

Data Subject	Responsible Person	Operator	Processing
<ul style="list-style-type: none"> Person or company to whom the personal information relates 	<ul style="list-style-type: none"> The person who determines the purpose of and the means of processing the PI. 	<ul style="list-style-type: none"> Person who processes the PI for a responsible person i.t.o a contract 	<ul style="list-style-type: none"> Anything to do with PI including collection, storage, modification destruction etc

2. Governance Structure

2.1 Information Officer and Deputy Information Officer

The information officers’ main role is to encourage compliance with POPI throughout the company and create a culture where the protection of privacy is considered in all levels of decision making. The IO and DIO must ensure that all private data held by the company is protected with both physical security measures as well as best practice behaviours. The IO and DIO must be registered with the regulator before taking up any duties.

Other responsibilities:

- Deal with requests made to the organisation in relation to POPI.
- Cooperate with the Regulator in relation to any investigations.
- Implement a compliance framework.
- Create a comprehensive POPIA manual.
- Update any policies and terms to consider POPI regulations.
- Ensure awareness training is given to all staff.
- Remain up to date with any important changes to legislation.

Current Information Officer: Peter Downes
 Current Deputy Information Officer: Kerry Gherbavaz

Both officers have done a POPI online course presented through Masthead (Pty) Ltd.

See Addendum 1:

2.2 Dedicated Email Address

All POPIA related queries or complaints can be directed to a dedicated email address which is monitored by both the IO and DIO - popi@kibo.co.za. Customers requesting access to their personal information should send a formal request to this email address.

2.3 Prior Authorisation

Kibo Connect only processes unique identifiers as a responsible party for the reasons intended when we collected the information. We **do not** share any of this unique information with any 3rd parties for other reasons such as marketing or credit reporting.

1. Full names, ID # numbers and address information is required on record for RICA purposes as required by ICASA.
2. Bank account numbers are required for debit order payment purposes only.
3. We do not collect or process unique information about children.

Kibo Connect has therefore concluded that we do not require prior authorisation from the Information Regulator. All customer registration forms will be updated with POPIA compliance information.

3. Internal Policies and Procedures

All Kibo employees have signed a document outlining our internal POPIA Compliance Policies and Procedures. This document details what is considered private information and what the acceptable processing procedures are when dealing with this information.

[See Addendum 2](#)

4. Marketing Communication

Kibo will collect information so that we can contact you on occasion with Kibo related marketing information. All marketing emailers provide an unsubscribe link should the recipient not wish to receive further promotions or marketing related communications. Customers that do not wish to be contacted are automatically removed from our email list by our CRM software.

Information collected:

- Your full name
- E-mail address
- Telephone number
- Physical address

We **do not** collect sensitive data about our customers such as information about your religion, health, political beliefs, or sexual orientation.

We **do not** collect personal social media information.

Existing customers may be contacted to inform them about any network maintenance that will affect their services. They may also be contacted to update them about any finance related notices that will affect them such as price increases or debit order payment notices.

5. Privacy Policy

5.1 Collection of Information

We may collect your personal information/data in the following ways:

- When you contact us, place orders with us or create an account.
- When you register for any events, workshops, or seminars.
- When you fill in any online forms or reply to any communication from us.
- When you subscribe to our newsletters and mailing lists.
- Third party sources such as business partners with whom we have joint marketing activities.

5.2 Sharing of Personal Data

Kibo Connect respects confidentiality of all our customers and will observe all privacy and information best practices in accordance with the applicable laws in South Africa, including the POPI act. We undertake not to sell your personal information to third parties for commercial or marketing purposes. We will not share your personal data with any third party unless required by law:

- We may share your personal data in request to a competent authority in accordance with, or required by any law, regulation, or legal process.
- We may share your personal data, if necessary, to comply with any judicial proceedings, court orders or government orders.
- We may disclose information to defend ourselves against any legal claims.

Please refer to our **Acceptable Usage Policy** for information on what is considered unlawful usage as well as our policy on the protection of minors.

6. Data Security

6.1 Hard copy Information

Kibo has aimed to become paperless since mid-2020. However, any hard copy quotes and registration forms are to be scanned and securely saved on the server; the original documents should then be torn and placed in the shredding bins.

Our shredding service provider, SHREDMASTER Recycling (Pty) Ltd is POPI compliant and provides a destruction certificate on completion.

SHREDMASTER Recycling (Pty) Ltd
<https://shredmaster.co.za>
021 200 6002

See Addendum 3

6.2 Digital Informaton

Kibo has a very secure IT network infrastructure, good IT Governance is a passion in the company, and we strive to lead by example when selling IT security services. The Kibo approach to network security is a layered approach:

- All staff have signed company policy documents related to IT usage, security, and confidentiality.
- All network access is governed by strict password policies with restricted access.
- The network is protected by a UTM Firewall, anti-malware protection.
- The network health is monitored and patched with proactive RMM tools.
- Company applications include a CRM system and a finance application both hosted on our own protected infrastructure.
- Company data is backed up daily to an encrypted online backup platform with 14 days of retention.
- Company servers are hosted in datacentres with 99,999% uptime.
- The company network is segmented from BYOD and guest devices with VLAN separation.

6.3 IT /Electronic Waste

All electronic waste is disposed of responsibly to both protect the environment from toxins as well as the privacy of the information stored on these devices. All electronic waste is sent to Cape E-Waste who provide us with a certificate of secure data destruction on completion. Cape E-Waste is POPIA Compliant.

Cape E-Waste (Pty) Ltd
<http://capee-waste.co.za/>
021 987 7133

See Addendum 4

7. Updates

We reserve the right to update this statement at any time. The most updated version will be available on our website.

Addendum 1: Kibo Connect (Pty) Ltd IO & DIO Registration



**INFORMATION
REGULATOR
(SOUTH AFRICA)**
*Ensuring protection of your personal information
and effective access to information*

REGISTRATION CERTIFICATE

Registration Number: 4400/2021-2022/IRRTT

This is to certify that Peter Downes and Kerry Gherbavaz have been registered with the Information Regulator by Kibo Connect (Pty) Ltd as the Information Officer and Deputy Information Officer respectively, in terms of section 55(2) of the Protection of Personal Information Act 4 of 2013 with effect from 19 May 2021.



*Ensuring protection of your personal
information and effective access to information*



**Chief Executive Officer
INFORMATION REGULATOR**

NB: Please note that it is your responsibility to ensure that the particulars of an Information Officer and/or Deputy Information Officer(s) are correct and updated on an annual basis or as and when it becomes necessary.

Addendum 2: POPIA COMPLIANCE – POLICIES AND PROCEDURES

Kibo Connect (Pty) Ltd values the right to privacy and will ensure all the necessary steps are taken to secure private data for our clients and suppliers. As an employee it is important that you understand your role in protecting this private information. Please familiarise yourself with the Protection of Personal Information Act (POPIA).

What is considered personal information:

“personal information means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person...” – below are some examples relevant to Kibo:

1. Full names.
2. Home and or Business address details.
3. Unique identifiers such as ID numbers and bank account details.
4. Any correspondence received that is explicitly private or confidential.
5. Any information along with the name of the person that would further identify the person.

Policies and Procedures:

1. All personal information is to be treated with the utmost confidentiality by Kibo employees.
2. Any documents that have not been filed securely must be shredded.
3. Any documents containing unique identifiers must be stored on the secure server and/or Microsoft 365 only.
4. All company, contact and address details to be stored on Connectwise.
5. No client information may be stored on personal flash drives or 3rd party communication platforms such as WhatsApp or private mail.
6. Passwords to the Kibo domain are to be updated regularly and kept confidential.
7. No personal information may be passed on to any third party without prior approval from the Information Officer. The only exclusion to this is providing name and address details to upstream providers as this is required to deliver the service and this will be made clear in all registration documentation.
8. Unique identifiers such as ID numbers and bank account are never to be shared and access must be limited to the finance and projects departments for RICA compliance.

It is important to keep Privacy top of in mind when processing any information but especially when processing private or personal information.

Should you require any assistance or further explanation, please ask the Information and or Deputy information officer. A dedicated email address has been set up for all queries: popi@kibo.co.za.

Please keep up to date with the Compliance Manual which will be available on the company [website](#).

I _____ hereby declare that I understand the importance of the POPI act I understand my role in supporting Kibo Connect's compliance. I undertake to comply with the policies and procedures as set out above.

Signed: _____

Date: _____

Addendum 3: SHREDMASTER Recycling (Pty) Ltd



 **Consumer**
PROTECTION & POPI
SEESA

Certificate

This is to certify that
Hiermee word gesertifiseer dat

SHREDMASTER RECYCLING PTY LTD

is a client of SEESA Consumer Protection & POPI.
'n kliënt is van SEESA Consumer Protection & POPI.

SEESA Consumer Protection & POPI will assist with consumer related as well as protection of personal information aspects within the parameters of these legislation in furthering the business interests of the aforesaid client.

SEESA Consumer Protection & POPI sal omsien na verbruikersverwante asook beskerming van persoonlike inligting aspekte binne die raamwerk van dié wetgewings tot die bevordering van die besigheidsbelange van die bogenoemde kliënt.

DATE ISSUED: **17/04/2015**
DATUM UITGEREIK: **17/04/2015**

CLIENT NUMBER: **23-10264**
KLIËTENOMMER: **23-10264**

APPLICABLE LEGISLATION: Consumer Protection Act No 68 of 2008
TOEPASLIKE WETGEWING: & Protection of Personal Information Act No 4 of 2013


Banie Oostendurp
Managing Director
Besturende Direkteur

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Addendum 4: Cape E-Waste (Pty) Ltd



**INFORMATION
REGULATOR
(SOUTH AFRICA)**

Ensuring protection of your personal information
and effective access to information

REGISTRATION CERTIFICATE

Registration Number: 8677/2021-2022/IRTT

This is to certify that Rita Bradford has been registered with the Information Regulator by Cape E-waste Recyclers as the Information Officer in terms of section 55(2) of the Protection of Personal Information Act 4 of 2013 with effect from 24 May 2021.

*Ensuring protection of your personal
information and effective access to information*



**Chief Executive Officer
INFORMATION REGULATOR**

NB: Please note that it is your responsibility to ensure that the particulars of an Information Officer and/or Deputy Information Officer(s) are correct and updated on an annual basis or as and when it becomes necessary.