



**TRANSPORT**  
Sector Retirement Fund  
Moving Towards A Better Future

## TRANSPORT SECTOR RETIREMENT FUND

**Policy Name**

POPIA and PAIA Compliance Management Framework and Manual

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**Policy sponsor**

Penny Spentzouris

### Approval process

MANAGER/ POSITION	NAME	SIGNATURE	DATE
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		<b>Document Confidentiality</b>	
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## Table of Contents

<b>1. INTRODUCTION</b>	<b>5</b>
<b>2. PURPOSE OF THE POPIA COMPLIANCE MANAGEMENT FRAME-WORK</b>	<b>5</b>
<b>3. SCOPE</b>	<b>6</b>
<b>4. OBJECTIVE OF THE POPIA COMPLIANCE MANAGEMENT FRAMEWORK</b>	<b>6</b>
<b>5. APPLICABLE PRINCIPLES</b>	<b>6</b>
<b>5.1 Principle 1: Accountability</b>	<b>6</b>
<b>5.2 Principle 2: Processing limitation</b>	<b>6</b>
<b>5.3 Principle 3: Specific purpose</b>	<b>7</b>
<b>5.4 Principle 4: Limitation on further processing</b>	<b>7</b>
<b>5.5 Principle 5: Information quality</b>	<b>7</b>
<b>5.6 Principle 6: Transparency/ openness</b>	<b>7</b>
<b>5.7 Principle 7: Security safeguards</b>	<b>7</b>
<b>5.8 Principle 8: Data Subject participation</b>	<b>7</b>
<b>6. PURPOSE OF THE PROCESSING OF PERSONAL INFORMATION</b>	<b>7</b>
<b>7. CATEGORIES OF DATA SUBJECTS AND PERSONAL INFORMATION/ SPECIAL PERSONAL INFORMATION</b>	<b>8</b>
<b>8. CROSS-BORDER FLOWS OF PERSONAL INFORMATION</b>	<b>8</b>
<b>10. DESCRIPTION OF INFORMATION SECURITY MEASURES TO BE IMPLEMENTED BY TSRF</b>	<b>9</b>
<b>11. OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION BY A DATA SUBJECT</b>	<b>9</b>
<b>12. REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION</b>	<b>9</b>
<b>13. DATA PROTECTION IMPACT ASSESSMENT(GDPR)</b>	<b>9</b>
<b>14. RIGHT TO DATA PORTABILITY (GDPR)</b>	<b>10</b>
<b>SECTION B: PAIA</b>	<b>11</b>
<b>15. INTRODUCTION</b>	<b>11</b>
<b>16. GUIDE OF THE SOUTH AFRICAN HUMAN RIGHTS COMMISSION AND THE INFORMATION REGULATOR (SOUTH AFRICA)</b>	<b>11</b>

<b>17. ACCESS TO RECORDS HELD BY TSRF</b>	<b>12</b>
17.1 Personal Requester	12
17.2 Other Requester	12
17.3 Request Procedure	12
17.4 Decision	13
17.5 Grounds for refusal of access to records in terms of PAIA	13
17.6 Remedies available to the requester upon refusal of a request for access in terms of PAIA	15
17.6.1 Internal remedies:	15
17.6.2 External remedies:	15
<b>18. FEES</b>	<b>15</b>
<b>19. CATEGORIES OF RECORDS HELD BY TSRF:SECTION 51(1)(E)</b>	<b>15</b>
19.1 Financial records	15
19.2 Agreements or contract records	16
19.3 Employees /Trustees	16
19.4 Company policies and directives	16
19.5 Regulatory	16
19.6 Client information	16
19.7 Systems, solutions and information technology	16
19.8 Reference materials	16
<b>SECTION C: INFORMATION OFFICER</b>	<b>17</b>
<b>20. INTRODUCTION</b>	<b>17</b>
<b>21. GENERAL RESPONSIBILITIES OF INFORMATION OFFICER</b>	<b>17</b>
<b>SECTION D: OPERATIONAL CONSIDERATIONS</b>	<b>18</b>
<b>22. POPIA / PAIA COMPLIANCE PROCESS</b>	<b>18</b>
<b>23. OPERATING CONTROLS</b>	<b>19</b>
<b>SECTION E: GDPR</b>	<b>19</b>
<b>24. EU General Data Protection Regulation</b>	<b>19</b>
<b>ANNEXURE 1</b>	<b>20</b>
<b>ANNEXURE 2</b>	<b>21</b>



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**ANNEXURE 3..... 23**

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**ANNEXURE 4..... 26**

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**ANNEXURE 5..... 29**

## SECTION A: POPIA

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### 1. INTRODUCTION

The Protection of Personal Information Act 4 of 2013, (POPIA) Compliance Management Framework consists of policies, processes, standards, systems and structures that help identify and manage the risks around the processing of personal information. The success of a Framework relies heavily on the commitment and attitude of all employees and Management, including the Board of Trustees.

We are committed to compliance with the Protection of Personal Information Act (POPIA). Chp 3 of POPIA provides for the minimum conditions for lawful processing of personal information by a responsible party. These conditions may not be derogated from unless specific exclusions apply as outlines in POPIA. TSRF is the Responsible Party as defined in POPIA.

This policy and compliance framework establishes measures and standards for the protection and lawful processing of personal information within our organization and provides principles regarding the right of individuals to privacy and to responsible safeguarding of their personal information.

### 2. PURPOSE OF THE POPIA COMPLIANCE MANAGEMENT FRAMEWORK

The purpose of the POPIA Compliance Management Framework is to establish and implement appropriate strategic framework that defines the responsibilities of both management and employees and facilitates the implementation, monitoring and reporting on robust practices and standards for the effective management of compliance obligations regarding the processing of personal information. The establishment of an effective compliance management framework will reduce and/or mitigate the following risks:

- Damage to TSRF's reputation.
- Inadequate internal control systems and processes that may lead to fraud, corruption, unlawful processing and/or inefficiencies in the processing of personal information.
- Non-compliance with regulatory requirements.
- Financial loss.

TSRF's POPIA Compliance Framework and procedures including processes as set-out here, gives effect to the compliance policy.

### 3. SCOPE

This Framework applies to all TSRF's employees and relevant stakeholders. Employees are those who are permanent, temporary or casual and include contractors and consultants. This document outlines the structure, measures, principles, standards and key processes that TSRF will implement within to ensure compliance with obligations expected by its own data and information governance structures and the Information Regulator.

### 4. OBJECTIVE OF THE POPIA COMPLIANCE MANAGEMENT FRAMEWORK

The object of a POPIA Compliance Management Framework is to:

- Promote a culture of compliance and responsibility within TSRF, when processing personal information and highlighting its importance and connection to TSRF's corporate culture;
- Foster continuous improvement in compliance processes, systems, and standards ensuring obligation are always met by establishing monitoring and reporting mechanisms that will assist in identifying and assessing on non-compliance and tracking remedial actions;
- Maintain and grow TSRF's reputation in the marketplace and;
- Demonstrate TSRF's corporate and social responsibility with regard to processing personal information.

### 5. APPLICABLE PRINCIPLES

#### 5.1 Principle 1: Accountability

To ensure that reasonable steps are taken to ensure that personal information obtained from Data Subjects, it is legally obtained, processed responsibly, stored securely and destroyed responsibly. This includes all personal information about TSRF's members and employees (hereinafter referred to as 'Data Subjects').

#### 5.2 Principle 2: Processing limitation

Personal information must only be collected directly from Data Subjects, to the extent required. The information must only be processed with the consent of the Data Subjects and only used for the purpose for which it was obtained. Information which is by law required to be released, must be done in accordance with the defined legal parameters. In this event, the Data Subject must be informed.

### 5.3 Principle 3: Specific purpose

Personal information must only be processed for the specific purpose for which it was obtained and must not be retained for any longer than it is needed to achieve such purpose.

### 5.4 Principle 4: Limitation on further processing

Further processing of personal information must be compatible with the initial purpose for which the information was collected. Information is collected for the purposes of providing accounting services to Data Subjects and for employment purposes.

### 5.5 Principle 5: Information quality

TSRF must ensure that personal information held is accurate and updated regularly and that the integrity of the information is maintained by appropriate security measures. The information must be complete, up to date and accurate. It will therefore be necessary for Data Subjects to update their information and confirm that it is still relevant.

### 5.6 Principle 6: Transparency/ openness

There must be transparency between the Data Subject and TSRF.

### 5.7 Principle 7: Security safeguards

TSRF must take reasonable steps to ensure that adequate safeguards are in place to ensure that personal information is being used responsibly and is not unlawfully accessed. Technical and organisational measures will be used to ensure the integrity of personal information, and guard against the risk of loss, damage or destruction. TSRF is committed to ensuring that information is only used for legitimate purposes with the consent of Data Subjects and only by authorized employees.

### 5.8 Principle 8: Data Subject participation

The Data Subject must be made aware that their information is being processed and must have provided their informed consent to such processing. They are entitled to correct and update any information held by TSRF, on a regular basis.

## 6. PURPOSE OF THE PROCESSING OF PERSONAL INFORMATION

As outlined in paragraph 5.3 above, personal information may only be processed for a specific purpose. The purposes for which TSRF processes or will process personal information is set out in Annexure 1.

## 7. CATEGORIES OF DATA SUBJECTS AND PERSONAL INFORMATION/ SPECIAL PERSONAL INFORMATION

As per section 1 of POPIA, a Data Subject may either be a natural or a juristic person. Annexure 1 sets out various categories of Data Subjects that TSRF processes personal information on and the types of personal information relating thereto.

## 8. CROSS-BORDER FLOWS OF PERSONAL INFORMATION

Section 72 of POPIA provides that personal information may only be transferred out of the Republic:

- a) If the recipient country can offer such data an "adequate level" of protection. This means that its data privacy laws must be substantially like the Conditions for Lawful Processing as contained in POPIA; or
- b) If the Data Subject consents to the transfer of their personal information; or
- c) If the transfer is necessary for the performance of a contractual obligation between the Data Subject and TSRF; or
- d) If the transfer is necessary for the performance of a contractual obligation between TSRF and a third party, in the interests of the Data Subject; or
- e) If the transfer is for the benefit of the Data Subject, and it is not reasonably practicable to obtain the consent of the Data Subject, and if it were, the Data Subject, would likely provide such consent.

TSRF does not do any cross-border transfers of any personal information relating to employees, members, companies or organisations.

In the event that tsrf does cross-border transfers, it acknowledges and will comply with the requirements of the General Data Protection Rules of the EU(GDPR). The GDPR specifies that a cross-border transfer is allowed based on international agreements for judicial cooperation. The grounds for a cross-border transfer includes the transfer being made from a register which, according to the EU or a Member States' law, is intended to provide information to the public, and which is open to consultation either by the public in general or by any person who can demonstrate a legitimate interest, but only to the extent that the conditions laid down by EU or Member State law for consultation are fulfilled in the particular case.



## 10. DESCRIPTION OF INFORMATION SECURITY MEASURES TO BE IMPLEMENTED BY TSRF

Section D of Annexure 1 sets out the types of security measures to be implemented by TSRF to ensure that personal information is respected and protected.

A preliminary assessment of the suitability of the information security measure implemented or to be implemented by TSRF may be conducted in order to ensure that the personal information that is processed by TSRF is safeguarded and processed in accordance with the Conditions for Lawful Processing.

## 11. OBJECTION TO THE PROCESSING OF PERSONAL INFORMATION BY A DATA SUBJECT

Section 11(3) of POPIA and regulation 2 of the POPIA Regulations provides that a Data Subject may at any time object to the processing of his/hers/its personal information in the prescribed form attached to this framework as Annexure 2 subject to exceptions contained in POPIA.

## 12. REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION

Section 24 of POPIA and regulation 3 of the POPIA Regulations provides that a Data Subject may request for their personal information to be corrected / deleted in the prescribed form attached as Annexure 3 to this framework.

## 13. DATA PROTECTION IMPACT ASSESSMENT(GDPR)

The GDPR sets out requirements for conducting Data Protection Impact Assessments ('DPIAs'). A data controller is required to, where necessary, carry out a review to assess whether the processing of personal data is in accordance with the DPIA, particularly when there is a change in risks to processing operations. In the event that the personal information of EU subjects is being processed, the provisions of this clause will become applicable.

DPIA will be conducted if:

- a data controller utilises new technologies to process personal data;
- the processing may result in a high risk to the rights and freedoms of an individual;
- when a systematic and extensive evaluation of personal aspects relating to natural persons is involved, which is based on automated processing or profiling;
- there is processing on a large scale of special categories of data; and
- there is systematic monitoring of a publicly accessible area on a large scale.

The assessment will contain at least the following:

- a systematic description of the envisaged processing;
- operations and legitimate purposes of the processing;
- the necessity and proportionality of the operations in relation to the purposes; and
- the risks to the rights and freedoms of Data Subjects.

A data controller must consult the supervisory authority prior to any processing that would result in a high risk in the absence of risk mitigation measures as indicated by the DPIA.

POPIA does not contain equivalent provisions regarding a DPIA. However, Section 4(b) of the POPIA Regulations outline that the responsibilities of Information Officers include ensuring a personal information impact assessment is conducted to make certain that adequate measures and standards exist in order to comply with the conditions for the lawful processing of personal information.

#### 14. RIGHT TO DATA PORTABILITY (GDPR)

Unlike the GDPR, POPIA does not refer to a right to data portability. The GDPR defines the right to data portability as the right to receive data processed on the basis of contract or consent and processed by automated means, in a 'structured, commonly used, and machine-readable format' and to transmit that data to another controller without hindrance. The GDPR does not explicitly limit the scope of the right to data portability to special categories of personal data. EU Data Subjects' rights of portability are acknowledged.

## SECTION B: PAIA

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### 15. INTRODUCTION

The Promotion of Access to Information Act 2 of 2000,(PAIA) gives third parties the right to approach private bodies and the government to request information held by them, which is required in the exercise and/or protection of any rights. On request, the private body or government is obliged to release such information unless PAIA expressly states that the records containing such information may or must not be released. This manual informs requestors of procedural and other requirements which a request must meet as prescribed by PAIA.

#### **Nature of Business**

The Company is an incorporated company, focused on providing quality accounting, tax and related services.

#### **Contact Details**

Name of body:	Transport Sector Retirement Fund
Head of body:	Joe Letswalo
Information Officer:	Joe Letswalo
Physical address:	3 <sup>rd</sup> Floor 24 Wellington Road Parktown 2193.
Postal address:	PO Box 72402 Parkview 2121.
Telephone number:	011 484-0749/6
Email address:	<a href="mailto:joe@tsrf.co.za">joe@tsrf.co.za</a>

### 16. GUIDE OF THE SOUTH AFRICAN HUMAN RIGHTS COMMISSION AND THE INFORMATION REGULATOR (SOUTH AFRICA)

A guide to PAIA is available from the South African Human Rights Commission. The guide contains such information as may be reasonably required by a person who wishes to exercise any right contemplated in PAIA. Any enquires regarding this guide and its contents should be directed to:



The Information Regulator (South Africa)

Physical address: D House, 27 Stiemens Street,

Braamfontein, Johannesburg 2017.

Postal address: P.O.Box 31533

Braamfontein, Johannesburg 2017.

Complaints email: [complaints.IR@justice.gov.za](mailto:complaints.IR@justice.gov.za)

General enquiries email: [inforeg@justice.gov.za](mailto:inforeg@justice.gov.za)

Website: <https://justice.gov.za/inforeg/index.html>

## 17. ACCESS TO RECORDS HELD BY TSRF

Records held by T<sub>S</sub>R<sub>F</sub> may be accessed on request only once the requirements for access have been met. A requester is any person making a request for access to a record of T<sub>S</sub>R<sub>F</sub> and in this regard, PAIA distinguishes between two types of requesters:

### 17.1 Personal Requester

A personal requester is a requester who is seeking access to a record containing personal information about the requester. Subject to the provisions of PAIA and applicable law, T<sub>S</sub>R<sub>F</sub> will provide the requested information, or give access to any record about the requester's personal information. The prescribed fee for reproduction of the information will be charged by T<sub>S</sub>R<sub>F</sub>.

### 17.2 Other Requester

This requester (other than a personal requester) is entitled to request access to information pertaining to third parties. However, T<sub>S</sub>R<sub>F</sub> is not obliged to grant access prior to the requester fulfilling the requirements for access in terms of PAIA. The prescribed fee for reproduction of the information will be charged by T<sub>S</sub>R<sub>F</sub>.

### 17.3 Request Procedure

A requester must comply with all the procedural requirements contained in PAIA relating to a request for access to a record. A requester must complete the request form attached hereto as Annexure 4 and submit it, as well as the payment of a requester fee, if applicable



to the Information Officer at the physical address, or email address as stated herein. The request form must be filled in with enough information to at least enable the Information Officer to identify:

- The record or records requested
- The identity of the requester
- What form of access is required?
- The postal address, fax or email address of the requester.

A requester must state that he or she requires the information to exercise or protect a right, and clearly state what the nature of the right is, so to be exercised or protected. The requester must also provide an explanation of why the requested record is required for the exercise or protection of that right.

TSRF will process a request within 30 days, unless the requester has stated special reasons which would satisfy the Information Officer that circumstances dictate that this period not be complied with.

The requester shall be informed in writing whether access has been granted or denied. If, in addition, the requester requires the reasons for the decision in any other manner, he or she must state the way it is required. If a request is made on behalf of another person, the requester must then submit proof of the capacity in which the requester is making the request to the satisfaction of the Information Officer.

If an individual is unable to complete the prescribed form because of illiteracy or disability, such a person may make the request orally to the Information Officer.

## 17.4 Decision

TSRF will decide whether to grant or decline a request and give notice with reasons (if required) to that effect. The 30 day period within which TSRF has to decide whether to grant or refuse a request, may be extended for a further period of not more than 30 days if the request is for a large quantity of information, or the request requires a search for information that has been backup up and stored offsite and the information cannot reasonably be obtained within the original 30 day period. The Information Officer will notify the requester in writing should an extension be necessary.

## 17.5 Grounds for refusal of access to records in terms of PAIA

The following are the grounds on which TSRF may, subject to the exceptions contained in Chapter 4 of PAIA, refuse a Request for Access in accordance with Chapter 4 of PAIA.

- 17.5.1 Mandatory protection of the privacy of a third party who is a natural person, including a deceased person, where such disclosure of personal information would be unreasonable.
- 17.5.2 Mandatory protection of the commercial information of a third party, if the records contain:
- a) Trade secrets of that third party;
  - b) Financial, commercial, scientific or technical information of the third party, the disclosure of which could likely cause harm to the financial or commercial interests of that third party; and/ or
  - c) Information disclosed in confidence by a third party to TSRF, the disclosure of which could put that third party at a disadvantage in contractual or other negotiations or prejudice the third party in commercial competition.
- 17.5.3 Mandatory protection of confidential information of third parties if it is protected in terms of any agreement.
- 17.5.4 Mandatory protection of the safety of individuals and the protection of property.
- 17.5.5 Mandatory protection of records that would be regarded as privileged in legal proceedings.
- 17.5.6 Protection of the commercial information of TSRF, which may include:
- a) Trade secrets;
  - b) Financial /commercial, scientific, or technical information, the disclosure of which could likely cause harm to the financial or commercial interests of TSRF;
  - c) Information which, if disclosed, could put TSRF at a disadvantage in contractual or other negotiations or prejudice TSRF in commercial competition; and/or
  - d) Computer programs which are owned by TSRF, and which are protected by copyright and intellectual property laws.
- 17.5.7 Research information of TSRF or a third party, if such disclosure would place the research or the researcher at a serious disadvantage, and
- 17.5.8 Requests for records that are clearly frivolous or vexatious, or which involve an unreasonable diversion of resources.

## 17.6 Remedies available to the requester upon refusal of a request for access in terms of PAIA

### 17.6.1 Internal remedies:

TSRF does not have internal appeal procedures. As such, the decision made by the Information Officer is final, and requesters will have to exercise such external remedies at their disposal if the Request for Access is refused.

### 17.6.2 External remedies:

In accordance with sections 56(3)(c) and 78 of PAIA, a requester may apply to a court for relief within 180 days of notification of the decision for appropriate relief.

## 18. FEES

PAIA provides for two types of fees:

Fees are set out in Annexure 5.

A request fee, (which will be a standard fee) and an access fee, which must be calculated by considering reproduction costs, search and preparation time and cost, as well as postal / delivery costs where applicable. When a request is received by the Information Officer, the Information Officer shall be notice require the requester, other than a personal requester, to pay the prescribed request fee, if any, before further processing of the request can take place. If a search for the information is necessary and the preparation and disclosure of the information for disclosure, requires more time than prescribed in the regulations for this purpose, the Information Officer shall notify the requester to pay a deposit if the request is granted.

The Information Officer shall withhold information until the requester has paid the fee as indicated. A requester whose request for access to information has been granted, must pay an access fee reproduction, for search, preparation, and for any time in excess of the prescribed hours to prepare the information for disclosure including making arrangements to make it available in the request form. If a deposit has been paid in respect for access, which is refused, then the Information Officer shall repay the deposit to the requester.

## 19. CATEGORIES OF RECORDS HELD BY TSRF:SECTION 51(1)(E)

### 19.1 Financial records

- Financial statements of TSRF
- Insurance Information

## 19.2 Agreements or contract records

- Standard agreements
- Contracts concluded with third party service providers
- Supplier contracts

## 19.3 Employees /Trustees

- List of employees/trustees
- Personal information of employees/trustees
- Employee contracts of employment
- Letter of appointment for trustees
- Salaries of employees/ trustees
- Leave records
- Personnel files of employees/trustees
- Performance appraisals
- Training records

## 19.4 Company policies and directives

- Internal policies and directives relating to employees, trustees and the TSRF

## 19.5 Regulatory

- Licenses or Authorities

## 19.6 Client information

- Member details
- Contact details of individuals within employers
- Communications with members / employers

## 19.7 Systems, solutions and information technology

- Intellectual property pertaining to solutions and products used
- Usage of solutions and products

## 19.8 Reference materials

- Newsletters and Journal Articles
- Magazines
- Newspaper articles



## SECTION C: INFORMATION OFFICER

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### 20. INTRODUCTION

POPIA and PAIA require the appointment of an Information Officer and permit them to delegate any power or duty to a Deputy Information Officer, as necessary to make the body as accessible as reasonably possible. In terms of section 55(2) of POPIA, Information Officers and Deputy Information Officers shall take up their duties only after being registered with the Information Regulator. These so registered Information Officers and Deputies, are the same Information Officers as referred to in section 1, 14 and 51 of PAIA. The Information Officers of public and private bodies perform their duties and responsibilities in terms of both POPIA and PAIA.

TSRF acknowledges the contents of, and will comply with the Guidance Note on Information Officers and Deputy Information Officers of the Information Regulator dated 1 April 2021.

### 21. GENERAL RESPONSIBILITIES OF INFORMATION OFFICER

The Information Officer will:

- Be registered with the Regulator
- Encourage compliance
- Develop, implement, monitor and maintain a POPIA and PAIA Compliance Management Framework
- Deal with requests
- Handle complaints
- Assist the Regulator with investigations
- Ensure compliance with the policies developed within the framework
- Support training and awareness
- Submit annual reports as required to the Regulator

## SECTION D: OPERATIONAL CONSIDERATIONS

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### 22. POPIA / PAIA COMPLIANCE PROCESS

Management and the Information Officer are responsible for administering and overseeing the implementation of this framework and policy and, as applicable, supporting guidelines, standard operating procedures, notices, consents and appropriate related documents and processes. All employees, associates and individuals directly associated with TSRF will be trained, according to their functions, in the regulatory requirements, policies, guidelines that govern the protection of personal information, and access thereto. Periodic reviews, audits and gap analyses will be conducted to evaluate, maintain and improve and effective and responsive monitoring system within TSRF and its use of personal information.

The content of this compliance framework depends on TSRF's business activities. It is based on the principles of good governance, proportionality, transparency and sustainability. TSRF is committed to compliance with POPIA and PAIA, regulations, codes of conduct and organisational standards, as well as standards of good corporate governance, best practices, ethics and Data Subject expectations.

TSRF will develop and implement a POPIA/ PAIA compliance process that includes effective monitoring practices. The compliance process will encompass compliance risk identification, compliance risk assessment, compliance risk management and compliance monitoring. This plays an essential role in assisting management to discharge its responsibility to comply with applicable regulatory requirements in respect of POPIA and PAIA. The function presently is performed by the Director/ Information Officer. The following methodology form an integral part of the POPIA / PAIA compliance process:

a) Methodology I - Compliance risk identification

All the POPIA/ PAIA regulatory requirements that have been identified together form the regulatory universe of TSRF in respect of POPIA and PAIA.

b) Methodology II - Compliance risk assessment

The Information Officer will prioritise the regulatory requirements by rating each according to their risk.

b) Methodology III - Compliance risk management

Control measures that will ensure compliance and facilitate the implementation thereof.

c) Methodology IV - Compliance risk monitoring and reporting

The controls that have been implemented will be monitored to determine the level of compliance and whether the controls are effective; this will also include reporting on the findings to the Regulator.

TSRF acknowledges that the compliance process is an important activity. This process enables the Information Officer to identify, prioritize, manage and monitor the POPIA/ PAIA compliance risks that face TSRF thereby significantly reducing the potential for non-compliance with the regulatory requirements and industry norms.

## 23. OPERATING CONTROLS

TSRF shall establish appropriate standard operating procedures that are consistent with this policy and regulatory requirements. This will include:

- Review of information security responsibilities and allocation to a responsible person;
- Data Breach Policy;
- Incident reporting and management;
- User ID addition or removal;
- Information security training and education; and
- Data backup.

## SECTION E: GDPR

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### 24. EU General Data Protection Regulation

GDPR and POPIA are very similar in that they set out to protect personal information/data. The main difference is the mismatch of the effective dates. In respect of GDPR, which was effective from May 2018, South African businesses have to comply with POPIA effective from 1 July 2021.

As far as GDPR is concerned, South African businesses will have to comply with the EU data protection regulations when processing the data of EU subjects i.e. by providing services to or doing business with an EU partner (including UK, despite Brexit) or by holding personal information of an EU Data Subject.

TSRF's compliance with POPIA in respect of the processing and safe-keeping (protection) of personal information, is in line with the GDPR. See provisions relating to GDPR under Section A.



## ANNEXURE 1

### Processing of Personal Information

#### A. Purpose of Processing

TSRF uses personal information under its care in the following manner:

- Administration
- Rendering services according to contractual agreements/ instructions/mandate
- Staff administration
- Complying with company, labour, tax and employment laws
- Keeping records of account

#### B. Categories of Data Subjects and their Personal Information

TSRF may possess records relating to suppliers, shareholders, service providers, staff, vendors and members:

Data Subject	Information Processed
Members- Natural persons	Names, contact details, physical and postal address, date of birth, ID numbers, banking details, nationality, gender, marital status, ethnicity, age, language, confidential information, employment details, salary.
Employers- Juristic persons / entities	Names of contact persons, name of legal entity, physical and postal address, contact details, Registration number, banking details, authorised signatories, beneficial owners
Service Providers	Names of contact persons, name of legal entity, physical and postal address, contact details, Registration number, founding documents, tax related information, banking details, authorised signatories, beneficial owners
Vendors	Names of contact persons, name of legal entity, physical and postal address, contact details, Registration number, founding documents, tax related information, banking details, authorised signatories, beneficial owners
Employees / Trustees	Names, contact details, physical and postal address, date of birth, ID numbers, tax related information, banking details, nationality, gender, confidential information, pregnancy, marital status, ethnicity, age, language , education information, financial information, employment history, health/ well-being details, criminal behaviour.

#### C. Actual or Planned Transborder Flows of Personal Information

There is presently no actual or planned transborder flow of information.

#### D. General Description of Information Security Measures

TSRF uses up to date technology of ensure the confidentiality, integrity and availability of personal information under its control. Measures include:

- Firewalls
- Virus protection software and update protocols
- Logical and physical access control
- Secure setup of hardware and software making up the IT structure



## ANNEXURE 2

Form to Object to the Processing of Personal Information in terms of POPIA:

Objection to the Processing of Personal Information

In terms of section 11(3) of POPIA and Regulation 2(1)

Please note:

- Affidavits or other documentary evidence in support of the objection needs to be attached to this form.
- If more space is required add additional pages as appendices to this form.

Details of Data Subject	
Name and surname	
Address	
Phone number	
Cell number	
E-mail address	
Details of Responsible Party	
Name and surname of responsible person, public or private body	
Address	
Phone number	
Cell number	
E-mail address	





## ANNEXURE 3

### Request for Amendment, Correction or Erasure of Personal Data

Section 24 of POPIA and Regulation 3, provides that a Data Subject may request for their personal information to be corrected or deleted as held by TSRF.

As a main rule, your request will be handled free of charge. However, if we were to find your request to be manifestly unfounded, excessive or repetitive, we may charge a reasonable fee based on the administrative cost of providing the information but not exceeding R500.00.

Please fill out the details below and we will get back to you within 30 calendar days of the date that the fully completed form, proof of identity and other supporting documents(if required), has been received by us. The documents must be sent to the following address: Information Officer, TSRF, 3<sup>rd</sup> Floor, 24 Wellington Street, Parktown, 2193. [joe@tsrf.co.za](mailto:joe@tsrf.co.za).

Details of the person requesting the amendment, correction or erasure	
Full name	
Address	
Date of birth / ID Number	
Email address	
Phone Number	

Your role (tick the correct role)	
<input type="checkbox"/>	I am the Data Subject
<input type="checkbox"/>	I am not the Data Subject, though I am acting on behalf of the Data Subject by virtue of a power of attorney
<input type="checkbox"/>	I am not the Data Subject, though I am acting on behalf of the Data Subject as his/her parent or legal guardian

Proof of identity and authority submitted(tick the applicable)	
<input type="checkbox"/>	Driving License
<input type="checkbox"/>	Passport
<input type="checkbox"/>	Identity document
<input type="checkbox"/>	Power of attorney
<input type="checkbox"/>	Evidence of parental responsibility/ guardianship



Amendment	
	I wish to amend my personal data (proof of identify must be provided)
	I wish to amend personal data concerning a Data Subject that I am acting on behalf of (proof of identity of representative, a power of attorney and proof of identity of the Data Subject must be provided)
	I wish to amend personal data concerning a Data Subject to whom I am parent or legal guardian (proof of identity and evidence of parental responsibility or legal guardianship must be provided)
Type of personal data you wish to amend	
Describe the amendment	

Correction	
	I wish to correct my personal data (proof of identify must be provided)
	I wish to correct personal data concerning a Data Subject that I am acting on behalf of (proof of identity of representative, a power of attorney and proof of identity of the Data Subject must be provided)
	I wish to correct personal data concerning a Data Subject to whom I am parent or legal guardian (proof of identity and evidence of parental responsibility or legal guardianship must be provided)
Type of personal data you wish to correct	
Describe the correction	

Erasure	
	I wish to erase my personal data (proof of identify must be provided)
	I wish to erase personal data concerning a Data Subject that I am acting on behalf of (proof of identity of representative, a power of attorney and proof of identity of the Data Subject must be provided)
	I wish to erase personal data concerning a Data Subject to whom I am parent or legal guardian (proof of identity and evidence of parental responsibility or legal guardianship must be provided)
Type of personal data you wish to erase	

By signing this form, you certify that the information you have provided is correct to the best of your knowledge and that you are the person to whom it relates or that you are legally entitled to act on behalf of such person.

You understand that it may be necessary to obtain further information in order to comply with this request.

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

**ANNEXURE 4**  
**Request for Access to the Record of Private Body**  
**(Section 53(1) of the Promotion of Access to Information Act 2 of 2000**  
**And Regulation 10)**

**A. Particulars of Private Body**

The Head: \_\_\_\_\_

**B. Particulars of the Person Requesting access to the record**

- a) The particulars of the person who requests access to the records must be given below.  
b) The address and/ or contact numbers in South Africa to which information is to be sent must be given.  
c) Proof of the capacity in which the request is made, if applicable, must be attached.

Full names and surname: \_\_\_\_\_

Identity number: \_\_\_\_\_

Postal address: \_\_\_\_\_  
\_\_\_\_\_

Telephone / cell number: \_\_\_\_\_

Fax number: \_\_\_\_\_

Email address: \_\_\_\_\_

Capacity in which the request is made, when made on behalf of another person: \_\_\_\_\_

**C. Particulars of the Person on whose behalf the request is made**

This section must be completed ONLY if the request for information is made on behalf of another person.

Full names and surname: \_\_\_\_\_

Identity number: \_\_\_\_\_

**D. Particular of Record**

- a) Provide full particulars of the record to which access is requested, including the reference number if that is known to you, to enable the record to be located.  
b) If the provided space is inadequate, please continue on a separate page and attach to this form. The requester must sign all the additional pages.

Description of record or relevant part of the record: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_





<b>1. If the record is in written or printed form</b>					
	Copy of record*				Inspection of record
<b>2. If record consists of visual images</b> <i>(this includes photographs, videos, computer-generated images, sketches etc)</i>					
	View the images		Copy of the images *		Transcript of the images*
<b>3. If record consists of recorded words or information which can be reproduced in sound</b>					
	Listen to the soundtrack				Transcription of soundtrack*(written or printed document)
<b>4. If record is held on computer or in an electronic or machine-readable form</b>					
	Printed copy of record*		Printed copy of information derived from the record*		Copy in the computer readable form (CD, DVD or digital audio format)
*If you requested a copy or transcription of a record (above), do you wish the copy or transcription to be posted to you? Postage is payable.					

**G. Particulars of right to be exercised or protected**

*If the provided space is inadequate, please continue on a separate page and attach it to this form. The requester must sign all additional pages.*

Indicate which right is to be exercised or protected: \_\_\_\_\_

Explain why the record requested is required for the exercise or protection of the aforementioned right:

**H. Notice of decision regarding request for access**

*You will be notified in writing whether your request has been approved / denied. If you wish to be informed in another manner, please specify that manner and provide the necessary particulars to enable compliance with your request.*

**How would you prefer to be informed of the decision regarding your request for access to the record?**

Signed at \_\_\_\_\_ this \_\_\_\_\_ day \_\_\_\_\_ of 20 \_\_\_\_\_

\_\_\_\_\_  
Signature of Requester/ Person on whose behalf request is made

## ANNEXURE 5

### Applicable Fees in respect of Private Bodies in relation to PAIA

#### Fees on respect of Private Bodies

1. The fee for a copy of the manual as contemplated in regulation 9(2)(c) is \_\_\_\_\_ for every copy of an A4 size page or part thereof.
2. The fees for reproduction referred to in regulation 11(1) are as follows:

a) For every photocopy of an A4 size page or part thereof	R
b) For every printed copy of an A4 size page or part thereof held on a computer or in an electronic or machine-readable form	R
c) For a copy in a computer-readable form on:	R
I. Compact	
II. DVD	R
III. Digital audio format	R
IV. For a transcription of visual images, for an A4 size page or part thereof	R
V. For a copy of visual images	R
VI. For a transcript of an audio record, for an A4 size page of part thereof	R
VII. For a copy of an audio record	R

3. The request fee payable by a requester, other than a personal requester, referred to in regulation 11 (2) is R0,00.
4. The access fees payable by a requester referred to in regulation 11 (3) are as follows:

d) For every photocopy of an A4 size page or part thereof	R
e) For every printed copy of an A4 size page or part thereof held on a computer or in an electronic or machine-readable form	R
f) For a copy in a computer-readable form on:	R
J. Compact	
II. DVD	R
III. Digital audio format	R
IV. For a transcription of visual images, for an A4 size page or part thereof	R
V. For a copy of visual images	R
VI. For a transcript of an audio record, for an A4 size page of part thereof	R
VII. For a copy of an audio record	R



g) To search for and prepare the record for disclosure, R30.00 for each hour or part thereof reasonably required for such search and preparation.	R30.00
A. For the purposes of section 54(2) of PAIA, the following applies:	
a) Six hours as the hours to be exceeded before a deposit is payable; and	
b) One third of the access fee is payable as a deposit by the requester.	
B. The actual postage is payable when a copy of a record must be posted to a requester.	