



Protection of Personal Information Act (POPIA) Policy for Service Index SA

Effective Date: 30th October 2024

Last Updated: 30th October 2024

1. Introduction

Service Index SA values and respects the privacy of all individuals and is committed to protecting personal information in compliance with the Protection of Personal Information Act (POPIA), Act 4 of 2013. This policy outlines how personal information is collected, processed, stored, and safeguarded in alignment with our legal obligations and business practices.

Service Index SA is a registered managing agent firm with the Property Practitioners Regulatory Authority (PPRA) and is also registered with Financial Intelligence Centre (FIC). Service Index SA offers a range of services and a comprehensive suite of business services. Thereby creating an index of services for our clients. Our Services range from Property Managing Agents to facilities management, consulting services and resource supply, tours, conferences, and events.

2. Scope

This policy applies to all employees, clients, suppliers, contractors, and stakeholders whose personal information is collected and processed by Service Index SA during its operations.

3. Definitions

- **Data Subject:** The person to whom personal information relates.
 - **Personal Information:** Any information about an identifiable individual, including contact details, identification numbers, and financial records.
 - **Responsible Party:** Service Index SA, which determines the purpose and means of processing personal information.
 - **Processing:** Any operation concerning personal information, such as collecting, storing, sharing, or deleting data.
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4. Personal Information We Collect

We may collect the following categories of personal information:

- **Clients and Suppliers:** Contact details, Address details, Company Beneficial Ownership and resolution information, payment information, and business emails, attachments, communications and records.
 - **Employees:** Identification details, contact details, address details, banking information, qualifications, medical reports, payroll and performance records.
 - **Event Participants:** Names, addresses, emails, contact information, dietary requirements, and preferences.
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5. How We Use Personal Information

Personal information is collected and processed for the following purposes:

- To fulfil our services as a managing agent, including any administration and facilities management, consulting services, resource supply, conference, tours and events services.
 - To manage and maintain client and supplier relationships.
 - For marketing purposes with consent (e.g., events, tours, and conferences).
 - For legal and regulatory compliance (e.g., PPRA requirements, FIC, SARS, DoL and other statutory business requirements and financial reporting).
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6. Protection of Personal Information

Service Index SA is committed to safeguarding personal information through:

- **Data Security Measures:** Use of secure storage, and access controls and all data is stored in Microsoft cloud-based software programs which are password protected. Hard copies are filed in an orderly manner and securely locked away.
 - **Access Control:** Restricting access to authorized personnel only.
 - **Third-Party Agreements:** Ensuring that third parties processing data on our behalf adhere to POPIA.
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7. Rights of Data Subjects

Under POPIA, individuals have the following rights:

- To access and correct their personal information.
 - To object to the processing of their information.
 - To withdraw consent for marketing communications.
 - To lodge a complaint with the Information Regulator if their rights are violated.
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8. Sharing and Retention of Personal Information

- Personal information will only be shared with third parties where reasonably necessary for business purposes or with consent or as required by law.
 - Retention periods for personal information will comply with legal requirements and operational needs.
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9. Complaints and Queries

If you have concerns or queries regarding the processing of your personal information, contact:

Information Officer: Luanne Hall

Email: info@serviceindex.co.za

Phone: 021 300 8271

10. Ongoing Compliance Obligations

To maintain compliance with POPIA, Service Index SA will:

1. **Appoint and Train an Information Officer:** Oversee POPIA compliance, address data subject requests, and ensure policies are implemented effectively.
2. **Conduct Regular Data Audits:** Identify and address risks in data collection, storage, and processing practices.
3. **Implement Privacy Training:** Ensure employees understand and adhere to POPIA requirements.
4. **Maintain Consent Records:** Retain documentation of data subject consent where applicable.
5. **Review and Update Policies Annually:** Ensure the POPIA policy aligns with legislative and operational changes.
6. **Respond to Data Breaches:** Develop and maintain a data breach response plan, including notification procedures for affected parties and the Information Regulator.



11. Data Breach Response and Handling Requests

Data Breach Response Policy

Service Index SA is committed to protecting personal information and responding promptly and effectively to any data breaches. A data breach refers to unauthorized access, loss, disclosure, or destruction of personal information.

11.1 Immediate Actions Upon Detection of a Data Breach

- **Step 1: Identify and Contain the Breach**
 - Immediately identify the source of the breach.
 - Contain the breach to prevent further unauthorized access or disclosure.
- **Step 2: Assess the Breach**
 - Evaluate the nature and scope of the breach, including what information was compromised and the potential risk to affected parties.
- **Step 3: Notify the Compliance Officer**
 - The staff member discovering the breach must notify the Compliance Officer immediately.

11.2 Notification Requirements

- **Notify the Information Regulator:**
 - Inform the Information Regulator as soon as possible, providing details of:
 - The nature of the breach.
 - Categories of affected personal information.
 - Measures taken to address the breach.
 - Actions to mitigate further risks.
- **Notify Affected Data Subjects:**
 - Inform individuals whose personal information has been affected, including:
 - A description of the breach.
 - Steps they can take to mitigate potential harm.
 - Contact details for further assistance.

11.3 Mitigation and Review

- Implement corrective measures to prevent recurrence, such as improving security protocols.
- Conduct a post-breach review to assess the adequacy of the response and update policies as needed.



12. Handling Requests Under POPIA

Service Index SA ensures that all requests related to personal information are addressed promptly, transparently, and in compliance with POPIA.

12.1 Types of Requests

- **Access to Personal Information:** Data subjects may request to access their personal information held by the company.
- **Correction or Deletion:** Data subjects can request corrections to inaccurate information or the deletion of information no longer required.
- **Objections to Processing:** Data subjects can object to the processing of their personal information under certain conditions.
- **Direct Marketing Preferences:** Data subjects can provide or withdraw consent for direct marketing.

12.2 Procedure for Handling Requests

- **Step 1: Receipt of Request**
 - Acknowledge the request in writing within **7 days** of receipt.
 - Verify the identity of the requester to ensure the security of personal information.
- **Step 2: Evaluate the Request**
 - Determine the validity of the request based on legal and operational requirements.
- **Step 3: Respond to the Request**
 - Provide a response within **30 calendar days**, indicating:
 - The outcome of the request.
 - Any steps taken to address the request.
 - Reasons for refusal, if applicable, citing specific legal grounds.

12.3 Documentation of Requests

- Maintain records of all requests, including:
 - Date of receipt.
 - Nature of the request.
 - Actions taken.
 - Final outcome.

12.4 Escalation

- If a request cannot be resolved satisfactorily, data subjects may escalate the matter to the Information Regulator.



By adhering to these procedures, Service Index SA demonstrates its commitment to safeguarding personal information and ensuring transparency and accountability in its data protection practices.

13. Availability of This Policy

This policy is available on our website and at our physical office during working hours. Copies may be requested from the Information Officer.

Service Index SA is committed to maintaining the highest standards of data protection and ensuring that personal information is handled with care, confidentiality, and in full compliance with South African law.

For further information, contact info@serviceindex.co.za.

Date: _____

Name: _____

Signature: _____

Review Date: _____