



POPIA COMPLIANCE FRAMEWORK (HIGH LEVEL)

1. Formalise POPIA compliance project

1.1. Relevant stakeholders (clients, suppliers, individuals etc.)

- 1.1.1. Business Owner: Richard Douglas Wooley
- 1.1.2. Clients: Companies
Private individuals
Trusts
- 1.1.3. Suppliers: Construction companies
Engineers
Project Mangers
Construction service providers
- 1.1.4. Project sponsor: Richard Douglas Wooley
- 1.1.5. Project manager: Desmond Kitching

1.2. High level scope, timescale, budget

- 1.2.1. Scope: Implementation and compliance with POPI Act
- 1.2.2. Time Scale: 1 week
- 1.2.3. Budget: R 4 000

1.3. Security safeguards applicable to the business

- 1.3.1. Personal information
- 1.3.2. Property titles and deeds
- 1.3.3. Bond details
- 1.3.4. Purchaser details
- 1.3.5. Seller details

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2. Details of Information Officer (Legal requirement)

2.1. Promotion of Access to Information Act (PAIA) and POPIA Information Officer (IO) details

- 2.1.1. Name: Richard Douglas Wooley
- 2.1.2. Id no: 6805145073082
- 2.1.3. Address: 66A Second Ave
Inanda
Sandton
Gauteng
2196
- 2.1.4. Email: richard@thetaprojects.co.za
- 2.1.5. Tel: +27 82 887 1825
- 2.1.6. Designation: Managing Director

2.2. Information Officer (IO) roles and responsibilities

- 2.2.1. See annexure A4

2.3. Formal appointment application

- 2.3.1. Submission no 40543/2021- 2022/IRRRTT.
- 2.3.2. See annexure A5 (IRSA Certificate)

3. Gap analysis versus the ACT (POPIA)

- 3.1. Set interim and final targets for compliance – Compliance within reasonable practicality.
- 3.2. Engage with stakeholders in the assessment
- 3.3. Use an evidence-based approach
- 3.4. Use the assessments for ongoing compliance monitoring

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4. What and how Personal Information is processed (status quo)

4.1. The company collect personal information in 2 instances

4.1.1. When a client appoints Theta as the project manger to Design, Develop or Maintain a property

4.2. The personal information that Theta collect is

4.2.1. Name and surname

4.2.2. Id no

4.2.3. Address

4.2.4. Telephone no

4.2.5. Email address

4.2.6. Company registration details

4.2.7. Property details

4.2.8. Municipal account details

4.3. Various aspects as required by the POPIA when collecting information

4.3.1. Consent from data source

4.3.2. Advise data source on the purpose

4.3.3. Advise date source relating to sharing of data collected

4.4. Consider user rights and their management

4.4.1. Obtain Approval from client to share personal information with contractors

4.4.2. Obtain Approval from client to share personal information with municipalities

4.4.3. Obtain Approval from client to share personal information with project mangers

4.5. Types of devices where data is stored

4.5.1. Desk top computers (Outlook, Word and Excel)

4.5.2. Laptop (Outlook, Word and Excel)

4.5.3. Mobile phones (Outlook, Word, Excel address book)

4.5.4. Cloud storage

4.6. Possible Security compromise risk

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- 4.6.1. Wifi passwords
- 4.6.2. Computer log in passwords
- 4.6.3. Mobil phone password and access
Cloud Storage passwords

5. POPIA compliance policy

- 5.1. Doc name: THETA_POPIA Version 1: 3 Jun 2021
- 5.2. Created on: 3 June 2021
- 5.3. Reviewed: 3 June 2021
- 5.4. Next Review: 3 Jun 2022
- 5.5. Policy Owner: Theta Projects
- 5.6. Annexure : A6

6. Websites & online platforms

6.1. PAIA Manual availability

- 6.1.1. Doc name: THETA_Sec 51 Ver 1 : 3 6 2021
- 6.1.2. Created on: 3 June 2021
- 6.1.3. Reviewed: 3 June 2021
- 6.1.4. Next Review: 3 Jun 2022
- 6.1.5. Policy Owner: Theta Projects
- 6.1.6. Annexure: A7

6.2. Website Privacy Notice

- 6.2.1. Doc name: THETA_Privacy Note Ver 1 : 3 6 2021
- 6.2.2. Created on: 3 June 2021
- 6.2.3. Reviewed: 3 June 2021
- 6.2.4. Next Review: 3 Jun 2022
- 6.2.5. Policy Owner: Theta Projects
- 6.2.6. Annexure: A8

6.3. The above 2 documents will be posted on the website

7. POPIA compliant PI management processes

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7.1. Personal Information lifecycle:

7.1.1. Acquisition

- 7.1.1.1. When a client appoint Theta as project manager
- 7.1.1.2. When a Theta obtain personal details relating to the project

7.1.2. Processing

- 7.1.2.1. Collection process to obtain data from data sources
- 7.1.2.2. Refine data and distribute to 3rd parties where necessary

7.1.3. Retention,

- 7.1.3.1. Data is retained as part of property deal file for a period of 7 years

7.1.4. Destruction

- 7.1.4.1. Data that does not form part of a property file will be destroyed on request of Data subject or after 7-year process.

8. Train internal stakeholders on their roles in POPIA compliance

- 8.1. Design on-going training annually as per the Information officer Roles and responsibilities.

9. Adopt POPIA compliance as “Business-As-Usual”

- 9.1. POPIA compliance will be the “new normal”
- 9.2. New request for information on listing of properties
- 9.3. New request for information for new possible purchasers

10. Information security Safeguards

- 10.1. Considered generally accepted information security practices and procedures
- 10.2. Electronic data protection tools i.e. Cybersecurity against Ransomware are updated on the computers, Laptops on regular basis as requested by anti-virus software
- 10.3. Secure data transfer is processed as part of MS Office with antivirus software
- 10.4. Storage is done by “Icloud” as well as “one drive”
- 10.5. Recovery is done by “Icloud” as well as “one drive”
- 10.6. Processes for non-electronic data storage / filing : Files are stored in a lockable cabinet, in the office

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