



MINES PROFESSIONAL ASSOCIATIONS' SECRETARIAT (MPAS) POPIA CLIENT / USER PRIVACY POLICY

1. INTRODUCTION

The purpose of this policy is to advise the member/ user (data subject) of the Associations that the Mines Professional Associations' Secretariat (MPAS)/ Association represents, both electronic and otherwise. Why data is being collected, processed and what data is in focus as well as how it will be processed. The Mines Professional Associations' Secretariat (MPAS)/ Association is committed to being fully compliant with the POPI Act as far as the utilization and disclosure of data subject personal information (PI) is concerned. Technical and operational measures have been put in place to protect our data subject privacy and the Mines Professional Associations' Secretariat (MPAS)/ Association invites all data subjects and / or requesters to engage with its Information Officer (IO) in perspective of any matter related hereto.

2. SCOPE OF APPLICATION

In the Promotion of Access to Information Act (PAIA) this policy applies to data subjects under the POPI Act in respect of requesters of records held by the Mines Professional Associations' Secretariat (MPAS)/ Association. Personal Information (PI) applies to both, the natural and juristic persons. Our data subjects are invited to engage with the Mines Professional Associations' Secretariat (MPAS) Information Officer (IO) about any matters pertaining to the POPI and PAIA, including but not limited to updating Personal Information (PI), deleting of PI. Complaints in respect of how PI is being processed and updating consent for electronic direct marketing.

3. PERSONAL INFORMATION (PI)

Personal information relates to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including but not limited to:

- Information relating to race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person.
- Information related to education or the medical, financial, criminal or employment history of the person.
- Biometric information of a person, the personal opinions, views, or preferences of the person
- Any correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence.
- Views or opinions of another individual about the person
- The name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person.

4. PURPOSE OF COLLECTING AND PROCESSING PERSONAL INFORMATION (PI)

The Mines Professional Associations' Secretariat (MPAS)/ Association processes PI for various purposes including for:

- Registration as an Association Member
- Engaging in various forms of educational, event information and marketing
- Facilitating transactions with data subjects
- Complying with the provisions of statute and regulations
- Attending to the legitimate interest of data subjects

- Providing data subject information to the Mines Professional Associations' Secretariat (MPAS)/ Association partners, to use data subject information to confirm membership to current clients and/or who have consented as envisaged in the POPI Act. The Mines Professional Associations' Secretariat (MPAS)/ Association partners who are recipients of PI are business organisations who are permitted to use the information only for lawful information distribution and engagement.
- Confirm and verify data subject identity or to verify that they are authorised users for security purposes.
- Conduct market or customer satisfaction research
- Audit, financial and record keeping purposes.
- In connection with legal proceedings

5. **LAWFUL BASIS**

In response of processing PI as mentioned above, the Mines Professional Associations' Secretariat (MPAS) will adhere to the conditions for the lawful processing of PI, based on its desire to provide data subjects services in their best interest as well as a legitimate interest of the Mines Professional Associations' Secretariat (MPAS) to achieve its business objectives.

6. **PERIOD OF HOLDING PERSONAL INFORMATION**

The Mines Professional Associations' Secretariat (MPAS)/ Association endeavors to provide the most accurate information as possible to its stakeholders as well as data subjects. The Mines Professional Associations' Secretariat (MPAS)/Association seeks to verify the accuracy of its information as frequently and to remove information when it learns to be inaccurate. The Mines Professional Associations' Secretariat (MPAS)/ Association intend to process information that it has on data subjects for so long as it is accurate or until the data subject instructs the Mines Professional Associations' Secretariat (MPAS)/Association to refrain from processing the information.

To instruct the Mines Professional Associations' Secretariat (MPAS)/ Association to refrain from collecting and/or processing PI, please contact our Information Officer.

The Mines Professional Associations' Secretariat (MPAS)/ Association shall hold PI for such period as may be required in terms of the statutes such as the Companies Act and various laws.

7. **DATA SUBJECT RIGHTS**

Data subjects have the right to request that the Mines Professional Associations' Secretariat (MPAS)/ Association provide them with access to their PI, to rectify or correct their PI, delete PI, or restrict the processing of their PI. This includes refraining from sharing or providing it to any third party. Data subject also have the right to raise complaints with the Information Regulator. The afore-going rights may be subject to certain limitations pursuant to applicable law. To access any of these rights, contact our Information Officer.

8. **SOURCES OF PERSONAL INFORMATION (PI)**

The Mines Professional Associations' Secretariat (MPAS)/ Association gathers PI from several sources, which include directly from data subject, publicly available sources such as websites, social media, LinkedIn, commercial transactions, engagements, conferences. Given that PI can be extracted and/or obtained from several sources and consolidated into one CRM or other similar systems of record, it may be difficult or impossible to identify the exact source of a particular piece of information.

9. CATEGORIES OF PERSONAL INFORMATION (PI) COLLECTED AND PROCESSED

The Mines Professional Associations' Secretariat (MPAS)/ Association collects information of data subjects who may be members, prospective member.

Information is collected on its employees and suppliers, as well as third parties that forms part of its scope of operations. In respect of all of the above listed the Mines Professional Associations' Secretariat (MPAS)/ Associations may have some or all the following categories of PI on the data subjects, historical and/or current:

- Full Name and Surname
- Identity Number
- Contact Details (email/office number, mobile number), alternative contact details
- Member District
- Gender and Date of Birth
- Designation /Position held
- Certification Information- GCC, MMC, CoM rec, Com SCO, CoM AREC (Certificate number and Certification Date)
- Professional Body Certification – ECSA, HPCSA, SACNASP (Certification and Category)
- Email correspondence and attachments
- Organisation details
- Address details
- Organization contact details.
- Organisation email address
- Organisation and data subject on social media and URL's
- Other information that is available on public domain

The Mines Professional Associations' Secretariat (MPAS)/ Association collect and process personal information mainly to contact data subjects for the purpose of understanding their requirements and delivering services accordingly. Where possible, the Mines Professional Associations' Secretariat (MPAS)/ Association will inform data subjects what information they are required to provide the Mines Professional Associations' Secretariat (MPAS)/ Association and what information is optional, as well as the consequences of not providing the said information.

Website information that is being used may be collected using LinkedIn and other website information which allows the Mines Professional Associations' Secretariat (MPAS)/ Association to collect standard contact information. Website usage information may also be collected using "cookies" which allows the Mines Professional Associations' Secretariat (MPAS)/ Association to collect standard internet visitor usage information.

10. DISCLOSURE OF INFORMATION

The Mines Professional Associations' Secretariat (MPAS)/ Association may disclose data subject's personal information to its service providers who are involved in the delivery of products or services data subjects.

The Mines Professional Associations' Secretariat (MPAS) may also disclose data subject Personal information:

- Where it has a duty or a right to disclose in terms of law and/or industry codes
- Where it believes it is necessary to protect its rights

11. INFORMATION SECURITY

The Mines Professional Associations' Secretariat (MPAS)/ Association is legally obliged to provide adequate systems, technical and operational protection for the PI that it holds and to prevent unauthorised access to as well as prohibited use of PI.

The Mines Professional Associations' Secretariat (MPAS) will therefore on a regular basis review the security controls and related processes to ensure that the PI of the data subjects remains secure.

The Mines Professional Associations' Secretariat (MPAS) will on regular basis do assessment across all its functions and use the finds thereof to manage risk optimally as well as to provide iterative improvements on an ongoing basis.

The Mines Professional Associations' Secretariat (MPAS)/ Association ensures contact with Operators/ Service Providers as required by POPI and appropriate security, privacy, and confidentiality obligations of these operators/service providers to ensure that personal information (PI) is kept secure. The same protocols apply to any whom the Mines Professional Associations' Secretariat (MPAS)/Association may pass personal information on to for the purpose mentioned herein.

12. CONTACT- INFORMATION OFFICER

Information Officer: Raymond van der Berg
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