

PLANTATIONS HOMEOWNERS ASSOCIATION

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Co Reg No 2003/009741/08

Information Officer: Alison Kitching (Estate Manager)

Policy title: POPI Policy

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Responsible Dept: Estate Office v3.26.11.25

Version compiled by: A Kitching

Version approved by:

Purpose: To comply with The Protection of Personal Information (POPI) Act 4 of 2013, in respect of the information it holds about any Person/Entity/Body/Individual/Company

Last date audited: Internal audit 26.11.25

Last audited by: Alison Kitching

Protection of Personal Information Policy (POPI)

1 Introduction

Plantations Home Owners Association (PHOA) is a residential housing estate consisting of 706 properties, further broken down into free hold stands and 5 separate Body Corporates.

PHOA is obligated to comply with The Protection of Personal Information Act 4 of 2013.

2 Objective

This policy sets the standard for suitable protection of personal information as required by The Protection of Personal Information Act 4 of 2013, as well as the purpose for which said information is used.

3 Information Officer

The April 2025 amendments to South Africa's POPIA (Protection of Personal Information Act) regulations have introduced important changes to the duties of Information Officers (IOs) and the procedures for managing their registration.

Regulation 4 of the POPIA regulations has been amended, specifically trimming the IO's responsibilities under the Promotion of Access to Information Act (PAIA) while emphasizing continuous compliance efforts under POPIA. Any deviations from this policy or breach thereof or incidents that may relate to such a possibility must be reported to the Information Officer.

The role of the Information Officer is set out below –

- **Ensure compliance:** The primary role is to ensure the organization complies with POPIA and PAIA, and to encourage the lawful processing of personal information.
- **Develop and implement a compliance framework:** The Information Officer must design, implement, and monitor a compliance framework to ensure ongoing adherence to the law.
- **Handle data subject requests:** They must manage requests from data subjects for access to, correction of, or deletion of their personal information.
- **Conduct impact assessments:** A key duty is ensuring that personal information impact assessments are conducted to verify that adequate measures are in place to protect data.
- **Cooperate with the Information Regulator:** This includes working with the Regulator on any investigations and registering the organization's Information Officer through the official portal.
- **Conduct internal training:** The Information Officer must ensure internal awareness sessions are conducted to educate staff about their responsibilities and POPIA compliance.
- **Manage information-related activities:** This includes managing data materials, resources, and databases to support organizational objectives.

4 Scope

This policy is applicable to PHOA's Management, all employees and any Person/Entity/Body/Individual/Company ("the client") whose information is supplied or given to PHOA.

4.1 Agreement and Consent declaration:

PHOA must have the consent of both Employee and Supplier before collecting and storing personal information.

- Employees need to sign a consent
- Suppliers - External service providers (Person/Entity/Body/Individual/Company) must sign a

separate Agreement and Consent declaration, whereby confirming commitment to this policy and will include assurance that security measures are in place when personal information is processed.

5 Control Collection and Processing of Personal Information

The PHOA has compiled a POPI Inventory of Documents Control as part of the compliance procedure. By compiling this Inventory, PHOA illustrates its commitment to sufficiently protecting and using information in a manner that facilitates transparency around the following:

POPI REQUIREMENTS	PHOA COMPLIANCE DETAILS
What is the reason for collecting the personal information	Procedure name and number
Usage - How and Why it is processed	Quality records generated
Identify any personal information	Personal Information? (Yes/No)
What is the Sensitivity of the information	Sensitivity? (High/Low)

What is the format of the information	"Format - (electronic / paper)"
Where is the information stored	Record location
Who the personal information is shared with	Access to record?
Who will monitor this information	"Responsibility (for ensuring accurate record keeping)"
Archiving of the information	"Retention time (according to PHOA record retention policy)"
Disposal of the Information	Disposal Trigger
	Disposal (Way of disposal)

6 Core principles

PHOA is committed to processing personal information lawfully and to comply with the following principles:

- PHOA will maintain and develop reasonable protective measures against risks such as loss, unauthorised access, destruction, use, alteration or revelation of personal information.
- **Accountability (section 8 of POPI) & Openness (sections 17 - 18 of POPI):** PHOA upholds the requirements of the legislation on POPI and maintains an approach of transparency of operational procedures that controls collection and processing of personal information.
- PHOA is committed to complying with all applicable regulatory requirements related to the collection and processing of personal information.
- **Processing Limitation (sections 9 – 12 of POPI) & Further Processing Limitation (section 15 of POPI):** PHOA undertakes to collect personal information in a legal and reasonable way and to process the personal information obtained from clients only for the purpose for which it was obtained in the first place.
- Processing of personal information obtained from clients will not be undertaken in an insensitive or wrongful way that can intrude on the privacy of the client.
- **Data Subject Participation (sections 23 - 25 of POPI):** Employees or Suppliers can request certain personal information and may also be required to correct or delete personal information within the specifications of the POPI Act.
- PHOA undertakes not to request or process information related to race, religion, medical situation, political preference, trade union membership, sexual certitude or criminal record. PHOA will also not process information of juveniles.
- **Information Quality (section 16 of POPI):** PHOA will ensure that accurate and sufficient information is on record of its clients and will be updated when necessary.
- PHOA also undertakes not to provide any documentation to a third party or service provider without the consent of the client except where it is necessary for the proper execution of the service as expected by the client.
- **Purpose Specific (sections 13 – 14 of POPI):** PHOA is compelled to keep effective record of personal information and undertakes not to retain information for a period longer than specified in the Act. Information will be disposed at the end of the retention period in such a way that it cannot be reconstructed.

- **Security Safeguards (sections 19 - 22 of POPI):** PHOA will secure the integrity and confidentiality of personal information in its possession. PHOA will provide the necessary security of data and keep it in accordance with prescribed legislation.

7 Availability and Revision

The Policy is made available in the PHOA office, by request, from the Information Officer.

This policy will continually be updated to comply with legislation, thereby ensuring that personal information will be secure.

Date: 26.11.2025