

PROTECTION OF PERSONAL INFORMATION
POLICY 2021

FOR

MADGE WALLACE INTERNATIONAL COLLEGE
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Madge Wallace

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International College of Skincare & Body Therapy



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Introduction

The POPIA is to protect the privacy of personal information. Madge Wallace stands to recognise the South African constitution and the protection of personal information act 4 of 2013 (POPIA) to create guidelines, policies and disclosure agreements in the aim to promote protection of content for all staff, students, clients, customers and college material, to the best of our knowledge and understanding.

Personal information

Referring to revealing person identity, race, gender, sex, religion, mental state, pregnancy, marriage, sexual orientation, disability, belief, culture, language, education, financial history, employment history, address, telephone number, online identity, biometric information, opinions, views, preferences, college information and results.

Data subjects

- Suppliers
- Students
- Customers
- Staff
- Clients

Responsible party

Madge Wallace is the responsible party. As we need personal information for college reasons and determine the purpose in which this information will be used within the company.

Operator

The lecturing, administration and accounting staff use the customer/student personal information for quotation, invoices, creating of student files, databases, reports and sending out updated information to not only students but parents and sponsors.

The administration and accounting staff use supplier information to place orders and for account reconciliation.

There is no 3rd party involved in dealing with any personal information.

Information officer

The Director of Madge Wallace is responsible to abide to the POPIA. The Director has completed registration with the South African information regulation established under POPIA to perform her duties and awaits further feedback.

Name and Surname	Lesley Adelaine
Work Address	49A 7th Ave, Parktown North, Sandton, 2193
Work Number	011 447 6059
Email Address	lesley@madge-wallace.co.za
Position	Director of Madge Wallace
Appointed Date	1 st July 2021

Staff at the college such as College Manger, Principal and Reception are responsible to assist the director with theses duties by maintaining, implementing and monitoring personal information.

The duties entail:

- The college is compliant to the POPIA and staff have been trained accordingly.
- Taking reasonable steps to ensure the compliance with the provision of POPIA.
- Keeping staff updated about responsibilities, security and obligations.
- Informing staff on personal information processing procedures.
- Ensuring regular POPIA audits.
- Ensuring data subjects have updated and relevant information.
- Ensuring all compliance is lawful
- Ensuring staff are aware of the risks involved with exposing personal information.
- Address data subject questions.

- 8 conditions of lawful processing of personal information
 1. Accountability
 2. Purpose specification
 3. Processing limitations
 4. Further processing limitation
 5. Information quality
 6. Openness
 7. Security safeguards
 8. Data subject participation

Processing

Any personal information given or obtained at the college such as the below can or will be processed by the means of, archives, filing, email communication, Moodle system, databases, tracking sheets, WhatsApp groups, classroom registers, etc.

This information is not accessible to any 3rd parties and only available to information officers and staff.

This information is gathered for recording, organization, storage, updating and modification, interviews, employment, to provide a service and qualifications, etc. and only used for college purposes and obtained and processed in a lawful manner.

Student information obtained:

- Application forms: Person identity, race, gender, sex, religion, mental state, pregnancy, marriage, sexual orientation, disability, belief, culture, language, education, financial history, employment history, address, telephone number, online identity, biometric information, opinions, views, preferences,
- Student results
- Students' exams
- Students case studies
- Debit order applications
- Proof of payments
- ID/Passport documentation
- Proof of residence
- Medical history
- Doctors' certificates
- Certificates/ Qualifications

Staff information obtained:

- CV
- Certificates/ Qualifications
- ID/ Passport documentation
- Doctors' notes
- Employment contract
- Leave forms
- Salary/Wages
- Banking details
- Tax details
- Warnings
- Incident reports
- KPO's
- Emails
- Information containing Person identity, race, gender, sex, religion, mental state, pregnancy, marriage, sexual orientation, disability, belief, culture, language, education, financial history, employment history, address, telephone number, online identity, biometric information, opinions, views, preferences,

Recordings

No personal information is or will be used for any video or public recording purposes.

Recording of practical demonstrations within the classroom is for student usage to assist with practical aspects of the course and not used or obtained with bad intentions.

Recording on results such as, reports, practical assessments, theory examinations, case studies, worksheets, assignments etc. are used for education matters only and captured to obtain sufficient results on the subject matter to provide the student with a qualification.

This information is only accessible to staff via computer files or printed and filed documentation. At no time is this information made accessible to 3rd parties.

Filing system

All filing is kept at the college either in the staff or director's office. These files are stored and labelled according to the information it contains.

No filing systems are accessible to 3rd parties.

Unique identifier

The information officer is assigned as a unique identifier as she has access to all personal staff information as mentioned in the processing section. The information officer is responsible to ensure that this information in the staff file is kept confidential and not accessible to any persons.

Re-identifier

No information is accessible to identify any staff that can be used as manipulation or unlawfully.

Consent

All data subjects are given voluntary consent. In terms of letters, agreements, disclosures etc.

Direct marketing

Complete

Website

Complete

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The purpose

The purpose of this policy is to protect all staff, students and clients from the compliance risks associated with the protection of personal information.

Data subject rights

All data subjects have a choice to choose how their information is handled and have the right to the following:

- Access their personal information
- Have personal information updated, corrected or deleted.
- Object the processing of personal information
- Object direct marketing
- To be informed of any personal data being shared and why

8 conditions of lawful processing of personal information

Accountability

- Failure to comply with the POPIA can cause claims and damage to the college.
- The protection of personal information is everyone's responsibility.
- Disciplinary action will be taken against those who fail to abide by the POPIA.

Processing limitation

- Information must be processed in a fair, lawful and non-excessive manner.
- Data subjects must provide consent.

- Processing is only done to provide a service to students and the employment of staff.
- Any personal information provided is always for a purpose and will be communicated accordingly.
- No personal information is to be distributed.

Purpose specification

- All business operations but be transparent when processing personal information.
- Provide specific and legitimate reasons to by why you are collecting this information.

Further processing limitation

- Personal information will not be processed for 2nd or 3rd party use unless completed needed.
- all information received will only be used for the purpose it was collected.

Information quality

- Take reasonable steps to ensure that all personal information collected is accurate and not misleading.

Open communication

- All data subjects are aware of why their personal information have been collected.
- The case study can contact the college to get their personal information or ask any questions needed.

Security safeguards

- All filing systems will be secure to ensure that personal information is protected.
- For sensitive or highly confidential information, extra security measures must be in place.
- All staff need to sign confidentially clauses

Data subject participation

- A data subject may request the deletion of personal information.

Processing information as a staff member

- Always have consent
- Provide a conclusion for why you need this information
- Ensure processing complies with the law
- All processing is protected
- All personal information needed is clearly understood and the purpose for this information is communicated.
- Personal information is only processed for educational, accounting or assistance matters.
- No information is shared.
- All information is secure
- All laptops, cell phones etc have unique passwords for restricted access.
- No personal information is ever left out or unattended.

POPIA audit

The purpose of the POPIA audit is for the following:

- Process used personal information, by collecting, recording, storing or destroying.
- Determine who has access to this information
- Create systems in place

- Ensure security measures are in place
- Monitor effectiveness and internal control

Request to access personal information

A case subject has the right to request their personal information. They can request this via email or in person with a signed written request letter.

POPIA compliant procedure

If a case study has a complaint regarding their personal information, they have the right to contact the information officer with a written complaint. Once the officer acknowledges the receipt of the complaint, they officer will provide further assistance with 2 working days.

The complaint must have the following:

- Reason for the complaint
- Date of the complaint

Disciplinary action

If there has been a gross negligence or mismanagement of personal information. Serious form of misconduct will be considered and could result in dismissal of the staff member.

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