



20th Annual Pension Lawyers Association
Conference 2015

POPI WHIRLWIND TOUR

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- When will POPI become effective ? - Best guess.
(Remember the one year)
- 8 conditions plus:
 - SPI
 - Children's info
 - Account numbers
 - Direct marketing
 - Codes of conduct(Keep an eye on industry bodies)

SUMMARY OF THE 8 PLUS (not all)

————→ The Rule, then —————→ The Exceptions

1. Responsible Party

- Ensure processed lawfully
- Doesn't infringe on privacy
(NB: for account numbers)

2. Purpose

- Collection —————→ related to activity
- Processing —————→ not excessive

3. Processing

- Consent
- Collected from DS
- Limited, compatible further processing
- **No** processing SPI or Children's info:
 - Regulator authorisation; or
 - Permitted by POPI
(lots of work here !)
- Criminal behaviour → need authorisation

4. Account numbers is a biggie

- Scary criminal offences “failed to take reasonable steps”
- Knowingly disclose
- Transferring outside the country
 - Beware children’s information especially
- Prior authorisation
- Direct marketing



Other not covered:

- Records managements and security
- Communication with DS

EXAMPLES OF A SIMPLIFIED POPI PROJECT - EARLY PHASE

PROCESSING - 8 plus. Business analysis, business processes, organisational records management

Dealing with / communication with DS – processes

- IT - records management + security
- Physical security

● High level policies, processes information officers, communication and risk management

Operators and third parties

PROJECT PHASES

- Buy in, structures and governance
- Risk and effort analysis
- Must start now and quick-wins
- Data gathering and detailed analysis
- Prioritising and planning
- Implementation
- Closure
- Next phase

NB: Project Management

TRAINING AND GOVERNANCE

☆ **Comic for October 14, 2010** »

from Dilbert Daily Strip



THANK YOU