

Data privacy policy

Analyze



Smart solutions for better business

Document control

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1 Aim and purpose

This policy shows the commitment of Analyze Consulting management and employees to protect individuals' right to privacy by protecting their personal information. It explains how Analyze obtains, uses and discloses personal information of all data subjects, in accordance with the requirements of the Protection of Personal Information Act ("POPIA").

At Analyze Consulting we are committed to ensuring that all personal information collected is used properly, lawfully and transparently.

2 Definition of personal information

According to the Protection of Personal Information Act (POPIA) “**personal information**” means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person. Information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, includes, but not limited to -

- a. information relating to the 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;
- b. information relating to the education or the medical, financial, criminal or employment history of the person;
- c. any identifying number, symbol, e-mail address, physical address, telephone number or other particular assignment to the person;
- d. the blood type or any other biometric information of the person;
- e. the personal opinions, views or preferences of the person
- f. 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;
- g. the views or opinions of another individual about the person; and
- h. 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.

3 Data protection principles

Analyze Consulting is committed to processing data in accordance with its responsibilities under the Protection of Personal Information Act (POPIA).

POPIA sets out eight conditions which are the requirements for the processing of personal information:

1. Accountability: Analyze must be accountable for the personal information it processes or holds in its possession.
2. Processing limitation: Personal information must be processed in a fair and lawful manner with the consent of employees.
3. Purpose specification: Personal information will only be processed for specific, explicitly defined and legitimate reasons.
4. Further processing limitation: Personal information will not be processed for a secondary purpose unless that processing is compatible with the original purpose.
5. Openness: The Regulator and employees must be aware if personal information is being collected by Analyze Consulting.
6. Information quality: Analyze Consulting must ensure that personal information is kept reliable, accurate and up to date.
7. Security safeguards: Personal information must be kept secure against the risk of loss, unauthorised access, interference, modification, destruction or disclosure.
8. Employee participation: Employees may request the correction/deletion of any personal information held about them that may be inaccurate or misleading.

4 Data protection guidelines

4.1 General provisions

- a. This policy applies to all personal data processed by Analyze Consulting.
- b. The Information Officer will take responsibility for Analyze Consulting's ongoing compliance with this policy.
- c. This policy will be reviewed at least annually.
- d. Analyze Consulting will register with the Department of Justice as an organisation that processes personal data.

4.2 Lawful, fair and transparent processing

- a. Analyze Consulting will maintain a Register of Information and Systems to ensure its processing of data is lawful, fair and transparent.
- b. The Register of Information and Systems will be reviewed at least annually.
- c. Data subjects have the right to access their personal data and requests made will be dealt with in a timely manner.

4.3 Lawful purposes

- a. Analyze Consulting will note the appropriate lawful basis in the Register of Information and Systems.
- b. Where consent is relied upon as a lawful basis for processing data, evidence of consent will be kept with the personal data.

4.4 Data minimisation

- a. Analyze Consulting will ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

4.5 Accuracy

- a. Analyze Consulting will take reasonable steps to ensure personal data is accurate.
- b. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.

4.6 Archiving / removal

- a. To ensure that personal data is kept for no longer than necessary, Analyze Consulting will put in place a retention and destruction policy for each area in which personal data is processed and review this process annually.
- b. The retention and destruction policy must consider what data should/must be retained, for how long, and why.

4.7 Security

- a. Analyze Consulting will ensure that personal data is stored securely.
- b. Access to personal data will be limited to personnel who need access and appropriate security will be in place to avoid unauthorised sharing of information.
- c. When personal data is deleted, this will be done safely so that the data is irrecoverable.
- d. Appropriate back-up and disaster recovery solutions will be in place.

4.8 Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, Analyze Consulting will promptly assess the risk to individuals and if appropriate report this breach to the Information Regulator.

5 Appendix A: Personal information collected and processed by Analyze Consulting

DATA SUBJECTS: EMPLOYEES		
<u>Personal Information processed:</u>	<u>Source of the Personal Information</u>	<u>Is the supply of Personal Information mandatory or voluntary?</u>
Information relating to the 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	Employee	Mandatory
Information relating to the education or the medical, financial, criminal or employment history of the person	Employee	Mandatory
Any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person	Employee	Mandatory

DATA SUBJECTS: EMPLOYEES		
The biometric information of the person	Employee	Mandatory
The personal opinions, views or preferences of the person	Employee	Voluntary
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	Employee	Voluntary
The views or opinions of another individual about the person	Employee	Voluntary
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	Employee	Mandatory
Will any of the Personal Information be transferred to another country or international organisation?		
Yes		
Description of the level of protection afforded to the Personal Information by such other country or international organisation.		
UK GDPR		

DATA SUBJECTS: EMPLOYEES		
<u>Purpose of processing Personal Information:</u>		
Assessing potential employees for employment, managing our employment relationships, compliance with statutory obligations relating to employees, loading employees on the payroll		
<u>Recipient or categories of recipients to whom the Personal Information is supplied:</u>		
Human Resources, Finance Departments, Compliance Reporting Bodies		
<u>The consequences of failure to provide information:</u>		
Unable to employ candidates, effectively manage the employment relationship and fulfil compliance obligations		

DATA SUBJECTS: CLIENTS/CUSTOMERS		
<u>Personal Information processed:</u>	<u>Source of the Personal Information</u>	<u>Is the supply of Personal Information mandatory or voluntary?</u>
Any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person	Client	Mandatory
The personal opinions, views or preferences of the person	Client	Voluntary

DATA SUBJECTS: CLIENTS/CUSTOMERS		
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	Client	Voluntary
The views or opinions of another individual about the person	Employee	Voluntary
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	Client	Mandatory
Will any of the Personal Information be transferred to another country or international organisation?		
No		
<u>Purpose of processing Personal Information:</u>		
Onboard clients, conduct a needs analysis, effectively manage our client relationships and contractual obligations and adequately render services		
<u>Recipient or categories of recipients to whom the Personal Information is supplied:</u>		
Operations, Sales, Finance		
<u>The consequences of failure to provide information:</u>		

DATA SUBJECTS: CLIENTS/CUSTOMERS
inability to onboard clients, conduct a needs analysis on clients, effectively manage our client relationships and contractual obligations and adequately render services

DATA SUBJECTS: SUPPLIERS		
<u>Personal Information processed:</u>	<u>Source of the Personal Information</u>	<u>Is the supply of Personal Information mandatory or voluntary?</u>
Any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person	Supplier	Mandatory
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	Supplier	Voluntary

DATA SUBJECTS: SUPPLIERS		
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	Supplier	Mandatory
Will any of the Personal Information be transferred to another country or international organisation?		
No		
<u>Purpose of processing Personal Information:</u>		
Effectively manage supplier contracts and relationships, evaluate suppliers and place orders		
<u>Recipient or categories of recipients to whom the Personal Information is supplied:</u>		
Finance and Operations		
<u>The consequences of failure to provide information:</u>		
Inability to effectively manage supplier contracts and relationships, evaluate suppliers and place orders		

DATA SUBJECTS: SERVICE PROVIDERS		
<u>Personal Information processed:</u>	<u>Source of the Personal Information</u>	<u>Is the supply of Personal Information mandatory or voluntary?</u>

DATA SUBJECTS: SERVICE PROVIDERS		
Any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person	Service Provider	Mandatory
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	Service Provider	Voluntary
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	Service Provider	Voluntary
Will any of the Personal Information be transferred to another country or international organisation?		
No		
<u>Purpose of processing Personal Information:</u>		
To effectively assess service providers, manage service providers, comply with legislative reporting requirements and order services		

DATA SUBJECTS: SERVICE PROVIDERS		
<u>Recipient or categories of recipients to whom the Personal Information is supplied:</u>		
Finance		
<u>The consequences of failure to provide information:</u>		
Inability to effectively assess service providers, manage service providers, comply with legislative reporting requirements and order services		

DATA SUBJECTS: PROSPECTIVE CLIENTS		
<u>Personal Information processed:</u>	<u>Source of the Personal Information</u>	<u>Is the supply of Personal Information mandatory or voluntary?</u>
Any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person	Prospective Client	Mandatory
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	Prospective Client	Voluntary

DATA SUBJECTS: PROSPECTIVE CLIENTS		
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	Prospective Client	Mandatory
Will any of the Personal Information be transferred to another country or international organisation?		
No		
<u>Purpose of processing Personal Information:</u>		
To market our services to prospective clients and prepare quotations and proposals		
<u>Recipient or categories of recipients to whom the Personal Information is supplied:</u>		
Sales, Finance, Operations		
<u>The consequences of failure to provide information:</u>		
Inability to market our services to prospective clients and prepare quotations and proposals		

DATA SUBJECTS: APPLICANTS OR CANDIDATES		
<u>Personal Information processed:</u>	<u>Source of the Personal Information</u>	<u>Is the supply of Personal Information mandatory or voluntary?</u>

DATA SUBJECTS: APPLICANTS OR CANDIDATES		
Information relating to the 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	Applicant	Mandatory
Information relating to the education or the medical, financial, criminal or employment history of the person	Applicant	Mandatory
Any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person	Applicant	Mandatory
The personal opinions, views or preferences of the person	Applicant	Voluntary

DATA SUBJECTS: APPLICANTS OR CANDIDATES		
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	Applicant	Voluntary
The views or opinions of another individual about the person	Interviewers	Mandatory
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	Applicant	Mandatory
Will any of the Personal Information be transferred to another country or international organisation?		
No		
<u>Purpose of processing Personal Information:</u>		
To effectively recruit for candidates that would be a good fit for Analyze		
<u>Recipient or categories of recipients to whom the Personal Information is supplied:</u>		
Operations, Finance, Human Resource, Third Parties (Background Checks)		
<u>The consequences of failure to provide information:</u>		
Unable to effectively recruit new talent for Analyze		

6 Appendix B: Security measures to protect personal information

<u>PHYSICAL SECURITY MEASURES:</u>	<u>CYBER SECURITY MEASURES:</u>
Access control to the premises and certain key areas, which access is restricted to authorised personnel	Firewalls
Devices and user stations are password protected	Virus protection
Devices (laptops or otherwise) and user stations are safely secured by case lock or otherwise when not in use	Password protection on devices is changed regularly
Servers are stored in access-controlled rooms	Data encryption
Security gate	Systems and devices are automatically locked after certain periods of inactivity
Access control (employee key card)	Data is backed up
On site security guards	Protection of information stored on printers
Safe storage of physical documentation	
Discarded documentation is shredded	