

Mukhanyo Theological College

Protection of Personal Information Policy (O-11)

1. Introduction

The Protection of Personal Information Act, 4 of 2013, requires Mukhanyo Theological College NPC (hereafter referred to as MTC), to inform their clients as to the manner in which their personal information is used, disclosed and destroyed.

2. Scope of Application

MTC guarantees its commitment to protecting its client's privacy and ensuring that their personal information is used appropriately, transparently, securely and in accordance with applicable laws.

The Policy sets out the manner in which MTC deals with their client's personal information as well as and stipulates the purpose for which said information is used.

3. Definitions:

- 3.1. MTC: Mukhanyo Theological College NPC
- 3.2. POPIA: Protection of Personal Information Act, 4 of 2013.
- 3.3. Deputy Information Officers: Appointed staff of MTC that oversee the dealing with personal information of staff, students, friends, applicants and enquirers.
- 3.4. Clients: Staff, students, friends, applicants and enquirers of MTC. Including existing and potential clients.

4. Personal Information Collected

- 4.1. Section 9 of POPI states that *"Personal Information may only be processed if, given the purpose for which it is processed, it is adequate, relevant and not excessive."*
- 4.2. MTC also collects and processes the client's personal information for marketing purposes in order to ensure that our products and services remain relevant to our clients and potential clients.
- 4.3. MTC aims to have agreements in place with all product suppliers, insurers and third party service providers to ensure a mutual understanding with regard to the protection of the client's personal information. MTC's suppliers will be subject to the same regulations.
- 4.4. With the client's consent, MTC may also supplement the information provided with information MTC receives from other providers in order to offer a more consistent and personalized experience in the client's interaction with MTC.

5. The usage of Personal Information

- 5.1. The Client's Personal Information will only be used for the purpose for which it was collected and as agreed. This may include:
 - 5.1.1. Providing products or services to clients and to carry out the transactions requested;
 - 5.1.2. Confirming, verifying and updating client details;

- 5.1.3. Underwriting purposes;
 - 5.1.4. Assessing and processing claims;
 - 5.1.5. Purposes of claims history;
 - 5.1.6. Conducting credit reference searches or verification;
 - 5.1.7. Audit and record keeping purposes;
 - 5.1.8. The detection and prevention of fraud, crime, money laundering or other malpractices;
 - 5.1.9. In connection with legal proceedings;
 - 5.1.10. Conducting market or customer satisfaction research;
 - 5.1.11. Providing services to clients, to render the services requested and to maintain and constantly improve the relationship;
 - 5.1.12. Providing communication in respect of the company and regulatory matters that may affect clients; and
 - 5.1.13. In connection with and to comply with legal and regulatory requirements or when it is otherwise allowed by law.
- 5.2. According to section 10 of POPI, personal information may only be processed if certain conditions as listed below, are met along with supporting information for processing of Personal Information:
- 5.2.1. The client's consents to the processing: Consent is obtained from clients during the introductory appointment and communication, and needs to be confirmed in the analysis stage of the relationship;
 - 5.2.2. The necessity of processing: in order to conduct an accurate analysis of the client's needs for purposes of amongst others: employment or study at MTC or support of the ministry.

6. Disclosure of Personal Information

- 6.1. MTC will not disclose the client's information unless it is legally forced to do as explained under 6.2.
- 6.2. MTC may disclose a client's information where it has a duty or a right to disclose in terms of applicable legislation, the law, or where it may be deemed necessary in order to protect MTC's rights.

7. Safeguarding Clients' Personal Information

- 7.1. It is a requirement of POPI to adequately protect personal information. MTC will continuously review its security controls and processes to ensure that personal information is secure.
- 7.2. Each new employee will be required to sign an Employment Contract containing relevant consent clauses for the use and storage of employee information, or any other action so required, in terms of POPI.
- 7.3. MTC archived client information is stored on site which is also governed by POPI, access is limited to these areas to authorized personnel.
- 7.4. All electronic files or data are backed up by MTC's IT Division which is also responsible for system security that protects third party access and physical threats. MTC's IT Division is responsible for Electronic Information Security.
- 7.5. Consent to process client information is obtained from clients (or a person who has been given authorization from the client to provide the client's personal information) during the introductory appointment and communication, and needs to be confirmed in the analysis stage of the relationship.

8. Access, correction and destroying of Personal Information

- 8.1. Clients have the right to access the personal information MTC holds about them. Clients also have the right to ask MTC to update, correct or delete their personal information on reasonable grounds. Once a client objects to the processing of their personal information, MTC may no longer process said personal information. MTC will take all reasonable steps to confirm its clients' identity before providing details of their personal information or making changes to their personal information.
- 8.2. MTC will ensure that any destroying of Personal Information is done within the regulations / procedures contained in its POPI Policy.

