

	<p>PROTECTION OF PERSONAL INFORMATION POLICY VERSION 1.0 17 FEBRUARY 2025</p>	<table><tr><th colspan="2">LEGAL SERVICES</th></tr><tr><td>DOCUMENT NUMBER</td><td></td></tr><tr><td>REVISION NUMBER</td><td>1.0</td></tr><tr><td>EFFECTIVE DATE</td><td>01 April 2025</td></tr><tr><td>DOCUMENT CLASSIFICATION</td><td>Internal Use</td></tr></table>	LEGAL SERVICES		DOCUMENT NUMBER		REVISION NUMBER	1.0	EFFECTIVE DATE	01 April 2025	DOCUMENT CLASSIFICATION	Internal Use
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PROTECTION OF PERSONAL INFORMATION POLICY

13 February 2025

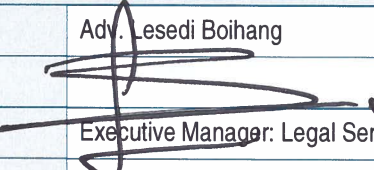
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APPROVAL: PROTECTION OF PERSONAL INFORMATION POLICY	
NLC Chairperson: Prof Barney Pityana	Signature:
Date: 31. 03. 2025	

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DOCUMENT CONTROL – VERSION MANAGEMENT

VERSION CONTROL			
Revision No.	Date	Description	Comments
1.0	13 February 2025		
Next Revision	Three years from date of approval or as and when changes are required to address legislative/ policy position change or administrative matter.		

PROPOSED BY DIVISION (POLICY OWNER)	
Name	Adv. Lesedi Boihang
Signature:	
Designation	Executive Manager: Legal Services
Date:	13 February 2025
Confirmation re Staff engagement.	Policy posted on, communicated on 18 February 2025.
Organised Labour engagement where applicable.	N/A
PRC recommendation	PRC changes incorporated and policy presented to EXCO on 13 March 2025

RECOMMENDED BY EXCO		RECOMMENDED BY SUB COMMITTEE TO BOARD	
Name:	Ms. Jodi Scholtz	Name	Mr. Tembinkosi Bonakele
CM Signature:		Signature:	
Designation:	Commissioner	Designation:	Chairperson: Board Legal and Regulatory Compliance Committee
Date:	26/03/2025	Date	31.03.2025

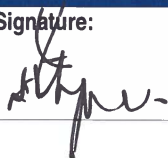
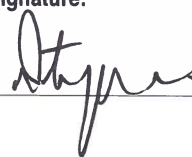

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1. POLICY STATEMENT

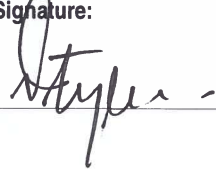
The principles of information privacy contained within this policy are aligned with POPIA requirements and other generally accepted privacy best practice. This policy statement briefly describes the principles for the protection and appropriate processing of personal information at the NLC through collection, creation, capturing, recording, using, manipulation, storage, transmission, displaying, disclosure, analysis, linking, sharing, distribution, transferring, disposal, destruction and any other purposes for which personal information may be used, except as required by legislation and regulations.


2. CORE VALUES

The NLC is committed to achieving sustainable growth through the practice of good corporate governance, provision of excellent service and sound regulatory practice.

It subscribes to and strive to uphold the following core values:

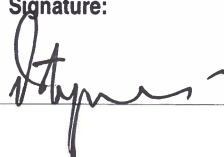
Accountability	To embrace our duties with a sense of ownership and responsibility, aiming to create a positive and lasting sustainable influence on the communities we are dedicated to serving.
Integrity and Ethical conduct	To be honest and demonstrate consistent, transparent, fair and an uncompromising adherence to strong moral and ethical principles.
Caring and Respect	To have empathy, compassion, and consideration for others, fostering a positive relationship and supportive work environment.
Excellence	To be committed to consistently achieve the highest standards of quality and performance in all aspects of our operations.


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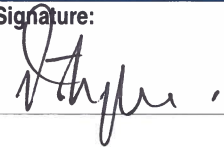
3. DEFINITIONS


Term	Definition
Availability	Ensuring timely and reliable access to and use of information.
Best Practice	Recommendations or solutions that are considered the most desirable or preferred.
Biometric	A technique of personal identification that is based on physical, physiological or behavioural characterisation including blood typing, fingerprinting, DNA analysis, retinal scanning and voice recognition.
Board Members	Means the Governing Body/Accounting Authority of the NLC as appointed in terms of section 3 of the Lotteries Act, 1997.
Consent	Any voluntary, specific and informed expression of will in terms of which permission is given for the processing of personal information.
Control	A systematic measure implemented to minimise or mitigate risk.
Data	A set of values, numbers, characters, words or other elements that may be interpreted or processed in order to produce information.
Data Subject	This refers to the natural or juristic person to whom personal information relates, such as employees, stakeholders, appellants, complainants, sub-contractors or a company that supplies the NLC with goods or services.
Deputy Information Officer	Means an official designated by the Information Officer with certain powers of the Information Officers.
Disaster	An unplanned event causing great damage or loss of information resources or the capability to perform certain functions.
Electronic Communication	Any text, voice, sound, image, or video message sent over an electronic network, such as e-mail, instant message (IM), SMS, WhatsApp, BBM message, unified communication and video conferencing.
Employee	For the purpose of this document only, the term employee is considered to include all permanent and/or temporary individuals employed or appointed by the NLC, third party contractors, consultants, auditors and interns of NLC.
Guideline	A document that provides recommended but not mandatory advice regarding practices in a given situation, scenario or topic.

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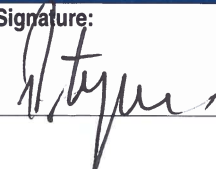
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Term	Definition
Incident	An identified occurrence of an adverse event, indicating a possible breach of policy, failure of controls, or previously unknown situation that may have an impact on the information security and privacy responsibilities of an organisation.
Information Officer	In relation to a public body means an information officer or deputy information officer as contemplated in terms of section 1 or 17 of PAIA. In terms of PAIA the Commissioner or equivalent officer is designated as the Information officer. The public body is required to designate such number of persons as Deputy Information Officers.
Information Privacy	The right of individuals to control, or at least significantly influence, the acquisition, access, use, dissemination and truthfulness of information about themselves.
Information Processing Facility	Any information system, service, infrastructure or the physical location that they are housed in.
Information Regulator	The public body formed under the POPI Act to regulate personal information handling practices in South Africa.
Information Resource	Any information in electronic, physical or audio-visual form or any hardware, software or information processing facilities that makes possible the use, handling, transfer and/or storage of information.
Information Security Policy	A set of statements which express management's intent for the implementation, maintenance, and improvement of its information security.
Integrity	The property of information that describes its accuracy and completeness, especially as impacted by unauthorised modification.
National Lotteries Commission	The Commission established by Section 2 of the Lotteries Act 57 of 1997
Operator	Means a person who processes personal information for a Responsible Party in terms of a contract or mandate.
Person	A natural person or a juristic person

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Term	Definition
Personal Information	<p>Information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to—</p> <ul style="list-style-type: none"> 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, location information, online identifier or other particular assignment to the person; d) the 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 g) or confidential nature or further correspondence that would reveal the contents h) of the original correspondence; i) the views or opinions of another individual about the person; and j) 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
POPI Policy	<p>A set of statements which express management's intent for the implementation, maintenance, and improvement of measures to protect personal information and privacy. It governs an organisation's handling practices for personal information by specifying what can and cannot be done with the personal information.</p> <p>The policy is compulsory and failure and/or refusal to abide by it may be deemed as misconduct and may result in an investigation and/or disciplinary action against an employee.</p>
POPI Champion	<p>Means individuals who have been appointed to assist in monitoring the processing and storage of personal information in their respective departments. These individuals are also responsible for overseeing the day-to-day POPIA compliance of their departments and providing awareness to the organisation's employees about POPIA. The POPI Champion serves as a point of contact between the Deputy Information Officer(s) and POPI Champion.</p>

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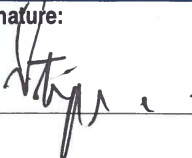
Term	Definition
Procedure	A series of detailed steps to accomplish an end or instructions for implementation. A series of activities or tasks that contribute to the fulfilment of a task.
Processing	Means any operation or activity or any set of operations, whether by automatic means, concerning personal information, including <ul style="list-style-type: none"> a) the collection, receipt, recording, organization, collation, storage, updating or modification, retrieval, alteration, consultation, or use b) dissemination by means of transmission, distribution or making available in any other form; or c) merging, linking, as well as restriction, degradation, erasure, or destruction of information.
Record	Any recorded information <ul style="list-style-type: none"> (a) regardless of form or medium, including any of the following: <ul style="list-style-type: none"> (i) Writing on any material; (ii) information produced, recorded or stored by means of any tape-recorder, computer equipment, whether hardware or software or both, or other device, and any material subsequently derived from information so produced, recorded or stored; (iii) label, marking or other writing that identifies or describes anything of which it forms part, or to which it is attached by any means; (iv) book, map, plan, graph or drawing; (v) photograph, film, negative, tape or other device in which one or more visual images are embodied so as to be capable, with or without the aid of some other equipment, of being reproduced; (b) in the possession or under the control of a responsible party; (c) whether or not it was created by a responsible party; and (d) regardless of when it came into existence
Responsible Party	Means the person, legal entity, public body or private company that is responsible for the processing of information belonging to a data subject.
Risk	A measure of the extent to which an entity is threatened by a potential circumstance or event.
Standard	A document that provides specific, low level mandatory controls that help enforce and support policies.
Third Party	A person or body that is a separate legal entity to NLC.
Transfer	To exchange information or data with another party.


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4. ABBREVIATIONS AND ACRONYMS

Abbreviation	Full term
ICT	Information and Communications Technology
ISO	International Organisation of Standardisation
PI	Personal Information
POPI	Protection of Personal Information Act
NLC	National Lotteries Commission

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5. REGULATORY FRAMEWORK

This policy and all related standards, procedures and guidelines shall comply with legal and regulatory requirements, including guidance released by the Information Regulator from time to time.

This document is in support of or is supported by the following:

Number	Regulatory Framework	Relevance and Application
1	Companies Act No. 71 of 2008	Governs corporate governance and accountability, including data protection obligations.
2	Constitution of Republic of South Africa, 1996	Upholds the right to privacy and forms the foundation for protecting personal information under POPIA.
3	Cybercrimes Act No. 19 of 2020	Criminalises cyber-related offenses, including unauthorized access and misuse of personal data.
4	Electronic Communications and Transactions Act No. 25 of 2002 ("ECTA")	Regulates electronic communications, including the protection of personal information online.
5	Financial Intelligence Centre Act No. 38 of 2001 ("FICA")	Mandates due diligence in financial transactions, impacting data privacy and protection.
6	Information Security Policy	Ensures the safeguarding of personal information through secure handling, storage, and transmission in line with POPIA's requirements.
7	National Archives and Records Services of South Africa Act No. 43 of 1996	Governs the management and preservation of public records and archives.
8	PAIA and POPIA Manual	Guides public and private bodies in complying with transparency and privacy obligations set out in PAIA and POPIA, respectively.
9	Promotion of Access to Information Act No. 2 of 2000 ("PAIA")	Provides access to information held by public and private bodies to foster transparency and accountability.
10	Promotion of Administrative Justice Act No. 3 of 2000 ("PAJA")	Guarantees fair administrative actions, supporting the protection of personal information in decision-making processes.
11	Protection of Personal Information Act No. 4 of 2013 ("POPIA")	Regulates the processing of personal information, ensuring it is done lawfully, transparently, and with respect for privacy rights.

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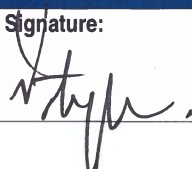
Number	Regulatory Framework	Relevance and Application
12	Records Management Policy	Facilitates the systematic management and retention of personal data, ensuring compliance with POPIA's record-keeping requirements.
13	Regulation of Interception of Communications and Provision of Communication-Related Information Act No. 70 of 2002 ("RICA")	Regulates the lawful interception of communications and the provision of communication-related information, balancing privacy with national security needs.


6. PURPOSE

This policy is intended to govern information handling practices related to personal information at the National Lotteries Commission (the NLC). It is aligned with the Protection of Personal Information Act, 4 of 2013 (POPIA). In the event of any ambiguity, the definitions, stipulations and requirements of POPIA and any related regulations will prevail over this policy.

The purpose of this policy is to articulate NLC's position on information privacy and the protection of personal information during the course of its business operations, and therefore to:

- 6.1 provide management direction and support for information privacy and the protection of personal information;
- 6.2 set the requirements and expectations for information privacy;
- 6.3 ensure that information privacy is considered for all new and existing business activities, projects, programmes, businesses, processes, technologies, products or research;
- 6.4 guide the implementation of appropriate policies, standards, processes, procedures and controls that are necessary to uphold the confidentiality, integrity and availability of all personal information resources within NLC;
- 6.5 set out the roles and responsibilities that all employees have towards privacy;
- 6.6 ensure that only relevant personal information is collected by the NLC;
- 6.7 ensure that personal information is not retained for excessive periods of time;
- 6.8 ensure transparency by being open and honest about what personal information the NLC collects and how it will be used;
- 6.9 protection of personal information the NLC holds from unauthorised access;

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- 6.10 that the NLC uses and discloses personal information only when necessary and legally required; and
- 6.11 promotion of privacy rights by helping the NLC's data subjects to exercise rights and maintain control over their personal information.

7. OBJECTIVES

The specific objectives of this policy are:

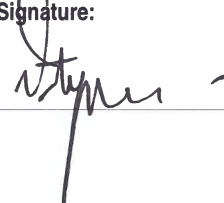
- 7.1 to develop and implement privacy standards and practices which uphold the rights of individuals as afforded to them by the Constitution of the Republic of South Africa and related legislation such as POPIA;
- 7.2 to ensure that NLC's information systems comply with relevant laws and regulations, industry leading practices and recognised international standards on information privacy and the protection of personal information;
- 7.3 to enhance and promote trust in the information handling practices at NLC;
- 7.4 to preserve the integrity and quality of all personal information for which NLC is responsible; and
- 7.5 to protect NLC and its stakeholders from the consequences associated with the inappropriate use of their personal information.


8. SCOPE

This policy applies to all business functions of the NLC, all employees (as defined in the Glossary), and other stakeholders, regardless of legal jurisdiction or geographic location, who may process or have access to personal information as a result of their employment with the NLC.

This Policy applies to the processing of all personal information records in any format or structure, either electronic or hardcopy, including but not limited to those of former, existing and prospective employees (as defined in the Glossary), and other stakeholders.

The entire lifecycle of information is considered under this policy, including creation, collection, capturing, recording, use, manipulation, storage, transmission, display, disclosure, analysis, linking, sharing, distribution, transfer, disposal, destruction and any other purposes for which personal information may be used.

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9. ROLES AND RESPONSIBILITIES

All privacy responsibilities across the NLC must be defined, documented and allocated.

The following roles and responsibilities associated with this policy are outlined below. These persons and functions shall be responsible for collaboratively giving effect to the organisational, operational processes and technology aspects required by the NLC to drive privacy compliance throughout the organisation. More details on the specific roles, responsibilities, activities and tasks related to privacy are defined and documented in supporting standards and approved documents.

Management must review these roles and responsibilities on a periodic basis, and whenever there is a change in the legislative or regulatory landscape which may have an impact on privacy-related operations and activities or those associated with personal information, update the policy accordingly:

9.1 Board Members


The Board is ultimately accountable for ensuring that the NLC meets its obligations under POPIA. The Board Members may however delegate some of its responsibilities to management or other capable individuals.

9.2 Information Officer / Commissioner

- 9.2.1 The Information Officer derives his/her duties and responsibilities from section 55 of POPIA, and in the case of the NLC, this role is undertaken by the Commissioner.
- 9.2.2 The Information Officer is permitted to delegate these duties and responsibilities to Deputy Information Officer(s). This role has been allocated to all the Executives or Executive Committee Members (EXCO).
- 9.2.3 The Information Officer must ensure that a manual is developed, monitored, maintained and made available as prescribed in sections 14 and 51 of the PAIA.


9.3 Deputy Information Officers


- 9.3.1 The Deputy Information Officers are responsible for taking steps to ensure the NLC's reasonable compliance with POPIA requirements;

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- 9.3.2 The Deputy Information Officers are responsible for keeping the Board Members informed of the organization's information protection responsibilities, for instance in the case of a security breach;
- 9.3.3 The Deputy Information Officers are responsible for reviewing the NLC's information protection Procedures and Policies;
- 9.3.4 The Deputy Information Officer are responsible for ensuring that the NLC makes it convenient for data subjects to communicate with the organisation regarding their personal information;
- 9.3.5 The Deputy Information Officers must oversee the amendment of employment contracts and other service level agreements;
- 9.3.6 The Deputy Information Officers must encourage compliance with the lawful processing of personal information in the NLC;
- 9.3.7 The Deputy Information Officers must ensure that employees and persons acting on behalf of the NLC are aware of the risks associated with the processing of personal information;
- 9.3.8 The Deputy Information Officers must ensure that employees are trained in the processing of personal information;
- 9.3.9 The Deputy Information Officers must address employees' POPIA related questions;
- 9.3.10 The Deputy Information Officers must address POPIA related requests and complaints made by the data subjects;
- 9.3.11 The Deputy Information Officers act as a contact point for the Information Regulator on issues pertaining to the processing of personal information;
- 9.3.12 The Deputy Information Officers are responsible for approving and maintaining the protection of personal information statements and disclaimers that are displayed on the organization's website, including those attached to communications such as emails and electronic newsletters;
- 9.3.13 The Deputy Information Officers are responsible for addressing any personal information protection queries from media;
- 9.3.14 The Deputy Information Officers must work with persons acting on behalf of the NLC to ensure that any outsourced marketing initiatives comply with POPIA requirements;
- 9.3.15 The Deputy Information Officers monitor the NLC's compliance with POPIA; and
- 9.3.16 The Deputy Information Officers enforce disciplinary measures for breaches of this Policy and POPIA obligations.

9.4 NLC Management


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Management has a responsibility to support all privacy efforts within the organisation and must discharge such responsibility through demonstrable commitment.

9.5 POPI Champions

- 9.5.1 The POPI Champion has the responsibility of ensuring that information is processed in a lawful manner that does not infringe on the right to privacy of data subjects;
- 9.5.2 The POPI Champion has the responsibility of ensuring that transfer of personal information across the NLC divisions is lawful and in line with relevant legislation;
- 9.5.3 The POPI Champion has the responsibility of ensuring Personal information in the custody of the NLC is protected;
- 9.5.4 The POPI Champion has the responsibility of ensuring all personal information breaches are managed in a manner that achieves deterrence and prevents reoccurrence of breaches. The POPI Champion has the responsibility to assist in implementing corrective actions when there are breaches;
- 9.5.5 The POPI Champion has the responsibility of ensuring there is a defined standard for processing personal information in the NLC and that it is followed;
- 9.5.6 The POPI Champion has the responsibility of promoting a data protection and privacy culture within the organization;
- 9.5.7 The POPI Champion has the responsibility of promoting and communicating the embedment of POPI throughout the organization;
- 9.5.8 The POPI Champion has the responsibility to conduct awareness sessions on POPIA Compliance;
- 9.5.9 The POPI Champion has the responsibility to assist the Information Officer in the monitoring of POPIA Compliance; and
- 9.5.10 The POPI Champion has the responsibility of working closely with each department in the NLC for the implementation of POPI requirements at an operational level. Each divisional head may appoint a POPI Champion to serve as a contact between the department and the DIOs.
- 9.5.11 The POPI Champion has the responsibility of identifying the areas where consent will be needed for the processing of personal information in their departments;
- 9.5.12 The POPI Champion has the responsibility of document management, including digitization of documents in their department;
- 9.5.13 The POPI Champion has the responsibility of retention and destruction of information practices in their departments;

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9.5.14 The POPI Champion has the responsibility of ensuring that there is proactive monitoring of data/information breach incidents and review the response to these incidents and reporting to the DIOs.

9.6 Records Manager


The Records Manager is responsible for the development, implementation, maintenance of security standards, processes and procedures in terms of the NLC's Records Management Policy.


9.7 Organisational Compliance Function / Legal Services Division

- 9.7.1 The Organisational Compliance Function must oversee compliance with the conditions for lawful processing of personal information as described in POPIA and any associated regulations or international data protection laws, as applicable.
- 9.7.2 The Legal Services Division will be responsible for providing strategic guidance to the NLC with regard to information security protocols.
- 9.7.3 The key responsibilities of the Legal Services Division are to plan, develop, implement, manage and lead an information security programme and all associated activities.
- 9.7.4 The Organisational Compliance Function shall be responsible for monitoring of compliance to information security standards, processes & procedures.
- 9.7.5 The Organisational Compliance Function is responsible for monitoring the NLC's Operators compliance with privacy standards /in line with the agreed service level agreement.

9.8 Human Capital Management Division

- 9.8.1 The Human Capital Management Division is responsible for ensuring that the human resource and payroll system is POPIA compliant;
- 9.8.2 The Human Capital Management provides assurance of good privacy practices applied in the department;
- 9.8.3 The Human Capital Management authorizes access rights to the human resource and payroll systems;


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9.8.4 The Human Capital Management ensures that there is adequate, reasonable, technical and organisational security measures for all personal information of the NLC employees and that of the Board Members.

9.9 Employees, Contractors and Third Parties

- 9.9.1 All employees (as defined in the Glossary) and any other third parties must take responsibility for protecting their own and the NLC's information privacy.
- 9.9.2 All employees and third parties are bound by a duty of confidentiality for all personal information which they come into contact with as a result of their relationship with the NLC.
- 9.9.3 All employees and third parties must secure all personal information that they are processing, by taking precautions and complying with this policy;
- 9.9.4 All employees and third parties are responsible for ensuring that personal information is kept in as few places as is necessary;
- 9.9.5 All employees and third parties are responsible for ensuring that no personal information is placed and/or left on desks unattended or unsecured;
- 9.9.6 All employees and third parties are responsible for ensuring that personal information is encrypted prior to sharing the information electronically;
- 9.9.7 All employees and third parties are responsible for ensuring that all devices such as computers, flash drives, etc. are password protected and never left unattended (refer to the NLC ICT Policy);
- 9.9.8 All employees and third parties are responsible for ensuring that computer screens and other devices are switched off when not in use;
- 9.9.9 All employees and third parties are responsible for ensuring that removable storage devices such as external drives that contain personal information are locked away securely when not in use;
- 9.9.10 All employees and third parties are responsible for ensuring that where personal information is stored on paper, that such hard copies are kept in a secure place where unauthorized persons are not able to access it. That is by ensuring that drawers are constantly locked to secure any personal information at their disposal;
- 9.9.11 All employees and third parties are responsible for ensuring that where personal information has been printed out, that the printouts are not left unattended where unauthorized individuals could see them;


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- 9.9.12 All employees and third parties are responsible for taking reasonable steps to ensure that personal information is stored only for as long as it is needed or required by the Records Management Policy and/or National Archives and Records Service Act; and
- 9.9.13 All employees and third parties must undergo POPIA awareness training from time to time.
- 9.9.14 Any incidents, or suspected incidents, related to personal information, breaches of privacy or alleged non-compliance with this policy or POPIA must be reported to relevant management and the NLC Information Officer/ Deputy Information Officers immediately by all employees and third parties.

9.10 The NLC's Operators (Information Technology service provider)

- 9.10.1 The NLC's Operators must ensure that the organization's IT infrastructure and any other devices used for processing personal information meet acceptable security standards;
- 9.10.2 The NLC's Operators are responsible for ensuring that servers containing personal information are placed or stored in a secure location;
- 9.10.3 The NLC's Operators are responsible for ensuring that all electronically stored information is backed up and tested on a regular basis;
- 9.10.4 The NLC's Operators are responsible for ensuring that all back-ups are protected from unauthorized access, accidental deletion, negligent loss and malicious hacking attempts;
- 9.10.5 The NLC's Operators are responsible for ensuring that information being transferred electronically is encrypted;
- 9.10.6 The NLC's Operators are responsible for ensuring that all servers and computers containing personal information are protected by a firewall and up-to-date security software;
- 9.10.7 The NLC's Operators are responsible for ensuring that all mobile devices used by the NLC employees and Board Members are encrypted and/or can be remotely encrypted if stolen and/or lost;
- 9.10.8 The NLC's Operators are responsible for performing regular IT audits to ensure that the security of the organization's hardware and software systems are functioning properly;
- 9.10.9 The NLC's Operators are responsible for performing regular IT audits to verify whether electronically stored personal information has been accessed or acquired by unauthorized persons; and

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9.10.10 The NLC's Operators are responsible for performing a proper due diligence review prior to contracting with third party providers to process personal information on the organization's behalf.

10. INDEPENDENT REVIEW

An independent assessment of the NLC's adherence to this policy and/or to POPIA and associated regulations shall be performed periodically. This may be performed by Internal Audit, as part of an audit exercise or by independent consultants, dependent on the needs of the NLC as determined by NLC management.

11. COMPLIANCE

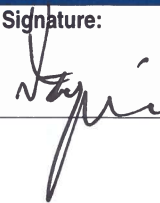
The NLC expects all employees (as defined in the Glossary) and any other third parties to comply with this POPI Policy and supporting standards, processes and procedures. Failure and/or refusal to abide by this policy may be deemed as misconduct, may result in an investigation and/or disciplinary action against an individual in accordance with the NLC's Disciplinary and Grievance Policy. A claim of ignorance as to the existence and/or application of this policy shall not be grounds of justification for non-compliance.


If any provision of this policy is rendered invalid under law, such provision must be deemed modified or omitted to the extent necessary, and the remainder of this policy must continue in full force and effect.

12. POPIA CONDITIONS

12.1 Accountability

- 12.1.1 The NLC must ensure that personal information is processed in compliance with POPIA and is responsible for demonstrating this compliance.
- 12.1.2 The NLC must appoint an Information Officer to oversee and manage the protection of personal information.
- 12.1.3 An Information Protection Impact Assessment (IPIA) should be conducted to identify and mitigate privacy risks during processing activities.
- 12.1.4 Adequate security measures must be in place to protect personal data from unauthorized access, destruction, or alteration.
- 12.1.5 The NLC must maintain proper documentation that records how personal information is collected, used, and safeguarded.
- 12.1.6 Regular audits must be conducted to assess data processing activities and ensure that they meet POPIA's standards.

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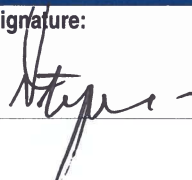
- 12.1.7 Employees must be trained on data protection principles, the rights of data subjects, and their responsibilities under POPIA.
- 12.1.8 The NLC must establish mechanisms to handle data subject requests, such as for access to or correction of their personal information.
- 12.1.9 In the event of a data breach, the Information Regulator and affected individuals must be notified within the stipulated time frame.
- 12.1.10 The NLC must ensure third-party service providers comply with POPIA's requirements through contractual arrangements.


12.2 Processing Limitation

- 12.2.1 All personal information collected and used by the NLC must be done lawfully, reasonably and in a way which does not infringe on the privacy of any individual.
- 12.2.2 Only the minimum amount of information required for the purpose must be collected, stored and used.
- 12.2.3 Consent to use personal information must be obtained, unless otherwise allowed by law, as far as possible, and evidence of this consent must be stored together with the information collected.
- 12.2.4 Individuals must be allowed to object to the use of their information before it is collected and at any time thereafter.
- 12.2.5 The NLC Commissioner must be notified in the event that any objections to the use of personal information are received after collection of this information.
- 12.2.6 As far as possible, personal information must be collected directly from the data subject, unless otherwise allowed by law.

12.3 Purpose Specification

- 12.3.1 At all times, personal information must be collected and only used for specific purposes that are linked to the business needs or interests of the NLC.
- 12.3.2 The data subject must be aware of the information being collected and the specific purposes for which it is being collected.
- 12.3.3 Personal information must only be kept for such time as required for the specified purpose, as specified by the individual (where lawful), as specified by organisational rules and as required by law.

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- 12.3.4 Once personal information is no longer needed to fulfil the specific purpose it was collected for, it must be securely disposed of in such a way that prevents its reconstruction in an intelligible form.
- 12.3.5 In cases where personal information needs to be retained, archived or kept for proof or evidentiary purposes, access to such records must be appropriately secured so that this information cannot be used for any other purposes.

12.4 Further Processing Limitation

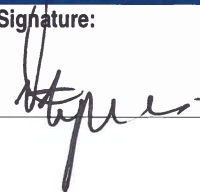
- 12.4.1 If personal information is to be used for a purpose other than the one that was specified at the time it was collected, consent from the data subject for the new purpose must be obtained prior to using the personal information for the new purpose.
- 12.4.2 In cases where personal information is anonymised to the extent that it is not possible to identify data subjects, then such information may be used for other purposes and data subject consent is not required.


12.5 Information Quality

The NLC must take steps to ensure that all personal information under its control is complete, accurate, up to date, and not misleading.

12.6 Openness

- 12.6.1 The NLC must maintain a Promotion of Access to Information Manual that is in line with the requirements of the Promotion of Access to Information Act (PAIA) and POPIA. This manual must notify individuals and the general public of the NLC's information practices, that is, how it collects, uses, retains and discloses personal information.
- 12.6.2 The Promotion of Access to Information Manual must be made readily accessible and available to individuals.
- 12.6.3 At the point and time where personal information is collected, individuals must be made aware of:
- the purposes for collecting or using their personal information;
 - any consequences for failing to supply such information;
 - any laws which authorise such collection;
 - where information will be transferred to a third party;
 - where information will be transferred across international borders; and

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vi. the rights that they have in terms of their personal information.

12.7 Security Safeguards

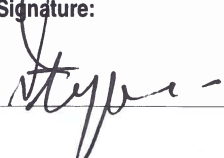
- 12.7.1 The NLC must ensure that generally accepted or best practice technical and organisational controls are in place to protect all personal information for which it is responsible.
- 12.7.2 Information security controls which support privacy, and the protection of personal information must be evaluated periodically to ensure that they are operating effectively and to identify areas for improvement.
- 12.7.3 All third parties providing services to the NLC and/or who have access to personal information must adhere to security safeguards which are aligned with those described in the NLC's Information Security Policy and related standards. These safeguards must be documented in the form of a written agreement. Any such agreements must allow NLC to reserve the right to review the information security practices and procedures of any third party at any time and make provision for changes or updates to any agreement between the NLC and such third parties.
- 12.7.4 If personal information is compromised, the prescribed notification and risk mitigation processes must be followed to inform the Information Regulator as well as any data subjects of any personal information which has been or is suspected to have been compromised.


12.8 Data Subject Participation

- 12.8.1 The NLC must ensure that data subjects are provided access to their personal information, as appropriate, so that they may correct or update it, or exercise any other rights that they may have under applicable information privacy or data protection laws.
- 12.8.2 The NLC must ensure that a data subject's identity has been suitably verified before allowing them to gain access to, correct or update any personal information related to them.

13. DISCIPLINARY ACTION

The Information Officer may recommend appropriate legal or disciplinary action to be taken against any employee found to be implicated in any non-compliant activity outlined within this policy and/or in the NLC's Disciplinary and Grievance Policy.

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14. DISPUTE RESOLUTION

Complaints and grievances shall be dealt with in terms of the approved NLC grievance procedures.

15. DEVIATION

The Board delegates the authority to consider written requests for deviations from this policy to the Commissioner. The Commissioner reports on deviations to the Board at the Quarterly meetings.

16. SANCTIONS

This policy shall be adhered to at all times and non-compliance or failure to adhere to its provisions shall result in disciplinary action being taken against the transgressor in accordance with the NLC Disciplinary Code and Procedures.

17. POLICY REVIEW

The Executive/ Head of Legal Services shall review this policy every three (3) years or when required to ensure its continued relevance, effectiveness and alignment to enabling legislation and regulations. The revised policy must be submitted to the NLC Board or appointed accounting authority appointed by the Minister or as and when required.

Date of next review: 16 February 2028

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