

# INTERNAL PRIVACY POLICY



## 1. Scope

This policy outlines Chapter policies with respect to the treatment of the personally identifiable information (PII)<sup>1</sup>, within the context of the South African Protection of Personal Information Act (4 of 2013), of the following individuals:

- Current and past website users and individuals who purchase materials;
- Members (both current and past);
- Event attendees, speakers, sponsors, survey respondents, and other participants in Chapter programs; and
- Non-member volunteers who participate on Chapter projects and/or volunteer groups.

This policy does not describe Chapter policies with respect to personally identifiable information of employees, consultants, contractors, vendors, licensees, sponsors, or advertisers.

This policy applies to handling of personally identifiable information stored in all forms (whether on paper, electronically – including on computer hard drives, CD ROMs, removable flash drives – or otherwise) by Chapter. It does not describe the treatment of information by legally independent entities that may work with Chapter, including ISACA International.

This policy is for internal use by Chapter directors, officers, volunteers, employees and by others (such as contractors, vendors, committee members, and the like) who have access in the course of their duties for Chapter to PII (as defined below) maintained by or on behalf of Chapter

## 2. Responsibility and Accountability

The Chapter Secretary is responsible for Chapter's privacy program, which responsibilities include maintenance and review of this policy, dissemination of this policy to Chapter members, volunteers, and employees, and oversight of the implementation and application of the policy within the Chapter's procedures, processes, and other policies.

## 3. Notice

Chapter provides notice about its policies and practices relating to personally identifiable information and identifies the purposes for which information is collected, used, stored shared, and secured. Chapter's notice program includes the following elements:

- When feasible (and/or legally required) Chapter provides notice to individuals before their personally identifiable information is collected.
- Chapter provides notice and obtains consent (as legally required) before information it maintains is used for a purpose that is either unrelated to the purpose for which the information was originally provided, or that is for a purpose that was not disclosed in the original notice to the individual.
- Chapter provides external notice about its privacy practices on its website. The notice describes how personally identifiable information is collected, used, stored, and shared, and secured.
- Chapter provides notice in its various printed information collection forms about how personally identifiable information will be used.

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<sup>1</sup> Defined to include any information that could be used to directly or indirectly identify an individual, such as name, email or home address, phone number, as well as information that is maintained in connection with individually identifiable information, like credit card numbers, demographic information, and the like.

- Chapter also provides notice in situations other than traditional online or offline information collection, such as when people are taking surveys or attending meetings, and instructs its employees about when notice must be provided.
- This Internal Privacy Policy is used to inform Chapter personnel (and others, such as volunteers, contractors, etc., who will access personally identifiable information maintained by Chapter and who have a responsibility to adhere to this policy) about Chapter’s responsibilities with respect to use of personally identifiable information, and is distributed to personnel along with the external privacy notice

#### **4. Collection**

Chapter currently collects the following types of personally identifiable information (for the purposes described in the “use” section of this policy): name and surname, contact details, employment details, national identification number, education information, payment information, and dietary requirements. Chapter collects information directly from individuals or through ISACA Headquarters. In the online environment, Chapter uses some common passive data collection mechanisms, including cookies.

Chapter uses fair and lawful means to collect information, collects information using methods that have been reviewed and approved by the chapter designee responsible for the Chapter privacy program, and analyzes third-party sources of personally identifiable information to determine if those third parties are reliable data providers.

It is Chapter’s policy not to develop or acquire additional information about those individuals whose personal information is covered by this policy, unless it has obtained consent from those individuals. Certain exceptions apply, including to build behavioral profiles or to obtain information to verify applicants for courses or certification

#### **5. Choice and Consent**

To the extent feasible – keeping in mind Chapter’s legal obligations, business goals and resources – Chapter gives individuals choice about how their information will be used. This choice includes, for example, seeking consent and/or providing clear notice about use of personally identifiable information. Chapter informs individuals what choices they have about how information will be used, stored, or shared with third parties.

#### **6. Use**

Chapter uses personally identifiable information it obtains for the following purposes:

- Those purposes described in Chapter’s external privacy policy, and as described at the time it collects information (for example in an online or offline form);
- To process individuals’ requests;
- For purposes that a reasonable individual would view as related to the purpose for which an individual provided information; and
- For other legitimate business purposes of Chapter that are permitted by applicable laws, rules and regulations, and/or that are in keeping with appropriate industry guidelines and practices.

## **7. Sharing**

Chapter respects the right to privacy and will not sell or share personal information with other institutions or companies to use for their own purposes. Chapter shares personally identifiable information with third parties only for legitimate business purposes and as permitted by applicable law, rules and regulations. Instances when Chapter may share information include

- To vendors or third-party to deliver or provide goods and services, including, for example, exam testing agencies and training providers and partners, product-fulfillment companies, or third-party event hosts;
- To the IT Governance Institute, ISACA Headquarters, and from time to time volunteers (such as ISACA board members) performing tasks on Chapter's behalf;
- To investigate potentially fraudulent or questionable activities;
- In anticipation of and in the course of an actual or potential sale, reorganization, consolidation, merger, or amalgamation of all or part of Chapter's business or operations;
- When responding to a request made under the Promotion of Access to Information (2 of 2000) of South Africa (which includes proactively notifying individuals affected by such requests); and
- When Chapter believes it is necessary to co-operate with law enforcement or in response to a government request.

Individuals are notified of Chapter's practices with respect to the sharing of information with third parties in Chapter's external privacy policy, accessible on the Chapter website.

When sharing information, Chapter limits the amount and type of information shared to that which the other party needs or that is relevant to the other party.

If Chapter shares personally identifiable information with a vendor or other third party providing services on Chapter's behalf, Chapter requires that the third party use the data as directed by Chapter and that it maintain the confidentiality and security of the data.

Chapter will take appropriate remedial actions if it becomes aware of any situation in which a third party misuses personally identifiable information.

## **8. Access**

Those who wish to access their information or have their information updated are directed in Chapter's external privacy policy to contact Chapter by email, regular mail, or phone. Such requests will be answered and addressed under the direction and supervision of chapter designee responsible for the Chapter privacy program.

## **9. Completeness and Accuracy**

Chapter relies on individuals to provide it with complete and accurate personally identifiable information, and in certain circumstances may require individuals to represent and warrant that the details they have provided are their own, are complete, and are accurate.

## **10. Retention and Disposal**

Chapter's current policy is to retain information for so long as it is needed by the business. Since most information is in continuous use, much is retained on an indefinite basis.

When Chapter finds that it has extensive information it is not using, it will determine appropriate means to dispose of personally identifiable information in a secure manner in keeping with its legal obligations

### 11. Review

This Procedure shall be reviewed annually.

### 12. Amendment History

Revision Number	Date	Author Name & Designation	Amendment comment
0.1	15 May 2019	Jerall Toi (Membership Coordinator)	Document Created
0.2	27 June 2019	Board	Approved

### 13. Approval

This policy document was approved by the ISACA SA Board of Directors on 27 June 2019.