



Guideline

This guideline is intended to apply to Telkom SA SOC Limited and its Group of Companies

Protection of Personal Information Act 4 of 2013

Compliance Framework Development and Implementation Plan

Version: 1

Compliance Framework and Implementation Plan

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DOCUMENT CONTROL INFORMATION

Document review and approvals		
Compiled by:	State the functional area (Group Finance), Section Name (Group Financial Control),	YYYY/MM/DD
	Name of Compiler and Signature	
Reviewed by:	Per the DOA, Policy Framework and approval matrix	YYYY/MM/DD
Approved by:	Per the DOA, Policy Framework and approval matrix	YYYY/MM/DD

Legal and Regulatory Service for Laws and Regulations impacting this document		
Reviewed by:	Legal Services	YYYY/MM/DD
Reviewed by:	Regulatory	YYYY/MM/DD

Quality Control						
Effective Date	This document comes into effect from	YYYY/MM/DD				
Type:	Group wide	Yes	√	No		
	Entity Specific - (Name of Entity)	Yes		No	√	
	Division Specific - (Name of Division)	Yes		No	√	
Risk Level	Procedure Review					
Level 1 – Group Wide	Every 3rd year or if there are any significant changes	Yes	√	No		
Level 2 – BU/Subsidiary	Every 3rd year or if there are any significant changes	Yes		No	√	
Level 3 – Operational	Every 3 rd year and no later than 5 years or if there are any significant changes	Yes		No	√	
Level 4 - Other	In terms of legislative or business requirements	Yes		No	√	
Saved by:	Group Financial Control	YYYY/MM/DD				

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1 PURPOSE AND OBJECTIVE

As a responsible, forward-looking business, Telkom SA SOC Limited and its group of companies (hereafter “Telkom” or “the Organisation”) recognises the need to comply with the Protection of Personal Information Act 4 of 2013 (POPIA) and ensure that effective measures are in place to protect personal information as guided by the POPIA.

The purpose of this Compliance Framework Development and Implementation Plan document is to recommend documents to be put into practice. The Organisation should aim to work towards a holistic and interrelated set of technical and organisational measures, to be understood and implemented in an integrated manner, and that can be evaluated and directed to ensure the rights to privacy of individuals in South Africa are protected.

2 APPLICABILITY AND SCOPE

The Compliance Framework and Implementation Plan document is applicable to documents identified in terms of the POPIA provisions. The content is guided by the POPIA Act as well as Regulations, published in December 2018, that expand on the duties of the Information Officer and provide that he/she is responsible for ensuring that a compliance framework is developed, implemented, monitored and maintained.

Extract from the POPIA

Provision 4: Lawful processing of personal information

4. (1) The conditions for the lawful processing of personal information by or for a responsible party are the following:

- (a) “Accountability”, as referred to in section 8;
- (b) “Processing limitation”, as referred to in sections 9 to 12;
- (c) “Purpose specification”, as referred to in sections 13 and 14;
- (d) “Further processing limitation”, as referred to in section 15;
- (e) “Information quality”, as referred to in section 16;
- (f) “Openness”, as referred to in sections 17 and 18;
- (g) “Security safeguards”, as referred to in sections 19 to 22; and
- (h) “Data subject participation”, as referred to in sections 23 to 25.

(2) The conditions, as referred to in subsection (1), are not applicable to the processing of personal information to the extent that such processing is—

- (a) excluded, in terms of section 6 or 7, from the operation of this Act; or
- (b) exempted in terms of section 37 or 38, from one or more of the conditions concerned in relation to such processing.

Provision 55: Duties and responsibilities of Information Officer

55. (1) An information officer’s responsibilities include—

- (a) the encouragement of compliance, by the body, with the **conditions for the lawful processing** of personal information;
- (b) dealing with **requests** made to the body pursuant to this Act;
- (c) working with the Regulator in relation to **investigations** conducted pursuant to Chapter 6 in relation to the body;
- (d) otherwise **ensuring compliance** by the body with the provisions of this Act; and

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(e) as may be prescribed.

2) Officers must take up their duties in terms of this Act only after the responsible party has registered them with the Regulator.

Extract from the POPIA Regulations

Provision 4: Responsibilities of Information Officers

4. (1) An information officer must, in addition to the responsibilities referred to in section 55(1) of the Act, ensure that-

(a) a **compliance framework** is developed, implemented, monitored and maintained;

(b) a **personal information impact assessment** is done to ensure that adequate measures and standards exist in order to comply with the conditions for the lawful processing of personal information;

(c) a **manual** is developed, monitored, maintained and made available as prescribed in sections 14 and 51 of the Promotion of Access to Information Act, 2000 (Act No. 2 of 2000);

(d) **internal measures** are developed together with adequate systems to **process requests** for information or access thereto; and

(e) internal **awareness sessions** are conducted regarding the provisions of the Act, regulations made in terms of the Act, codes of conduct, or information obtained from the Regulator.

(2) The information officer shall upon request by any person, provide copies of the manual to that person upon the payment of a fee to be determined by the Regulator from time to time.

3 DOCUMENTS FOR POPIA COMPLIANCE FRAMEWORK AND IMPLEMENTATION PLAN

Various documents to support management in implementing the framework and plan were developed as guidelines to support management. Refer to Annexure B for an extensive list of documents that would support the Organisation further in addressing the POPIA requirements, which may be incorporated in other existing internal documents.

4 CONTACT DETAILS

Telkom has designated the undermentioned as our Information Officer/Deputy Information Officers with the responsibility to maintain our compliance with the POPI Act.

If you have any questions about our POPIA compliance framework, please contact us by email at popi@telkom.co.za

Contact details	
Information Officer	Sipho Maseko
Deputy Information Officers	Serame Taukobong, Consumer Althon Beukes, Openserve Lunga Siyo, Telkom Business Dirk Reyneke, Group Finance Melody Lekota, Group Human Resources
E-Mail Address	popi@telkom.co.za paia@telkom.co.za

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Contact details

Physical Address	The Information Officer 61 Oak Avenue Highveld, Technopark Centurion 0157
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Postal address Private Bag X881
Pretoria
0001

Information Regulator

You have the right to lodge a complaint with the Information Regulator in writing as per their website <https://www.justice.gov.za/infoereg/contact.html> to:

E-mail **Complaints** email: complaints.IR@justice.gov.za
General enquiries email: inforeg@justice.gov.za

Physical address	House 27 Stiemens Street Braamfontein Johannesburg 2001
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Postal address PO Box 31533
Braamfontein
Johannesburg
2107

5 ENFORCEMENT AND VIOLATION

Compliance to this guideline will be monitored on a regular basis and the results reviewed by designated forums. Any breach will be treated as a serious disciplinary offence and may be subject to disciplinary in accordance with the provisions of the relevant Group HR policy.

6 DEFINITIONS, ABBREVIATIONS AND ACRONYMS

For definitions, acronyms and abbreviations refer to Annexure A of this document.

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7 ANNEXURE A: DEFINITIONS, ACRONYMS, REFERENCE DOCUMENTS, LAWS & REGULATIONS

7.1 Definitions

Definitions	Description
Information Regulator	The Information Regulator (South Africa) is an independent body established in terms of section 39 of the Protection of Personal Information Act 4 of 2013. It is subject only to the law and the Constitution and it is accountable to the National Assembly.
Information Officer	POPIA Section 1 the Information Officer: "Of, or in relation to, a: (a) public body means an information officer or deputy information officer as contemplated in terms of section 1 or 17; or (b) private body means the head of a private body as contemplated in section 1, of the Promotion of Access to Information Act."
Deputy Information Officer	POPIA Section 56 states: "Designation and delegation of deputy information officers: Each public and private body must make provision, in the manner prescribed in section 17 of the Promotion of Access to Information Act, with the necessary changes, for the designation of: (a) such a number of persons, if any, as deputy information officers as is necessary to perform the duties and responsibilities as set out in section 55(1) of this Act; and (b) any power or duty conferred or imposed on an information officer by this Act to a deputy information officer of that public or private body."
Organisation	Telkom SA SOC Limited (group of companies, including all business units and subsidiaries)
Responsible party	POPIA Section 1 defines the role as follows: "'responsible party' means a public or private body or any other person which, alone or in conjunction with others, determines the purpose of and means for processing personal information".

7.2 Acronyms

Acronyms and Abbreviations	Description
POPIA	Protection of Personal Information Act 4 of 2013
PAIA	Promotion of Access to Information Act 2 of 2000
Telkom	Telkom SA SOC Limited (including business units and subsidiaries)

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Acronyms and Abbreviations	Description
e.g.	Example

7.3 Reference Documents

I. POPIA Compliance Framework

7.4 Laws and Regulations

- I. Protection of Personal Information Act 4 of 2013
- II. GNR.1383 of 14 December 2018, Information Regulator: Regulations relating to the protection of personal information
- III. Promotion of Access to Information Act 2 of 2000
- IV. GNR.1244 of 22 September 2003 (which amended GNR.187 of 15 February 2002): Regulation of the Promotion of Access to Information Act 2 of 2000
- V. GNR.1284 of 4 October 2019, Rules of Procedure for Application to the court in terms of the Promotion of Access to Information Act 2 of 2000.
- VI. All other laws, regulations, codes and standards relevant to Telkom.

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8 ANNEXURE B: DETAIL POPIA COMPLIANCE FRAMEWORK AND IMPLEMENTATION PLAN

The generic POPIA compliance framework below, contains a list of both recommended and mandatory documents an entity should consider developing. POPIA requires a process approach for establishing, developing, implementing, evaluating, maintaining and improving an effective and responsive compliance framework within the organisation. Every organisation needs to identify and manage many activities related to the processing of personal information in order to function effectively, therefore a process approach is adopted to understand and accurately assess the impact of the processing of personal information on the affected data subjects.

POPIA Compliance Implementation Project Plan

Objective: Create a POPIA Compliance Implementation Project Plan

NOTE: All categories and activities are approximations and will depend on the specifics of your project. If appointed and registered, the Information Officer may take the role of Project leader.

Critical Activities Completion	Number	Completed	WIP	%
Total Activities				100%
Mandatory documents				
Recommended documents				
Optional documents				
Completed Activities				
Partial Completed Activities				

Standard Activities Completion	Number	Completed	WIP	%
Total Activities				100%
Mandatory documents				
Recommended documents				
Optional documents				
Completed Activities				
Partial Completed Activities				

Detail POPIA Compliance Framework Example

#	Activity	Template	Main POPIA Reference	Type	Responsible Person or Section	Start Date	Date Activity Completed	Date Approved	Notes
_ Compliance Statement									
000.0	Create _Compliance Statement	_Compliance Statement		Optional					Incorporated in Privacy Statement

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Detail POPIA Compliance Framework Example									
#	Activity	Template	Main POPIA Reference	Type	Responsible Person or Section	Start Date	Date Activity Completed	Date Approved	Notes
0 – Documentation Management									
0.0	Create Summary 0 – Documentation Management	00.0_Summary Category 0_00_Documentation Management		Optional					
0.1	Create POPIA Compliance Framework	00.1_POPIA Compliance Framework	POPIA: Section 8 & 109(3)(g) Regulations: R. 4(1)(a)	Mandatory	Information Officer				Guideline drafted. [Corporate Compliance drafted guideline. Units to adapt to their needs.]
0.2	Create a Document Retention and Destruction Policy	00.2_Document Retention and Destruction Guide	POPIA: Section 14 & 109(3)(g)	Mandatory	Archivist Information Security				Guideline drafted.
0.3	Create a Personal Information Assets Information Classification Matrix and Handling Guide	00.3_Personal Information Assets Information Classification Matrix and Handling Guide	POPIA: Section 109(3)(g)	Recommended	All sections				Guideline drafted.
0.4	Create an Archiving of Records Register [To keep record of documents in archive]	00.4_Archiving of Records Register	POPIA: Section 14 & 109(3)(g)	Mandatory	Archivist Information Security				Guideline drafted.
0.5	Create a Record Disposal Certificate [To keep record of disposed documents]	00.5_Record Disposal Certificate	POPIA: Section 14 & 109(3)(g)	Recommended	Archivist Information Security				Guideline drafted.
0.6	Create a Records Disposal Register [To keep record of disposed documents]	00.6_Records Disposal Register	POPIA: Section 14 & 109(3)(g)	Recommended	Archivist Information Security				Guideline drafted.
0.7	Develop & Implement a Register of Processing Documentation	00.7_Section 17 Register of Processing Documentation	POPIA: Section 8 & 17 Regulations:	Mandatory	All sections				Guideline drafted.
1 – Preparation for the Project									
01.0	Create Summary 1 – Preparation for the Project	01.0_Summary Category 01.0 – Preparation for the Project		Optional					
1.2	Develop a POPIA Personal Information Impact	01.2_POPIA Personal Information Impact Assessment	POPIA: Section 8, 19 & 109(3)(g) Regulations: R. 4(1)(d)	Mandatory	Information Officer All Sections				Guideline drafted.

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Detail POPIA Compliance Framework Example									
#	Activity	Template	Main POPIA Reference	Type	Responsible Person or Section	Start Date	Date Activity Completed	Date Approved	Notes
	Assessment and do an Assessment								
1.3	Develop a Privacy Audit Checklist in support of the PIIA	01.3_Privacy Audit Checklist		Optional	All Sections				Guideline drafted.
1.4	Draw up an executive letter from the head of the Organisation to show to the staff, outside contractors that the top management support the implementation of a POPI Compliance Management Framework for the Organisation	01.4_POPIA Executive Support Letter	POPIA: Section 8 Regulations: R. 4(1)(e)	Mandatory	Information Officer				Guideline drafted.
1.5	Draw up a cover letter for Staff Members Knowledge Questionnaire	01.5_Project Cover letter for Staff Members Knowledge Questionnaire	POPIA: Section 8 Regulations: R. 4(1)(e)	Mandatory	Information Officer Human Resources				Guideline drafted.
1.6	Develop a start questionnaire to determine staff members knowledge	01.6_Project Start Questionnaire Staff Members Knowledge	POPIA: Section 8 Regulations: R. 4(1)(e)	Recommended	Human Resources				Guideline drafted.
1.7	Draw up a cover letter for Leadership Knowledge Questionnaire	01.7_Project Cover letter for Leadership Knowledge Questionnaire	POPIA: Section 8 Regulations: R. 4(1)(e)	Recommended	Human Resources				Guideline drafted.
1.8	Develop a start questionnaire to determine leadership knowledge	01.8_Project Start Questionnaire Leadership Knowledge Questions	POPIA: Section 8 Regulations: R. 4(1)(e)	Recommended	Human Resources				Guideline drafted.
1.9	Develop a checklist to determining the data protection designation of the organisation	01.9_Determining the Data Protection Designation of the Organisation	POPIA: Section 1	Recommended	All Sections				Guideline drafted.
1.11	Develop a POPIA Compliance Framework Development & Implementation Plan to guide the journey towards compliance	01.11_POPIA Compliance Framework Development & Implementation Plan		Recommended	All Sections				Guideline drafted.
12.1.2_Checklist_Staff Awareness Training									
12.2.2_Guideline Are you a Responsible Party or an Operator									

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Detail POPIA Compliance Framework Example									
#	Activity	Template	Main POPIA Reference	Type	Responsible Person or Section	Start Date	Date Activity Completed	Date Approved	Notes
3 – 02_Implement & Maintain Governance & Leadership Structure									
02.	Create Summary Implement & Maintain Governance & Leadership Structure	02_Implement & Maintain Governance & Leadership Structure							
2.1	Develop and implement a Personal Information Protection Policy	02.1_Protection of Personal Information Policy	POPIA: Section 8 & 109(3)(g) Regulations: R. 4(1)(d)	Mandatory	Information Officer				On Policies and Procedures portal
2.2	Draw up an appointment letter for the Information Officer	02.2_Appointment Letter Information Officer	POPIA: Section 55(1), 55(2) PAIA: Section 17, 90(1), 90(2), 90(3) & 77K POPIA Regulations: R. 4	Mandatory	Information Officer				Guideline drafted.
2.3	Draw up a letter for the Authorisation of an Information Officer	02.3_Authorisation Letter Information Officer	POPIA: Section 55(1), 55(2) PAIA: Section 17, 90(1), 90(2), 90(3) & 77K POPIA Regulations: R. 4	Optional	Information Officer				Incorporated in 02.2_Notification Letter Information Officer
2.4	Draw up an appointment letter for the Deputy Information Officer	02.4_Designation Letter Deputy Information Officer	POPIA: Section 55(1), 55(2) PAIA: Section 17, 90(1), 90(2), 90(3) & 77K POPIA Regulations: R. 4	Optional	Information Officer				Incorporated in 02.2_Notification Letter Information Officer
2.5	Develop, draw up and get signed an addendum to employee's current service agreements	02.5_Access and Confidentiality Agreement with Employees	POPIA: Section 5 Regulations:	Mandatory	Information Officer				Guideline drafted.
2.6	Develop Letter to Employees Privacy Notification	02.6_Letter to Employees Privacy Notification	POPIA: Section 18	Recommended	Human Resources				Guideline drafted.
2.7	Develop POPIA Section 18 Privacy Notification - Employees	02.7_POPIA Section 18 Privacy Notification – Employees	POPIA: Section 18	Recommended	Human Resources				Guideline drafted.
12.1.4_Checklist Section 17 - Documentation of processing operations									
12.2.4_Guideline Documentation Processing Operations									
4 - 03_Data Subject Rights									
03.0	03.0_Summary 03_Data Subject Rights Policies & Procedure			Optional					

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Detail POPIA Compliance Framework Example									
#	Activity	Template	Main POPIA Reference	Type	Responsible Person or Section	Start Date	Date Activity Completed	Date Approved	Notes
3.1	Create Procedure for Handling of Individual Rights	03.1_Procedure for Handling of Individual Rights	POPIA: Section 5 & 109(3)(g) Regulations: Regulations 4(1)(d)	Mandatory	Information Officer All Sections				Guideline drafted.
3.2	Create Consent for Processing of Personal Information	03.2_Consent to Process Personal Information Policy	POPIA: Section 14(7) Regulations: Regulations 4(1)(d)	Mandatory	Information Officer All Sections				Guideline drafted.
3.3	Develop & implement privacy notification for customers	03.3_POPI Section 18 Privacy Notification - Customers	POPIA: Section 18	Mandatory	Information Officer All Sections				Guideline drafted.
3.4	Create Privacy Statement	03.4_Privacy Statement	POPIA: Section 18	Optional					Available on Website
3.6	Create Data Subject Request Register	03.6_Data Subject Request Register	POPIA: Section 14(7) Regulations: 4(1)(d)	Recommended	All Sections				Guideline drafted.
3.7	Create Forms and Procedure for Objection to the Processing of Personal Information	03.7_Form 1 Objection to the Processing of Personal Information	POPIA: Section 11(3) Regulations: 2	Mandatory	Information Officer All Sections				Guideline drafted.
3.8	Create Forms and Procedure Request for Correction or Deletion of Personal Information or Destroying or Deletion of Record of Personal Information	03.8_Form 2 Request for Correction or Deletion of Personal Information or Destroying or Deletion of Record of Personal Information	POPIA: Section 24(1) Regulations: 3	Mandatory	Information Officer All Sections				Guideline drafted.
3.9	Create Forms and Procedure Request for Access to Record of Private Body	03.9_Form C Request for Access to Record of Private Body	PAIA: Section 51(1)(b)(iv) & 51(1)(e) Regulations: 10	Mandatory	Information Officer Legal Services All Sections				Guideline drafted. POPIA & PAIA Manual on Website
3.10	Create Forms & Procedures for Withdrawal of Consent	03.10_Withdrawal of Consent	POPIA: Section 11(2)(b))	Recommended	All Sections				Guideline drafted.
12.1.5_Checklist Data Subject Rights Forms & Procedures									
12.2.5_Guideline Data Subject Rights									
04_Implement & Maintain Personal Information Inventory									
04.1	Read How to find computer hardware	04.1_How to find computer hardware		Recommended					
04.2	Create & Maintain Personal Information Assets Hardware	04.2_Personal Information Assets Hardware	POPIA: Section 8 & 109(3)(g) Regulations: R. 4(1)(d)	Recommended	Information Security				

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Detail POPIA Compliance Framework Example									
#	Activity	Template	Main POPIA Reference	Type	Responsible Person or Section	Start Date	Date Activity Completed	Date Approved	Notes
04.3	Create & Maintain Personal Information Assets Shared Databases	04.3_Personal Information Assets Shared Databases	POPIA: Section 8 & 109(3)(g) Regulations: R. 4(1)(d)	Recommended	Information Security				
04.4	Create & Maintain Personal Information Assets Operating Systems and Software	04.4_Personal Information Assets Operating Systems and Software	POPIA: Section 8 & 109(3)(g) Regulations: R. 4(1)(d)	Recommended	Information Security				
04.1_How to find computer hardware									
05_Create & Maintain Policies & Procedures									
05.0	05.0_Summary Create & Maintain Policies & Procedures			Optional					
5.1	Create & Implement Information Quality Policy	05.1_Information Quality Policy	POPIA: Section 8 & 109(3)(g) Regulations: R. 4(1)(d)	Recommended	Information Security				
5.2	Create & Implement Minimum Access Policy	05.2_Minimun Access Policy	POPIA: Section 8 & 109(3)(g) Regulations: R. 4(1)(d)	Recommended	Information Security				
5.3	Create & Implement Password Management Policy	05.3_Password Management Policy	POPIA: Section 8 & 109(3)(g) Regulations: R. 4(1)(d)	Recommended	Information Security				
5.4	Create & Implement Acceptable Use Policy of Computer Equipment	05.4_Acceptable Use Policy of Computer Equipment	POPIA: Section 8 & 109(3)(g) Regulations: R. 4(1)(d)	Recommended	Information Security				On Policies and Procedures portal
5.5	Create & Implement Social Media Policy	05.5_Social Media Policy	POPIA: Section 8 & 109(3)(g) Regulations: R. 4(1)(d)	Recommended	Group Communication				
5.6	Create & Implement Bring your Own Device Policy	05.6_Bring your Own Device Policy	POPIA: Section 8 & 109(3)(g) Regulations: R. 4(1)(d)	Recommended	Information Security				On Policies and Procedures portal
5.7	Create & Implement Clear Desk and Clear Screen Policy	05.7_Clear Desk and Clear Screen Policy	POPIA: Section 8 & 109(3)(g) Regulations: R. 4(1)(d)	Recommended	Information Security Human Resources				
5.8	Create & Implement Shred-it All Policy	05.8_Shred-it All Policy	POPIA: Section 8 & 109(3)(g) Regulations: R. 4(1)(d)	Recommended	Archivist Information Security				Guideline drafted.
5.10	Create & Implement Removable Media Policy	05.10_Removable Media Policy	POPIA: Section 8 & 109(3)(g)	Recommended	Information Security				

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Detail POPIA Compliance Framework Example									
#	Activity	Template	Main POPIA Reference	Type	Responsible Person or Section	Start Date	Date Activity Completed	Date Approved	Notes
			Regulations: R. 4(1)(d)						
5.11	Create & Implement Remote Working Policy	05.11_Remote Working Policy	POPIA: Section 8 & 109(3)(g) Regulations: R. 4(1)(d)	Recommended	Human Resources				
5.12	Create & Implement IT Equipment Disposal Policy	05.12_IT Equipment Disposal Policy	POPIA: Section 8 & 109(3)(g) Regulations: R. 4(1)(d)	Recommended	Information Security				
12.2.1_Guideline Cybersecurity Practices for Small Organisations									
06_Implement & Maintain Training & Awareness Program									
06.0	06.0_Summary Implement & Maintain Training & Awareness Program			Optional					
6.0	Develop POPIA Training	06.0 POPI Act Fundamentals Course	POPIA: Section 8 Regulations: R. 4(1)(e)	Recommended	Human Resources				Corporate Compliance drafted Telkom POPI Act Fundamentals Course Content
06.1	Employee Training Log	06.1_Employee Training Log	POPIA: Section 8 Regulations: R. 4(1)(e)	Recommended	Human Resources				
06.2	Employee Training Programme	06.2_Employee Training Programme	POPIA: Section 8 Regulations: R. 4(1)(e)	Recommended	Information Officer Human Resources				
06.3	Awareness Poster - Email Phishing	Awareness Poster - Email Phishing	POPIA: Section 8 Regulations: R. 4(1)(e)	Recommended					
06.4	Awareness Poster - Insider, Accidental or Intentional Data Loss	Awareness Poster - Insider, Accidental or Intentional Data Loss	POPIA: Section 8 Regulations: R. 4(1)(e)	Recommended					
06.5	Awareness Poster - Loss or Theft of Equipment and Data	Awareness Poster - Loss or Theft of Equipment and Data	POPIA: Section 8 Regulations: R. 4(1)(e)	Recommended					
06.6	Awareness Poster - Make secure choices	Awareness Poster - Make secure choices	POPIA: Section 8 Regulations: R. 4(1)(e)	Recommended					
06.7	Awareness Poster - What is my responsibility regarding e-mail security	Awareness Poster - What is my responsibility regarding e-mail security	POPIA: Section 8 Regulations: R. 4(1)(e)	Recommended					
06.8	Awareness Poster - What is my responsibility regarding passwords	Awareness Poster - What is my	POPIA: Section 8 Regulations: R. 4(1)(e)	Recommended					

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Detail POPIA Compliance Framework Example									
#	Activity	Template	Main POPIA Reference	Type	Responsible Person or Section	Start Date	Date Activity Completed	Date Approved	Notes
		responsibility regarding passwords							
06.10	Awareness Poster - What is our client's (data subject) rights	Awareness Poster - What is our client's (data subject) rights	POPIA: Section 8 Regulations: R. 4(1)(e)	Recommended					
06.11	Awareness Poster - What is our legal basis for processing personal information	Awareness Poster - What is our legal basis for processing personal information	POPIA: Section 8 Regulations: R. 4(1)(e)	Recommended					
06.12	Awareness Poster - What is Personal Information	Awareness Poster - What is Personal Information	POPIA: Section 8 Regulations: R. 4(1)(e)	Recommended					
06.13	Awareness Poster - What to do when Using a Mobile Device	Awareness Poster - What to do when Using a Mobile Device	POPIA: Section 8 Regulations: R. 4(1)(e)	Recommended					
06.14	POPI Act Compliance Awareness Poster	POPI Act Compliance Awareness Poster	POPIA: Section 8 Regulations: R. 4(1)(e)	Recommended					
06.15	POPI Awareness1_An Overview Leadership	POPI Awareness1_An Overview Leadership	POPIA: Section 8 Regulations: R. 4(1)(e)	Recommended					
06.16	POPI Awareness2_An Overview All Staff	POPI Awareness2_An Overview All Staff	POPIA: Section 8 Regulations: R. 4(1)(e)	Recommended					
06.17	POPI Awareness3_Mobile Devices All Staff	POPI Awareness3_Mobile Devices All Staff	POPIA: Section 8 Regulations: R. 4(1)(e)	Recommended					
06.18	POPI Awareness3_Mobile Devices All Staff	POPI Awareness4_Security Measures in the Context of POPI - Leadership	POPIA: Section 8 Regulations: R. 4(1)(e)	Recommended					
06.19	POPI Awareness5_Collection of Personal Information in the Context of POPI - All Staff	POPI Awareness5_Collection of Personal Information in the Context of POPI - All Staff	POPIA: Section 8 Regulations: R. 4(1)(e)	Recommended					
06.20	POPI Awareness6_Data Subject Rights - All Staff	POPI Awareness6_Data Subject Rights - All Staff	POPIA: Section 8 Regulations: R. 4(1)(e)	Recommended					
06.21	POPI Awareness7_Electronic Communications - All Staff	POPI Awareness7_Electronic Communications - All Staff	POPIA: Section 8 Regulations: R. 4(1)(e)	Recommended					

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Detail POPIA Compliance Framework Example									
#	Activity	Template	Main POPIA Reference	Type	Responsible Person or Section	Start Date	Date Activity Completed	Date Approved	Notes
12.1.2_Checklist_Staff Awareness Training									
07_Manage Information Security Risk during Communication & Transmission									
07.0	07.0_Summary Manage Information Security Risk during Communication and Transmission			Optional					
7.2	Create & implement Consent to Use Electronic Communication	07.2_Consent to Use Electronic Communication	POPIA: Section 8 & 109(3)(g) Regulations: R. 4(1)(d)	Recommended					
7.3	Create & implement Fax Cover Letter Confidentiality Notice and Disclaimer	07.3_Fax Cover Letter Confidentiality Notice and Disclaimer	POPIA: Section 8 & 109(3)(g) Regulations: R. 4(1)(d)	Recommended					
7.4	Create & implement Disclaimer Clauses for all Electronic Communications	07.4_Disclaimer Clauses for all Electronic Communications	POPIA: Section 8 & 109(3)(g) Regulations: R. 4(1)(d)	Recommended					
12.2.1_Guideline Cybersecurity Practices for Small Health Care Organisations									
08_Third Party - Operator - Compliance Management									
08.0	08.0_Summary Managing Third Party Compliance			Optional					
8.1	Create and maintain an Approved Vendors/Operator's list	08.1_Approved Vendors/Operators	POPIA: Section 20, 21 & 22 Regulations: R. 4(1)(d)	Recommended					Guideline drafted.
8.2	Create and prepare a Cover Letter to send with Operator POPI Compliance Questionnaire	08.2_Cover Letter Operator POPI Compliance Questionnaire	POPIA: Section 20, 21 & 22 Regulations: R. 4(1)(d)	Recommended					Guideline drafted.
8.3	Create and prepare an Operator POPI Compliance Questionnaire	08.3_Operator POPI Compliance Questionnaire	POPIA: Section 20, 21 & 22 Regulations: R. 4(1)(d)	Mandated	Information Officer				Guideline drafted.
8.4	Check all third-party service provider agreements and if necessary, implement this 08.5_ Data Protection Agreement for Operators	08.4_Confidentiality provisions for Operator Agreements	POPIA: Section 20, 21 & 22 Regulations: R. 4(1)(d)	Mandated	Information Officer				Guideline drafted.

Compliance Framework and Implementation Plan

Detail POPIA Compliance Framework Example									
#	Activity	Template	Main POPIA Reference	Type	Responsible Person or Section	Start Date	Date Activity Completed	Date Approved	Notes
8.5	Implement 08.5_Data Protection Agreement for Operators	08.5_Data Protection Agreement for Operators	POPIA: Section 20, 21 & 22 Regulations: R. 4(1)(d)	Mandated	Information Officer				Guideline drafted.
12.2.3_Guideline Understanding whether you are Processing Personal Information									
09_Managing Direct Marketing									
9.1	Create and maintain Application for the Consent of a Data Subject for the Processing of Personal Information	09.1_Application for the Consent of a Data Subject for the Processing of Personal Information	POPIA: Section 69(2) Regulations: Regulation 6	Mandatory for direct marketing	Information Officer				Guideline drafted.
12.2.3_Guideline Understanding whether you are Processing Personal Information									
10_Implement & Maintain Security Incident Procedures									
10.0	10.0_Summary Implement & Maintain Security Incident Procedures			Optional					
10.1	Create and maintain Data Breach Policy Security Compromise Policy	10.1_Data Breach Policy Security Compromise Policy	POPIA: Section 8 Regulations: R. 4(1)(e)	Mandatory	Information Security				Guideline drafted.
10.2	Create and prepare 10.2_Data Breach Security Compromise Report Form	10.2_Data Breach Security Compromise Report Form	POPIA: Section 8 Regulations: R. 4(1)(e)	Mandatory	Information Security				Guideline drafted.
10.5	Develop Personal Information (PI) Security Breach Register	10.5_Personal Information Security Breach Register	POPIA: Section 8 Regulations: R. 4(1)(e)	Mandatory	Information Security				Guideline drafted.
10.6	Develop Breach Procedure	10.6_Telkom Information Security Incident Management Procedure	POPIA: Section 8 Regulations: R. 4(1)(e)	Mandatory	Information Security				On Policies and Procedures portal
11_Implement & Maintain									
11.1	Information Regulator	11.1_List of Information Regulator documents		Mandatory	Compliance functions				Completed
11.2	Legislation	11.2_Legislation		Mandatory	Compliance functions				Completed

Compliance Framework and Implementation Plan

Detail POPIA Compliance Framework Example									
#	Activity	Template	Main POPIA Reference	Type	Responsible Person or Section	Start Date	Date Activity Completed	Date Approved	Notes
11.3	Regulations	11.3_Regulations		Mandatory	Compliance functions				Completed
12_Implement & Maintain Guides and Checklists									
12.1	Guides and Checklists	12.1T Information Regulator document list		Optional					Guideline drafted.
12.2	Develop POPIA implementation questionnaire	12.2_Questionnaire for POPIA Implementation		Recommended	All Sections				Guideline drafted.
12.3	Develop simplified POPIA guide	12.3_Simplified POPIA Guide - Employees		Recommended	Human Resources				Guideline drafted.
12.4	Maintain an IO and DIO record	12.4_Telkom Information & Deputy Information Officers 2021		Recommended	Compliance functions				Guideline drafted.

9 ANNEXURE C: APPROVALS



Sample - review
and approvals