



THE MOOIKLOOF OWNERS' ASSOCIATION NPC
POPIA COMPLIANCE IMPLEMENTATION STRATEGY

1 INTRODUCTION

- 1.1 The Mooikloof Owners' Association NPC ("The MOA" / "The Company") places a high premium on the privacy and personal information of our members, visitors, employees, customers, affiliates, service providers and any other third-parties with whom we engage or contract. As such, we have recognised the importance of deploying a comprehensive data protection compliance program to ensure that our day to day activities comply with the Protection of Personal Information Act, 2013 ("POPIA") and other potentially applicable data protection and privacy laws. We seek to process the personal information of any third parties in a responsible and lawful manner and are also taking appropriate steps to ensure that our service providers and suppliers do the same.
- 1.1 The purpose of this notice is to inform our members and stakeholders of the proactive steps the Company is taking to comply with POPIA and prevailing data protection and privacy laws, as well as to create appropriate awareness for the steps which we will be taking in future. A key aspect which we want to bring to your attention, is our privacy notice, which we attach to this circular, for your kind consideration.

2 BACKGROUND & OBJECTIVES OF THE COMPLIANCE PROGRAM

- 2.1 In anticipation of the full enforcement of POPIA in South Africa, we initiated a legal data protection and privacy compliance project with the following objectives:
- 2.1.1 Evaluating our data processing infrastructure and identify areas of risk in relation to compliance with prevailing data protection and privacy laws, such as POPIA.
 - 2.1.2 Deployment of an internal training and awareness program to lay a proper foundation for the implementation of a standardised compliance framework.
 - 2.1.3 Implementation of practical legal measures and documentation with the following objectives:
 - 2.1.3.1 To give effect to the responsibilities and duties of our Information Officer.
 - 2.1.3.2 Creation and implementation of a compliance policy framework which categorises acceptable policy standards and operational processes to ensure that we always endeavour to process personal information and data in general in compliance with the provisions of POPIA and prevailing data protection and privacy laws.
 - 2.1.3.3 To establish an internal culture of data protection and privacy compliance, hold our employees, suppliers and service providers accountable, and ultimately manage our compliance risks effectively.

3 **IMPORTANCE OF THE PROGRAM**

- 3.1 Compliance with prevailing data protection and privacy laws pose significant operational challenges. We have recognised the challenges associated with implementing appropriate compliance strategies, without making everyone's lives unnecessarily difficult. To this end, we are developing a compliance framework which will:
- 3.1.1 Enable us, as the MOA, to comply with the conditions for the lawful processing of personal information as set forth in terms of POPIA.
 - 3.1.2 Allow the establishment of clear, standardised processing principles and businesses processes within which to foresee, identify and deal with information security and data processing risks.
 - 3.1.3 Enables the MOA to stay operational and mitigate our risks in the event of an incident occurring.
 - 3.1.4 Identify the obligations imposed upon us as a responsible party, and which will hold our employees, suppliers and service providers accountable.
 - 3.1.5 Foster a culture of data protection and information security compliance.

4 **PRACTICAL STEPS AND IMPLEMENTATION STRATEGY**

- 4.1 To give credence to our compliance efforts, we are executing short term, medium term, and long term objectives and will be ensuring that we are implementing the following:

Awareness and Training	The MOA has started executing its broader obligations and responsibilities in terms of POPIA and has postponed the appointment of its Information Officer and Deputy Information Officer until such time it is necessary. One (1) of the most important of these responsibilities is facilitating ongoing internal awareness and training. The MOA will be deploying various training interventions throughout the course of the coming months, which will take the form of interactive workshops and online training courses.
Privacy Policy Framework	The MOA takes the privacy of data subjects, specifically our members, very seriously and have developed a privacy policy framework addressing the manner in which the company may process personal information and data in general. Our privacy policy framework will provide for the manner and purposes for which we may process personal information and will establish clear protocols and standards for the processing of personal information and data. We need to make sure that all third parties are aware of how and for what purposes we process personal information and data.

A PAIA Manual	The MOA accepts that the Promotion of Access to Information Act, 2000 (PAIA) is just as important as POPIA and as such, we have developed a comprehensive PAIA Manual framework in terms of Section 51 of PAIA. This Manual clearly sets out the process through which any data subject can engage with us to request access to information. This Manual will be published on our website.
Terms and Conditions	Any data subject who engages with the MOA should be fully aware that such engagement is subject to certain terms and conditions. These terms and conditions must clearly set forth the types of personal information we process and the manner in which we process it.
Information Notices and Consent Forms	In accordance with Sections 11 and 18 of POPIA, the MOA must establish a lawful justification for the processing of personal information, and we must use our best endeavours to always inform data subjects of any occasion whereby which they provide us with their personal information, as well as the purpose for which we would be processing such information. We may also need to get their consent to process their information (consent is not always necessary and it should be a last resort)
Data Sharing Protocols (SOP's)	To ensure that the MOA implement the provisions of POPIA which deal with the sharing of personal information effectively, we need to ensure that everyone is made aware of clear, standardised business processes and procedures which must be followed in respect of the sharing of personal information with third parties. In this regard, we will be deploying various standard operating procedures (SOP's) which are to be applied when sharing data with third parties.
Technical Information Security Policy Framework and Protocols (SOP's)	It is important for you to know that the best legal and operational policies won't protect our systems if those policies, and the procedures which flow from them, are not implemented effectively and adhered to. Therefore, the MOA is also deploying a tailored network firewall to protect the information that is stored digitally on the MOA server with the backs up of all the information being uploaded to the Cloud.

5 CLOSING NOTE

5.1 We reiterate that we are required to take the privacy and information security of anyone whose personal



information and data we process very seriously. Therefore, we want to make sure that you are aware of the fact that we are committed to maintaining a comprehensive compliance framework in the administration of our beautiful estate.

Yours Faithfully,

Motlatsi Nzeku
Chairman