



the gpaa

Department:  
Government Pensions Administration Agency  
**REPUBLIC OF SOUTH AFRICA**

## **PRIVACY POLICY**

### **1. PURPOSE**

The purpose of this Privacy Policy is to establish the requirements and conditions for the collection, distribution and retention of personal information. Government Pensions Administration Agency (“GPAA”) would like you to know what we do with your personal information.

This Privacy Policy governs the manner in which the GPAA treats personal information that it collects manually and electronically.

The GPAA respects your privacy and personal information. The GPAA takes all reasonable measures, in accordance with the Protection of Personal Information Act, to protect your personal information and to keep it strictly confidential. GPAA is committed to protecting the integrity, confidentiality and privacy of the personal information you submit.

### **2. DEFINITIONS**

For the purposes of this privacy policy and as per the definitions provided in terms of the Protection of Personal Information Act, the terms in this Privacy Policy shall mean the following:

Third party	An operator is a person who processes personal information for a responsible party in terms of a contract or mandate.
Consent	Any voluntary, specific and informed expression of will in terms of which permission is given for the processing of personal information.

Personal information	Information related to an identifiable, living, natural person and, where applicable, an identifiable, existing juristic person. This information can include, but is not limited to names; surname; contact details; physical and postal addresses; date of birth; identification number; passport number; tax number; tax related information; nationality; gender; age; disability; well-being; marital and pregnancy status; race ;bank account details; biometric information; health information; confidential correspondence; Information relating to children; education and employment history.
Processing	Any activity, automated or manual, concerning personal information. Such activity may include, but is not limited to, collection, receipt, recording, organisation, storage, collation, retrieval, alteration, updating, distribution, dissemination by means of transmission, erasure or destruction of personal information.
Special personal information	This very sensitive personal information that requires stringent protection. Special personal information includes, but is not limited to, religious beliefs, political affiliations, race and ethnic origin, health, sex life and biometric information.

### 3. DATA COLLECTED

The GPAA collects large volumes of personal information from you through various interactions and platforms. You provide some of this data directly or indirectly through various source documents such as but not limited to application forms, change forms, agreements and your employer. Substantial amounts of general personal information and special personal information are collected by GPAA through these documents.

Personal information is also collected internally, with respect to employment records, and board and committee members. GPAA also collects personal information from its own records relating to its previous supply of services or responses to your request for services; and/or from a relevant public or equivalent entity.

The collection and processing of personal information is directly aligned to the execution of the GPAA mandate.

GPAA's requires the personal information from you for the administration of pensions funds, administration of benefits, administration of injury on duty benefits, employee administration, accounts retention and records, complying with tax laws and other applicable legislation, complying with pension laws and regulations, complying with any other administrative purposes in terms of relevant laws, codes of good practice and standards.

In the normal course of business activities, GPAA will collect personal information, including special personal information.

The purpose of collection will be explained to you when the information is collected and you may then decide whether to grant GPAA written consent to collect and process personal information or not. You will be advised of the consequences of not giving consent GPAA for the collection and processing of your personal information and special information as required by law.

You will be made aware that failure to give such written consent will result in your record being invalid and not subject to any performance on the part of GPAA. In the event that GPAA seeks to use the information for another purpose which is different to the purpose for which the information was collected initially, then GPAA will contact you to obtain their written consent for further processing

#### **4. CONSENT**

Unless one of the additional conditions listed in clause 7 below applies, GPAA will not collect or process personal information without the prior you written consent. Consent is normally sought explicitly by GPAA, however, there are also some actions and behaviour that may amount to consent. This includes signing an agreement or application or ticking a tick box on an application form.

The procedure undertaken is that you will be informed of the purpose for which information is being collected and thereafter prompted to give written consent to having the information collected and processed. Once written consent has been granted to GPAA the information will be collected and may only be used for the purpose for which the consent was obtained and for which purpose is compatible with that initial purpose. The persons to whom disclosure may be made will be specified in the consent form.

In the event that GPAA seeks to process your information for a different purpose to that which consent has been granted, additional written consent will be sought for the further processing.

- You may withdraw or revoke his/her consent at any time
- This withdrawal of consent must be communicated to the Information Officer in writing with reasonable notice.
- Should the withdrawal of consent result in the interference of legal obligations, then the withdrawal will only be effective if GPAA agrees to same in writing.
- GPAA will inform you of the consequences of the withdrawal where it will result in GPAA being unable to provide the requested information and/or services and/or financial or other benefits.
- The revocation of consent is not retroactive and will not affect disclosures of personal information that have already been made.

## **5. SECURITY OF PERSONAL INFORMATION**

GPAA takes reasonable steps to ensure the security of personal information that it holds, regardless of the form in which that information is held. This will include taking reasonable steps to prevent the misuse, destruction, deletion and loss of this information, or unauthorised disclosure, access to, or modification of this information.

GPAA has implemented and continues to implement security safeguards so that all personal information that is held by GPAA remains strictly confidential and protected against loss or theft, unauthorised access, disclosure and use.

The following methods of protection are in place to ensure that personal information disclosed to GPAA is protected:

- Password protection is active on computers that may contain personal information thereby limiting access to authorised GPAA personnel only;
- Physical security measures are in place such as the limitation of access to the building (and the completion of a visitor registration form when entering into the GPAA building). Employees are given access control measures and no one is allowed to enter the premises without authorisation;

Each manager is responsible for ensuring that the employees under his or her authority take note of the policies on the implementation and maintenance of document management;

Personal information can only be accessed by GPAA employees and management who deal with the particular record;

- GPAA has off site back-up and archiving facilities. Third parties who provide these services are obligated to respect the confidentiality of any personal information. GPAA has agreements in place with these third parties to ensure that they comply with the necessary security and confidentiality conditions;
- Technological measures are in place to monitor the transmission and inspection of electronic data, including IT audit trails and encryption;
- Personnel files are kept in a secure locked cupboard and access is restricted. Access is only granted to personnel who require it for operation reasons.

GPAA has a number of policies and procedures in place that detail the protocols around security breaches, disaster recovery and incident management. These include the IT Policy and Procedure, Business Continuity Plan and data protection policies, all of which are available to the public on request.

## **6. ACCOUNTABILITY**

GPAA remains responsible for all personal information collected and stored. This includes all and any information collected directly from you and from any other source or authorised third parties.

GPAA, as the responsible party, will highlight and provide support, where appropriate, to all third parties provided with personal information on the POPI requirement for compliance and privacy policies that safeguard personal information.

## **7. COOKIES**

When you visit GPAA's platform, the web server temporarily records the following information for system security purposes: the domain name or IP address of the computer or device requesting access and the access date. We may save some information in the form of cookies on your PC. A cookie is a piece of information that a website can send to your browser and save on your system. Cookies do not give us access to your system or data your personal data.

Please note that standard browser settings allow the use of cookies. If you do not want to allow the use of cookies, you can disable this option in your browser. Cookies are exclusively used to tailor our website to your preferences.

## **8. PROCESSING LIMITATION AND SHARING OF PERSONAL DATA**

GPAA will ensure that the personal information collected from you will be limited to what is needed for identification and processing, what is required by other bodies and the laws which govern GPAA.

The use and/or processing of personal information will also be limited to the purpose which will be stipulated upon collection and the purpose for which written consent has been granted. Therefore, GPAA may not process your personal information in any other manner other than that for which written consent has been given unless required by law or where there is a legitimate interest.

The GPAA uses the collected data for administration of pensions funds, administration of benefits, administration of injury on duty benefits, administration of unclaimed benefits, employee administration, accounts retention and records, complying with tax laws and other applicable legislation, complying with pension laws and regulations, complying with any other administrative purposes in terms of relevant laws, codes of good practice and standards purposes only and for the legitimate purpose for which it was provided.

GPAA employees are required to keep the data collected strictly confidential. Information shared internally is controlled through restricted platforms and is only shared with authorised users in accordance to the activities of GPAA.

GPAA will not disclose your personal information to anyone without written consent unless:

- It is necessary to carry out actions for the conclusion or performance of a contract to which you are party to;
- the processing complies with an obligation imposed on GPAA by law;
- the processing protects your legitimate interest;
- the processing is necessary for the proper performance of a public law duty by a public body; or
- the processing is necessary for pursuing GPAA's legitimate interests or the legitimate interests of a third party to whom the information is supplied.

GPAA is required by law to keep an accurate record of any disclosure of personal information and the circumstances surrounding such disclosure. GPAA is also required by law to keep an accurate record of general personal or special personal information in its restricted archives.

## **9. THIRD PARTIES**

GPAA binds all service providers who provide services to GPAA's to signed agreements and policies. All services providers that may be required to have access to our stakeholders' personal information to perform services are bound signed agreements and policies.

GPAA ensures safekeeping of data and will only disclose data to official agencies if required to do so by law.

Our website ([www.gpaa.gov.za](http://www.gpaa.gov.za)) may contain links to or from other sites. While we try to link only to sites that share our high standards and respect for privacy, GPAA is not responsible for the content or the security or privacy practices employed by other sites.

We recommend that you always read the privacy and security statements on such sites.

## **10. RETENTION**

GPAA will only retain personal information for as long as needed to carry out the purposes for which it was collected. Once the purpose for collection has been fulfilled, the personal information will be sent to storage for record keeping and archives as it is required to do so by law.

Where the law requires GPAA to keep personal information post its use for a specified period of time, all personal information will be kept securely in file or on a server for the duration specified by law. No unauthorised personnel will be permitted access to the information.

## **11. YOUR ACCESS TO AND CORRECTION OF PERSONAL INFORMATION**

You have the right to be informed whether GPAA holds their personal information and to view any personal information GPAA may hold. Furthermore, you have the right to be informed as to how that information was collected and to whom your personal information has been disclosed.

You may, at any time, request disclosed information in line with the GPAA Protection of Access to Information Act manual and guidelines, which are available for download on GPAA's website.

Information requested will be provided to you within a reasonable time. A reasonable fee may be charged in order to process the request and provide copies of the information requested. This will only happen in exceptional circumstances.

You have the right to ask GPAA to update, amend or delete their personal information on reasonable grounds. GPAA relies largely on you to ensure that their personal information is accurate and correct.

You may be prompted periodically by a GPAA representative to update the personal information that GPAA holds. Failure to reply to the prompts to update personal information will result in the assumption that all information that is on GPAA's systems is accurate.

You are entitled to, at any time, to inform GPAA of any changes to your personal information in the possession of GPAA. Upon receipt of any changes to personal information, GPAA will, within a reasonable period, update the personal information.

## **12. EXCLUSIONS**

This policy does not include the following information gathered by GPAA in terms of its various functions such as:

- attendance registers at events/workshops and tender briefing sessions;
- prospective provider list;
- tender submission registers;
- visitors registers and
- Stakeholder communication.

The above information is collected for internal operational purposes only.

### 13. AMENDMENTS OF THE POLICY

The GPAA reserves the right to amend the terms and conditions of this Privacy Policy at any time. Stakeholders remain at all times responsible for ensuring that they are aware of the current terms of this Policy.

### 14. CONTACT DETAILS

Please direct any questions, suggestions, complaints or specific requests to change personal information:

#### **Deputy Information Officer**

Ms Esti de Witt

Tel: 012 319 1270

Email: [Esti.deWitt@gpaa.gov.za](mailto:Esti.deWitt@gpaa.gov.za)

#### **Personal Assistant** (to Esti de Witt)

Ms Marinda Smith

Tel: 012 319 1006

Email: [marinda.smith@gpaa.gov.za](mailto:marinda.smith@gpaa.gov.za)

#### **Contact details of the GPAA Offices:**

**Head Office** 011 319 1007

**Toll free number** 0800 117 669

**Fax** 0800 117 669

**E-mail address** [enquiries@gpaa.gov.za](mailto:enquiries@gpaa.gov.za)

**Postal address** Private Bag X63

Pretoria  
**Physical Address** 34 Hamilton Street  
Acadia  
Pretoria  
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### **Regional and Satellite Offices**

**Johannesburg** 2nd Floor, Lunga House, Marshall Street  
(Corner Marshall and Eloff - Gandhi Square Precinct),  
Marshalltown

**Bisho** No. 12, Global Life Office Center, Circular Drive

**Pietermaritzburg** 3rd Floor, Brasfort House, 262 Langalibalele Street

**Kimberley** 11 Old Main Street

**Bloemfontein** No.2 President Brand Street

**Polokwane** 87(a) Bok Street

**Mafikeng** Office No.4/17, Mega City, Mmabatho

**Cape Town** 21st Floor, No.1 Thibault Square,  
LG Building

<b>Nelspruit</b>	Block A, Ground Floor, 19 Hope Street, Ciliata Building
<b>Durban</b>	8th Floor, Salmon Grove Chambers, 407 Anton Lembede Street (former Smith Street)
<b>Port Elizabeth</b>	Ground Floor, Kwantu Towers, Sivuyile Mini- Square, next to City Hall
<b>Mthatha</b>	2nd Floor, PRD Building, Corner Sutherland and Madeira Streets