

**ANNEXURE 5**

**TO THE**

**PASA MANUAL OF PROCEDURES**

**PASA PRIVACY POLICY**

## **PASA PROTECTION OF PRIVACY OF INFORMATION POLICY**

PASA is committed to protect your privacy and to ensure that your personal information is used responsibly and securely in a transparent manner in accordance with the Protection of Personal Information Act.

This Policy sets out how PASA deals with personal information, for which purposes information is collected and what it is used for. This Policy is made available on the association's website [www.pasa.co.za](http://www.pasa.co.za) and at our office upon request.

### **Which Information do we collect?**

PASA collects and processes Personal Information to identify our members, visitors, employees and service providers. We also collect other information about these parties that we may require to administer our membership, agreements, operations, and to manage risk and incidents. The type of information we collect and process depends on the purpose we collect it for and we will process the information only for that purpose.

Whenever possible, we will inform the party what information they are required to provide us with and what information is optional. Examples of the personal information we collect include, but are not limited to:

Identity number, name, surname, address, postal code, telephone, gender, profession, email address.

We may also collect and process further information that we may require in order to provide a well administrated, safe environment where our members' interests and activities in skydiving can be exercised.

For purposes of this policy, members and visitors also include potential and existing members and visitors and other parties we may deal with whose information is subject to the legislation on privacy.

### **How we use personal information**

We only use personal information for the purpose for which it was collected. This may include the following:

- To provide our services to our members and visitors and to perform the normal activities of PASA;
- To confirm, verify and update a party's details;
- To keep proper records of your activity history;
- To establish if you are eligible to take part in our activities;
- To conduct market research or establish your satisfaction;
- For audit and record keeping purposes;
- In connection with legal proceedings;
- To carry out the activities and services you sign up for and to maintain and constantly improve our relationship with you;
- To communicate with you in respect of our regulatory matters that may affect you;
- In connection with, and to comply with, legal and regulatory requirements or when it is otherwise allowed by law.

### **When we collect and process personal information:**

When you consent that we may process the information. We obtain such consent when you apply for membership, when you visit our facilities, or when you take part in our activities.

When we require personal information to assess whether you are eligible to take part in our activities, or a specific activity, and at what level;

When we have to process personal information to comply with an obligation imposed by law on us.

When we need to protect your legitimate interest and it is in your best interest for us to have certain personal, information as well as the identity and contact details of your next of kin, for example in the case of an incident that may take place during our activities or at our facilities.

When it is necessary for PASA to pursue its legitimate interests or that of a third party to whom information is supplied, in order to provide you with appropriate services.

Where both ourselves and our associates or affiliates need certain personal information from you to perform our functions, make decisions when required and to inform you of our activities.

#### **How we disclose personal information**

We provide our members' personal information to the Aero Club of South Africa, of which our members are also required to be members, as all recreational aviation activities resort under the Aero Club. As we administer our own licences, ratings, and membership fees, all information is collected and processed by us, but also passed on to and retained by the Aero Club for administration and record keeping purposes.

We may disclose a member or visitor's personal information to a drop zone operator / chief instructor and/or to the Sport Skydivers Association committee(s) of the specific discipline(s) that you choose to take part into develop and promote the various disciplines within the sport of skydiving.

We may disclose a party's' information where we have a duty or a right to disclose in terms of applicable legislation, the law or where it may be necessary to protect our rights.

#### **How we safeguard your information**

We protect personal information we hold in an adequate manner. We take measures to avoid unauthorized access and unauthorized use of your personal information. We will continuously review our security controls and processes to ensure that your personal information is secure.

Our Information Officer is the current PASA Chairperson whose details are available below. Our Information officer will oversee compliance with the conditions of the lawful processing of personal information and other provisions of POPI and may delegate these functions where necessary.

We are implementing this policy throughout PASA and our employees will be continuously trained on this policy and the POPI Act;

We conclude confidentiality agreements with our employees.

Information collected and processed by us is stored at the registered office of PASA in the case of paper records and, in the case of electronic records, on a secure database server with limited access.

Our electronic files are automatically backed up daily to a cloud server with limited access.

Third parties that we deal with to provide services to us are required to guarantee their commitment to confidentiality, the protection of personal information against loss, destruction and unlawful access. Our written agreements with them will be adapted accordingly.

We keep a security incident register. We log Security incidents, report on them and manage such incidents. This register will be maintained by PASA's current Chairperson, who will be the Key Individual of PASA.

#### **Access to and correction of your personal information**

Members / visitors or other party's information that is subject to the POPI act, may request access to the personal information that we hold about them. They may ask us to update it, make corrections or, upon providing us with reasonable grounds, ask us to delete the personal information we have. When you object that we processing of your personal information any longer, we may no longer process the specific personal information, subject to circumstances where we are obligated to, or have a legitimate lawful requirement to do so. When we receive a request for access, correction or deletion, we will take all reasonable steps to confirm your identity before we provide details, make changes or delete the personal information.

The details of our Information Officer and head office are as follows: The current PASA Chairperson, 4 Janssens Crescent, Melkbosstrand, 7441, telephone/fax 021-553-3398.

#### **Restriction on use of intellectual property:**

All ownership in PASA's intellectual property or trademarks, including but not limited to signs, logos, slogans, information or research, will remain vested in PASA. Notwithstanding how access thereto or possession thereof is obtained, whether through dealings with PASA or otherwise, received directly from PASA, or indirectly from any third party, it may not be used, reproduced or disseminated for any reason whatsoever, without PASA's official prior written authorisation.

**Amendments to this policy**

This Policy will be amended as necessary or revisited at least once a year. Members, visitors and other parties we deal with are advised to check our website from time to time to inform themselves of any changes.

March 2019