

**DELIVERING WORLD-CLASS  
SUPPLY CHAIN COMPETENCE**

BUY • MAKE • MOVE • SELL • PLAN

**POPI ACT POLICY  
AND STANDARD  
OPERATING  
PROCEDURE**

Abstract

# COMMERCE EDGE SOUTH AFRICA POPI ACT POLICY AND STANDARD OPERATING PROCEDURE

## Definitions

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Terminology	Definition
<b>Connect</b>	Commerce Edge Learning Management System
<b>LMS</b>	Learning Management System
<b>POPI</b>	Protection of Personal Information

## Responsibilities

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- All Commerce Edge Staff
- Privacy Officer
- Clients

## Implementation

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This policy is effective from 1 July 2021

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## 1. Scope and Purpose

The POPI Act stipulates 8 conditions for the lawful processing of data. These include:

1. Accountability
2. Processing limitation
3. Purpose specification
4. Further processing limitation
5. Information quality
6. Openness
7. Security safeguards
8. Data subject participation

This document outlines the process followed on Commerce Edge (Connect) to ensure compliance with the POPI Act.

## 2. Training and Non-Disclosure

All employees of Commerce Edge are to be trained on POPI Act Awareness by July 2021.

## 3. Condition 1: Accountability

Commerce Edge South Africa will ensure conditions for lawful processing of Personal Information – especially when it comes to the electronic processing of such information on Commerce Edge Connect.

## 4. Condition 2: Processing Limitation

The second condition handles the processing of data on the system. This include processing data in such a way that it doesn't risk the subject's privacy, that only relevant data is processed, that the subject gives consent for this data to be used. Proof of this consent must be kept on the system and the subject should be able to withdraw this consent at any given time.

The following data is processed on the system:

### 4.1. Personal Information

#### Sign up

Only relevant personal information, which is required for identification purposes, is asked from the user upon signing up:

- Name
- Surname
- Email address

- Organisation

Further biographical information is required for qualification requirements by Academic Bodies for qualification purposes

- SDP code
- Citizenship
- Disability status code
- Disability rating
- Immigrant status
- Home address
- Postal address
- Highest qualification
- ID Number
- Copy of certified ID document (proof of student's existence)
- Equity
- Gender

A full list of Personal Information that is processed, and the reason for processing, can be found under Annexure A of this document.

#### From browser

Automatic Internet usage information is logged on the system, such as Internet Protocol address (IP address), browsing habits, click patterns, cookie preferences, JavaScript enablement, the content and pages that you access on the website, and the dates and times that you visit the website, paths taken, and time spent on sites and pages within the website (usage information).

#### Cookies

Small text files called 'cookies' are put on the user's device when they visit the site. These files do contain a personal identifier allowing Commerce Edge Connect to associate personal data with a certain device. These files ensure the tailoring of the website's functionality to the user's personal preferences, e.g. allowing quick access links to most recently used areas of the site.

## 5. Privacy Policy Agreement

All users must accept a privacy policy when logging in the first time and thereby giving consent for personal data to be processed and used to complete services rendered by Commerce Edge.

Policies and agreements			
New policy			
Name	Policy status	Version	Agreements
Protect my Personal Information Site policy, Authenticated users, Compulsory	Active	20 February 2020 - v3 21 April 2020, 7:56 PM	1296 of 4048 (32%) Actions ▾

A copy of the user agreements (proof of acceptance of policy) is kept on the system.

User agreements

No filters applied



Search keyword or select filter

First name **All** A B C D E F G H I J K L M N O P Q R S T U V W X Y Z

Surname **All** A B C D E F G H I J K L M N O P Q R S T U V W X Y Z

1 2 3 4 5 6 7 8 9 10 ... 41 >

Download table data as Comma separated values (.csv) **Download**

Select	First name / Surname	ID number	Email address	Department	Institution	Overall	Protect my Personal Information
<input type="checkbox"/>	 [Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	<span style="color: orange;">○</span> Pending Accept Decline	<span style="color: orange;">○</span> Pending Accept Decline
<input type="checkbox"/>	 [Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	<span style="color: green;">✓</span> Accepted Withdraw	<span style="color: green;">✓</span> Accepted Withdraw

The user can withdraw this consent at any time. See following example:

Version	Response	Date
14 October 2019 - v3 <b>Active</b>	<span style="color: green;">✓</span> Accepted <b>Withdraw</b>	13 May 2021, 12:55 PM

## 6. Condition 3: Purpose Specification

Condition 3 details the reasons for collecting data and specifies that this data should only be kept on the system for as long as necessary to process what the users do on the system.

There are two aspects around this. The first one is that the learner should be identified, and that proof of this identity should be uploaded to the system. Commerce Edge Connect is an online learning system, whereby users on the system completes learning activities and records of these activities are linked to the users. The law requires that this information is kept for 5 years.

Certain information is required by governing bodies, e.g. the Quality Council for Trades and Occupations (QCTO), various SETAs, CIPS and CILT.

Other information is required for Alumni Communication, Notification of Professional Development Events, Training and Further Education.

## 7. Condition 4: Further Processing Limitation

The following measures are put in place to ensure users' privacy:

There are three options available on the Commerce Edge Connect system when it comes to users' information:

- Not visible
- Visible to user




- Visible to everyone

All data fields are set to "Visible to user", so that only the user and the Systems Administrator can access their own personal data. Relevant information may be sent to our CRM and be viewed by our Customer Service Agent to support our learners in their studies.

Who is this field visible to? 

Email display default is set to hidden:

Email display 

## 8. Condition 5: Information Quality

When a user signs up for an Accredited Programme, proof of ID is required for registration with the relevant Academic Body or Authority. Therefore, along with personal information entered on the system, a verified proof of ID should also be uploaded to the system (Only for learners studying towards an Accredited Programme. ID Documents are not required for non-accredited short courses). The user receives a username and password, which is used to log in to Commerce Edge Connect.

- Commerce Edge will take reasonably practicable steps to ensure that the personal information is complete, accurate, not misleading and updated where necessary
- In taking the steps referred to above, Commerce Edge must have regard to the purpose for which personal information is collected or further processed

Commerce Edge Connect provides all users with the ability to update and ensure correctness of their own personal information through the "Update my profile" functionality.

## 9. Condition 6: Openness

Commerce Edge South Africa will take reasonably practicable steps to ensure that learners are made aware of:

- the information being collected and if not directly from the data subject, the source from which it is collected
- the name and address of Commerce Edge South Africa
- the purpose for which the information is being collected (Available in Annexure A)
- whether or not supply of this information by the data subject is voluntary or mandatory
- the consequences of failure to provide such information
- any particular law which authorizes or requires the collection of the information

- the intention of Commerce Edge South Africa to transfer the information to a third country or international organization and the level of protection provided to this information by that country or organization
- any further information necessary to enable processing in respect of the learner to be reasonable, taking into account the specific circumstances in which the information is to be (or not to be). For example:
  - recipient or category of recipients of the information
  - nature or category of the information
  - existence of the right of access to and right to rectify the personal information collected
  - the existence of the right to object to the processing of the information
  - the right to lodge a complaint to the Information Regulator

The learner should be made aware of the above information prior to collection or in the instance where the information is collected from a source other than the data subject, as soon as reasonably practicable after the personal information is collected.

## **10. Condition 7: Security safeguards**

Commerce Edge Connect works with system roles and capability security. Thus, only individuals who should have the capability to view certain information, has that capability.

Commerce Edge South Africa subscribes to industry standards for information technology security as per the POPI Act.

## **11. Condition 8: Data subject participation**

Commerce Edge Connect provides all users with the ability to update and ensure correctness of their own personal information through the “Update my profile” functionality. Learners can at any time access their profiles to view the information that we keep on them.



## 12. Data Request SOP

When a Commerce Edge Connect User submits a request for their information to be removed, the following process should be followed:

1. Establish account purpose and history
  - a. If the account was used for Internal Training (Employee), or short course training, then the account can be deleted – given that the certificates have been backed up
  - b. If the account was used for an accredited course, SETA or QCTO qualification, or, for CIPS or CILT studies, then the account cannot be deleted and the following steps need to be taken:
2. Log ticket with CE Learning Innovation (CELI) support desk
3. Since the account needs to be kept for learning history purposes and data archiving, redact personal information and suspend account
4. The following fields need to be changed on the user's profile:
  - a. First Name - Redacted
  - b. Last Name - Redacted
  - c. Email – Redacted and add {NationalIDNumber} field in the email field. Should the learner ever need to retrieve academic history, this will be the identifier used
  - d. If uploaded, delete ID document
  - e. If uploaded, delete profile picture
  - f. If completed, all address fields to be redacted
  - g. Keep National ID number field
5. CELI resolves ticket with screenshots
6. Commerce Edge South Africa to confirm action with requesting user

### 13. Annexure A: Profile Fields and data collection reason

Below is a list of all the profile fields and reason for collecting the data:

Field Name	datatype	Reason we ask this
Date of Birth	datetime	QCTO/SETA/CIPS/CILT
Title	menu	Communication
Organisation	text	Report Filtering
Gender	menu	QCTO/SETA/CIPS/CILT
Equity	menu	QCTO/SETA/CIPS/CILT
Employment Level	menu	QCTO/SETA/CIPS/CILT
Industry or Occupation Category	menu	QCTO/SETA/CIPS/CILT
Citizenship	menu	QCTO/SETA/CIPS/CILT
Do you have a disability?	menu	QCTO/SETA/CIPS/CILT
Site	text	Report Filtering
Company Job Title	text	Report Filtering
Job Title QCTO Learner	text	QCTO/SETA/CIPS/CILT
TCO	text	Auto Enrolment to the TCO course
Line Manager First Name	text	Report filtering - manager security
CIPS Membership number	text	CIPS, enrolment
Origin	textarea	Report Filtering
User Dashboard Type	menu	To allocate correct dashboard on the system
National ID Number	text	QCTO/SETA/CIPS/CILT
Alternate ID (If a South African ID number is not available)	text	QCTO/SETA/CIPS/CILT
Alternate ID Type	menu	QCTO/SETA/CIPS/CILT
Home Language Code	menu	QCTO/SETA/CIPS/CILT
Occupational Level	menu	QCTO/SETA/CIPS/CILT
Company Name	text	Report Filtering   Theme changer
Company Street Address	textarea	Billing
Company Postal Address	textarea	Billing
Company VAT Number	text	Billing
Company Fax Number	text	Billing
Company Telephone Number	text	Billing

SDP Code	text	QCTO/SETA/CIPS/CILT
ID Document (We need this for skills development audit verification purposes)	file	QCTO/SETA/CIPS/CILT
Qualification Document(s)	file	QCTO/SETA/CIPS/CILT
Socio-Economic Status	menu	QCTO/SETA/CIPS/CILT
Disability Status Code	menu	QCTO/SETA/CIPS/CILT
Disability Rating	menu	QCTO/SETA/CIPS/CILT
Immigrant Status	menu	QCTO/SETA/CIPS/CILT
Learner Home Address 1	text	QCTO/SETA/CIPS/CILT
Learner Home Address 2	text	QCTO/SETA/CIPS/CILT
Learner Home Address 3	text	QCTO/SETA/CIPS/CILT
Learner Postal Address 1	text	QCTO/SETA/CIPS/CILT
Learner Postal Address 2	text	QCTO/SETA/CIPS/CILT
Learner Postal Address 3	text	QCTO/SETA/CIPS/CILT
Learner Home Address Postal Code	text	QCTO/SETA/CIPS/CILT
Learner Postal Address Postal Code	text	QCTO/SETA/CIPS/CILT
STATSSA Area Code	text	QCTO/SETA/CIPS/CILT
Province	menu	QCTO/SETA/CIPS/CILT
Highest qualification (NQF aligned)	text	QCTO/SETA/CIPS/CILT
Institution where qualification was obtained	text	QCTO/SETA/CIPS/CILT
Planner Qualification Approved	menu	
Learner Fax Number	text	QCTO/SETA/CIPS/CILT
Line Manager Last Name	text	Report Filtering
Line Manager Job Title	text	Report Filtering
Line Manager Email	text	Report Filtering
Line Manager User ID	text	Report Filtering
CIPS package	menu	Correct allocation of learning material/CIPS
CILT membership number	text	CILT, enrolment
CIPS package Level 5	menu	Correct allocation of learning material/CIPS
CIPS package Level 6	menu	Correct allocation of learning material/CIPS
First Name	text	Communication about learning events

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Last Name	text	Communication about learning events
Email Address	text	Communication about learning events
Mobile phone	text	Communication about learning events

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