

PRIVACY POLICY

FSI.PO.06

Document Owner: Privacy Officer

Document Version: 03

Creation Date: July 2022

Last Review Date: January 2025



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1. Document Control

1.1. Version Control

Document Name	Privacy Policy
Document No. and Version	FSI.PO.06 Version 3
Next Review Date	January 2027
Date Last Reviewed	January 2025
Authors	Chief Operations Officer

1.2. Updates to this document

This document will be reviewed biennially, or when changes to the process or procedure occur.

1.3. Policy Changes

All changes to this document must be approved and authorised by the Chief Operations Officer.

The record below is to be completed by the person making the amendment(s). Each new document will have a version number and date of issue printed on it. If a review is performed, and no changes to the document is made, the issue date will be updated, but not the version number. Format changes do not require a new version number or issue date.

Version	Issue Date	Pages Amended	Amended by	Approved by
1.0	24 Jul 22	All, policy created	Paolo Cianfanelli	Jeanine Stols
2.0	15 Oct 23	New template	Paolo Cianfanelli	Jeanine Stols
3.0	22 Jan 25	Sections 9 & 10 added	Jeanine Stols	Seyton Hayes

1.4. Distribution

Once approved, the document will be circulated to the following individuals:

Issued To	Issue Date	Position/s
ww.f-si.co.za	15/01/2024	FSI Website - Publicly Available
<u>vv vv vv.1-S1.CO.Za</u>		Information
All FSI Employees	15/01/2024	All
All FSI Employees	14/02/2025	All
www.f-si.co.za	17/02/2025 FSI Website - Publicly Availab Information	FSI Website - Publicly Available
<u>www.i-si.co.za</u>		Information



2. Purpose

This policy describes how the Forensic Sciences Institute (hereafter referred to as "FSI") as a responsible party, processes personally identifiable information that is provided by its highly valued customers, re-sellers, and suppliers, either while visiting our website, or during normal business operations.

3. Scope

The Privacy Policy applies to all Personally Identifiable Information processed by the Forensic Sciences Institute. The Privacy Policy is available to all interested parties on the www.f-si.co.za website. The Privacy Policy document is available to all FSI employees on the company shared drive.

4. Roles and Responsibilities

Role	Responsibility
FSI Privacy Officer: Jeanine Stols	 Privacy Policies and Procedures: Developing and implementing data privacy policies, procedures, and guidelines to govern the collection, processing, and storage of personal data. Data Inventory and Mapping: Maintaining a detailed record of the organization's data assets, including the types of data, where it is stored, and who has access to it. Privacy Impact Assessments (PIAs): Conducting and overseeing PIAs to evaluate the potential privacy risks associated with new projects, systems, or processes that involve personal data. Employee Training and Awareness: Providing training and education to employees about privacy best practices and data protection policies. Data Subject Requests: Managing and facilitating requests from data subjects (individuals whose data is processed) regarding their rights under data protection laws, such as the right to access, rectify, or erase their personal data. Incident Response and Breach Management: Developing and implementing procedures for responding to data breaches, including notifying affected parties and relevant authorities as required by law. Vendor and Third-Party Risk Assessment: Evaluating the data protection practices of third-party vendors and service providers that handle the organisation's data. Audit and Monitoring: Conducting regular audits and monitoring activities to assess compliance with privacy policies and regulations.



Role	Responsibility	
	 Privacy Advocacy: Acting as an advocate for privacy within the organisation, promoting a culture of data protection awareness. Privacy Impact on Marketing and Business Strategies: Advising on the impact of privacy regulations on marketing, customer engagement, and overall business strategies. Regulatory Liaison: This role acts as a bridge between the organisation and government agencies responsible for data protection. Their job is to make sure the company works closely with these authorities during any inquiries or checks. Policy and Legislative Updates: Staying informed about changes in data protection laws and regulations and updating the organisation's policies and practices accordingly. 	
Technical Director	Data Transfers: Managing international data transfers and ensuring that data is adequately protected when crossing borders.	

5. Contact Details of the Privacy Officer

Name and Surname	Jeanine Stols
Position	Operations Director
Email	jeanine@f-si.co.za
Contact Number	087 265 3683

6. References

- Protection of Personal Information Act, 4 of 2013.
- ISO27001:2022 Information: Information security, cybersecurity, and privacy protection Information security management systems Requirements.
- ISO27002:2022 Information security, cybersecurity, and privacy protection Information security controls.
- FSI.MA.02 Privacy Manual
- FSI.ST.02 Information Handling Standard
- FSI.ST.03 Record Retention Standard



7. Policy Statement

7.1. FSI's Commitment to Privacy Compliance

FSI is committed to conducting its business activities lawfully and in a manner that is consistent with its compliance obligations as described in the Protection of Personal Information Act, 4 of 2013.

The Protection of Personal Information Act can be accessed at: POPIA Official Site.

The personally identifiable information (PII) collected by FSI, and the process to access this information is contained in the FSI Privacy Manual (FSI.MA.02).

7.2. FSI's Privacy Objectives

- a) Ensure that all personally identifiable information (PII) collected and processed by FSI is protected.
- b) Ensure that all FSI employees and directors, as representatives, are aware of their accountabilities as a responsible party and the associated privacy principles and rules that must be adhered to for FSI to achieve and maintain privacy compliance.
- c) Comply with the relevant privacy requirements mandated by the South African Government and other jurisdictions where FSI operates.
- d) Conduct business in an ethical, open, and transparent manner to fulfil its obligations to the Information Regulator.

8. Privacy Compliance Obligations

8.1. Lawfulness

FSI will only collect and process personally identifiable information (PII) as per the prescripts of the law.

8.2. Minimality

Only personally identifiable information (PII) that is necessary for the purpose for which it is being used may be collected for a defined business process, or the conclusion or performance of a contract.

8.3. Authorised Access

Only FSI staff who are authorised to view or process personally identifiable information (PII) in the course of their duties will be granted access.

8.4. Consent



FSI aims to obtain clear or implied approval before collecting any information. When you provide information willingly, either through our website or during business transactions, you permit FSI to use that information.

8.5. Retention and Destruction of Personal Information

FSI will ensure that personally identifiable information (PII) no longer required is securely de-identified or destroyed once retention obligations expire.

8.6. Withdrawal of Consent

You may object to the usage of your personally identifiable information (PII) or revoke previously given consent. The request must follow the process described in the FSI Privacy Manual. The legality of information processed prior to the withdrawal remains unaffected.

8.7. Information Portability

You may request any personally identifiable information (PII) processed automatically based on consent or contract performance to be handed over to you or a third party in a machine-readable format as described in the FSI Privacy Manual.

8.8. Security of personal information

FSI will take all practicable actions to prevent unauthorised access, business disruptions, and abuse of PII records.

9. PII Data collected on our website

9.1. Cookies Policy

FSI uses cookies to improve website usability. Most are "Session Cookies" deleted after your visit. Cookies do not facilitate personal information collection without consent. Users can manage cookie settings via their browser.

9.2. Contact Forms

Enquiries submitted via contact forms, along with provided contact details, are saved for processing and follow-ups. This data is not shared without consent.

9.3. Job Application Information

Personal information collected for job applications is processed to complete recruitment activities. Data is deleted six months after the staffing process unless legal or legitimate interests necessitate otherwise.



10. PII Data Collected to Facilitate Business Operations

10.1. What Data Do We Collect?

FSI collects personal information such as names, contact details, job titles, and other necessary data for business operations. This includes:

- Contact details provided via web forms or email.
- Employee and applicant information for recruitment and employment purposes.
- Information necessary for transactional and contractual agreements.

10.2. How Do We Collect Data?

We collect data through direct interactions, such as completing forms, email correspondence, or submitting applications.

10.3. How Will We Use This Data?

FSI uses personal information to:

- Fulfil contractual obligations.
- Respond to enquiries and provide requested services.
- Conduct internal business processes, including recruitment and customer relationship management.
- Comply with legal obligations and regulatory requirements.

10.4. How Do We Store the Data?

FSI stores personal information securely using appropriate technical and organisational measures. Access is restricted to authorised personnel, and data retention follows the FSI Record Retention Standard (FSI.ST.O3).

10.5. Sharing of Personal Information with Third Parties

FSI may share personal information with trusted service providers and partners only when necessary for service delivery, contractual obligations, or legal compliance. All third parties are bound by confidentiality and privacy agreements.

10.6. Personally Identifiable Information of Minors

FSI may collect and process information related to children as part of its forensic investigation services. This is conducted strictly in compliance with applicable laws and regulations, including the Protection of Personal Information Act (POPIA). FSI ensures that any such data is handled with the utmost care, confidentiality, and sensitivity, and only for the purposes necessary to fulfill its investigative obligations. Access to such information is restricted to authorised personnel, and measures are taken to protect the privacy and rights of minors involved.



11. Data Subject Rights

In accordance with the Protection of Personal Information Act, you have the right to:

- Access your personal information.
- Request correction or deletion of your data.
- Object to the processing of your personal information.
- Lodge a complaint with the Information Regulator.

12. Breaches of this Policy

Breaches of this policy will be handled following FSI's performance management and disciplinary procedures.

13. Policy Approval

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	Director: Jeanine Stols		14/02/2025
Authorised		Signature	Date
by:	Director: Seyton Hayes	Solon.	14/02/2025
		Signature	Date



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