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FSI

PRIVACY POLICY

FSI.PO.06

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1. Document Control

1.1. Version Control

Document Name	Privacy Policy V2
Document No. and Version	FSI.PO.06
Next Review Date	October 2025
Date Last Reviewed	October 2023
Authors	Data Privacy Officer
Authorised By	Chief Executive Officer

1.2. Updates to this document

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

1.3. Change History

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

1.4. Distribution

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

Issued To	Issue Date	Position/s
www.f-si.co.za		FSI Website – Publicly Available Information
All FSI Employees	15/01/2024	All

The Privacy Policy document is available to all FSI employees on the company shared drive.

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.

4. Roles and Responsibilities

Role	Responsibility
FSI Privacy Officer	<ul style="list-style-type: none"> • Data Protection Compliance: Ensuring that the organisation complies with data protection laws and regulations.
Designated DPO	<ul style="list-style-type: none"> • 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.

	<ul style="list-style-type: none"> • Audit and Monitoring: Conducting regular audits and monitoring activities to assess compliance with privacy policies and regulations. • 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 organization 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 organization's policies and practices accordingly. • Data Transfers: Managing international data transfers and ensuring that data is adequately protected when crossing borders. • Privacy Reporting: Preparing and presenting privacy reports to senior management and the board of directors, detailing the organization's data protection activities and any potential risks.
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5. 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.PO.05 Information Security Policy
- FSI.MA.02 Privacy Manual
- FSI.ST.02 Information Handling Standard
- FSI.ST.03 Record Retention Standard

6. Policy Statement

6.1. 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: https://www.gov.za/sites/default/files/gcis_document/201409/3706726-11act4of2013protectionofpersonalinforcorrect.pdf

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

6.2. FSI's Privacy Objectives

- a) Ensure that all personal information 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) Ensure that FSI complies with the relevant privacy requirements as mandated by the South African Government as well as the privacy requirements from other jurisdictions in which we operate.
- d) Ensure that FSI will fulfil its responsibility to the Information Regulator to conduct business in an ethical, open, and transparent manner.

7. Privacy Compliance Obligations

FSI must comply with rules relating to the collection and processing of personal information. This involves consent, specifying the purpose for which personal information is collected and processed, sharing personal information with third parties, and minimality to protect FSI from claims against the excessive, irrelevant, or inaccurate processing of personal information.

FSI commits to the following behaviours when collecting, processing, sharing, archiving, or deleting personal information.

7.1. Lawfulness

FSI will only collect and process personal information per the prescripts of the law.

7.2. Minimality

Only personal information 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.

7.3. Authorised access

Only FSI staff who are authorized to view or process personal information in the course of their duties will be granted access to do so.

7.4. Consent

At FSI, we aim to get your clear or implied approval before collecting any information. When you willingly provide information to us on our website or during business transactions, you're essentially permitting us to use that information.

7.5. Retention and destruction of personal information

FSI will prevent unauthorised access, business disruptions, legal liabilities, and abuse of personal information records.

FSI will ensure that personal information no longer required for the purposes for which it was collected or for which the legal obligations for retention have expired, will be de-identified or destroyed via secure means.

7.6. Withdrawal of consent to process personal information

You may, at any time, object to the usage of your personal information, or revoke the consent given regarding the processing of your information. The request must be made via the processes described in the FSI Privacy Manual.

The legality of the information already processed before the withdrawal is not affected by the withdrawal.

7.7. Right of information portability

You have the right to request to have any of your personal information that we process automatically based on your consent, or in the performance of a contract, handed over to you or an appointed third party in a common machine-readable format. The processes to request this information are described in the Privacy Manual.

7.8. Security of personal information

FSI will take all such reasonably practicable actions to prevent unauthorised access, business disruptions, legal liabilities, and abuse of personal information records.

7.9. Information collected on our website

7.9.1. Cookies

FSI uses cookies to make our website more user-friendly, effective, and secure.

Cookies are small text files which are placed on your computer and saved by your browser. Cookies do not cause any harm to your computer and do not contain any viruses.

Most of the cookies we use are so-called “Session Cookies”. They will be deleted automatically after your visit. Other cookies remain saved on your device until you delete them. These cookies enable us to recognise your browser at your next visit.

Our cookies do not facilitate the collection or processing of personal information without your consent.

You can set your browser to inform you whenever a cookie is placed and only allow the reception on a case-by-case basis, only for certain cases or generally prohibit cookies. You can also set your browser to automatically delete cookies when quitting your browser. If you deactivate the use of cookies in general, the functionality of this website may be restricted.

7.9.2. Contact Forms

If you use our contact forms to send an enquiry, the enquiry, and the contact information you supplied in that enquiry will be saved to process your enquiry and for any follow-up questions. We will not share this information with third parties without your consent.

The information entered in the contact form will remain in our systems until you ask us to delete it, revoke your consent for saving it or until the purpose of saving the information is rendered obsolete (e.g. after your enquiry is completed). Mandatory legal provisions – especially retention periods – remain unaffected.

7.9.3. Job Application Information

We collect and process the personal information of applicants to execute the application process. The processing can happen electronically.

This is especially the case if an applicant has provided his/her application documents electronically, e.g., via email or a contact form on the website.

If the application results in an employment contract, all transmitted information is saved in compliance with the legal provisions to process the employment relationship.

If the application does not result in an employment contract, the application documents will be deleted six months after the staffing process is finished, as long as no other legitimate interest of the person responsible for processing exists.

8. Breaches of this Policy

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

9. Policy Approval

Authorised by:	CEO		
		Signature	Date
	COO		
		Signature	Date



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Get In Touch

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