



Government Employees Pension Fund

Corporate Services Policy Document

Privacy Policy

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Confidential

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Document Versions

Version	Revision Date	Prepared / Revised by	Business Unit	Status
v.1	Annually	Emmanuel Lekgau	Corporate Services	Draft

Document Reference Library

Document File Name	Context and Relevance
GEP Law	Founding legislation for the Government Employees Pension Fund Government Employees Pension law, 1996, Proclamation 21 (Refer to specific sections of the GEPL)
POPIA	Protection of Personal Information Act 4 of 2013

Business Areas Impacted By This Policy

Name Business Unit / Area	Context and Relevance
All Business Units within the GEPF and Service Provider	To give effect to the provisions of POPIA

Glossary of Terminology

Abbreviation/Terminology	Description
GEPF	Government Employees Pension Fund
Service Provider	Government Pensions Administration Agency, Public Investment Corporation and other service providers

Data subject	The person to whom personal information relates
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

1. INTRODUCTION

- 1.1 The purpose of this privacy policy is to establish the requirements and conditions for the collection, distribution, protection and retention of personal information. Government Employees Pensions Fund (“GEPF”) would like its members and pensioners to know what is done with their personal information.
- 1.2 This Privacy Policy governs the manner in which the GEPF treats personal information that it collects manually and electronically.
- 1.3 The GEPF respects privacy and personal information of its members and pensioners. The GEPF takes all reasonable measures, in accordance with the Protection of Personal Information Act (“POPIA”), to protect the data subjects’ personal information and to keep it strictly confidential.
- 1.4 The GEPF is committed to protecting the integrity, confidentiality and privacy of the personal information the data subject submits.

2. DATA COLLECTED

- 2.1 The GEPF collects information either directly from the data subject, the employer or through financial services intermediaries. In certain instances, GEPF may appoint third parties to collect information on its behalf.
- 2.2 Data is collected through various source documents such as but not limited to application forms, change forms and agreements. Substantial amounts of general personal information and special personal information are collected by GEPF through these documents.
- 2.3 Personal information is also collected internally, with respect to employment records, and board members and trustees. GEPF also collects personal information from its own records relating to its previous supply of services or responses to the data subjects’ request for services; and/or from a relevant public or equivalent entity.
- 2.4 The collection and processing of personal information is directly aligned to the execution of the GEPF mandate.

- 2.5 GEPF requires the personal information from the data subject 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, standards and fulfilling a transaction on request of a data subject.
- 2.6 In the normal course of business activities, GEPF will collect personal information, including special personal information.
- 2.7 The purpose of collection will be explained to the data subject when the information is collected. The data subject may decide whether to grant GEPF written consent to collect and process personal information or not. The data subject will be advised of the consequences of not giving consent GEPF for the collection and processing of the data subjects' personal information and special information as required by law.

3. CONSENT

- 3.1 GEPF will not collect or process personal information without the prior written consent of the data subject. Consent is normally sought explicitly by GEPF, 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 or through written correspondence.
- 3.2 The procedure undertaken is that the data subject 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 GEPF 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 where applicable.
- 3.3 In the event that GEPF seeks to process the data subjects' information for a different purpose to that which consent has been granted, additional written consent will be sought for the further processing.

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

4. SECURITY OF PERSONAL INFORMATION

- 4.1 GEPF 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.
- 4.2 GEPF has implemented and continues to implement security safeguards so that all personal information that is held by GEPF remains strictly confidential and protected against loss or theft, unauthorised access, disclosure and use.
- 4.3 The following methods of protection are in place to ensure that personal information disclosed to GEPF is protected:
 - 4.3.1 Password protection is active on computers that may contain personal information thereby limiting access to authorised GEPF personnel only; and
 - 4.3.2 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 GEPF building). Employees are given access control measures and no one is allowed to enter the premises without authorisation.

- 4.4 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.
- 4.5 Personal information can only be accessed by GEPF employees and management who deal with the particular record.
- 4.6 GEPF has off site back-up and archiving facilities. Third parties who provide these services are obligated to respect the confidentiality of any personal information. GEPF has agreements in place with these third parties to ensure that they comply with the necessary security and confidentiality conditions.
- 4.7 Technological measures are in place to monitor the transmission and inspection of electronic data, including IT audit trails and encryption.
- 4.8 Personnel files are kept in a secure locked cupboard and access is restricted. Access is only granted to personnel who require it for operational reasons.
- 4.9 GEPF 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.

5. SHARING OF DATA

- 5.1 GEPF will only share the data subjects' personal information with third parties if it has consented to such disclosure. If consent has been obtained, GEPF may share your personal information with persons or organisations within and outside GEPF.
- 5.2 Where GEPF discloses personal information to intermediaries, other financial institutions, insurers or any other third parties, the third parties will be obliged to use that personal information only for the reasons and purposes it was disclosed for. GEPF may be obliged to disclose your personal information to the extent that it is required to do so by law, in connection with any legal proceedings or prospective legal proceedings, or for the purposes of protecting the interest of clients, for example fraud prevention or to give effect to an agreement.

6. ACCOUNTABILITY

- 6.1 GEPF remains responsible for all personal information collected and stored. This includes all and any information collected directly from the data subject and/or authorised third parties.
- 6.2 GEPF, as the responsible party, will highlight and provide support, where appropriate, to all third parties provided with personal information on the POPIA compliance and privacy policies that safeguard personal information.

7. COOKIES

- 7.1 When data subjects visit GEPF'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 the data subjects' PC. A cookie is a piece of information that a website can send to the data subjects' browser and save on the data subjects' system. Cookies do not give us access to the data subjects' system or personal information.
- 7.2 The standard browser settings allow the use of cookies. If the data subject does not want to allow the use of cookies, the data subject can disable this option on its browser. Cookies are exclusively used to tailor our website to the data subjects' preferences.

8. PROCESSING LIMITATION AND SHARING OF PERSONAL DATA

- 8.1 GEPF will ensure that the personal information collected from the data subject will be limited to what is needed for identification and processing, what is required by other bodies and the laws which govern GEPF.
- 8.2 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, GEPF may not process the data subjects' personal information in any other manner other than that for which written consent has been given unless required by law.

- 8.3 The GEPF uses the collected data for 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, code of good practice and for the legitimate purpose for which it was provided.
- 8.4 GEPF 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 GEPF.
- 8.5 GEPF will not disclose the data subjects' personal information to anyone without written consent unless:
- 8.5.1 It is necessary to carry out actions for the conclusion or performance of a contract to which the data subject is party to;
 - 8.5.2 the processing complies with an obligation imposed on GEPF by law;
 - 8.5.3 the processing protects the data subjects' legitimate interest;
 - 8.5.4 the processing is necessary for the proper performance of a public law duty by a public body; or
 - 8.5.5 the processing is necessary for pursuing GEPF's legitimate interests or the legitimate interests of a third party to whom the information is supplied.
- 8.6 GEPF is required by law to keep an accurate record of any disclosure of personal information and the circumstances surrounding such disclosure. GEPF is also required by law to keep an accurate record of general personal or special personal information in its restricted archives.

9. THIRD PARTIES

- 9.1 The policy binds all service providers who provide services to the GEPF. All services providers that may be required to have access to the GEPF stakeholders' personal information to perform services are also bound by this policy.
- 9.2 GEPF ensures safekeeping of data and will only disclose data to official agencies if required to do so by law and by the order of court.

9.3 GEPF website (www.gepf.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, GEPF is not responsible for the content or the security or privacy practices employed by other sites.

10. RETENTION

- 10.1 GEPF 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.
- 10.2 Where the law requires GEPF 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. THE DATA SUBJECTS' ACCESS TO AND CORRECTION OF PERSONAL INFORMATION

- 11.1 The data subject has the right to be informed whether GEPF holds their personal information and to view any personal information GEPF may hold. Furthermore, the data subject has the right to be informed as to how that information was collected and to whom its personal information has been disclosed to.
- 11.2 The data subject may, at any time, request disclosed information in line with the GEPF Protection of Access to Information Act manual and guidelines, which are available for download on GEPF's website.
- 11.3 Information requested will be provided to the data subject 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.
- 11.4 The data subject has the right to ask GEPF to update, amend or delete their personal information on reasonable grounds. GEPF relies largely on the data subject to ensure that their personal information is accurate and correct.

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

11.6 The data subject is entitled to, at any time, to inform GEPF of any changes to its personal information in the possession of GEPF. Upon receipt of any changes to personal information, GEPF will, within a reasonable period, update the personal information.

12 EXCLUSIONS

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

12.1.1 attendance registers at events/workshops and tender briefing sessions;

12.1.2 prospective provider list;

12.1.3 tender submission registers;

12.1.4 visitors' registers; and

12.1.5 stakeholder communication.

The above information is collected for internal operational purposes only.

13 AMENDMENTS OF THE POLICY

The GEPF 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 to:

Deputy Information Officer

Mr Emmanuel Lekgau

Tel: 012 424 7317

Email: Emmanuel.lekgau@gepf.co.za**Contact details of the GEPF Offices:****Toll free number** 0800 117 669**Fax** 012 326 2507**E-mail address** enquiries@gepf.gov.za**Postal address** Private Bag X63
Pretoria**Physical Address** Kasteel Park, 1st Floor,
546 Cnr Nossob &
Jochemus Street,
Erasmuskloof, Pretoria
Postal Address: PO
Box 2375, Brooklyn
Square, 0075PO Box 2375, Brooklyn
Square, Pretoria, South
Africa, 0075

15 LIMITATIONS AND CONDITIONS

This policy should be read in conjunction with all approved Fund's policies.

16 REVISION OF THE POLICY

This Policy will be reviewed as and when required. The Governance and Legal Committee is responsible for implementing, updating and reviewing this Policy.

17 APPROVAL OF THE POLICY

Recommended / Not Recommended



ADVOCATE M NDABA

**TITLE: CHAIRPERSON: GOVERNANCE AND LEGAL COMMITTEE
GOVERNMENT EMPLOYEES PENSION FUND**

DATE: 2021-09-23

Approved /~~Not Approved~~



DR RD MOKATE

**CHAIRPERSON: BOARD OF TRUSTEES
GOVERNMENT EMPLOYEES PENSION FUND**

DATE: 2021-09-23
