



GoFETCh[®]

POPI & GDPR COMPLIANCE

Compliance Document

YOUR COMPLIANCE IN THE SPOTLIGHT

GoFETCh is fully committed to **complying with data privacy regulations** and has been developed from the onset with the principles of **data security and privacy** in mind - privacy by design. We continue to enhance certain system features and, in some cases, develop new ones to ensure that we remain ahead of the curve with **existing regulations** and are in the best position to adapt to new ones as they come into force.

We apply strict security measures that include **encryption, firewalling and authentication**. Over and above this, we adopt a **decentralised data structure** and use **masking** extensively to severely limit data tracking and usage in the event of a breach. We also continue to explore and adopt new **anonymisation** and **pseudonymisation** techniques to further protect your data and stay ahead of the curve.

These are the technical and operational measures that GoFETCh has taken to help you comply with the European Union's **General Data Protection Regulation (GDPR)** and the South African **Protection of Personal Information Act (POPI)**:



GoFETCh®

1. POPI COMPLIANCE



1.1 THE RESPONSIBLE PARTY

1. The South African Protection of Information Act (POPI) officially came into effect on the 1st of July 2020. You, the Client, are deemed by the act to be 'The Responsible Party' and are responsible for the following:
 - Appoint an Information Officer
 - Draft a Privacy Policy
 - Raise awareness amongst all employees
 - Amend contracts with operators
 - Report data breaches to the regulator and data subjects.
 - Check that they can lawfully transfer personal information to other countries.
 - Only share personal information when they are lawfully able to.

2. GoFETCh will assist you to perform your responsibilities as The Responsible Party, as follows:
 - Section 8 of our GoFETCh License & Service Agreement deals with Data Protection extensively.
 - This clause also deals with our responsibility to notify you of any breach within 72 hours of us become aware of it.
 - Please take note of our updated License & Service Agreement which is available on the GoFETCh Hub:
gofetchonline.com
 - The Acceptable Use Policy agreement accepted by the users of GoFETCh, also ensures that your team are bound to execute their customer data responsibilities ethically and within the boundaries of the POPI Act while using the GoFETCh Platform.

1.2 THE OPERATOR

1. GoFETCh is deemed by the act to be the Operator. Fortunately, we are already GDPR compliant which has put us in good stead to ensure security and enable the Responsible Party to be compliant. Our obligations under the POPI act, in summary, include:

1.1 Section 20:

- An operator or anyone processing personal information on behalf of a responsible party or an operator, must process such information only with the knowledge or authorisation of the responsible party; and
- treat personal information which comes to their knowledge as confidential and must not disclose it, unless required by law or in the course of the proper performance of their duties.

1.2 Section 21:

- A responsible party must, in terms of a written contract between the responsible party and the operator, ensure that the operator which processes personal information for the responsible party establishes and maintains the security measures (referred to in section 19). These measures include:
 - A. Identify all reasonably foreseeable internal and external risks to personal information held by the entity;
 - B. Establish and maintain appropriate safeguards against the risks identified above;
 - C. Regularly review these measures to ensure that they are implemented effectively, and;
 - D. Ensure that these safeguards are consistently reviewed and updated where necessary to keep up to date with the ever-evolving risks associated with the storage and processing of personal information.

2. For information on how GoFETCh ensures that it complies with the terms set out in section 19, 20 and 21, please refer to the following documentation resources on the GoFETCh Hub gofetchonline.com:

- Hosted Services Specification
- Hosting & Security Specification
- Data Protection Operational Policy
- Client Services Operational Policy
- Disaster Recovery Plan Policy

The background features a series of concentric, semi-transparent rings in shades of blue and purple. These rings have a wavy, organic texture, resembling a stylized eye or a futuristic lens. The center of the image is a solid dark circle, which serves as a backdrop for the text.

2. GDPR COMPLIANCE

According to the the General Data Protection Regulation (GDPR) you, as the GoFETCh Client, are deemed to the the 'Data Controller' and GoFETCh is the 'Data Processor'. Listed below are the relevant principles of the General Data Protection Regulation (GDPR) and the security measures and features made available by GoFETCh to facilitate your compliance:

2.1 CONSENT (THE RIGHT TO BE INFORMED)

1. Opt-ins across all of your data entry points gathered by your 3rd party data systems and collected by your GoFETCh Data Centre are **tracked, measured and accessible** via system searches, filters and exports.
2. GoFETCh is taking this one step further by assigning **GDPR-Compliance-Flags** based on the validation of the data-source system's compliance. **GDPR-Compliance-Flag Reports** are made accessible and exportable via our channel page
3. **GoFETCh-Recency-Flags** are also incorporated to identify 'outdated contacts' where there have been no new interactions over a predefined period of time e.g. 2 years.
4. Using these flags in tandem will ensure that your data remains **compliant and recent**.

2.2 DATA COLLECTION (THE RIGHT TO ACCESS)

1. This refers to the right of your contacts to confirm that their data is being processed and 'the right to access' their data upon request.
2. Your Privacy Policy Document must state that:
 - 'Data collected across our business is centralised in our Customer Data Centre';
 - 'We **correlate** this data in order to **clean and standardise** it';
 - 'We use this data to build the most **up-to-date** and **complete profile** of our customers to better service them'.
3. GoFETCh also **meticulously stores and tracks** all records collected from your 3rd party systems.
4. Searches and export features within the system are available for you to **access and export** customer data and make it available to your contact upon request.

2.3 DATA PROFILING (THE RIGHT TO RESTRICT PROCESSING)

1. Should your contact not wish to have their data processed by GoFETCh, they have the right to request this. GoFETCh has incorporated a feature to **exclude contacts from data processing**, while still allowing you to access the individual records collected first hand.
2. This feature is currently available via requests sent to your Help Desk and will be actioned **within 48 hours from receipt** (working days only).
3. GoFETCh will incorporate this functionality and provide system users with access to activate this directly within the system in due course.

2.4 UPDATING DATA (THE RIGHT TO RECTIFICATION)

1. Your contacts are entitled to have personal data rectified if it is **inaccurate or incomplete**.
2. It is your responsibility and in your best interests to open a line of communication with your contacts to constantly receive and action requests to **add, edit and delete their personal data**.
3. The existing **On-The-Go** and **Dynamic-Profile-Card** features of the GoFETCh system allow system users to search, access and action these requests on demand.

2.5 DELETING DATA (THE RIGHT TO BE FORGOTTEN)

1. Don't get this **mixed up with unsubscribes...** Not only does your contact have the right to unsubscribe from your communication but they also have the right to request that all of their personal data that you have on record is **deleted permanently**. This goes further than just making them inactive or 'putting them in the bin'.
2. GoFETCh has released a new feature to allow your Helpdesk to **search and action requests** of this nature directly in the system and these requests will be processed and confirmed by the system **within 48 hours** (on working days).
3. This feature may also be developed further to allow your contacts to access and delete their data directly, but the legalities and implications of this are still being investigated

2.6 BREACH AND NOTIFICATION

1. GoFETCh **adopts the strictest of security measures**, we have a passionate and experienced data security expert and all system code and personal data is hosted with a reputable provider that has a **100% secure track record**.
2. Our agreements include a commitment from our 3rd party providers to inform us of any data breaches **within 72 hours of incident**.
3. Our policy, in turn, includes a 72-hour notice agreement that will inform all GoFETCh clients of a breach that may **directly or indirectly affect them**.



IT'S TIME TO
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