



INDEPENDENT MUNICIPAL AND ALLIED TRADE UNION

## ADMINISTRATION POLICY

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### PRIVACY POLICY

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IMATU processes the personal information of clients/members for whom we are providing a service. We take our responsibility under the Protection of Personal Information Act 4 of 2013 (also known as POPIA) seriously. We have therefore put in place strict measures to ensure that any personal information received, whilst providing a service, is kept secure and is used only for the purpose for which it was intended.

#### **What is POPIA about?**

POPIA prescribes a set of conditions and principles that regulate the collection, processing and use of personal information and ensures the lawfulness of such actions. These principles and conditions have been enacted to promote the constitutional right to privacy, as contained in section 14 of the Constitution, to protect a person's personal information, and the use of this information by third parties.

Importantly, POPIA protects persons from suffering damage and harm by requiring entities and parties who receive their personal details to protect the confidentiality and integrity of such information. POPIA therefore places an important responsibility on parties who collect, use, and destroy personal information, and provides rights and solutions to persons whose rights have been infringed in terms of POPIA. It requires the relevant parties dealing with personal information to take care of such information and protects the general public against the incorrect and unauthorised use of their personal information, whether used for purposes of identity theft, abusive marketing practices or other unauthorised purpose.

It is important to be aware that POPIA does not aim to stop the flow or sharing of personal information, but rather aims to establish and set guidelines and rules for how this must be done in line with international standards, to protect the privacy of the persons whose personal information is being processed.

#### **Terms and Definitions**

- (a) Data Subject means the individual whose personal data is being processed and to whom personal information relates.
- (b) Operators means a person processing the information on the instruction of the

responsible party by contract or mandate and is not under the direct authority of the responsible party. When personal information is processed by an operator the responsible part remains responsible for the processing.

- (c) Personal Information means any information relating to an identifiable, living natural person and, if applicable, to an existing identifiable juristic person (which is known as a data subject). Personal information may therefore include, but is not limited to, any of the following information relating to race, gender, sexual orientation, medical history, religion, beliefs, disabilities, marital status, pregnancy, language, education, finances, employment history, online credit checks identifiers, pseudonyms, physical address, telephone numbers, and biometric information. If processing a name of a person reveals that the persons personal information, then the name is also considered personal information.
- (d) Processing means the collection, use, storage, deletion, or destruction of any personal information.
- (e) Responsible Party means the individual or company, either public or any private, that processes personal information and determines its purpose.

## **Mission**

IMATU is strongly committed to protecting your privacy and complying with your choices. Both personal and non-personal information collected is safeguarded according to the highest privacy and data protection standards adopted worldwide.

- Your information will not be shared or sold to any third party;
- We use security measures to protect your information from unauthorized users; and
- We give you the possibility to control the information that you shared with us (opt-out).

### **1. Notice**

We will clearly inform you when information that personally identifies you ("personal information") is asked for and you will have the choice to provide it or not. Information to be completed on the Membership form is mandatory and must be completed in full.

### **2. Usage**

We use your personal information to:

- Provide you information that will allow you to interact with IMATU;
- Automatically customise your documents with your information; and
- Alert you of updates, discounts, new products, loans, or other services from IMATU.

We collect your personal information when you request a loan from IMATU. We also collect your email to send you communication. We will also collect information as per your signed mandate form that you have completed and signed. The data is stored as per data retention laws and which comply with POPIA. The data stored is also stored for statistical purposes.

### **3. Consent**

When you provide your personal information, you consent that it may be used for the above purposes and that IMATU is an authorised holder of such information.

#### **3.1 Information we collect from others**

If the law requires us to do so, we will ask for your consent before collecting personal information about you from third parties.

The third parties (which may include parties we engage with as independent responsible parties, joint responsible parties, or operators) from whom we collect information about you, include, but are not limited to:

- Appointed third parties
- Service Providers
- Agents
- Advisers
- Employers
- Business partners
- Other financial services providers, payment processing service providers, and credit bureau
- Attorneys, tracing agents, debt collection agencies and other persons that assist with the enforcements of agreements
- Government departments, tax authorities, courts of law or tribunals, law enforcement and fraud prevention agencies and other persons tasked with the prevention and prosecution of crime
- Regulatory authorities, industry ombuds, local and international authorities
- Trustees, executors, curators and beneficiaries
- Social media platforms
- Online search engine providers

### **4. Access to Your Information**

You are entitled to review the personal information you have provided us and ensure that it is accurate and current at all times. You have the right to request access to the personal information that we hold about you. This includes requesting:

- Confirmation that we hold your personal information;
- Requesting a copy or description of the record containing your personal information; and/or

- The identity or categories of third parties who have had access to your personal information.

## 5. Security of Information

IMATU is strongly committed to protecting your information and ensuring that your choices are honoured. We have taken strong security measures to protect your data from loss, misuse, unauthorized access, disclosure, alteration, or destruction. All sensitive data is stored behind firewalls on secure servers with restricted employee access.

## 6. What We Do with the Information You Share

Your information is never shared outside IMATU without your permission. Inside IMATU, data is stored behind **multiple** (see GS Notes) firewalls on secure servers with restricted user access.

We may on occasion require the help of other companies to provide limited services on our behalf, such as IT support, and processing of Personal Information. We will only provide such companies with the information required for them to perform these services. These service providers are bound by strict privacy policies and are prohibited from using your information for any other purpose.

In very rare instances IMATU may disclose your personal information, without notice, only if required to do so by law or in the good faith belief that such action is necessary to:

- Conform to the laws of the Republic of South Africa or comply with any legal process served on IMATU;
- Protect and defend the rights of IMATU; and
- Act in urgent circumstances to protect the personal safety of users of IMATU, or its website.

## 7. How to Opt-Out

We provide users with the opportunity to opt-out from receiving updates on our products, newsletters, and other communications from us. You can opt-out by clicking on the link provided in our electronic mailings or by contacting us at the address at the bottom of this Policy.

## 8. Does IMATU'S Privacy Policy Apply to Linked Websites?

Our Privacy Policy applies solely to information collected on our website. The site contains links to websites of third parties. IMATU is not responsible for the actions of these third parties, including their privacy practices and any content posted on their websites.

We encourage you to review their privacy policies to learn more about what, why and how they collect and use personal information. IMATU adheres to industry recognised standards to secure any personal information in our possession, and to secure it from unauthorised access and tampering.

It is, however, possible that third parties may unlawfully intercept transmissions of personal information, or other users of the site may misuse or abuse your personal information that they may collect from the site, as is true with all online actions.

## **9. Changes to This Policy**

If we make changes to our Privacy Policy, we will post these changes here so that you are always aware of what information we collect, how we use it and under what circumstances, if any, we disclose it. If at any point we decide to use your information in a manner different from that stated at the time it was collected, we will notify you by email.

## **10. Enforcement of Policy**

If for some reason you believe IMATU has not adhered to these principles, please notify us and we will do our best to promptly make corrections. We encourage you to first allow our internal complaints process to resolve the Complaint, which complaint can be emailed to [info@imatu.co.za](mailto:info@imatu.co.za).

If you are not satisfied after this process, you have the right to refer a complaint to the Information Regulator in instances where the complaint warrants the attention of the Regulator, as provided for by the POPIA.

Contact Information:

The information Regulator of South Africa  
JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001  
P.O. Box 31533, Braamfontein, Johannesburg, 2017

General enquiries email: [info@justice.gov.za](mailto:info@justice.gov.za).  
Complaints email: [POPIAComplaints.IR@justice.gov.za](mailto:POPIAComplaints.IR@justice.gov.za) and  
[PAIAComplaints.IR@justice.gov.za](mailto:PAIAComplaints.IR@justice.gov.za)

## **11. Questions or Comments**

If you have questions or comments about this privacy policy, please email us or write us at:

IMATU  
P.O Box 35343 Menlo Park Pretoria  
47 Selati Street Ashlea Gardens Pretoria 0081  
General email: [info@imatu.co.za](mailto:info@imatu.co.za)





**General Secretary**  
07 December 2021