

PRIVACY NOTICE REGARDING THE PROTECTION OF PERSONAL INFORMATION ACT (POPIA)

INTRODUCTION

The Institution of Fire Engineers (IFE) was registered as a charity in Scotland in 1924 as a fire professionals association of members. The objectives of the Institution were to promote the science and practice of fire engineering and to enable members to meet and correspond with each other to exchange ideas for the improvement in such science, and to publish information on these subjects.

It is governed by a Constitution and managed by a centralised administration staff complement overseen by a Board of Trustee Directors consisting of elected members. It provides graded membership having professional recognition in the global fire sector through the use of post nominals, with these grades being based on knowledge and capability in the fire engineering occupations. A printed quarterly fire professional journal is distributed to members throughout the world, as are emailed newsletters. It is an Awarding Organisation licensed by The Office of Qualifications and Examinations Regulation in England and lists many so Regulated Qualifications. Examinations for these qualifications are held around the world twice a year. It also evaluates and awards continuing professional development (CPD) events. As a professional organisation it also interacts with government organisations in many countries. The IFE has Branches in many countries, including South Africa. The South African Branch provides educational courses and professional development workshops.

The IFE stakeholders consist of members, employees, learners, and organisations that the IFE interacts with. As part of managing the business and creating value for its stakeholders the IFE is required to process and maintain personal information (PI) and protect it according to the requirements of the UK's Data Protection Act, and in South Africa the Protection of Personal Information Act 4 of 2013, (POPI Act).

This Notice constitutes The IFE's Privacy Policy stating its commitment to comply with the POPI Act when collecting, processing, storing and protecting your personal information. In doing this, we apply the 8 information protection principles that govern the processing of PI.

- Accountability we comply fully with the POPI Act by obtaining your PI in a fair and lawful manner
- We use minimality in obtaining only the necessary PI with your consent
- Purpose specification we have a specific, lawful purpose for collecting the data
- Further processing limitation there is no further processing beyond the scope that was agreed
- Information Quality we endeavour to keep the information complete, accurate, not misleading and up to date.
- Openness We ensure that you are fully informed about how we use your PI before you consent to its collection and processing.



- Security safeguards are put in place to ensure that data is not lost, damaged, destroyed or accessed without authorisation.
- We facilitate your participation in accessing and correcting your PI.

WHAT AND HOW IS PERSONAL INFORMATION (PI) COLLECTED

Personal information relates to an identifiable natural person or an identifiable existing juristic person. The PI we collect in the ordinary course of business includes:

Information which is necessary and relevant to enable us to effectively render a service to our stakeholders such as name, surname, identity number (where applicable), employer, gender, membership and/or exam number, date of birth, contact details, addresses, next of kin, dietary preferences, medical history, (if applicable) and banking details (if applicable).

- 1. Electronic, postal and verbal communications.
- 2. Information submitted to us when recruiting employees.
- 3. Social media-tracking pixel tags that allow platforms such as Facebook, LinkedIn, Instagram and Twitter to interact with the IFE's SA website and give feedback on the usage. We use analytical software to help us get a better understanding of how visitors use our website.
- 4. Email addresses from internet searches for purposes of marketing our services.
- 5. Public PI that may be collected when monitoring other websites or digital conversations on public platforms for the assimilation of people's opinions about our organisation or the fire industry in general.
- 6. PI collected at conferences, meetings and charity events such as golf days.
- 7. PI that may be collected in surveys.

PURPOSE OF COLLECTING PI

The purpose we collect your PI is to enable us to render a service to you. We may use PI for these purposes:

- 1. To process and manage applications for membership, examinations, courses and events. The way we process the PI could be by recording, storage, updating, retrieval, alteration, use, dissemination, transmission, merging, linking, or destruction of information.
- 2. To communicate with stakeholders regarding online and actual events, press releases, job vacancy posts, publishing of financial results, direct marketing communications (with consent), notices and updates, changes to terms, standard operating procedures (SOPs), policies, security alerts and administrative messages. There will be times when you will be given the opportunity to opt out of certain communications.
- 3. For security checks such as screening visitors and completing the attendance register to ensure that only authorised persons enter the premises of the IFE or venues hired by the IFE.
- 4. For the performance of a contract in order to fulfil statutory requirements.
- 5. When complying with applicable laws and with orders made by regulators, courts and law enforcement authorities. These include adherence to the Covid-19 protocols.

6. For auditing, data analysis, research, and analysing trends, usage and activities on digital platforms in order to improve the IFE's day-to-day operations and services.

DISCLOSURE AND PROTECTION OF YOUR PI

- 1. We use a variety of security measures and technologies to protect PI from unauthorised access, use, disclosure, alteration or destruction in line with the POPI Act.
- 2. We have adopted a Privacy Awareness Culture where our employees are trained on an ongoing basis to treat your information as confidential.
- 3. We may share your PI with the following third parties in order to monitor and analyse the use of our service and to communicate with you:
 - The IFE's service providers, including course providers as well as those who provide it with technology services such as data analytics, hosting and technical support.
 - The IFE's professional advisors and auditors.
 - Regulators, governments and law enforcement authorities.
 - Third parties enquiring about validity of qualifications of employment candidates.
 - Other third parties, if necessary, when re-structuring all or any part of the IFE's business.
- 4. If it becomes necessary to share personal information with a third party, we shall limit it to the minimum required. In such circumstances we will put in place Non-Disclosure agreements with third parties who might have access to your PI and require them to institute appropriate security measures to keep it secure.
- 5. When you share PI or otherwise interact in the public areas or social media with other users, such PI may be viewed by all users and may be publicly distributed outside. We have no control of this.
- 6. The transmission of information to us via the internet or a mobile phone network connection may not be completely secure and where possible we will put the necessary safeguards to eliminate or minimise the risks.
- 7. Our IT systems are on the cloud and in-house and our IT service providers use firewalls, password access and encryption methods. However, there are always risks that PI may be accessed by an unauthorised third party as a result of an illegal activity.
- 8. If you use our links to websites or mobile applications that we do not own or control you will need to first review their privacy policies as this notice does not apply to them. We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.
- 9. All due diligence will be undertaken for safeguarding PI and while we strive to use commercially acceptable means to protect your PI, we cannot guarantee its absolute security.
- 10. If a data breach happens, we will inform the Information Regulator and those involved as soon as possible unless law enforcement officials advise us to delay so as not to hamper their investigations.

CHILDREN'S PRIVACY

We do not deal directly with anyone under the age of 16 and we do not knowingly collect personally identifiable information from anyone under the age of 16. If we become aware that we have collected

personal data from anyone under the age of 16 without verification of parental consent, we take steps to remove that information from our database.

FOR HOW LONG IS PI KEPT

Our data retention policy is to keep PI for the period required by law or according to statutory requirements to assist in any investigations.

PI will be stored for as long as necessary in order to provide members and other stakeholders with access to services, resolve queries and enforce our legal agreements and policies. Certain PI such as member name, surname, member number, date of election, and birthday will be kept on the database indefinitely for historical, statistical and research purposes but membership/examination application forms will be deleted or destroyed once a member resigns or is deceased.

We will also retain usage data for internal analysis for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our service, or we are legally obligated to retain this data for a longer period.

TRANSFER OF YOUR PI

Your PI may be processed by us or our third-party service providers outside your home country. PI laws in the countries to which PI is transferred may not be equivalent to, or as protective as, the laws in your home country

Your consent to this Privacy Policy as a result of your submission of your personal information represents your agreement to that transfer.

We will implement appropriate and reasonable measures to ensure that your PI remains protected and secure when it is transferred outside your home country, in accordance with applicable PI protection and privacy laws. These measures include data transfer agreements implementing standard data protection clauses.

YOUR RIGHTS REGARDING PI

You will be entitled to:

- 1. Request the IFE for access to the PI it holds about you.
- 2. Request the correction and/or deletion of your Pl.
- 3. Request the restriction of the processing of your PI, or object to its processing.
- 4. Withdraw your consent to the processing of your PI if it was previously given.
- 5. Withdraw your consent to receive direct marketing messages or communication e-mails by **OPTING-OUT** or **UNSUBCRIBING**. However, you may not opt out of certain communication e.g. Account statements.
- 6. Request for the receipt or the transfer to another organisation, in a digital form, of the PI that you have provided.
- 7. If you believe we are using your information unlawfully, you may lodge a complaint to the Information Regulator (South Africa) at Tel 012 406 4818 or inforeg@justice.gov.za.

WHAT YOU SHOULD DO IF NOT WILLING TO PROVIDE YOUR PI

If you are given the circumstances to share your PI with the Institution of Fire Engineers, you can always elect not to do so. If you object to the processing of PI, or if you have accepted the processing and later choose to withdraw it, the IFE will comply with your request in accordance with its legal obligations.

CHANGES TO THIS PRIVACY POLICY

We may update our Privacy Notice from time to time. We will notify you by e-mail of any changes to our Privacy Notice prior to the change becoming effective and include the "Last updated" date at the top.

You are advised to review this Privacy Notice periodically for any changes as they become effective when they are posted on this page.

CONTACT US

By providing the IFE with your PI you consent to its processing which includes its transfer as set out in this Notice.

The registered Information Officer, who is the person responsible for compliance with the conditions for the lawful processing of PI and dealing with any matters relating to the POPI Act, is the CEO. In case of questions regarding this Notice the Information Officer can be contacted on adminstaff@ife.org.za.