

DATA PROTECTION POLICY AND PROCEDURE

JULY 2021



AUTHORISED: NAME _____ SIGNATURE: _____

Any questions relating to the contents of this document can be relayed to the above compiled and / or info@citypointchurch.co.za

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INTRODUCTION

City Point Church is committed to protecting personal data and respecting the rights of our data subjects (people whose personal data we collect and use). City Point Church values the personal information entrusted to us and we respect that trust by complying with all relevant laws*, and adopting good practice.

(**Protection of Personal Information Act, hereinafter “POPIA”*)

We process personal data to help us:

- Maintain a database of our church members
- Provide pastoral support for members and others connected with our church
- Provide services to the community
- Safeguard children, young people, and adults at risk
- Recruit, support and manage staff and volunteers
- Maintain our church accounts and records
- Promote our services
- Maintain the security of property and premises
- Respond effectively to enquirers and handle any complaints
- For any fundraising events that might require this information

This policy has been approved by the City Point Church Leadership Team who are responsible for ensuring that we comply with all our legal obligations. It sets out the legal rules that apply whenever we gather, process, store or use personal data.

1. Why this policy is important

A. We are committed to protecting personal data from being misused, getting into the wrong hands because of poor security or being shared carelessly, or being inaccurate.

B. This policy sets out the measures we are committed to taking as a church and what each of us will do to ensure we comply with the relevant legislation.

C. For instance, we will make sure that all personal data is:

- Processed lawfully, fairly and done transparently
- Processed for specific and legitimate purposes and not in a manner that is incompatible with those purposes
- Adequate, relevant, and limited to what is necessary for the purposes for which it is being processed
- Accurate, complete, and up to date
- Not kept longer than necessary for the purposes for which it is being processed
- Processed in a secure manner, by using appropriate technical and organisational means
- Processed in keeping with the rights of data subjects regarding their personal data.

2. How this policy applies to you and what you need to know

A. As an employee, volunteer, or trustee processing personal information on behalf of the church, you are required to comply with this policy. If you think that you have accidentally breached the

policy, it is important that you contact our Information Officer immediately so that we can take action try to and limit the impact of the breach. Anyone who breaches the Data Protection Policy may be subject to disciplinary action, and where that individual has breached the policy intentionally, recklessly or for personal benefit they may also be liable for prosecution or to regulatory action.

B. As a leader and/or manager you are required to make sure that any procedures that involve personal data, which you are responsible for in your area, follow the rules set out in this Data Protection Policy.

C. As a data subject of City Point Church, you can be assured that we will handle your personal information in line with this policy.

D. As an appointed data processor/contractor, you are required to comply with this policy under the contract with us. Any breach of this policy will be taken seriously and could lead to us taking contract enforcement action against the company or terminating the contract.

E. Our Information Officer is responsible for advising City Point Church and its staff and members about their legal obligations under data protection law, monitoring compliance with data protection law, dealing with data security breaches and with the development of this policy. Any questions about this policy or any concerns that the policy has not been followed should be referred to them at info@citypointchurch.co.za.

Before you collect or handle any personal data as part of your work (paid or otherwise) for City Point Church, it is important that you take the time to read this policy carefully and understand exactly what is required of you, as well as the organisation's responsibilities when we process data.

3. HR & Internal data collected, stored and processed

A. Employees and staff are periodically trained on what is lawful processing of personal information and the risks associated with day-to-day handling and processing of personal information should be addressed and limited through education.

B. A clause has been added to each employment contract to confirm the company's undertaking to ensure that the employee's personal data will be securely held and lawfully processed in terms of POPI (data protection clause).

C. Volunteer staff will sign a document agreeing to the company's undertaking to ensure their personal data will be securely held and lawfully processed in terms of POPI (data protection clause).

D. City Point Church uses a standard Google account for its online solutions. User access to the Google account is monitored as and when new devices access the account, the appropriate notification is sent of this activity. A list of devices that are signed into the account is maintained. Any breach of personal data will be reported to the Regulator and all efforts must be taken to contain the breach. Thereafter, data subjects will be informed of the extent of the breach.

4. Website, Cookies & Marketing

A. We believe that transparency is important when dealing with data subjects and their personal information, therefore our website collects limited personal information but is still compliant

with POPI. We therefore have an Online Privacy Policy, and have added an email disclaimer to every employee's email signature.

B. The Online Privacy Statement includes what data is collected and processed by the Company by any data subjects who visit the website. This information includes but is not limited to contact details, email address, cookies, and in some cases, financial information (for donations of payments being made via the website).

C. The 'City Point POPI Act: Procedures and Policies' document is available on the website for data subjects to peruse should they need to know how their data is processed within each department and by each service provider of the church.

D. All direct marketing is ring-fenced to only existing clients or new clients who have expressly consented to further marketing. The data subject must also have an option to opt-out or unsubscribe from any form of direct marketing.

Therefore we will be sending out a communication to all clients on the existing database and confirm that the company is now POPI compliant and that any individual can opt-out of further marketing material.

E. We sent out a newsletter / electronic consent form to all existing members to reaffirm the church's undertaking to continue to process any personal information in its possession lawfully and securely in terms of POPI.

5. Cybersecurity & Data Breach Protection

A. The standard Google account or the similar online cloud solution used by City Point Church does provide secure data protection and storage. The Privacy Policies are easily accessible and are compliant with GDPR and POPI provisions.

B. Furthermore, the standard Google account allows City Point Church to create a hybrid compliant cloud system.

C. Any further processing of the personal data under City Point Church's control is done in terms of a data transfer or data-sharing agreement, which agreement is in terms of POPI and the action has been consented to by the data subject prior to further processing (for any reason outside of the scope for which the personal data was collected for).

D. All personal data collected, stored and processed by City Point Church is done within a POPI compliant framework – accompanied by the necessary consent from all members, visitors or staff (to have their data processed).

E. Please note that as City Point Church deals with a lot of personal information, including medical conditions and certain preferences or conditions. We ensure that our internal practices are backed up by written policy or secure procedure which promotes secure and lawful processing of personal information at all times.

POLICY AND PROCEDURES

Finance

1. Vendor / Supplier Invoices

1.1. Staff member receives invoice and hands it in to the Finance office.

1.2. Staff member hands in a payment requisition with the attached invoice.

1.3. Papers are kept in the employee's In tray/folder, until processed / paid.

1.4. All paid invoices with paperwork are then filed in a lockable filing cupboard.

1.5. Office is lockable when employee is out of office.

1.6. Digital invoices are kept on the Finance Dept password protected laptop.

2. All HR / employee contracts / pension information forms etc.

2.1. These are stored in a lockable cupboard.

2.2. Any employee information / banking details / pension forms etc. sent on email are stored on a computer which is password protected. Printed items are stored in a lockable cupboard.

2.3. The office is lockable when employee is out of office.

2.4. Staff reimbursement forms / staff fuel claims

2.4.1. Staff member hands in payment reimbursement / claim (original or email).

2.4.2. The papers are kept in employee's desk tray, until processed / paid.

2.4.3. All paid paperwork is then filed in lockable filing cupboard.

2.4.4. Office is lockable when employee is out of office.

3. Financial documents / records from previous years (up to 5 years)

3.1. These are stored in a lockable cupboard.

Next Step Cards

1. A disclaimer is present on all Next Step Cards and online forms.

2. People who sign up via the online form on the website (need to give permission for us to use their information) - information gets emailed to the Admin Staff person, whose computer is password protected.

2. Grow Track

2.1. Guests complete an Attendance register and Next Step/Membership forms which are collected by Grow Track volunteers and put into the drop safe.

2.2. The Admin Staff Member unlocks the drop safe on the first work day of the week to fetch forms for processing.

2.3. The Admin staff Member processes all information on the first work day of the week, adding all information to the Anatomy database.

2.4. All signups are then immediately destroyed, except Membership forms. These are given to the Executive Pastor and locked in the filing cabinet in the Executive Pastor's office.

2.5. Attendance register is stored in a locked cupboard and shredded after attendees have attended all sessions.

3. Welcome Cards

3.1. People drop Welcome Cards at the Info Desk. This includes visitor, salvation, baby blessing, baptism, life group and Vision team sign ups.

3.2. The Admin Staff Member collects all the cards from the Info Desk and drops it into the drop safe.

3.3. The Admin Staff Member opens the drop safe on the first work day of the week to fetch the cards.

3.4. The Admin Staff Member processes all information.

3.5. The Admin Staff Member will process immediately and if not, will lock cards away until processed.

4. Visitors and Salvations

4.1. People fill in a Welcome Card and Spotters form from the auditorium and follow the process for Welcome Cards.

4.2. The Admin Staff Member calls them and adds them to Anatomy and updates their profile.

4.3. Forms are added to the dated envelope mentioned in point 2.5. and shredded after 2 weeks.

5. Baby Blessing

5.1. People sign up via the form.

5.2. The process for Welcome cards above is followed for sign up via a form.

- 5.3. The Admin Staff Member adds information to an Excel spreadsheet and contacts people who have signed up.
- 5.4. Forms are locked up and destroyed after the Baby Blessing certificates are printed and given to the parent.

6. Baptism

- 6.1. People sign up by filling out the form.
- 6.2. The process for Welcome cards above is followed.
- 6.3. The Admin Staff Member adds information to an Excel spreadsheet and contacts people who have signed up.
- 6.4. Forms are locked up until the person is baptised.
- 6.5. Once the person gets baptised and the certificate printed, that form is returned to the Admin Staff person.
- 6.6. The Admin staff Member updates each person's profile on Anatomy (protected by the fire wall).
- 6.7. The sign up form gets destroyed.

7. Vision Team sign ups

- 7.1. Option to sign up via Grow Track - follow Grow Track process.
- 7.2. Option to sign up via Welcome Card - follow the Welcome Card process.
- 7.3. Option to sign up via the website - Disclaimer in place.
- 7.4. Each person's details are then given to the relevant Dept leader to follow up and the form destroyed.

Hosting & Hospitality

1. Giving envelopes are placed at the back of the seats & Registration desk for congregation.
2. People choose to then personally and willingly put their personal information on the envelope (if applicable).
3. People put their giving envelope into a container held by an Usher during the Tithes segment of the service.
4. With the supervision of the Vision Team Co-ordinator, these envelopes are then locked up.
5. The Offering envelopes are collected from the locked area by a vetted Counting team member.
6. Monies contained in the envelopes are counted by at least 2 members of the Counting Team (the room in which counting takes place has a locked door). Once counting is complete, envelopes are put into the drop safe for processing.
7. The Admin Staff Member fetches the locked envelopes on the first working day of the week and captures the **amounts only** for stats. The envelopes are then ripped up and thrown away.
8. Covid screening forms / Registration lists
 - 8.1. Covid screening forms with disclaimer are kept at the Registration desks at the entrances into the building.
 - 8.2. People willingly put on all of their personal information on the screening forms.
 - 8.3. At the start of the Sunday services they get collected by the Admin Staff Member & put into the drop safe.
 - 8.4. After two weeks they are shredded.
9. Info Desk sales
 - 9.1. Info Desk volunteer places the Receipt book into the drop safe after the Sunday services.
 - 9.2. Receipts are collected by Finance staff member.
 - 9.3. The Finance staff member reconciles receipts, which are shredded thereafter.

10. Event and course registrations

- 10.1. Registration forms are kept at the Info desk. Includes disclaimer that we can use their information.
- 10.2. People willingly put on all of their personal information on the forms.
- 10.3. Info Desk volunteer places the Registration forms into the drop safe after the Sunday services.
- 10.4. Forms are collected by Admin staff member.
- 10.5. The Admin staff member processes the forms and captures all attendees on an Excel sheet for the event or course. Forms are shredded once captured.
- 10.6. The Attendee list is printed for use at the Event or course and shredded within the week after the event or course ends.

Life Groups

1. New Life Group leaders applications:

- 1.1. These are received verbally via Grow Track or recommended by existing Life Group Leaders.
- 1.2. Group leaders are informed they will be cared for by a Coach and contact details are shared with that Coach.
- 1.3. Life Group leaders are added to the “Life Group Leaders” WhatsApp Group.
- 1.4. Any email communication to groups of leaders is conveyed via the BCC field.

2. People joining Life Groups:

- 2.1. People sign up via the form or messaging the church cell number or online form on the website (need to give permission for us to use their information) - information gets emailed to the Admin Staff person, whose computer is password protected.
- 2.2. The process for Welcome cards above is followed for sign up via a form.
- 2.3. The Admin Staff Member adds information to an Excel spreadsheet and contacts people who have signed up and allocates them to a group.
- 2.4. Their names and contact details are given to their allocated Life Group leader.
- 2.5. Life Group leaders add them to their particular Life Group WhatsApp group.

Pastoral

1. The Admin Staff Member receives email, website and WhatsApp prayer requests.
2. The Admin Staff Member responds directly and then forwards these to Pastoral staff member.
3. The Pastoral Staff Member may then determine to share contact information with the Prayer team to pray confidentially.
4. Pastoral Staff Members to make contact with the person and pray with them directly.

Community Centre

1. Food parcel recipients are identified by Pastoral Staff and Community Centre Co-ordinator.
2. Their identities are kept confidential.
3. They are added to the Food Parcel Excel spreadsheet which is printed for the volunteers and staff to pack the parcels. This is shredded immediately once parcels are packed.
4. Their name and contact number are given to the Food Parcel admin volunteer to inform them when to collect their parcels.
5. Applications and interview forms (with disclaimers) for the 3 month Social Justice Program are locked up immediately after the interview or follow up updates.
6. Once the program has ended for the applicant, their file is shredded.

Reception

1. If someone calls asking for a staff member’s personal information, the Receptionist will not

give it out and will rather take down the caller's number and convey a message to the relevant staff member.

2. The Receptionist will then Whatsapp the staff member the information of the person so that the staff member can call them back.

Marriage Register & Funeral Confirmation letters

1. Certificate provided by the Marriage Officer (if applicable) and the marriage register booklet is locked away either at the home / work office.
2. Letters supplied by the Funeral Undertakers confirming funeral are locked away either at the home or work office.

Youth / Teenagers

1. Parents and newcomers complete a hard copy registration & indemnity form.
2. Forms are placed in the drop safe by the Youth Leader.
3. Admin Staff member collects documents on the first work day of the week to process.
4. Information provided on registration is then used to update or add to Anatomy and a Youth Whatsapp group.
5. Indemnity, Photo and WhatsApp consent forms are stored in a lockable cupboard.
6. Indemnity, Photo and WhatsApp consent forms are shredded and Anatomy updated when the teen transfers out of the youth department at age 20yrs or leaves the church.

Kids Church

1. Our Check In Volunteers are vetted and if deemed necessary, have police clearance.
2. Kids are checked in using a Google sheet on a password protected laptop.
3. Visitors complete a hard copy registration form on arrival. The visitor places the form in a designated envelope kept by the Check-in Volunteers
4. Following check in, Covid registers and all forms are placed in the envelope and put in a drop safe by the Check in Volunteer.
5. Admin Staff member collects documents on the first work day of the week.
6. Completed registration forms are processed and shredded immediately.
7. Indemnity, Photo consent and incomplete registration forms are kept securely in a locked venue.
8. Incomplete registration forms are shredded once they are completed and processed or when the child transfers out of the kids church department, whichever comes first.
9. Registration, Indemnity & Photo consent forms are shredded and Anatomy updated when the child transfers out of the Kids Church department or leaves the church.
10. Covid Registers are kept in a locked venue for 2 weeks and then shredded

IT

1. Firewall monitored on a daily basis with alert notifications "Switched On" for real time updates.
2. All important documents are stored in a secure Google Cloud Storage solution or backed up to a hard drive that is stored in a secure location.

Tenants

1. Leases and site inspection documents are locked in a secure cupboard.
2. Invoices and Tenant letters are stored on the TPN cloud and or the Finance Staff member's password protected laptop.
3. Invoices and tenant letters are emailed via password protected devices and email service providers.
4. Documents are kept for 5 years after the end of the lease then shredded.

FINANCIAL SERVICE PROVIDERS

FNB

<https://www.fnb.co.za/about-fnb/legal-matters/privacy-policy.html>

GENERAL SERVICE PROVIDERS

Anatomy Privacy Policy

<https://release.anatomy.org.za/anatomy/privacypolicy.htm>

SARS Privacy Policy

<https://www.sars.gov.za/privacy-policy/>

TPN Privacy Policy

https://www.tpn.co.za/website/tpn/privacy_policy.pdf

ROLES AND RESPONSIBILITIES OF INFORMATION OFFICER: CITY POINT CHURCH

The Information Officer role is by default that of the Designated Head of a Private Body in terms of the provisions of both the Promotion of Access to Information Act 2 of 2000 (PAIA) and the Promotion of Personal Information Act 4 of 2013 (POPI). The responsibilities defined for these roles in City Point Church, a private body in terms of the aforementioned Acts are:

1) POPI Act Section 55(1): An Information Officer's responsibilities include:

- a) the encouragement of compliance, by the body, with the conditions for the lawful processing of personal information;
- b) dealing with requests made to the body pursuant to this Act;
- c) working with the Regulator in relation to investigations conducted pursuant to Chapter 6 (prior authorization) in relation to the body;
- d) otherwise ensuring compliance by the body with the provisions of this Act; and
- e) as may be prescribed.

POPI Regulations 2018: Responsibilities of Information Officers

2) Regulation 4:

a) An Information Officer must, in addition to the responsibilities referred to in s55(1) of the POPI Act, ensure that:

- i) A compliance framework is developed, implemented, monitored and maintained;

- ii) A personal information impact assessment is done to ensure that adequate measures and standards exist in order to comply with the conditions for the lawful processing of personal information;
 - iii) A manual is developed, monitored, maintained and made available as prescribed in s14 and s51 of the PAIA Act;
 - iv) Internal measures are developed together with adequate systems to process requests for information or access thereto; and
 - v) Internal awareness sessions are conducted regarding the provisions of the Act, regulations made in terms of the Act, codes of conduct, or information obtained from the Regulator.
- b) The information officer shall upon request by any person, provide copies of the manual to that person upon the payment of a fee to be determined by the Regulator from time to time.

POPI Act: Section 56: Designation and delegation of deputy Information Officer(s)

3) Each public and private body must make provision, in the manner prescribed in section 17 of the Promotion of Access to Information Act, with the necessary changes, for the designation of –

- a) Such a number of persons, if any, as deputy information officers as is necessary to perform the duties and responsibilities as set out in section 55(1) of this Act; and b) Any power or duty conferred or imposed on an information officer by this Act to a deputy information officer of that public or private body.

Appointed City Point Church Information Officer : Pastor Lorraine Lun

Appointed City Point Church Deputy Information Officer: Pauline Kariuki