



Data Privacy Policy

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The Greatness Effect

KLM EMPOWERED, YOUR B-BBEE PROJECT MANAGEMENT, TRAINING SOLUTIONS AND ECO-SYSTEMS DESIGN PARTNERS
FOR SKILLS, ENTERPRISE AND SOCIAL-ECONOMIC DEVELOPMENT

Head Quarters

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Centre of Leadership Excellence
20 Skeen Boulevard, 3rd Floor, North Wing, Bedfordview, GMT, 2007
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Data Privacy Policy

We value the privacy of our stakeholders and understand that they are concerned about how we handle their personal information. This document explains our privacy principles and how we apply them. It will be posted on <https://klmempowered.com/>.

For the purposes of this Data Privacy Policy, the term “stakeholder” is to be given its widest possible interpretation and includes, but is not limited to, any natural person being a past, present, or prospective client, supplier, learner, candidate, or customer of KLM Empowered Human Solutions Specialists (Pty) Ltd.


KLM Empowered is under obligation to comply with The Protection of Personal Information Act (‘POPI’) of 2013. The POPI Act requires KLM Empowered to inform candidates, learners, suppliers, clients, contractors, and any other stakeholder as to how their personal information is collected, used, protected, disclosed, and destroyed.

This policy sets out how KLM Empowered deals with personal information and for what purposes information is used. Sections 9 and 10 of the POPI Act states that information may only be processed...

- lawfully
- in a reasonable manner that does not infringe the privacy of the data subject
- if, given the purpose for which it is processed, it is adequate, relevant, and not excessive.

KLM Empowered guarantees its commitment to protecting stakeholder’s privacy and ensuring that their personal information is used appropriately, transparently, securely, and in accordance with applicable laws.

This policy is made available on our website and by request from our Data Protection Officer, whose details are provided in this document.



This data privacy policy applies to all candidates, learners, clients, suppliers, contractors, and any other party that KLM Empowered deals with referred to in this document as stakeholders.

This data privacy policy provides an overview of:

- the type of personal information we collect and process
- the purposes for which we use it (including whether you have an obligation to provide us with your personal information and any consequences of your not doing so)
- how we collect your personal information
- how we keep your personal information secure
- who we disclose your personal information to and where those recipients are
- how we safeguard those arrangements
- how long we keep your personal information for
- your rights in respect to your personal information and how you can exercise those rights

Appointment of a Data Protection Officer

KLM Empowered has appointed a Data Protection Officer as follows:

Lyn Mansour

20 Skeen Boulevard 3rd Floor, North Wing

Bedfordview, Germiston

Johannesburg, 2007

Telephone: 011 856 4700 | 010 020 3920

Fax: 011 622 5140

Email: lyn@klmempowered.co.za



Personal Information Collected

KLM Empowered collects and processes personal information pertaining to all stakeholders only if there is a reason to do so. The reason(s) will be provided to the data subjects before any information is collected. The type of information will depend on the need for which it is collected and will be processed for that purpose only. Whenever possible, we will inform stakeholders what information they are required to provide us with and what information is optional.

Examples of the Personal Information we collect

For a Natural Person the information we collect includes but is not limited to:

- Name and Surname
- Addresses(s)
- Identity Number
- Gender
- Photographs
- CCTV footage
- Tax Information
- Academic Qualifications
- Current Employment and Employment History
- Credit Rating
- Email Address(s)
- Telephone and Mobile Number(s)
- Marital Status



For Organizations the information we collect includes but is not limited to:

- Company Name
- Company Registration Number
- Address
- TAX Information
- Credit rating
- Bank Account details
- Agreements
- Personal information of representatives of the organization
- BBEEE Status

How Personal Information is Used

Stakeholder's Personal Information will only be used for the purpose for which it was collected and intended. This would include but not limited to:

- Providing products or services to stakeholders
- Providing information to Professional Institutes and Regulators
- Providing information to employer firms who are responsible for the payment of learner's fees
- Enabling KLM Empowered to assess candidates' further development needs.
- For audit and record keeping purposes
- In connection with legal proceedings
- Providing our services to stakeholders to carry out services requested and to maintain and constantly improve relationships
- Providing communications in respect of KLM Empowered and regulatory matters that may affect stakeholders
- In connection with and to comply with legal and regulatory requirements or when it is otherwise allowed by law
- Marketing



How Personal Information is Collected

We collect personal information directly from stakeholders, and where lawful and reasonable, we may collect personal information about stakeholders from third parties and publicly available sources, such as credit reporting and government agencies. This information may be updated or generated during the course of a stakeholder's relationship with KLM Empowered.


Safeguarding Personal Information

It is a requirement of the POPI Act to adequately protect the personal information we hold and to avoid unauthorized access and use of your personal information. We continuously review our security controls and processes to ensure that your personal information is secure.

KLM Empowered offices are equipped with physical access/security systems including secure entry systems and CCTV systems.

All staff within those offices are subject to our standard take on and vetting processes and have contracts obliging them to keep our information confidential and restricting their use of that information.

All staff are further obliged to adhere to comprehensive written policies and procedures and undertake regular and ongoing training. Such training addresses, amongst other things, our clear desk policies, screen locking, use of own devices, disposal of confidential waste, encryption of data, and the use of passwords on the systems they use. Certain staff also have assigned roles and responsibilities to help ensure the security and integrity of our information – including our Data Protection Officer.



We restrict access to our IT systems to those personnel that require it in the performance of their role(s) and where possible endeavour to anonymize the personal information held. Our IT systems are inherently designed and regularly updated to try to ensure they remain as secure as possible. We use secure servers, firewalls, virus and ransom scanning software, and employ IT professionals to support these systems.

We have a framework in place for undertaking data protection impact assessments whenever a proposed new project or initiative involving our use of personal information is likely to result in a high risk to the individuals whose personal information is affected and in order to identify, manage and address any privacy risks posed.

Disclosure of Personal Information

We maintain complete records of all the third-party companies with whom we share personal information.

We may disclose stakeholder's information where we have a duty or a right to disclose it in terms of applicable legislation, the law, or where it may be necessary to protect our rights. When we do share personal information with a data processor, we ensure we have a lawful basis for doing so and have a formal vetting procedure that we follow to assess that data processor's ability to look after any personal information shared with them. We also ensure that we have a written contract in place with them to apply appropriate safeguards to protect personal information to a standard and in a manner that provides us with sufficient guarantees as to the security of that personal information.



Legal Disclaimer

We reserve the right to disclose personal information to governmental bodies, exchanges and other regulatory or self-regulatory organizations should we be required to do so by law or should we believe that such action is necessary to:

- comply with the law or with any legal process
- exercise, protect and defend our legal rights and property
- prevent fraud, theft or abuse; and/or
- protect your personal safety or property and that of our staff or other customers or the general public. (If you provide false or deceptive information about yourself or misrepresent yourself as being someone else, we may disclose such information to the appropriate regulatory bodies and commercial entities).

In addition, we may disclose information, if required to do so, to any regulatory authorities in connection with any investigation of fraud, intellectual property infringements, or other activity that is illegal or may expose us to legal liability.

Record Retention Period

We only hold personal information in a format which permits identification for as long as is necessary for the purposes for which it was obtained. Where legal requirements oblige us to retain records for a particular period of time, those periods are the minimum period for which we will retain the relevant record.



Your Rights

You have a number of rights in respect to your personal information:

- You have a right to be informed that your personal information is being collected or that your personal information has been accessed by unauthorized person
- You have a right of access to your personal information
- You have a right to take action to rectify inaccurate personal information
- You have a right to erase personal information
- You have a right to restrict the processing of your personal information
- You have a right to data portability
- You have a right to object to processing of personal information (including direct marketing)
- You have the right to institute civil proceedings regarding the alleged interference with the protection of your personal information

Right to change this data privacy policy

We reserve our right to change this data privacy policy. We will publish all changes on our website. The latest version of our privacy statement will replace all earlier versions, unless otherwise stated. Records of changes will be documented in our QMS.

Queries and Complaints

If you have any queries or complaints about our data privacy policy, feel free to contact our Data Protection Officer.