

MOBIUS INFORMATION PRIVACY SERVICE OFFERING

The Protection of Personal Information Act (POPI) aims to give effect to each South African's constitutional right to privacy by giving individuals and organisations specific requirements to process personal information in a manner that is fair, secure and responsible. Organisations are taking a proactive approach in assessing their current personal information processing practices and aligning them with POPI's requirements to ensure readiness for the commencement of the Act. Mobius Consulting's Information Privacy methodology as depicted in Figure 1 is designed to provide organisations with a structured and managed process to:

- Determine the extent of personal information processing and the impact of POPI on your business
- Determine the privacy strategy that will best suit your organisation
- Assess your organisation's current level of privacy readiness
- Define a detailed privacy roadmap and project plan
- Manage your organisation's privacy remediation projects/initiatives
- Provide Privacy/Information Security/Governance specialists to execute your organisation's privacy remediation project/initiatives throughout your organisation's journey to becoming POPI compliant

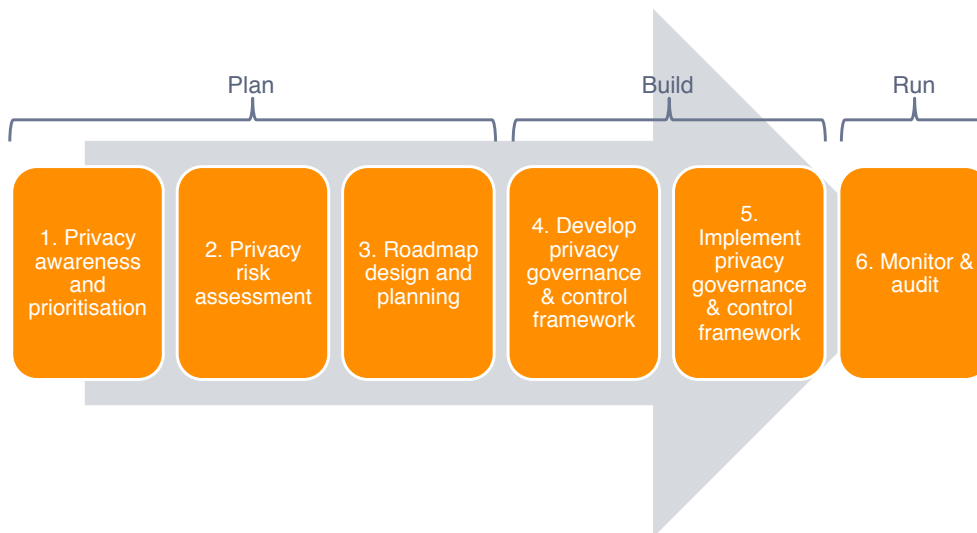


Figure 1: The Mobius Consulting Information Privacy methodology

MOBIUS CREDENTIALS

Mobius has a proven track record in performing Privacy projects from the awareness and prioritisation phase of the POPI journey through to remediation. We work with key stakeholders at our clients to tailor our approach to their specific needs, taking their internal expertise, resource availability and size of the project/initiative into account.

REMIEDIATION SKILLS & EXPERIENCE

Mobius Consulting has identified key Privacy remediation categories. We are in a position to assess and provide additional assistance or involvement required to assist our clients become compliant with POPI and related legislative requirements across these activities and phases.

Remediation activity	Phase: Planning	Phase: Implementation
Governance & policies	<ul style="list-style-type: none"> (a) Design Privacy governance structures and roles (b) Identify the need for the creation of relevant policies to govern privacy and security practices within the organisation. (c) Identify existing privacy, security and other relevant organisational policies that require review and updating to align with privacy requirements. 	<ul style="list-style-type: none"> (a) Implement Privacy governance structures and perform training and awareness for key stakeholders (b) Develop required privacy and security policies to govern privacy and security practices within the organisation. (c) Review and update existing privacy, security and other relevant organisation policies that require review and updating to align with privacy requirements.
Training & awareness	<ul style="list-style-type: none"> (a) Identify training requirements that consider the organisation, third parties and stakeholders. (b) Develop a formal POPI training strategy and plan that considers the organisation, third parties and stakeholders. 	<ul style="list-style-type: none"> (a) Create relevant content as per the defined POPI training plan (excluding development of software) (b) Deliver training modules as per the defined POPI training plan and/ or provide oversight during delivery of POPI training modules (to assist business ownership of POPI training) (c) Create assessment material relevant to the defined POPI plan.
Business processes	<ul style="list-style-type: none"> (a) Identify business processes that require review and updating to align with fair and lawful processing requirements (business process analysis, interviews etc.) (b) Develop a privacy governance framework (considering policies, the need for relevant committees or structures to support POPI, communication and alignment with business) (c) Identify the requirements to align application forms, contracts, web forms and other points of personal information collection with fair and legal processing requirements 	<ul style="list-style-type: none"> (a) Engage with business owners and stakeholders to identify solutions for aligning business processes with fair and lawful processing requirements (advise and provide assistance) (b) Implement the privacy governance framework. (as part of the privacy team) (c) Advise and assist to implement leading practice and reasonable steps to align application forms, contracts, web forms and other points of personal information collection with fair and legal processing requirements (note that third parties are managed separately from clients and employees)
Third party management	<ul style="list-style-type: none"> (a) Assist with understanding the current third party management practices within the organisation. (b) Identify third party relationships that must be considered as part of the organisation's POPI compliance strategy. (c) Develop a comprehensive third party management framework. 	<ul style="list-style-type: none"> (a) Advise and assist with implementing required actions to update third party management practices (legal expertise available through our outsourced partners) (b) Perform third party management actions as per the comprehensive third party management framework.
Information security	<ul style="list-style-type: none"> (a) Perform Information Risk Assessment (b) Understand and identify security, system development and change requirements to enable appropriate information security. 	<ul style="list-style-type: none"> (a) Understand and identify security, system development and change requirements through: <ul style="list-style-type: none"> • Security assessments (ISO 27000) • Vulnerability assessments • Data discovery assessments

NOTE: implementation of the controls, policies and procedures listed in this document does not guarantee compliance with local or international privacy legislation. Organisations should align privacy related security controls with their information risk assessment, strategic objectives and the regulatory requirements applicable to their country, industry or organisation.