SHARING INFO

SHARING IS CARING (IF YOU DO IT RIGHT)

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Project: **SHARING INFORMATION**
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novation consulting

POPIA
BASICS

(WHAT IS POPIA ABOUT?)

WHAT IS PERSONAL INFORMATION?

- Identifiers
- Demographic information
- Contact details

- Financial information
- Background or historical information

Information relating to an identifiable, living, natural person or an existing organisation.

- Usernames and social media handles
- Biometric information
- Health information

- Preferences and opinions
- Behavioural information
- Correspondence

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MEET YOUR DATA SUBJECTS

- **Students:** Prospective students, student applicants, students (South African or international), exchange students and alumni

- **Employees and functionaries:** Academic and administrative staff, employment candidates, external members of committees, student employees (e.g., research assistants, tutors), the SRC and council members

- **Research:** Researchers and research participants

- **Affiliated organisations:** Donors, funders, 'subsidiaries' (e.g., units and centers, companies in which the University is a shareholder), partners (e.g., exchange programmes), service providers, suppliers, independent contractors

- **Other individuals:** Family members of students and employees, sureties, emergency contacts visitors and members of the public

POPIA IS ABOUT BALANCE

PRIVACY	BUSINESS
Protect the constitutional right to privacy including the unlawful collection, retention, dissemination and use of personal information (the preamble)	But, the Regulator must take into account the interests of public and private bodies in achieving their objectives (yes, even the commercial ones) in an efficient way (section 44(1)*(b)*)

WHAT IS SHARING?

(WHAT DOES IT ALL MEAN?)

WHAT IS SHARING?

- **Sending** information to someone by email or a file transfer protocol
- **'Pushing'** information from your organisation's database to another organisation's database
- **Giving** an external individual **access** to your organisation's database
- Instructing another organisation to **collect** information on your behalf
- **Publishing** information on the internet

AVAILABILITY
INTEGRITY
CONFIDENTIALITY

- ☐ Plan
- ☐ Collect/Create
- ☐ Use
- ☐ Share
- ☐ Process some more
- ☐ Store/Retain
- ☐ Destroy

WHAT DOES THE POLICY SAY?

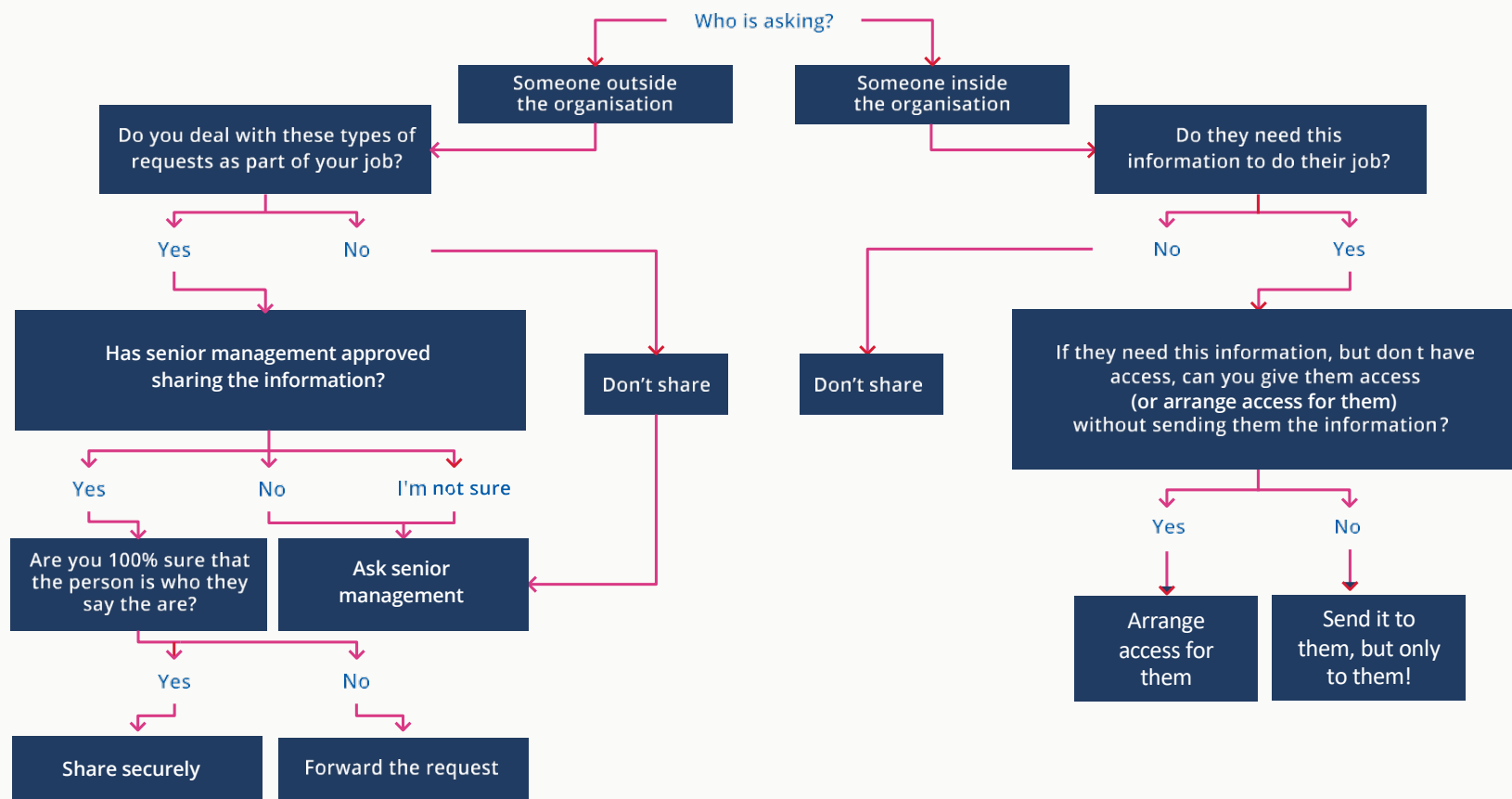| THE QUESTION	SIGNS OF TROUBLE (YOU ARE NOT ON TOP OF THIS)
Limit sharing: Identify who we share personal information with and ensure that they will protect it.	- You don't know who it is shared with (there is no record) - You haven't determined whether it is legal to share the information (go back to this slide) - You know there is sharing, but there is no record of a contract or you don't know whether there is a contract - There is a contract, but it doesn't say anything about how the personal information should be handled and what it can be used for

HOW TO
SHARE

(YOU GOT TO BE CAREFUL)

SOMEONE ASKS FOR INFO

Someone asks you for confidential or personal information

Who is asking?

Someone outside the organisation

Someone inside the organisation

Do you deal with these types of requests as part of your job?

Yes — No

Do they need this information to do their job?

No — Yes

Has senior management approved sharing the information?

Don't share

Don't share

If they need this information, but don t have access, can you give them access (or arrange access for them) without sending them the information?

Yes — No — I'm not sure

Are you 100% sure that the person is who they say the are?

Ask senior management

Yes — No

Arrange access for them

Send it to them, but only to them!

Yes — No

Share securely

Forward the request

SHARING WITH
SOMEONE OUTSIDE

RULE: Unless it is in your job description, do not share personal or confidential information with third parties.

Send the information request to a member of senior management.

SHARING WITH
SOMEONE OUTSIDE

RULE: If you must share information with external service providers like accountants, the organisation must have the appropriate contracts in place to ensure that these external organisations or individuals follow the same rules your organisation does regarding its information.

SHARING WITH SOMEONE OUTSIDE

FIND OUT MORE:

Ask senior management whether your organisation has a contract in place with the external organisations or individuals.

SHARE INSTITUTIONAL INFO SECURELY

RULE: **Less is more! Do not overshare institutional information.**

Only share the institutional information you need to achieve your purpose. Why must you do this? The less institutional information you share, the less institutional information can be compromised. Also, administratively, it is far more efficient (for you and the recipient of the institutional information) to only share the minimum amount of institutional information relevant for your purposes.

SHARE BY EMAIL

RULE: Do not share large batches of personal or confidential institutional information by email.

Email is one of the least secure ways you can share information because once an unauthorised user gains access to an email or email attachment, it is virtually impossible to control how those documents are then shared. Consider alternative sharing platforms, for example, Google Shared Drives, OneDrive, SharePoint or other sanctioned cloud services.

SHARE BY EMAIL

RULE: Only use your organisation's email address when you share institutional information.

Your organisation is ultimately responsible for the security, confidentiality and availability of all institutional information. If you only use your organisation's email address to share institutional information, it is much easier for the organisation to ensure the safety of all institutional information.

SHARE BY EMAIL

- Always double-check that you are sending your email to the right person.

- Ask the recipient to confirm receipt of the email.

- If you are emailing a large group of recipients, 'Bcc' everyone rather than 'Cc' them.

- When you share personal or confidential institutional information by email, do not include it in the body of the email.

- Use Google's 'confidential mode' if you email very sensitive institutional information.

SHARE THROUGH THE CLOUD

DO	DO NOT
DO share institutional information by using Google Drive (use Shared Drives rather than My Drive), OneDrive or SharePoint accounts, rather than sharing institutional information as an email attachment. These tools help you specify who you want to give access to, and they allow you to collaborate on documents in real-time.	**DO NOT** use your personal Google Drive, Dropbox, OneDrive or SharePoint accounts to share institutional information. For example, what if your personal account expires and you lose access to this institutional information?
DO use other organisation-sanctioned cloud services or platforms to share institutional information.	

SHARE THROUGH SOCIAL MEDIA

- Backup your WhatsApp conversations in which you exchanged institutional information as they may be important at a later stage.

- Have a screenlock for the device you use for WhatsApp and other social media platforms.

- Enable two-step verification to your WhatsApp profile.

- Enable security notifications.

- When you use social media platforms for official organisation purposes, only use those platforms to share public institutional information.

- Only share personal information with others responsibly and securely.

AN IMPORTANT
EMAIL ADDRESS

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THANK YOU!

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