




EKURHULENI WATER CARE COMPANY
COMPANY POLICY


Privacy Policy

EKURHULENI WATER CARE COMPANY (ERWAT) (Registration number: 1992/005753/08) Hartebeestfontein Office Park, Bapsfontein/Bronkhorstspruit Rd (R25), Kaalfontein, Kempton Park, South Africa, 1631	Document number:	BR 1/1/1	
	Issue date:	September 2023	
	Issue number:	1.0	

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R.C.

EKURHULENI WATER CARE COMPANY (ERWAT) (Registration number: 1992/005753/08) Hartebeestfontein Office Park, Bapsfontein/Bronkhorstspuit Rd (R25), Kaalfontein, Kempton Park, South Africa, 1631	Document number:	BR 1/1/1	
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i. DOCUMENT HISTORY

Table 1

Custodian:	Information and Communications Technology
Policy Number:	BR 1/1/1
Current Version:	1.0
Revised Date:	
Date Originally issued:	19 September 2023
Electronic File Name	ERWAT – Privacy Policy

Document Control

Document enquiries may be directed to the Information and Communications Technology Department,
ERWAT

Hartebeestfontein Office Park
R25 (Bronkhorstspuit/Bapsfontein)
Kempton Park NU
1631

The document control log table below must be updated each time that this policy is reviewed and/or amended in order to track any changes made.

Table 2

No.	Version	Date	Description of changes	Status	Modified by
1	1.0	15/09/2023	Development and documented first policy version	1 st Draft	Clifford Patel

EKURHULENI WATER CARE COMPANY (ERWAT) (Registration number: 1992/005763/08) Hartbeespoort Office Park, Bepofoan/Bronghorstapark Rd (R25), Kaalfontein, Kempton Park, South Africa, 1631	Document number:	BR 1/1/1	 ERWAT EXCELLENCE IN WATER CARE
	Issue date:	September 2023	
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II. DOCUMENT APPROVAL

The signatories hereof, being duly authorised thereto, by their signatures hereto authorise or confirm their acceptance of the contents hereof and authorise the implementation and adoption thereof, as the case may be, for and on behalf of the parties represented by them.

Table 3


Signatory 1:	Ms Zimasa Socikwa
Date:	29 / 11 / 2023
Designation:	Company Secretary
Sign:	

Table 4


Signatory 1:	Mr. Kennedy Chihota
Date:	04 / 12 / 23
Designation:	Managing Director
Sign:	

Table 5

Signatory 2:	Dr Natalie Skeepers
Date:	12/12/2023
Designation:	Chairperson of the Board of Directors
Sign:	NC Skeepers



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1. INTRODUCTION

Your privacy is important to ERWAT, and we want to make clear how ERWAT will handle your personal information when working with you. By providing you with an overview of how ERWAT will use your personal information through this privacy notice, ERWAT satisfies its notification duty under the Protection of Personal Information Act 4 of 2013 (the "POPIA").

In accordance with this Privacy Policy and the provisions of any applicable privacy and information protection laws, ERWAT is committed to managing and processing your Personal Information in a way that respects your right to privacy while also being lawful, fair, and transparent.

2. DEFINITIONS

2.1 The following definitions are applicable to this document:

- | | | |
|-------|-----------------|--|
| 2.1.1 | "Employee(s)" | Any person(s) who is in the permanent and non-permanent employment of ERWAT |
| 2.1.2 | "Data Subjects" | a person to whom personal information relates |
| 2.1.3 | "IBAN" | International Bank Account Number |
| 2.1.4 | "Records" | A record is any information which is legally recognized and judicially enforceable |
| 2.1.5 | "SWIFT Details" | Unique identification number used by your bank for international fund transfers |

3. HOW ERWAT COLLECTS PERSONAL INFORMATION


Personal Information is information which relates to an identified or identifiable natural person or a juristic person, by means of an identifying factor and subject to the applicable data protection laws. The Personal Information collected and processed by ERWAT may differ depending on the purpose for which the information was collected. ERWAT may collect or obtain Personal Information about you, not limited to the following instances:

- 1.1.1. directly from you;
- 1.1.2. in the course of our relationship with you;
- 1.1.3. when you make your Personal Information public;
- 1.1.4. when you visit ERWAT offices;
- 1.1.5. when you visit and/or interact with ERWAT through our website, emails or our various social media platforms;
- 1.1.6. in the course of providing services to you or your organisation;
- 1.1.7. from persons and entities employed/appointed by ERWAT;
- 1.1.8. ERWAT may also receive Personal Information about you from third parties (eg, law enforcement authorities; credit bureaus).

In addition to the above, ERWAT may create Personal Information about you such as records of your communications and interactions with us, including, but not limited to, your attendance at events or at interviews in the course of applying for a job with us.

4. PERSONAL INFORMATION WE COLLECT AND PROCESS

ERWAT may process the following categories of Personal Information about you:

EKURHULENI WATER CARE COMPANY (ERWAT) (Registration number: 1992/005753/08) Hartebeestfontein Office Park, Bapsfontein/Bronkhorstspuit Rd (R25), Kaalfontein, Kempton Park, South Africa, 1631	Document number:	BR 1/1/1	
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- 4.1.1. personal details: first name, last name and photographs;
- 4.1.2. demographic information: gender; date of birth / age; nationality; salutation; title; and language preferences;
- 4.1.3. identifier information: passport or national identity number;
- 4.1.4. contact details: correspondence address; telephone number; email address; and details of your public social media profile(s);
- 4.1.5. attendance records: details of meetings and other events organised by or on behalf of ERWAT that you have attended;
- 4.1.6. consent records: records of any consents you may have given, together with the date and time, means of consent and any related information;
- 4.1.7. employment details, -history, qualifications, and designations;
- 4.1.8. educational details, including student number, educational establishment, dates of study, subject studied, exam results, student training records, awards etc.
- 4.1.9. payment details: billing address; payment method; bank account number or credit card number; invoice records; payment records; SWIFT details; IBAN details; payment amount; payment date; and records of cheques;
- 4.1.10. data relating to your visits to our Website: your device type; operating system; browser type; browser settings; IP address; language settings; dates and times of connecting to a Website; and other technical communications information;
- 4.1.11. complaints and disciplinary records;
- 4.1.12. video and voice recordings;
- 4.1.13. company details;
- 4.1.14. details of membership or other professional bodies;
- 4.1.15. any other information which ERWAT may, in order to conduct its primary and secondary objectives, be required to process.

5. USE OF YOUR PERSONAL INFORMATION

ERWAT collects and processes Personal Information for the purpose indicated below but not limited to:

- 5.1.1. the purpose of providing any services or products to the Data Subject from time to time;
- 5.1.2. the purposes of receiving services or products provided by the Data Subject from time to time;
- 5.1.3. the Data Subject is an employee, in the course and scope of employment by ERWAT;
- 5.1.4. respond to any correspondence that the Data Subject may send to ERWAT, including via e-mail or by telephone;
- 5.1.5. such other purposes to which the Data Subject may consent from time to time; and
- 5.1.6. such other uses authorised in terms of applicable laws.


6. SHARING OF PERSONAL INFORMATION

ERWAT may disclose your personal information to third parties if:

- 6.1.1. Sharing is necessary to fulfil certain conditions, e.g. applications for training agreement, membership, recruitment,
- 6.1.2. Sharing is required by law;
- 6.1.3. Sharing protects your legitimate interest;
- 6.1.4. Sharing is necessary for pursuing our or a third parties to whom the information is supplied legitimate; and/or
- 6.1.5. Sharing was agreed to by you (or a competent person where you are a child) in the form of a consent.

7. PERSONS WHO WILL ACCESS YOUR PERSONAL INFORMATION

ERWAT employees will have access to your Personal Information to administer and manage our inclusive services and our various stakeholder relationships. Your personal information will further be shared with third parties, subject to the purpose of us collecting and processing your information, including but not limited to:

EKURHULENI WATER CARE COMPANY (ERWAT) (Registration number: 1992/005753/08) Hartebeestfontein Office Park, Bapsfontein/Bronkhorstspuit Rd (R25), Kaalfontein, Kempton Park, South Africa, 1631	Document number:	BR 1/1/1	
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- 7.1.1. Divisions within ERWAT, including directors, contractors, agents, auditors, legal and other professional advisors who are authorised to process this information;
- 7.1.2. Service providers;
- 7.1.3. To any person who acts as legal guardian, executor of an estate, curator or in a similar capacity;
- 7.1.4. Oversight and other regulators, professional bodies and statutory bodies;
- 7.1.5. Our Board and sub-Board Committee;
- 7.1.6. Other Committee members;
- 7.1.7. Government agencies; and
- 7.1.8. Law enforcement, e.g. SAPS

8. PROTECTION OF YOUR PERSONAL INFORMATION

ERWAT will take the necessary steps to secure the integrity and confidentiality of personal information in its possession and under its control by taking appropriate, reasonable technical and organisation measures to prevent loss of damage to or unauthorised destruction of your personal information and unlawful access to or processing of personal information, regardless of the format in which it is held.

Where there are reasonable grounds to believe that your Personal Information that is in our possession has been accessed or acquired by any unauthorised person, ERWAT will notify the relevant regulator and you, unless a public body responsible for detection, prevention or investigation of offences or the relevant regulator informs us that notifying you will impede a criminal investigation.

9. DATA RETENTION

ERWAT shall only retain and store Personal Information for the period for which the data is required to serve its primary purpose or a legitimate interest or for the period required to comply with an applicable legal requirement, whichever is longer.

10. DATA ACCURACY

ERWAT will ensure that all Personal Information is kept as accurate, complete and up-to-date. Should Personal Information change, the onus is on the provider of such data to notify ERWAT of the change and provide ERWAT with the accurate data.


11. YOUR LEGAL RIGHTS

You may have rights under the South African and other laws to have access to your Personal Information and to ask ERWAT to rectify, erase and restrict use of, your Personal Information. You may also have rights to object to your Personal Information being used, to ask for the transfer of Personal Information you have made available to us and to withdraw consent to the use of your Personal Information.

12. COOKIES

ERWAT may process your Personal Information by our use of Cookies. Cookies are small text files sent by a web server to store on a web browser. They are used to ensure websites function properly, store user preferences when needed and collect anonymous statistics on website usage. When you visit our Website we may place Cookies onto your device, or read Cookies already on your device, subject always to obtaining your consent, where required, in accordance with applicable law.

You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of the Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to the Website. If you accept a cookie or fail to deny the use of cookies, you agree that we may use your personal information collected using cookies.

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13. CHANGES TO DATA PROTECTION NOTICE

ERWAT will review this Privacy Notice and may amend or supplement this Notice from time to time, in accordance with regulatory changes, business strategies and new technology introduced into our operations. We will publish an updated version of this Notice, as and when amendments or supplements have been made on our website.

14. CONTACT DETAILS

You may address all your enquiries, requests and/or concerns regarding this policy or relating to the processing of personal information to popia@erwat.co.za

15. REVIEW AND CONTINUAL IMPROVEMENT

- 15.1 Ownership of this policy is vested in the ICT Manager who will co-ordinate the drafting and updating of the policy.
- 15.2 This policy will be reviewed and updated as and when required or should legislation require ERWAT to do so, to ensure that it is in line with any changes, new requirements or circumstances affecting scope and objectives, including significant change in premises, personnel, business activities and / or dynamics, technology, or services. The policy will be reviewed regularly (at least once every three years) to contribute towards the overall performance of ERWAT's.
- 15.3 This policy document will only be deemed in force once Table ~~2~~³ has been completed and all signatories have signed it off.
- 15.4 The 'Description of changes' column of Table 2 must be comprehensively completed i.e. providing the exact details of the changes made during the review as well as the affected pages.