



Privacy Policy

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1. Document Sign off

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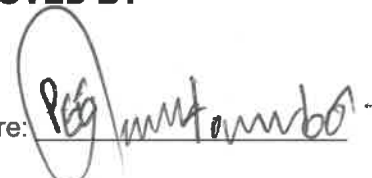
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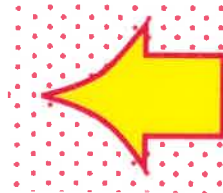




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2. Glossary of Abbreviations and Definitions

2.1 Abbreviations

Abbreviation	Full Form	Definition
PII	Personally Identifiable Information	Any information that can be used to identify a specific individual
GDPR	General Data Protection Regulation	European Union regulation on data protection and privacy
CCPA	California Consumer Privacy Act	California state law that provides residents with specific rights regarding their personal information
COPPA	Children's Online Privacy Protection Act	United States federal law designed to limit the collection and use of personal information about children by online services
HIPAA	Health Insurance Portability and Accountability Act	United States legislation that provides data privacy and security provisions for safeguarding medical information
PCI DSS	Payment Card Industry Data Security Standard	Proprietary standard for organizations that handle branded credit cards to enhance cardholder data security
IoT	Internet of Things	Network of physical devices embedded with sensors, software, and other technologies for the purpose of connecting and exchanging data
IP	Internet Protocol	Principal communications protocol for relaying datagrams across network boundaries

ISP	Internet Service Provider	Company that provides services for accessing, using, or participating in the Internet
SSL	Secure Sockets Layer	Standard technology for keeping an internet connection secure and safeguarding sensitive data
TLS	Transport Layer Security	Cryptographic protocol designed to provide communications security over a computer network
HTTPS	Hypertext Transfer Protocol Secure	Extension of the Hypertext Transfer Protocol for secure communication over a computer network
VPN	Virtual Private Network	Technology that creates a safe and encrypted connection over a less secure network
SaaS	Software as a Service	Software licensing and delivery model in which software is licensed on a subscription basis and is centrally hosted
IaaS	Infrastructure as a Service	Online services that provide high-level APIs used to dereference various low-level details of underlying network infrastructure
PaaS	Platform as a Service	Category of cloud computing services that provide a platform allowing customers to develop, run, and manage applications
DPA	Data Processing Agreement	Legal contract that defines the responsibilities and liabilities of the parties when personal data is processed
DPIA	Data Protection Impact Assessment	Process to identify and minimize the data protection risks of a project
DPO	Data Protection Officer	Officer responsible for overseeing data protection strategy and implementation



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FIPs	Fair Information Practices	Set of principles outlining a basic framework for balancing the privacy expectations of individuals with the needs of organizations to collect, use, retain, and disclose personal information
FTC	Federal Trade Commission	Independent agency of the United States government tasked with the promotion of consumer protection and the enforcement of civil (non-criminal) U.S. antitrust law
AI	Artificial Intelligence	Intelligence demonstrated by machines, in contrast to the natural intelligence displayed by humans
ML	Machine Learning	Study of computer algorithms that improve automatically through experience and by the use of data
NLP	Natural Language Processing	Subfield of linguistics, computer science, and artificial intelligence concerned with the interactions between computers and human language
IDS	Intrusion Detection System	Device or software application that monitors a network or systems for malicious activity
DoS	Denial of Service	Cyber-attack in which the perpetrator seeks to make a machine or network resource unavailable to its intended users
DDoS	Distributed Denial of Service	Cyber-attack in which multiple compromised systems are used to target a single system causing a Denial of Service attack

UTM	Unified Threat Management	Cybersecurity term that refers to a single security solution, and usually a single security appliance, that provides multiple security functions
SSO	Single Sign-On	Authentication scheme that allows a user to log in with a single ID and password to any of several related systems
MFA	Multi-Factor Authentication	Method of confirming a user's claimed identity by using a combination of two different factors
API	Application Programming Interface	Set of protocols and tools for building software and applications

2.2 Definitions

Term	Definition
Data Controller	An entity that determines the purposes, conditions, and means of the processing of personal data
Data Processor	An entity which processes personal data on behalf of the controller
Data Subject	An identified or identifiable person whose personal data is being processed
Cookies	Small pieces of data stored on a user's device while browsing to keep track of their movements within the site
Encryption	The process of converting information or data into a code to prevent unauthorized access
Firewall	A network security system that monitors and controls incoming and outgoing network traffic

Personal Data	Any information relating to an identified or identifiable natural person ('data subject')
Processing	Any operation or set of operations performed on personal data, whether or not by automated means
Anonymization	The process of erasing or encrypting personally identifiable information from data sets, so that the people whom the data describe remain anonymous
Pseudonymization	The process of transforming personal data in such a way that it cannot be attributed to a specific data subject without the use of additional information
Profiling	Any form of automated processing of personal data to evaluate certain personal aspects relating to a natural person
Data Breach	A security incident where information is accessed without authorization
Data Minimization	The principle that personal data must be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed
Consent	Freely given, specific, informed and unambiguous indication of the data subject's agreement to the processing of personal data
Two-Factor Authentication	A security process in which users provide two different authentication factors to verify themselves
IP Address	A unique string of numbers separated by periods that identifies each computer using the Internet Protocol to communicate over a network

Data Portability	The requirement for controllers to provide the data subject with a copy of his or her data in a format that allows for easy use with another controller
Privacy by Design	A principle that calls for the inclusion of data protection from the onset of the designing of systems
Privacy Impact Assessment	A process to identify and reduce the privacy risks of entities by analysing the personal data that are processed and the policies in place to protect the data

3. Document Control

3.1 Amendment History

Version ID	Date of Change	Author
1.1	30/05/2023	Metja Thongoane
1.2	26/06/2023	ICTSC
1.3	11/07/2023	EXCOMAN

3.2 Authorization

This document has been seen and accepted by:

Name	Designation
Tshepo Mofokeng	Chairperson of Audit and Risk Committee
Ineeleng Molete	Chief Executive Officer (CEO)
Tebogo Mmotla	Interim Chief Operations Officer (COO)
Kwena Mokgokong	Acting Chief Financial Officer (CFO)
Ineeleng Molete	Acting Executive Manager: Corporate Services
Josie Singaram	Acting Executive Manager: Strategy and Planning



4. Executive Summary

Welcome to the Local Government Sector Education and Training Authority (LGSETA), headquartered in South Africa. At LGSETA, we are dedicated to nurturing a culture of respect and protection for personal information in accordance with the highest standards of ethics and integrity. This Privacy Policy ("Policy") reflects our commitment to upholding these principles. Our Policy outlines the types of personal information we collect, the reasons for collecting it, how we use it, and the circumstances under which we may share it. The policy is based on COBIT framework under section MEA03 (External Compliance - Security & Risk). This is in line with our commitment to comply with the Protection of Personal Information Act, 2013 (POPIA), and other relevant South African laws and regulations, along with globally accepted data protection standards.

We recognize our obligation to maintain the confidentiality and security of your personal information and assure you that your privacy is of utmost importance to us. We strive to process your personal information in a lawful, legitimate, and responsible manner. We also endeavour to uphold your rights to privacy and to give you control over your personal information.

By engaging with our services, participating in our programs, or otherwise interacting with us, you acknowledge and agree to the terms of this Policy. If you have any questions or concerns about our privacy practices, we invite you to contact us at your convenience.



5. Personal Information We Collect

At LGSETA, we are committed to maintaining an environment that respects and protects your privacy. Our data collection processes are carefully designed to ensure that we only collect the personal information that is necessary for our functions and activities. This information might include, but is not limited to:

- **Identifying Information:** Such as your names, contact details, identification numbers, including but not limited to, your ID, passport, or driver's license number.
- **Professional and Academic Information:** This includes details about your employment history, job title, professional qualifications, educational background, training records, and academic achievements.
- **Financial Information:** We may collect financial details in certain cases, such as when processing payments or administering financial aid. This information might include bank account numbers, credit/debit card details, and other relevant financial data.
- **Special Personal Information:** In accordance with POPIA, we may collect special personal information, such as race or ethnic origin, only if necessary and with your explicit consent, or if the collection is required by law.
- **Digital Information:** When you interact with our digital platforms, we may automatically collect certain information such as IP addresses, device information, and usage data.

We understand the importance of obtaining your consent where required and will always strive to keep you informed about how and why we collect your data. Furthermore, we only collect personal information directly from you unless it is unreasonable or impracticable to do so.



6. How We Collect Personal Information

The process of collecting personal information at LGSETA is conducted with utmost respect for your privacy rights, and in compliance with POPIA and other applicable laws. Here are the ways in which we may collect your personal information:

- **Direct Interaction:** We primarily collect information directly from you when you apply for our services, participate in our programs, or interact with us in any other way. This could be via forms you fill out, emails you send, phone conversations, or face-to-face interactions during our events and programs.
- **Automated Technologies or Interactions:** When you use our website or digital platforms, we may automatically collect technical data about your equipment, browsing actions, and patterns. We collect this data by using cookies and similar technologies.
- **Third Parties:** In cases where it is lawful and reasonable, we might collect your personal information from third parties. These could include government agencies, educational institutions, employment agencies, or other service providers that have the right to disclose your information to us.
- **Publicly Available Sources:** We may also collect personal information from publicly available sources where this is lawful and in line with our functions and activities.

Regardless of the source, we ensure that your personal information is collected and processed in a manner that is lawful, reasonable, and not intrusive. We will always obtain your explicit consent where it is required, and we will inform you of the purpose for which we are collecting the information.



7. How We Use Personal Information

At LGSETA, we use your personal information with care and consideration, ensuring that it is processed for legitimate purposes only. Here's how we might use your personal information:

- **Service Delivery:** We primarily use your personal information to provide, manage, and improve our services. This includes processing applications, managing enrolments, delivering courses, administering financial aid, communicating updates, and offering support services.
- **Communication:** Your contact details help us stay connected with you. We use this information to respond to your inquiries, provide you with necessary information, and update you about our services or programs.
- **Legal Compliance:** We may process your personal information to comply with our legal and regulatory obligations. This could involve auditing, maintaining records, compliance checks, or disclosure to law enforcement agencies when necessary.
- **Performance Monitoring:** We may use personal information to evaluate the performance and effectiveness of our services and programs. This might involve conducting surveys, analyses, or research activities.
- **Security:** In some cases, we may process personal information to ensure the safety and security of our services, staff, and users. This includes monitoring our digital platforms and physical premises.
- **Marketing and Promotions:** With your consent, we may use your personal information to inform you about our new services, programs, or events that may be of interest to you.

We ensure that all our data processing activities are in line with POPIA and other relevant regulations. Your personal information will not be used for any purpose that you have not been informed of or consented to, unless required by law.



8. Disclosure of Personal Information

LGSETA respects the confidentiality of personal information and adheres to a strict policy of not disclosing it to third parties, except under certain circumstances. Here's how and when we might share your personal information:

- **Service Providers:** To effectively deliver our services, we may need to share your personal information with third-party service providers. These providers might include technology partners, data processing agencies, mailing houses, research companies, and others who assist us in carrying out our functions and activities.
- **Government Entities:** There may be instances where we are legally obliged to share your personal information with government bodies, regulatory authorities, or law enforcement agencies. This will only occur if required or authorized by law.
- **Educational Institutions:** To facilitate your learning and development, we may need to share your personal information with educational institutions such as schools, universities, or vocational training organizations.
- **Legal Requirements:** We may disclose your personal information to comply with legal obligations, enforce our terms and conditions, protect our rights, or prevent fraud and security issues.
- **Business Transfers:** In the event of a merger, acquisition, or sale of assets, we may transfer your personal information to the new entity, always ensuring that the receiving party is equally committed to protecting your privacy.

In all such cases, we ensure that the third parties adhere to POPIA and other relevant laws, and uphold the same level of confidentiality and security as we do. We will not sell, rent, or trade your personal information to any third party without your explicit consent.



9. Security of Personal Information

At LGSETA, the security of your personal information is of paramount importance. We are committed to implementing appropriate technical and organisational measures to protect your personal information against unauthorized access, loss, alteration, or misuse. Here's how we safeguard your information:

- **Data Encryption:** We use encryption technologies to ensure that your personal information is stored and transferred securely. This includes the use of secure servers and encrypted communication channels.
- **Access Control:** We limit access to your personal information to those employees, contractors, and third parties who have a legitimate business need to know. They are subject to strict contractual confidentiality obligations and may be disciplined or terminated if they fail to meet these obligations.
- **Security Policies and Procedures:** We have established comprehensive security policies and procedures that govern how we handle your personal information. These include regular audits, staff training, and incident response plans.
- **Data Breach Notification:** In the unlikely event of a data breach that compromises your personal information, we will notify you and the relevant regulatory authorities as required by POPIA and other applicable laws.
- **Data Retention:** We retain your personal information for as long as necessary to fulfil the purposes for which it was collected, including for the purposes of satisfying any legal, accounting, or reporting requirements.

We continually review and enhance our security measures in response to advancements in technology and new threats. However, no system can be completely secure, and we cannot guarantee the absolute security of your personal information.



10. Your Rights

LGSETA acknowledges and respects your rights concerning your personal information, as stipulated by POPIA and other applicable laws. These rights include:

- **Access:** You have the right to request access to the personal information we hold about you. This enables you to receive a copy of the personal information we have and to check that we are processing it lawfully.
- **Correction:** If you believe that any personal information we hold about you is incorrect or incomplete, you have the right to request correction of the same.
- **Deletion:** You may ask us to delete or remove your personal information under certain circumstances, such as where there is no good reason for us continuing to process it or you have successfully exercised your right to object to processing.
- **Objection to Processing:** You have the right to object to the processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.
- **Restriction on Processing:** You can request the restriction of processing of your personal information. This allows you to ask us to suspend the processing of your personal information in certain scenarios.
- **Data Portability:** You can request the transfer of your personal information to you or a third party in a structured, commonly used, machine-readable format.
- **Withdraw Consent:** If you have provided your consent to the collection, processing, and transfer of your personal information for a specific purpose, you have the right to withdraw your consent at any time.



To exercise any of these rights, please contact our Information Officer at info@lgseta.org.za. We may need to verify your identity before processing your request, which is a security measure to ensure that personal information is not disclosed to any person who has no right to receive it. Your request will be processed within a reasonable timeframe as prescribed by law.

11. Changes to this Policy

We recognize that privacy and data protection is an area of continuous change. As such, we may occasionally update this Privacy Policy to reflect changes in our practices, technologies, legal requirements, and other factors. Here are some details about how we handle such updates:

- **Notification of Changes:** Any changes we make to our Privacy Policy will be posted on this page and, where appropriate, notified to you by email or other direct communication. We suggest that you regularly visit our website and review this Privacy Policy to stay informed about our data practices and your rights.
- **Significant Changes:** In the event of significant changes to this Policy, we will inform you directly, providing a summary of the changes and, where necessary, seeking your consent.
- **Policy Review:** We regularly review this Policy to ensure it aligns with our current data practices and complies with evolving laws and regulations. This helps us ensure that our Policy remains robust and relevant.
- **Versioning:** Each version of this Policy will carry a date stamp at the beginning or end of the document so that you can easily tell when the Policy was last updated.

Your continued interaction with us after we make changes to our Privacy Policy implies your acceptance of those changes, so we encourage you to stay informed about any modifications.



12. Contact Us

If you have any questions about this Policy or our privacy practices, please contact our Information Officer at ictsupport@lgseta.org.za.

13. Deviation from policy

The Local Government Sector Education and Training Authority (LGSETA) in South Africa strongly discourages any deviation from its established policies. Such deviations, whether intentional or unintentional, can undermine the effectiveness of our programs and compromise our commitment to promoting skills development and job creation in the local government sector. Deviations can lead to inefficiencies, disparities, and legal issues, jeopardizing the credibility and integrity of LGSETA. Therefore, all stakeholders are urged to strictly adhere to LGSETA policies and procedures, and any deviations must be reported and appropriately addressed in line with the established corrective measures to uphold our mission of fostering an empowered, efficient, and effective local government sector.

14. Policy Review

This policy will be reviewed every 3 years from the date of the last approval. The ICT Manager is responsible for the facilitation of the review of this policy.