

Knysna Photographic Society

Policy for the Collection, Protection and Management of Personal Information and Member Images.

1.0 Background

This policy is prepared and maintained in terms of the Constitution of KPS. It describes the measures KPS will take to collect, protect and manage the data of KPS and its members. It also details the limitations of such collection, protection and management. The term “data” includes the protection of images and personal data of members in order to comply with the Protection of Personal Information Act (POPIA).

2.0 The purpose

The purpose of collecting the Personal Information is to enable effective communication with members regarding all of our Society’s activities.

3.0 Information Officer

KPS is required to formally appoint an “Information Officer” to oversee the implementation of this policy. This has been done and the registration on the government portal has been completed.
The Information Officer, for the time being, is Alan King.

4.0 Collection of Personal information and images

Personal information and images, once collected, will be stored electronically on personal computers used by designated committee members such as the Club “Scorer”, amongst others.

a Personal information

The following personal information will be collected, usually when members apply for membership;

- Name and Surname
- Contact phone number/s
- Email address
- Physical Address
- On occasion, ID numbers may be collected for committee members who deal with SARS and/or banking institutions, on behalf of the Club.

Given the purpose for which it is processed, it is deemed adequate, relevant and not excessive.

b Special Personal Information

No special personal information will be collected at any time.

c Member Images

Images belonging to members are collected when members voluntarily submit their images for judging, competitions, skills development programmes or any other official KPS Photographic event.

5.0 Deletion of Personal Information and member images

a Personal information.

Personal information will be deleted no later than six months after a member resigns or who forfeits membership for any other reason (E.g. through non-payment of annual member subscriptions.)

b Member images

Member images will be deleted as detailed in clause 10a below.

KPS will not be responsible for deleting images which have been submitted to organisations outside the club. Examples are salon submissions, local and international competitions, PSSA competitions and the like.

6.0 Member Rights

All club members have the following rights, in relation to data held by the club.

- a The right to be informed about processing of your personal data.
- b The right to have your personal data corrected in case of inaccuracy and to have incomplete personal information completed.
- c The right to object to processing of your personal data.
- d The right to restrict processing of your personal data.
- e The right to erasure of your personal data.
- f The right to request access to your personal data and information about how KPS processes it.
- g The right to move your personal data (Data Portability).
- h The right to withdraw consent (where use of personal information is based on consent).

In order to exercise these rights, members should contact the Club Chairperson or the Club Information Officer in writing.

7.0 Protection of data on KPS Computers

- a KPS, or committee members using personal computers for club affairs, will install similar levels of virus and malware protection on its computers as found in the home situation. This includes free versions of such software.
- b Protection software will be updated on a regular basis, at least monthly.
- c Operating systems will be updated regularly, at least quarterly.
- d Backups of KPS data will be taken at regular intervals, at least monthly. Such backups will be protected in the same way as data on KPS or committee member computers.
- e KPS owned computers are to be used only for KPS purposes, in order to limit the exposure to potential attacks.

8.0 Code of Conduct

All members who handle the data of members shall formally accept the Code of Conduct, detailed in the Annexure 1 of this policy. It is specifically noted that this code of conduct prevents distribution of images and personal data outside of KPS, and requires personal data not to be distributed in tabular form that can easily be copied.

9.0 Use of External Software Applications

KPS uses external software applications, such as Zoom, WhatsApp, Irfanview and PhotovaultOnline. KPS also has a web presence in the form of a website, Whatsapp Groups and a Facebook page. Other applications are possible in the future.

- a Where such applications store members' images, KPS will obtain and circulate to members the degree of protection provided by such applications.
- b If KPS places images on publicly accessible applications, it will protect the images by watermark, low resolution or prohibition of copying.
- c If members place images on publicly accessible applications, they are responsible for protection measures
- d Where there is a large body of stored images, such as in PhotovaultOnline, the policy of that application will be obtained and communicated to members.

10 Retention of Images and Their Copyright

- a The images held by KPS have been a valuable source of backup for members who have lost their own images. For this reason KPS may retain member images on its computers and associated backups. Images belonging to current members will be retained indefinitely, at the sole discretion of the committee. Images belonging to ex members will be retained for no longer than two years, after a member ceases to be a member.
- b The copyright of all members' images remains with members.
- c By entering any competition organised by KPS, members accept the policies laid out in this document.
- d KPS members grant KPS the non-exclusive right to use these images in the various competitions arranged by the Photographic Society of South Africa (PSSA). Should the club wish to use member images outside of KPS or PSSA, it will first secure the permission of the respective member.

11 Virtual Meetings and Communication Software

- a KPS makes use of software for virtual meetings and rapid communication. At present, these are email, WhatsApp, Facebook and Zoom. Other applications are possible in the future.
- b By attending any virtual meeting or joining communication applications, members accept the policies laid out in this document.
- c The degree of security offered by the respective applications in use is accepted by KPS and its members.
- d No recordings or communication of conversations, which contain personal information, will be distributed outside of the members of KPS, except for:
 - i Speakers and outside judges of events
 - ii Board members of PSSA, but with a prohibition on further publication of the information
 - iii Recordings of Interclub meetings to the clubs involved and their external judges.

12 Limitation of Liability

The management and operation of KPS is undertaken by unpaid volunteers, who are also not data protection specialists. For this reason, KPS and its members indemnify the committee, the projection team and any member authorised to handle their images, from any financial claim for the misuse of images or personal data.

13 Approval

This policy was approved at the Club's Annual General Meeting dated 4th August 2021.

Date; 4th August 2021

Annexure 1;Protection of Personal Information Code of Conduct - Committee and Audio/Visual Team members

I, _____ undertake to comply with the Data Collection, Protection and management policy of the Knysna Photographic Society (KPS) dated 4th August 2021. In doing so, I will:

1. Recognise that the copyright and ownership of images always reside with the author and undertake not to take any action that diminishes the authors' rights.
2. Never distribute personal information of members outside of the KPS, except for the contact details of a person designated to receive enquiries from the public, normally the Chairperson or Secretary.
3. Never distribute images of members outside of the KPS, except for
 - a. Posting of images on the KPS website, Facebook and other social media, as authorised by the committee.
 - b. Entry of images into the PSSA competitions approved by the committee. Initially this represents Interclub Competitions and Monthly Club Winners' competitions.
4. Never distribute the entire membership list, inside or outside KPS, in a tabular machine-readable form such as Excel or Word tables, without the specific written permission of the committee.
5. Protect the integrity of the computers used by KPS, or on behalf of KPS, by installing and keeping current (i.e. at least monthly) the anti-virus and malware protection software approved by the Committee. Initially this software is Avast Antivirus and Malwarebytes (free versions).
6. Regularly update the operating systems of KPS computer(s), at least every three months and immediately on becoming aware of major new threats.
7. Alert the committee to any suspected threat to the data on the KPS Computer(s) or those belonging to Committee members but used for KPS business.
8. Avoid using the KPS computer(s) for any purpose other than those of KPS.
9. Make regular backups of the user data on KPS computer(s), with such backups to be kept physically separate from the computer(s) and subject to the restrictions on distribution as listed above.

Signed:

Date:

Annexure 2; Definitions and abbreviations

Abbreviation or term	Meaning
Consent	means any voluntary, specific and informed expression of will in terms of which permission is given for the processing of personal information
Data subject	means the person (member) to whom personal information relates.
Electronic Communication	means any text, voice, sound or image message sent over an electronic communications network which is stored in the network or in the recipient's terminal equipment until it is collected by the recipient.
KPS	Knysna Photographic Society
Operator	means a person who processes personal information for the responsible party in terms of committee portfolio assignment without coming under the direct authority of that party
Personal Information	means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including. In the case of KPS, it is limited to the information specified in 2.1 above
Processing	means any operation or activity or any set of operations, whether or not by automatic means, concerning personal information.
Regulator	means the Information Regulator established in terms of the Protection of Personal Information Act.
Responsible Party	Means the KPS committee
"special personal information	Relates in information about criminal records, sexual orientation, religious beliefs, ethnic origin amongst other information. It is not relevant in the KPS context as it is not collected and therefore cannot be processed.