

Prime Outsourcing (Pty) Ltd

**T/A PRIME OUTSOURCING (PTY) LTD
REGISTRATION NUMBER: 2012/010408/07**

INFORMATION RISK POLICY

CONTENTS

1. Statement of Intent
2. Information Risk Management Structure
3. Information Risk Strategy
4. Threat Assessment
5. The Legal and Regulatory Requirements
6. Building and protecting a culture where Prime Outsourcing (Pty) Ltd values, protects and use Personal Information for Public Good
7. Reporting, Recovering and Managing from a Personal Information Breach
8. Corporate and individual consequences of the Failure to adhere to Personal Information Risk Policies and Procedures
9. Inspections

1. Statement of Intent

1. Information is a key asset and its proper use is fundamental to the delivery of our services. The public and our other Stakeholders are entitled to expect that we will protect their privacy and use and handle Personal Information of Natural Persons and Juristic Persons professionally and sensitively to ensure that their Personal Information is protected.

We will do this by effectively managing all risks, to the integrity, availability and confidentiality of our Personal Information whether held on paper or in our IT systems.

Risks include inappropriate disclosure or non-disclosure of information, loss, theft or fraud, Personal Information being wrongly destroyed, staff acting in error, and a failure to utilise the Personal Information for the public good.

2. We see the benefits of managing these risks as being able to:
 1. Ensure that Personal Information is being used professionally and in line with all relevant guidance and legislation;
 2. Constrain threats to the Personal Information to acceptable levels so that we can maintain public confidence;
 3. Make informed decisions on when we should share or re-use the Personal Information so that it can be used to its fullest value.
3. We have set down Policies and Procedures, which will enable Prime Outsourcing (Pty) Ltd, its Employees and its Third Parties to work within an acceptable level of risk, and to be aware of when and whom to contact if they want to deviate from these Policies, and the consequences both corporate and individual of not following these procedures.
4. Prime Outsourcing (Pty) Ltd's Management Team is committed to ensuring that all Staff comply with this Policy at all times.

2. Information Risk Management Structure

1. Prime Outsourcing (Pty) Ltd has put in place an Information Risk Management Structure to ensure that appropriate Personnel have responsibility for the management of Personal Information.
2. Prime Outsourcing (Pty) Ltd's Chief Executive is the Senior Information Risk Owner (SIRO). He is the focus for the management of Information Risk. The SIRO is responsible for:
 - The overall information Risk Policy and risk assessment process;
 - Ensuring that the Policies and Procedures are implemented, followed and agreeing any deviation from these;
 - Testing their effectiveness;
 - Leading and fostering a culture that values, protects and uses information for the public good.
3. **The Senior Management Team are the Information Asset Owners (IAOs).**

Their role is to understand which Personal Information is held, what is added and what is removed from our paper and electronic records, how Personal Information is moved and who has access to it and why. As a result, they are able to understand and address the risks to their Personal Information and ensure that Personal Information is fully used within the Law for the public good. They are also able to provide written input to the SIRO annually on the security and use of their asset.
4. All Staff have the responsibility to manage Personal Information in line with Prime Outsourcing (Pty) Ltd's Record Management and Personal Information Risk Policies and Procedures. They also have the responsibility to notify the SIRO if there is a breach or a suspected breach of Personal Information.

3. Information Risk Management Strategy

1. The Risk Management Process for Prime Outsourcing (Pty) Ltd is shown below.



2. The Governance and Compliance Manager and Information Asset Owners will meet to discuss the risks related to the Personal Information Prime Outsourcing (Pty) Ltd holds internally and that, which is shared or held with our Third Parties, quarterly. We collectively identify risks to Personal Information, agree how to either avoid these, or if that is not possible, to manage the adverse impact of these occurring.
3. Prime Outsourcing (Pty) Ltd pays considerable attention to managing risks and is prepared to take higher organisational risks to improve protection of patients and the public.
4. Managers review risk on an ongoing basis and will tolerate, treat or avoid risks according to the nature of each risk.

4. Threat Assessment

1. Prime Outsourcing (Pty) Ltd's current risk assessment shows that the risks to our Personal Information are low. The risks to the Personal Information are being managed and this is documented in Prime Outsourcing (Pty) Ltd's Risk Register. Prime Outsourcing (Pty) Ltd holds relatively little Special Personal Information and the Access Rights to this category of Personal Information are limited.
2. Prime Outsourcing (Pty) Ltd holds a Register of Staff that has access to these Rights and this is regularly reviewed. Staff who have access to this are used to dealing with it appropriately and do so in accordance with our Information Security Policies.
3. Managers also regularly review processes.

5. The Legal and Regulatory Requirements

1. When managing our Personal Information risk, Prime Outsourcing (Pty) Ltd works to the required legal and regulatory standards. Whilst this list is not exhaustive, they include:
 - The Protection of Personal Information Act 2013;
 - The Electronic Communications Act 2005;
 - Regulation of Interception of Communications and Provision of Communication-related Information Act 2002;
 - Financial Intelligence Centre Act 2001.

6. Building and Protecting a Culture where We Value, Protect and use Personal Information for Public Good

1. Prime Outsourcing (Pty) Ltd has a culture where it values, protects and use Personal Information for public good. Prime Outsourcing (Pty) Ltd reiterates regularly to Staff the need to ensure that they adhere to Prime Outsourcing (Pty) Ltd's Governance Policies. Prime Outsourcing (Pty) Ltd's has provided Staff with Information Governance Training.

7. Reporting, Recovering and Managing from a Personal Information Breach

- 1. Prime Outsourcing (Pty) Ltd has a Data Breach Notification Policy in place, which sets out how Prime Outsourcing (Pty) Ltd will report, recover, and manage an Information breach

8. Corporate and Individual Consequences of the Failure to adhere to Information Risk Policies and Procedures

Individual

- 1. Prime Outsourcing (Pty) Ltd has a Dismissal and Disciplinary Hearing Procedure which incorporates the consequences of failing to adhere to the Information Risk Policies and Procedures.

Corporate

- 2. There could be significant consequences for Prime Outsourcing (Pty) Ltd as an organisation if we failed to adhere to our internal Information Risk Policies and Procedures.
- 3. Prime Outsourcing (Pty) Ltd could face considerable loss of reputation, particularly if there is media interest; it could face action by the Information Regulator’s Office or individuals if Personal Information was involved; Prime Outsourcing (Pty) Ltd could face a loss of confidence by its Stakeholders; and even a loss of people willing to work with Prime Outsourcing (Pty) Ltd.
- 4. Similar consequences could occur to the Third Parties of Prime Outsourcing (Pty) Ltd.

9. Inspections

Internal

- 1. Prime Outsourcing (Pty) Ltd conducts quarterly assessments of the risks to the integrity, availability and confidentiality of the Personal Information within the organisation and with Third Parties.

External

- 2. Prime Outsourcing (Pty) Ltd complies with any reasonable external requests from the Information Regulator’s Office or others to inspect the implementation of Prime Outsourcing (Pty) Ltd’s Policies and Procedures.

10. Changes to this Policy

- 1. Prime Outsourcing (Pty) Ltd reserves the Right to amend, alter and terminate this Policy at any time.

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