


# URBAN EDGE CHURCH

**DATA PROTECTION  
POLICY AND PROCEDURE  
JULY 2021**

AUTHORISED: NAME EA Elish SIGNATURE: 

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## INTRODUCTION

Urban Edge Church is committed to protecting personal data and respecting the rights of our data subjects (people whose personal data we collect and use). Urban Edge Church values the personal information entrusted to us and we respect that trust by complying with all relevant laws\*, and adopting good practice.

(\**Protection of Personal Information Act, hereinafter "POPIA"*)

We process personal data to help us:

- Maintain a database of our church members
- Provide pastoral support for members and others connected with our church
- Provide services to the community
- Safeguard children, young people, and adults at risk
- Recruit, support and manage staff and volunteers
- Maintain our church accounts and records
- Promote our services
- Maintain the security of property and premises
- Respond effectively to enquirers and handle any complaints
- For any fundraising events that might require this information

This policy has been approved by the Urban Edge Church Leadership Team who are responsible for ensuring that we comply with all our legal obligations. It sets out the legal rules that apply whenever we gather, process, store or use personal data.

### 1. Why this policy is important

- A. We are committed to protecting personal data from being misused, getting into the wrong hands because of poor security or being shared carelessly, or being inaccurate.
- B. This policy sets out the measures we are committed to taking as a church and what each of us will do to ensure we comply with the relevant legislation.
- C. For instance, we will make sure that all personal data is:
  - Processed lawfully, fairly and done transparently
  - Processed for specific and legitimate purposes and not in a manner that is incompatible with those purposes
  - Adequate, relevant, and limited to what is necessary for the purposes for which it is being processed
  - Accurate, complete, and up to date
  - Not kept longer than necessary for the purposes for which it is being processed
  - Processed in a secure manner, by using appropriate technical and organisational means
  - Processed in keeping with the rights of data subjects regarding their personal data.

## **2. How this policy applies to you and what you need to know**

- A. As an employee, volunteer, or trustee processing personal information on behalf of the church, you are required to comply with this policy. If you think that you have accidentally breached the policy, it is important that you contact our Information Officer immediately so that we can take action try to and limit the impact of the breach. Anyone who breaches the Data Protection Policy may be subject to disciplinary action, and where that individual has breached the policy intentionally, recklessly or for personal benefit they may also be liable for prosecution or to regulatory action.
- B. As a leader and/or manager you are required to make sure that any procedures that involve personal data, which you are responsible for in your area, follow the rules set out in this Data Protection Policy.
- C. As a data subject of Urban Edge Church, you can be assured that we will handle your personal information in line with this policy.
- D. As an appointed data processor/contractor, you are required to comply with this policy under the contract with us. Any breach of this policy will be taken seriously and could lead to us taking contract enforcement action against the company or terminating the contract.
- E. Our Information Officer is responsible for advising Urban Edge Church and its staff and members about their legal obligations under data protection law, monitoring compliance with data protection law, dealing with data security breaches and with the development of this policy. Any questions about this policy or any concerns that the policy has not been followed should be referred to them at [info@urbanedge.org.za](mailto:info@urbanedge.org.za).

Before you collect or handle any personal data as part of your work (paid or otherwise) for Urban Edge Church, it is important that you take the time to read this policy carefully and understand exactly what is required of you, as well as the organisation's responsibilities when we process data.

## **3. HR & Internal data collected, stored and processed**

- A. Employees and staff are periodically trained on what is lawful processing of personal information and the risks associated with day-to-day handling and processing of personal information should be addressed and limited through education.
- B. A clause has been added to each employment contract to confirm the company's undertaking to ensure that the employee's personal data will be securely held and lawfully processed in terms of POPI (data protection clause).
- C. Urban Edge Church uses Google Suite for its online solutions. Google Suite provides decent cybersecurity and levels of encryption, which allows for secure and accountable processing of personal data. Furthermore, it allows for creating back-ups and can be used to create a hybrid cloud for the company. Permissions and access should remain controlled and limited to the different departments. Any breach of personal data will be reported to the Regulator and all efforts must be taken to contain the breach. Thereafter, data subjects will be informed of the extent of the breach.

## 4. Website, Cookies & Marketing

- A. We believe that transparency is important when dealing with data subjects and their personal information, therefore our website collects limited personal information but is still compliant with POPI. We therefore have an Online Privacy Policy, and have added the attached email disclaimer to every employee's email signature.
- B. The Online Privacy Statement includes what data is collected and processed by the Company by any data subjects who visit the website. This information includes but is not limited to contact details, email address, cookies, and in some cases, financial information (for donations of payments being made via the website).
- C. The 'Urban Edge POPI Act: Procedures and Policies' document is available on the website for data subjects to peruse should they need to know how their data is processed within each department and by each service provider of the church. For added information we have included the letter of appointment for its Information Officer (head of the organisation or Company) and a Deputy Information Officer (someone within the organisation or Company who will fulfil the role and/or actually attend to the duties – usually Admin or Finance staff).
- D. All direct marketing is ring-fenced to only existing clients or new clients who have expressly consented to further marketing. The data subject must also have an option to opt-out or unsubscribe from any form of direct marketing. Therefore we will be sending out a communication to all clients on the existing database and confirm that the company is now POPI compliant and that any individual can opt-out of further marketing material (pop-up or clickable box).
- E. We sent out a newsletter / electronic consent form to all existing members to reaffirm the church's undertaking to continue to process any personal information in its possession lawfully and securely in terms of POPI.

## 5. Cybersecurity & Data Breach Protection

- A. Google Suite or the similar online cloud solution used by Urban Edge Church does provide secure data protection and storage. The Privacy Policies are easily accessible and are compliant with GDPR and POPI provisions.
- B. Furthermore, Google Suite allows Urban Edge Church to create a hybrid compliant cloud system which includes comprehensive, multi-layered protection.
- C. Any further processing of the personal data under Urban Edge Church's control is done in terms of a data transfer or data-sharing agreement, which agreement is in terms of POPI and the action has been consented to by the data subject prior to further processing (for any reason outside of the scope for which the personal data was collected for).
- D. All personal data collected, stored and processed by Urban Edge Church is done within a POPI compliant framework – accompanied by the necessary consent from all members, visitors or staff (to have their data processed).
- E. Please note that as Urban Edge Church deals with a lot of personal information, including medical conditions and certain preferences or conditions. We ensure that our internal practices are backed up by written policy or secure procedure which promotes secure and lawful processing of personal information at all times.

## **POLICY AND PROCEDURES**

### **Finance**

1. Vendor / Supplier Invoices
  - 1.1. Staff member receives invoice and hands it in to the Finance office.
  - 1.2. Staff member hands in a payment requisition with the attached invoice.
  - 1.3. Papers are kept in the employee's desk tray, until processed / paid.
  - 1.4. All paid invoices with paperwork are then filed in lockable filing cupboard.
  - 1.5. Office is lockable and camera monitored, when employee is out of office.
  
2. All HR / employee contracts / pension information forms etc.
  - 2.1. These are stored in a lockable cupboard.
  - 2.2. Any employee information / banking details / pension forms etc. sent on email are stored on a computer which is password protected. Printed items are stored in a lockable cupboard.
  - 2.3. The office is lockable and camera monitored, when employee is out of office.
  - 2.4. Staff reimbursement forms / staff fuel claims
    - 2.4.1. Staff member hands in payment reimbursement / claim (original or email).
    - 2.4.2. The papers are kept in employee's desk tray, until processed / paid.
    - 2.4.3. All paid paperwork is then filed in lockable filing cupboard.
    - 2.4.4. Office is lockable and camera monitored, when employee is out of office.
  
3. Financial documents / records from previous years (up to 5 years)
  - 3.1. These are stored in a lockable rented facility off-site.

### **Next Steps**

1. A disclaimer is present on all Next Steps cards and online forms.
  
2. Growth Track - Durbanville Campus
  - 2.1. Guests complete registration/screening/membership forms which are collected by Growth Track volunteers and handed directly to Receptionist.
  - 2.2. Forms are dropped in the drop safe. Finance staff member opens drop safe on Monday morning and hands forms to Receptionist.
  - 2.3. The Receptionist processes all information on Monday morning, adding all information to the Anatomy database.
  - 2.4. All sign ups through Growth Track are then immediately destroyed.

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- 2.5. All registration and screening forms are put in envelope with connect cards and stored in locked Info Desk cupboard.
  - 2.6. After two weeks, forms are shredded.
3. Growth Track - Pinehurst Campus
    - 3.1. Guests complete registration / screening forms / Membership forms which are collected by Growth Track volunteers.
    - 3.2. The Growth Track staff member will ensure that Growth Track cards follow the same procedure as other Pinehurst cards.
    - 3.3. Forms will be processed immediately or locked away until processing.
    - 3.4. Forms are processed in the same way as Durbanville above.
4. Connect Cards
    - 4.1. People drop Connect Cards in offering containers at the end of the service on exiting the auditorium. They also can drop them in the connect box which is locked. This includes visitor, salvation, baby blessing, baptism, connect group and serve sign ups.
    - 4.2. Cards that come from Pinehurst get put in a sealed envelope and dropped in the drop safe.
    - 4.3. Volunteers put all cards from offering container into the drop safe.
    - 4.4. The Finance staff member opens drop safe on Monday and gives cards to Receptionist.
    - 4.5. The Receptionist receives cards and processes all information.
    - 4.6. The Receptionist will process immediately and if not, will lock cards away until processed.
    - 4.7. Prayer cards are taken out and given to the person on Transition and given to Media volunteer.
5. Visitors and Salvations
    - 5.1. People fill in a Connect Card from auditorium and follows the process for Connect Cards.
    - 5.2. The Receptionist sends email and adds them to Anatomy.
    - 5.3. A short 'Welcome Party' clip included in the email.
    - 5.4. The card is shredded.
6. Baby Blessing
    - 6.1. People sign up via the online form on the website (need to give permission for us to use their information) - information gets emailed to Receptionist, whose computer is password protected.
    - 6.2. The Receptionist adds information to Excel spreadsheet and contacts people who have signed up.
    - 6.3. The spreadsheet gets sent to Programming staff member for runsheet and is emailed to the Media email for Sunday slides.

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- 6.4. The spreadsheet gets printed, sent to campus in tote box and taken out on the Sunday at Info Desk to register the family.
  - 6.5. The spreadsheet gets shredded.
7. Baptism
- 7.1. People sign up by filling out the form.
  - 7.2. The process for Growth Track above is followed.
  - 7.3. The receptionist follows up in the week with a phone call.
  - 7.4. The receptionist creates spreadsheet and this gets sent to Programming staff member as well as to the Media email and is printed for each campus.
  - 7.5. Once the person gets baptised, that form is returned to the Receptionist.
  - 7.6. The Receptionist updates each person's profile on Anatomy (protected by the fire wall).
  - 7.7. The sign up form gets destroyed.
8. Welcome Party
- 8.1. Welcome Party registration filled out on website or via a Quicket link provided.
  - 8.2. The Staff member prints registration list for check-in on the night.
  - 8.3. The list is destroyed after the event.
9. Dream Team sign ups
- 9.1. Option to sign up via Growth Track - follow Growth Track process.
  - 9.2. Option to sign up via Connect Card - follow the Connect Card process.
  - 9.3. Option to sign up via the website - Disclaimer in place.
  - 9.4. Each person's details are then added to Anatomy to create an online follow up for the relevant person.

### **Hosting & Hospitality**

1. Giving envelopes are placed at the back of the seats for congregation.
2. People who choose to then personally and willingly put on all their personal information on the envelope (if applicable).
3. As people exit the service they are able to put their giving envelope into a container held by an Usher.
4. With the supervision of the Colour Leader and Usher Team leader, these envelopes are then put into an Offering bag marked with the service time details, which is sealed with a clip and placed into a safe.



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5. The Offering bags are then collected from the Drop Safe by the Finance staff member.
  
6. Monies contained in the envelopes are counted by the Finance staff member and a vetted team (the room in which counting takes place has a camera and a locked door). Once counting is complete, envelopes are ripped up and thrown away.
  
7. Covid screening forms / Registration lists
  - 7.1. Either, Covid screening forms are placed on the seats for congregation or registration lists are placed at the entrances to the building.
  - 7.2. People willingly put on all of their personal information on the screening forms.
  - 7.3. As people exit the service, they place their screening form into a container held by an Usher.
  - 7.4. These then get put into a Screening bag, which is sealed and then locked in a safe.
  - 7.5. At the end of the Sunday services they get collected with the Offering Bags by the Treasurer, and are locked in the drop safe at the Durbanville campus.
  - 7.6. They are then collected from the drop safe by the Finance staff member and handed to the Receptionist, who then locks them away.
  - 7.7. After two weeks they are shredded.
  
8. Info Desk sale receipts
  - 8.1. Receipts are collected by an Info Desk volunteer and are placed into an Info Desk envelope.
  - 8.2. The Hosting Staff Member ensures that the Info Desk envelope is placed in the drop safe after the Sunday services.
  - 8.3. Receipts are collected by Finance staff member.
  - 8.4. The Finance staff member reconciles receipts, which are shredded thereafter.

## **Connect Groups**

1. New Connect Group leader applications:
  - 1.1. These are received via website (disclaimer in place).
  - 1.2. These are then sent to the staff member via email.
  - 1.3. Information is captured on our Connect Groups Google Sheets document.
  - 1.4. Group leaders are informed they will be cared for by a Coach and contact details are shared with that Coach.
  - 1.5. Connect Group leaders are added to the "Ue Connect Group Leaders" Whatsapp Group.
  - 1.6. Any email communication to groups of leaders is conveyed via the BCC field.
  
2. People joining Connect Groups:
  - 2.1. All Connect Groups are now listed on the Urban Edge website.

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- 2.2. We have asked Connect Group leaders to supply their email address for this and they have done so willingly.
- 2.3. Therefore, anyone wanting to join a group can now make direct contact with the connect group leader via email.

## **Pastoral**

1. The Receptionist receives email, website and Whatsapp prayer requests.
2. The Receptionist responds directly and then forwards these to Pastoral staff member.
3. The Pastoral Staff Member may then determine to share contact information with a member of the Pastoral team to make contact with the person and pray with them directly.

## **Courses**

1. Registrations for courses come in via Quicket.
2. These are received by the Receptionist on a password protected computer.
3. These details are compiled and sent to the course co-ordinator.
4. Communication via email or phone is set up from there.

## **Worship & Production**

1. An individual completes online form for data capture.
2. This information is automatically captured into a database.
3. The database is password and permissions protected.

## **Young Adults**

1. Same as Connect Group procedure.

## **Fisantekraal**

1. Connect cards as well as giving envelopes are collected and put into a container.
2. The container is locked away in secure office.

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3. The Staff Member then transports both the Connect Cards and giving envelopes to the Durbanville campus.
4. The Connect Cards are placed in envelopes and stored away safely.
5. The giving envelopes are placed into a locked safe until they are taken for counting by the Finance Team.

## Reception

1. If someone calls asking for a staff member's personal information, the Receptionist will not give it out and will rather take down the caller's number and convey a message to the relevant staff member.
2. The Receptionist will then Whatsapp the staff member the information of the person so that the staff member can call them back.

## Youth

1. Revolution
  - 1.1. Under Covid regulations: People will register on Quicket.
  - 1.2. Under normal circumstances: Parents will write their information down at the registration tables on arrival - a Disclaimer is present on the registration forms.
  - 1.3. Information provided on registration is then used to add registrants to Anatomy, an email mailing list and a Connect Group Whatsapp group.
  - 1.4. Their information will also be added to a the registration spreadsheet for the following week.
  - 1.5. Registration forms are stored in a lockable cupboard.
  - 1.6. Details are loaded onto Anatomy on Monday's.
  - 1.7. After use, forms are destroyed.
2. Arise
  - 2.1. Under Covid regulations: People will register on Quicket.
  - 2.2. Under normal circumstances: Parents will write their information down at the registration tables on arrival - a Disclaimer is present on the registration forms.
  - 2.3. Information provided on registration is then used to add registrants to Anatomy, an email mailing list and a Connect Group Whatsapp group.
  - 2.4. Their information will also be added to a the registration spreadsheet for the following week.
  - 2.5. Registration forms are stored in a lockable cupboard.
  - 2.6. Details are loaded onto Anatomy on Monday's.
  - 2.7. After use, forms are destroyed.

## **Quicket**

1. Disclaimer to be put in T's & C's for every event that we can use their information. (See Addendum)
2. Event Registrations
  - 2.1. People will register for an event on Quicket, via our website.
  - 2.2. We will print out the guest list for the event from Quicket.
  - 2.3. After use, this list is locked away.
  - 2.4. Registration pages are destroyed within a week.

## **Marriage Registers**

1. Couples email and request to be married.
- 2.
3. Staff Member responds with blank application forms that are completed and returned via email.
- 4.
5. Marriage application forms are stored digitally on the Urban Edge Google suite.
- 6.
7. The Google Drive folder is available to appointed staff members only.
- 8.
9. The marriage officer doing the wedding will be provided with the application form.
- 10.
11. Marriage officer collects the necessary documents to complete the marriage register.
- 12.
13. Before the marriage takes place, these documents are stored in a folder that is locked away in a home / work office.
- 14.
15. Once the marriage has taken place, the documents are stored in a file in the work office.
- 16.
17. The marriage register booklet is locked away either at the home / work office.

## **Kids Church**

1. Our Security Team are vetted and have police clearance.
2. They collect Password protected laptops from a locked venue.
3. Kids are checked in using our Anatomy database.

4. Following the Sunday services, laptops are switched off and stored in a locked venue.
5. Visitors complete a hard copy form on arrival. The Security Team then adds this information to our database.
6. Documents get stored with laptops in a locked venue.
7. Staff member collects documents on a Monday and, once processed, shreds them.
8. Emergency contact stickers that are given to kids upon registration are collected after the service as kids exit. Stickers are then destroyed immediately.

### **IT**

1. Firewall monitored on a daily basis with alert notifications “Switched On” for real time updates.
2. All important documents are stored in a secure Google Cloud Storage solution.

## **FINANCIAL SERVICE PROVIDERS**

### **Mail Chimp**

[https://eep.io/assets/yzco4xsimv0y/29cSla3gvONiSTw0fArgZP/27d9fe52faa99bcdbcbc11ec3d9c2206/Mailchimp\\_Bavarian\\_DPA\\_Statement.pdf](https://eep.io/assets/yzco4xsimv0y/29cSla3gvONiSTw0fArgZP/27d9fe52faa99bcdbcbc11ec3d9c2206/Mailchimp_Bavarian_DPA_Statement.pdf)

### **Absa**

<https://www.absa.co.za/legal-and-compliance/>

### **Standard Bank**

<https://community.standardbank.co.za/t5/custom/page/page-id/TermsAndConditions>

## **GENERAL SERVICE PROVIDERS**

### **Quicket Privacy Policy**

<https://help.quicket.com/portal/en/kb/articles/privacy-policy>

### **Anatomy Privacy Policy**

<https://release.anatomy.org.za/anatomy/privacypolicy.htm>

### **SARS Privacy Policy**

<https://www.sars.gov.za/privacy-policy/>

### **Xneelo Privacy Policy**

<https://xneelo.co.za/legal/privacy-policy/>

### **SuperCare Privacy Policy**

<https://www.cleaningafrica.co.za/compliance/>

## URBAN EDGE COMPLIANCE

The logo for UrbanEdge, featuring the word "UrbanEdge" in white text on a dark red rectangular background.

Connecting people to people  
and people to God

### **APPOINTMENT LETTER FOR INFORMATION OFFICER ROLE: URBAN EDGE CHURCH**

The Information Officer role is by default that of the Designated Head of a Private Body in terms of the provisions of both the Promotion of Access to Information Act 2 of 2000 (PAIA) and the Promotion of Personal Information Act 4 of 2013 (POPI). The responsibilities defined for these roles in Urban Edge Church (registration number: ), a private body in terms of the aforementioned Acts are:

**1) POPI Act Section 55(1): An Information Officer's responsibilities include:**

- a) the encouragement of compliance, by the body, with the conditions for the lawful processing of personal information;
- b) dealing with requests made to the body pursuant to this Act;
- c) working with the Regulator in relation to investigations conducted pursuant to Chapter 6 (prior authorization) in relation to the body;
- d) otherwise ensuring compliance by the body with the provisions of this Act; and
- e) as may be prescribed.

**POPI Regulations 2018: Responsibilities of Information Officers**

**2) Regulation 4:**

- a) An Information Officer must, in addition to the responsibilities referred to in s55(1) of the POPI Act, ensure that:
  - i) A compliance framework is developed, implemented, monitored and maintained;
  - ii) A personal information impact assessment is done to ensure that adequate measures and standards exist in order to comply with the conditions for the lawful processing of personal information;
  - iii) A manual is developed, monitored, maintained and made available as prescribed in s14 and s51 of the PAIA Act;
  - iv) Internal measures are developed together with adequate systems to process requests for information or access thereto; and
  - v) Internal awareness sessions are conducted regarding the provisions of the Act, regulations made in terms of the Act, codes of conduct, or information obtained from the Regulator.
- b) The information officer shall upon request by any person, provide copies of the manual to that person upon the payment of a fee to be determined by the Regulator from time to time.

**UrbanEdge**

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and people to God

## **POPI Act: Section 56: Designation and delegation of deputy Information Officer(s)**

3) Each public and private body must make provision, in the manner prescribed in section 17 of the Promotion of Access to Information Act, with the necessary changes, for the designation of –

- a) Such a number of persons, if any, as deputy information officers as is necessary to perform the duties and responsibilities as set out in section 55(1) of this Act; and
- b) Any power or duty conferred or imposed on an information officer by this Act to a deputy information officer of that public or private body.

### **Urban Edge Church Information Officer role appointment acceptance:**

Signature: 

**Date of Appointment Acceptance:**

### **Urban Edge Church Deputy Information Officer role appointment acceptance:**

Signature: 

**Date of Appointment Acceptance:**





Certification date: 25 June 2021.

# Certificate of Compliance

## Protection of Personal Information Act

Please note that **Urban Edge Church** has been audited against POPI compliant requirements and at the date of this Certificate, the entity is deemed to be compliant.

The below-stated rating is the level of compliance determined following the certification/auditing.

The percentage recorded is the level at which the measured entity was found to be compliant, given the information provided.

A Company with a 100% rating is deemed to be fully compliant at the date hereof.

**Certification number: 00000000028**

**100%**

T's and C's Apply

