

POLICY DOCUMENT

SECTION:	De Beers Pension Fund (DBPF)	DEPARTMENT:	All departments
ORIGINATOR:	Cornel Wiese	DATE:	1 July 2016
SUBJECT:	Confidentiality Policy		
Version	3		

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1. **PURPOSE**

The De Beers Pension Fund has a need for ensuring confidentiality of all information. This policy addresses how DBPF will manage, handle, and control confidentiality on a day-to-day basis, whereas the protection and physical sharing of this data is addressed in the Privacy Policy. This policy applies to all staff members. The purpose of this policy is to protect DBPF, stakeholders and its members, since disclosure of sensitive or confidential information is not only generally unacceptable but could also have significant impact on members and result in litigation against DBPF.

2. **POLICY STATEMENT**

This policy establishes a clear, reasonable and fair standard for confidentiality applicable to DBPF staff members.

The objective of the DBPF Confidentiality Policy is to minimise the potential for the security of confidential, sensitive and / or proprietary information or data to be compromised and for it to be disclosed to third parties. Furthermore, compliance with this policy will minimise the risk of DBPF staff members being accused of inappropriate activity or the appearance of impropriety.

2.1 **Disclosure**

In terms of this policy, employees may not purposefully disclose confidential, sensitive or proprietary information within or outside the organisation, except to individuals known to be authorised to receive such information. Such employees shall act with due care to avoid the inadvertent disclosure of such information to anyone else, and to avoid its use for personal gain or the advantage of other organisations or entities.

2.2 **Request for Information**

Appeals from individuals and entities requesting access to information classified as confidential may be made in writing to the Information Officer of the De Beers Pension Fund in terms of the Promotion of Access to Information Act No.2 of 2000. The Communications Superintendent of the De Beers Pension Fund is the information officer.

2.3 **Administration**

2.3.1 Non-disclosure undertaking

All staff members will sign an undertaking acknowledging DBPF's Confidentiality Policy as a condition of their employment. Completed forms will be retained on personal files.

2.3.2 User access

Access authorisation to the Administration systems or the network is required in this regard a "Request for change in access levels" form must be completed and authorised by the relevant HOD and Manager. By authorising the form, the HOD and Manager give the assurance that the principle of segregation of duties will not be compromised and that system access is

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acquired for the employee to perform his duties as well as to prevent that incorrect access is granted to staff.

The various forms are;

- a) Request for change in access levels – Com_Pen 2000 (Payroll accounts and Admin)
- b) Request for change in access levels – Network

When a staff member resigns a “Request for change in access levels – Resignation” form must be completed and submitted to the Information Technology department by the relevant HOD and Manager.

2.3.3 User passwords

Users are responsible to reset passwords on a three monthly (90 day) basis. When a user password needs to be reset a “Password Reset Form” must be completed and authorised by the user. If the need arises for a password of a different user to be reset then the “Access to the desktop of a different user” form must be completed and authorised by the manager.

2.4 Document access

Access to member documentation and other documentation will in all instances be limited to staff members who in the normal course of their duties require such access and at any point in time are able to demonstrate the particular need for such access. Due care also needs to be taken by such employees to ensure that unauthorized person do not inadvertently obtain access to such documents.

2.4.1 Archive – on-site (DBPF)

Access to the documents in the on-site archive is under the control and supervision of the supervisor Member Ledger Administration.

2.4.2 Archive – DBPF, basement (payroll section)

Access to the documents in the DBPF basement archive is under the control and supervision of the payroll supervisor.

2.4.3 Active DBPF member files (filing room)

Access to active DBPF member files is controlled by Office Administration. A register is kept to track file movements and when un-attended the filing room is locked.

2.4.4 Archive – off-site (DBPF)

Access to the documents in the off-site archive is under the control and supervision of the Office Manager.

3. RELATED DOCUMENTS

Related procedures, forms, and other support documents enforce, maintain, and verify policy compliance. These procedures and forms support this policy.

Document Name	Document Type (Procedure, Policy, Form, User Guide, etc.)
Privacy Policy	Policy
Conditions of employment	Policy
Promotion of access to information	Policy

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Code of business conduct and ethics	Policy
Declaration of interests	Policy
Standard operating procedures for all department	Procedures
Information Technology	Policy

4. GLOSSARY OF TERMS

DBPF	De Beers Pension Fund
Compen	Pension Fund Administrative system
HOD	Head of Department

5. REVISION HISTORY

Changes to this policy are made as necessary under the direction of the preparers and approvers. The change log describes new topics and other changes.

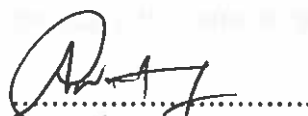
Version	Action (Creation, Revision, Review, etc.)	Date	Approved by
0	Creation	October 2010	PO
1	Reviewed	June 2016	PO
2	Reviewed	September 2018	PO
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1 May 2019

Original signed at Kimberley on 30 April 2019

AUTHORISED


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 PRINCIPAL OFFICER