

SWISSCHAM SOUTHERN AFRICA – SOUTH AFRICA CHAPTER NPC

PRIVACY POLICY

1. INTRODUCTION

- 1.1 This Privacy Policy (hereinafter referred to as the “Policy”) relates to the use of the website of the Swisscham Southern Africa – South Africa Chapter NPC (hereinafter referred to as “we”, “our”, “us” and “ourselves”) and any interactions between ourselves and a data subject.
- 1.2 We, through this Policy, wish to inform you of the scope and purpose for which personal information is processed by us in connection with your use of our website or through any interactions with us.
- 1.3 We gather, store and use your personal information only in line with the contents of this Policy and the Protection of Personal Information Act 4 of 2013 (hereinafter referred to as “POPI”).
- 1.4 We are committed to safeguarding the privacy of your personal information and we take the protection of privacy and personal information very seriously. We treat your personal information as confidential and in accordance with the applicable statutory data protection provisions.
- 1.5 This Policy hereby notifies you that we, in terms of this Policy, collect personal information, in accordance with section 18 of POPI.

2. SCOPE

This Policy applies to all data subjects (i.e. persons (whether a natural or juristic person) to which the personal information relates), and the personal information that we process and collect, whether it was provided to us through the use of our website, or through any other form of communications with us, such as email, telephone, or otherwise.

3. OUR CONTACT DETAILS

3.1 We are the responsible party, with registration number 2007/029035/08, we are a non-profit company duly incorporated and registered in South Africa in accordance with the laws of the Republic of South Africa, with our registered office at Building 14, Woodlands Office Park, 20 Woodlands Drive, Woodmead, Gauteng, 2191.

3.2 Our Information officer is available for questions related to the handling of personal information or more information on issues relating to the protection of personal information and may be contacted using the details provided below:

3.2.1 Information Officer: Mrs Evelyn Ralphs.

3.2.2 Postal Address: P.O. Box 1553 Gallo Manor Gauteng.

3.2.3 Street Address: 1st Floor, Building 14, Woodlands Office Park,
20 Woodlands Drive, Woodmead, Gauteng.

3.2.4 Telephone Number: 011 844 9075.

3.2.5 Email Address: info@swisscham.co.za

4. WEBSITE USE

4.1 General Use

4.1.1 We collect personal information from data subjects who visit our website. Additional personal information may be collected from the data subject for certain of the services on offer, such as registering to join as a member, or contacting us for any reason. We provide specific details in relation to this aspect in the corresponding section of this Policy.

4.1.2 When we request personal data, only the data that is mandatory must be provided. Further information can be provided on a voluntary basis. We will indicate whether it is a required field or optional details.

4.2 **Server Log Files**

4.2.1 We automatically collect and store information in so-called server log files, which your server automatically transmits to us. The information collected includes, but is not limited to:

4.2.1.1 Browser type and browser version;

4.2.1.2 Operating system used;

4.2.1.3 The internet service provider;

4.2.1.4 The date and time on which our website was accessed; and

4.2.1.5 IP address; and

4.2.1.6 Websites which are accessed by you through our website.

4.2.2 We collect and temporarily store your IP Address, to enable us to transmit the contents of our website to your device, which includes, but is not limited to text, images, and files. In order for these actions to occur, your IP Address must be stored by us for the entire duration of your session on our website.

4.2.3 Our use of server log files ensures that our website is functional, operates optimally and maintains the security of our information technology systems.

4.2.4 The supply of such information is mandatory in order to ensure that we can make the content of our website available and a failure to provide such information means that you will be unable to use our website.

4.2.5 The legal basis for processing is our legitimate interests in the proper and user-friendly functioning of our website in terms of section 11(1)(f) of POPI.

4.2.6 The information collected by us through server log files is not used for marketing purposes.

4.2.7 The information collected through server log files will be deleted as soon as possible once the purpose for its collection has been fulfilled. As a general rule, the information collected in server log files is deleted following the expiry of a period of 7 (Seven) days. Where information is stored for a longer period, we ensure that

your IP Address is deleted or altered to ensure that you can no longer be identified from such information.

4.3 **Cookies**

4.3.1 We use both technically necessary cookies and cookies for analysis purposes on our website.

4.3.2 Technically necessary cookies are widely used to 'remember' you and your preferences, either for a single visit (through a 'session cookie') or for multiple repeat visits (using a 'persistent cookie'). Generally, they ensure a consistent and efficient experience for visitors to our website and perform essential functions, such as allowing you to remain logged in to the website, amongst other things.

4.3.3 Through our use of these cookies we collect, store and transmit the following information: -

4.3.3.1 Information to recognise your browser or device on each occasion you visit the website;

4.3.3.2 Your user settings, such as audio and display settings; and/or

4.3.3.3 Information regarding how you interact, and behave, on the website so that we may improve the quality of the website and its contents.

4.3.4 Through analysis cookies, we collect, store and transmit the following information:-

4.3.4.1 `_ga` = Unique identifier of Google Analytics for individual user identification (composed of Client ID + timestamp), which will only be stored for a period of 2 (Two) years whereafter it will be deleted.

4.3.4.2 `_gat` = parameter which causes Google Analytics to reduce the query rate which will only be stored for a period of 24 (Twenty-Four Hours), whereafter it will be deleted;

4.3.4.3 `_gid` = Unique Identifier of Google Analytics to Identify a User (composed of Client_ID + Timestamp), which will only be stored for a period of 24 (Twenty-Four Hours), whereafter it will be deleted.

- 4.3.5 The information collected through cookies and analytics either does not contain personal information, or is anonymised by us to ensure that you cannot be identified from the information collected in this manner.
- 4.3.6 We collect this information in order to: -
- 4.3.6.1 Facilitate the use of our website;
 - 4.3.6.2 Allow access to certain sections of our website;
 - 4.3.6.3 Improve the quality of our website and its contents;
 - 4.3.6.4 Learn how the website is used so that we can continue to optimize our offerings; and
 - 4.3.6.5 identify and remedy errors in order to make adjustments or improvements as well as to identify and track abuse.
- 4.3.7 Cookies are stored on your device and transmitted to us. As such, you have full control of our use of such cookies and the supply of such information by you is entirely voluntary.
- 4.3.8 You are able to alter the cookie setting in your internet browser and can disable or restrict the transmission of cookies. Saved cookies are can also be deleted by you at any time.
- 4.3.9 However, you may only have access to a restricted version of our website, or not at all, if you reject the storage of cookies or delete the necessary cookies.
- 4.3.10 If you do not want tracking, you can disable it in the Google Analytics section of this Policy.
- 4.3.11 The legal basis for processing is: -
- 4.3.11.1 Based on your consent in terms of Article 6(1)(a) of the GDPR and Section 11(1)(a) of POPI; and/or
 - 4.3.11.2 Our legitimate interests in the proper and user-friendly functioning of our website in terms of Article 6(1)(f) of the GDPR and section 11(1)(f) of POPI.

4.3.12 We do not share the information we collect via cookies to any other person. However, our website and analytics service providers may have access to such information through the performance of their duties.

4.4 **Google Analytics**

4.4.1 Our website uses the "Google Analytics" service provided by Google Inc. (1600 Amphitheatre Parkway Mountain View, CA 94043, USA) to analyse your usage of our website. The service uses "cookies" - text files stored on your device. The information collected by the cookies is usually sent to a Google server in the US and stored there.

4.4.2 The personal information collected through the use of Google Analytics is anonymised to ensure that you cannot be identified by such information. Under the terms of the agreement, which website operators have entered into with Google Inc., they use the information collected to compile an evaluation of website activity and site activity and provide Internet-related services.

4.4.3 You are able to prevent the storage of cookies on your devices by selecting the appropriate settings on your browser. There is no guarantee that you will be able to access all features of our website without restriction if your browser does not allow cookies.

4.4.4 Furthermore, you can use a browser plug-in to prevent the information collected by cookies (including your IP address) from being sent to Google Inc. and used by Google Inc. The following link leads you to the corresponding plugin: <https://tools.google.com/dlpage/gaoptout?hl=en>

4.4.5 You can prevent the collection by Google Analytics by clicking on the following link. An opt-out cookie will be set which prevents the future collection of your data when visiting our website:

4.4.6 [Deactivate Google Analytics](#)

4.4.7 Here is more information on Google Inc's data usage: <https://support.google.com/analytics/answer/6004245?hl=en>

4.5 **Contact Form**

- 4.5.1 Some information is collected by us when it is provided to us, by you.
- 4.5.2 Should you send us an inquiry using the contact form on our website the contact information you provide therein, will be processed by us for the purpose of responding to your inquiry and any follow-up questions which may arise by virtue of our response to the inquiry;
- 4.5.3 The provision of the relevant information to us is mandatory and a failure to provide such information means that we will be unable to address your inquiry.
- 4.5.4 The information contained in the contact form is processed based on: -
- 4.5.4.1 your consent in terms of section 11(1)(a) of POPI, which consent may be revoked at any time.
- 4.5.4.2 Section 11(1)(b) of POPI, to the extent that such contact with us is aimed at concluding or entering into a contract.
- 4.5.4.3 Our legitimate interest in responding to your inquiry in accordance with section 11(1)(f) of POPI.
- 4.5.5 We will not share the information provided by you to any third parties.
- 4.5.6 We will retain the information provided by you on the contact form until such time as you request its deletion, revoke its consent in respect of its storage, or the purpose for its storage has been fulfilled. In certain circumstances, we may retain the information contained on the contact form for historical purposes, in which event we employ appropriate technical and organisational measures to ensure that the information is not processed for any other purpose and cannot be accessed by any unauthorised persons.
- 4.5.7 Any mandatory statutory provisions, in particular those regarding statutory information retention periods, remain unaffected by this provision.

5. **Application for Membership with us**

- 5.1 You do not have to provide us with personal information in order to visit or access the freely available sections of our website. However, certain services on our website are only accessible by data subjects who are registered members of our organisation.

- 5.2 You may apply for membership on our website, or via email by submitting the relevant membership application, to gain access to the additional functions offered by us.
- 5.3 We will require certain mandatory personal information from you in order to process the application. The mandatory information requested when applying must be provided in full, failing which we will reject your registration.
- 5.4 We will process the personal information on the application to elect whether to approve the application for membership or otherwise.
- 5.5 We will process the personal information provided during the application process based on: -
- 5.5.1 Your consent in terms of section 11(1)(a) of POPI, which consent may be revoked at any time; and
- 5.5.2 Actions which are necessary to carry out the conclusion of a contract to which you are party to in terms of section 11(1)(b) of POPI; and
- 5.5.3 Our legitimate interest in gaining new members in accordance with section 11(1)(f) of POPI.
- 5.6 The personal information collected by us during the application process will be stored by us until such time as the application process is completed. In the event that your application is denied, the personal information in respect of the application will be deleted.
- 5.7 Once an application is approved, we will share your personal information to our third-party accounting service provider, in order to issue an invoice. We ensure that our accounting service provider protects your personal information in terms of a written contract.
- 5.8 Once payment of membership fees is duly received by us, you will become a registered member of our organisation and your personal information will be stored by us as long as you remain registered as a member with us.
- 5.9 Your registration information will be subsequently deleted should you cancel your registration with us. However, statutory retention periods remain unaffected.

6. WEBSITE SECURITY

- 6.1 Our website uses Secure Socket Layer (SSL) encryption for security reasons and for the protection of the transmission of confidential content, such as the inquiries you send to us as the site operator, or the information which is provided when applying for membership with us on the website.
- 6.2 You can recognize an encrypted connection in your browser's address bar when it changes from "http://" to "https://" and the system-specific lock icon is displayed in your browser's address bar.
- 6.3 If SSL encryption is activated, the data you transmit to us cannot be read by third parties.

7. REGISTERED MEMBERS

- 7.1 We collect the personal information of registered members, including, where applicable, that of our representatives, from the information contained on the membership application form or where such information is provided by registered members to us.
- 7.2 We collect this information, in order to: -
- 7.2.1 Add members to the members data base;
 - 7.2.2 Provide services to members;
 - 7.2.3 Communicate with members;
 - 7.2.4 Inform members of upcoming events, news or opportunities which may be of interest; and/or
 - 7.2.5 Afford members access to specific events which they have registered for.
- 7.3 We will process the personal information of our registered members based on: -
- 7.3.1 The member's consent in terms of section 11(1)(a) of POPI;
 - 7.3.2 Actions which are necessary to carry out the performance of a contract to which you are party in terms of section 11(1)(b) of POPI;
 - 7.3.3 The protection of members legitimate interests to receive the services due to them in terms of section 11(1)(d) of POPI; and

- 7.3.4 Our legitimate interest in providing our members with our products and services in accordance with section 11(1)(f) of POPI.
- 7.4 The supply of the relevant information is mandatory to the extent that it pertains to your membership, or your registration to a particular event and a failure to supply such information means that your membership cannot be maintained, and you will not be afforded access to the relevant event.
- 7.5 The personal information of our members, including, where applicable, that of our representatives, who form part of our member database is operated by GlueUp, an international organisation, and is stored on their secure servers located in California. This inevitably involves the transfer of personal information outside of the Republic of South Africa for the purposes of secure storage.
- 7.6 We ensure that the personal information we transfer to the international organisation is securely protected, treated confidentially and processed lawfully in terms of a written contract to that effect.
- 7.7 Where your membership expires, your personal information may be processed for the purposes of inquiring whether you wish to renew their membership.
- 7.8 In the event you do not wish to renew your membership, or cancel your membership with us, we ensure that the personal information is restricted and is only processed to the extent necessary to comply with obligations imposed by law, such as the requirement to retain documents in accordance with statutory retention periods.

8. EVENTS

- 8.1 From time-to-time we host events which may be attended by you (whether you are a registered member or otherwise) where you have registered to attend.
- 8.2 Where you register to attend an event hosted by us, we collect personal information from you such as, your title, name, surname, email address, telephone number and the company you work for.
- 8.3 The information is collected by us in order to: -
- 8.3.1 Register you for the particular event;

- 8.3.2 Furnish you with an invoice for attendance at the event, where we charge a fee for attending;
 - 8.3.3 Afford you access to and attendance at the event, provided, where applicable payment has been duly received; and
 - 8.3.4 Provide you with any relevant materials to be used at the event.
- 8.4 We process the personal information of data subjects who attend events based on: -
- 8.4.1 Your consent in terms of section 11(1)(a) of POPI;
 - 8.4.2 Actions which are necessary to carry out the performance of a contract to which the data subject is party in terms of section 11(1)(b) of POPI;
 - 8.4.3 The protection of members legitimate interests to attend at the event in terms of section 11(1)(d) of POPI; and
 - 8.4.4 Our legitimate interest in securing the attendance of data subjects at the event in accordance with section 11(1)(f) of POPI.
- 8.5 It is mandatory to supply certain information to allow us to register you to the event, whereas the supply of additional information is voluntary. You will recognise the mandatory information which must be supplied by an asterisk "*" which appears in the relevant field.
- 8.6 Should you fail to provide the necessary mandatory information, we will be unable to register you for the event and you will not be afforded access.
- 8.7 Where a fee is payable to attend an event, we will share your personal information to our third-party accounting service provider, in order to issue an invoice. We ensure that our accounting service provider protects your personal information in terms of a written contract.
- 8.8 We wish to inform you that we take photographs at events which are uploaded onto our website under the "Gallery" section. In certain cases, photographs may contain images of you at the event. By attending events hosted by us, you acknowledge that photographs, which may contain images of you, may be uploaded on our website in line

with our legitimate interest to promote the popularity of its events in accordance with section 11(1)(f) of POPI.

8.9 Should you appear in a photograph on our website and wish for the photograph to be removed, you may request such removal by sending an email to us or our information officer and request the removal of the photo in question.

8.10 Attendance lists of the relevant events are retained by us for historical and statistical purposes.

9. GUEST SPEAKERS

9.1 From time-to-time we host events and may mandate guest speakers to present at such events.

9.2 Where guest speakers are requested to present at a particular event, we collect the following personal information: -

9.2.1 Name and surname;

9.2.2 Job title;

9.2.3 Company name;

9.2.4 Email address;

9.2.5 Telephone number;

9.2.6 Banking information (where necessary).

9.3 The information is collected by us in order to: -

9.3.1 Make the necessary arrangements for the guest speaker to present at the event;

9.3.2 Inform attendees of a particular event who the guest speaker is;

9.3.3 Enable us to pay the guest speaker for their services (where applicable).

9.4 We process the personal information of guest speakers who attend and present at events based on:

- 9.4.1 the guest speaker's consent in terms of section 11(1)(a) of POPI, which consent may be revoked at any time;
- 9.4.2 actions which are necessary to conduct the performance of a contract to which the guest speaker is party in terms of section 11(1)(b) of POPI;
- 9.4.3 the protection of the guest speaker's legitimate interests to attend and present at the event in terms of section 11(1)(d) of POPI; and
- 9.4.4 Our legitimate interest in securing the attendance and presentation of the guest speaker at the event in accordance with section 11(1)(f) of POPI.
- 9.5 It is mandatory for the guest speaker to supply the personal information in order to allow us to secure the guest speakers attendance, whereas the supply of additional information, which is not necessary to make the necessary arrangements for the guest speaker to attend and present at the event is voluntary.
- 9.6 Should a guest speaker fail to provide the necessary mandatory information, the guest speaker will be unable to attend or present at the relevant event.
- 9.7 Attendance lists of the relevant events are retained by us for historical and statistical purposes.

10. **MARKETING ACTIVITIES**

- 10.1 Marketing is an important way in which we conduct business and is key to its continued success. We ensure that our direct marketing activities are conducted strictly in accordance with this policy and POPI.
- 10.2 We will only direct market via electronic communication to our registered members, or to data subjects who have provided their consent to receive such marketing materials.
- 10.3 In order to enable such direct marketing activities, we will collect information from you such as your name, email address and telephone number, as well as the details of your company and position within the company.
- 10.4 For registered members of our organisation, this information is collected from the relevant membership application form, or where it is provided by you. For non-members,

this information is collected from you when it is voluntarily provided on the registration form for specific events.

10.5 We process the personal information of our members, who have provided their consent, for the purpose of staying in touch and informing them of upcoming events, webinars, promotions, news and other opportunities.

10.6 We process this personal information based on: -

10.6.1 Their consent in terms of section 11(1)(a) of POPI; or

10.6.2 Actions which are necessary for the performance of a contract to which the data subject is party in terms of section 11(1)(b) of POPI; and

10.6.3 Our legitimate interest in informing our members of relevant events, opportunities and news in accordance with section 11(1)(f) of POPI.

10.7 The supply of such information is entirely voluntary and a failure to provide such information would mean that we are unable to keep you informed of events, news and opportunities.

10.8 The personal information of data subjects who form part of our marketing data base is operated by GlueUp, an international organisation, and is stored on their secure servers located in California. This inevitably involves the transfer of personal information outside of the Republic of South Africa for the purposes of secure storage.

10.9 We ensure that the personal information we transfer to the international organisation is securely protected, treated confidentially and processed lawfully in terms of a written contract to that effect.

10.10 At all times, members and non-members have the right to object to the processing of their personal information for the purposes of direct marketing. To exercise this right, you can simply opt out of receiving further electronic communications by clicking the unsubscribe button at the bottom of every email we send.

10.11 We may also process your personal information to direct market in other ways, which do not involve electronic communications. In such cases, you are also entitled to object to the processing of your personal information in terms of section 11(3)(b) of POPI.

- 10.12 To exercise this right, you can inform us of your objection to such processing.
- 10.13 Where you have objected to the processing of your personal information for the purposes of direct marketing, either in terms of electronic communication or otherwise, we will remove you from our marketing data base and will ensure that we no longer processes your personal information for these purposes.

11. **THIRD PARTY SERVICE PROVIDERS**

In certain cases, we make use of third-party service providers to assist in performing our functions and duties. Where we transfer personal information to our third-party service providers, we commit them to safeguarding the security of the personal information which is provided to them in terms of written contracts which oblige them to treat such information as confidential and not disclose it and to adopt appropriate security measures to protect the relevant personal information from unauthorised access. The processing of personal information in such cases is performed: -

- 11.1 Where necessary to conclude and/or perform in terms of a written contract to which the data subject is party in terms of section 11(1)(b) of POPI;
- 11.2 Where it complies with an obligation which is imposed in terms of law in terms of section 11(1)(c) of POPI;
- 11.3 To protect the legitimate interests of the data subject in terms of section 11(1)(d) of POPI;
or
- 11.4 In pursuit of our legitimate interests to render services which are of a high quality in accordance with section 11(1)(f) of POPI.

12. **TRANSFER OF PERSONAL INFORMATION OUTSIDE OF THE REPUBLIC OF SOUTH AFRICA**

- 12.1 Save as specified in this policy, we will not transfer your personal information outside of the Republic of South Africa.
- 12.2 In cases where personal information is transferred to third parties based outside of the Republic of South Africa, we will only transfer such information in terms of a written contract which obliges recipients to: -
- 12.2.1 Treat the personal information as confidential and not disclose it;

- 12.2.2 Establish and implement appropriate security measures to protect the personal information against unauthorised access;
- 12.2.3 Effectively upholds the principles of reasonable processing as set out in POPI; and
- 12.2.4 Limit the further transfer of such personal information in terms of provisions which are substantially similar to the provisions of section 72 of POPI.

13. USE OF SOCIAL MEDIA

- 13.1 On our website, you may find a hyperlink to LinkedIn, which can be recognized by the provider's respective logo.
- 13.2 Clicking on the link will open the corresponding social media page, for which this privacy policy does not apply.
- 13.3 Please check the relevant privacy policies of the individual providers for details on the applicable terms and conditions; these can be found under:
- 13.4 LinkedIn: <https://www.linkedin.com/legal/privacy-policy>
- 13.5 Before calling up the relevant hyperlinks, your personal information is not transferred to the respective provider.

14. LINKS TO OTHER WEBSITES

- 14.1 Our website contains links to other websites, with relevant hyperlinks for these purposes being labelled as such.
- 14.2 We hereby provide notification that we have no influence on and to what extent the linked websites comply with the applicable data protection regulations and accordingly recommends that you acquaint yourself with the relevant privacy policies for such other websites before accessing or entering same.

15. DISCLOSURE OF INFORMATION

- 15.1 We do not sell or otherwise disclose personal information, save as specified in this Policy, or as may be required in terms of applicable law. However, we may disclose your personal information, *inter alia*: -

- 15.1.1 Where such disclosure is necessary for marketing purposes;
 - 15.1.2 Where such disclosure is made to suppliers or third-party service providers, who enable us to provide services;
 - 15.1.3 To our employees who strictly require it in order to perform their functions; and/or
 - 15.1.4 On our website's member portal to enable members to network with one another.
- 15.2 We ensure that third party service providers and employees, who receive your personal information respect the confidentiality and the need for protection of your personal information by adopting appropriate measures to this effect. In all other cases, we will not disclose your personal information without first notifying you and obtaining your consent to such transfer.

16. **PROMOTION OF ACCESS TO INFORMATION**

Should you wish to access any information held by us for the purposes of exercising any of your rights, you are hereby referred to our manual, which has been prepared in accordance with section 51 of the Promotion of Access to Information 2 of 2000, as amended, which manual is accessible on our website or may be obtained at our premises.

17. **SECURITY IN RESPECT OF PERSONAL INFORMATION**

- 17.1 All information stored by us, is stored in compliance with POPI.
- 17.2 Unless stated otherwise in this Policy, we, or our hosting providers, will store your personal information on specially secured servers.
- 17.3 The storage thereof is a technical and organizational measure employed by us to protect against loss, destruction, access, alteration or dissemination of your data by unauthorized persons.
- 17.4 Only authorized persons are able to access your personal information. These individuals are responsible for the technical, commercial and editorial supervision of the server. Despite regular inspections, complete protection against all risks is not possible and we in no way guarantee complete protection in this regard.

- 17.5 We undertake to delete or restrict the processing of your personal information when the purpose for the storage thereof is fulfilled.
- 17.6 However, storage may continue after the purpose is fulfilled where such storage is required in order to comply with statutory legal provisions to which we are subject, for example in terms of statutory retention periods and documentation obligations.
- 17.7 In a case such as this, we will delete or restrict your personal information following expiry of the relevant retention period.

18. DATA SUBJECTS RIGHTS IN RESPECT OF PERSONAL INFORMATION

In terms of POPI, you have the following options available in respect of your personal information that we process:

- 18.1 You may inquire, at no cost, whether we hold your personal information, as long as you provide us with adequate proof of your identity;
- 18.2 Where necessary, request the correction, destruction or deletion of your personal information, as per clause 20.8 below;
- 18.3 Object to, in terms of clause 21 below, restrict or limit the processing of your personal information;
- 18.4 Object to us utilising personal information for purposes of direct marketing; and/or
- 18.5 Request that your personal information not be used to send unsolicited emails.
19. We refer you to the clauses below, which give general guidance on how to exercise the rights listed above.

20. RIGHT OF ACCESS TO, CORRECTION AND/OR DELETION OF PERSONAL INFORMATION

- 20.1 We hereby provide notification that you, who may prove your identity have the right to request confirmation from us, free of charge, as to whether we hold personal information relating to you.
- 20.2 Should you wish to establish whether we hold any of your personal information, you are invited to send an email with your request to us using the information set forth above.

- 20.3 Although you have a right to request access to personal information from us, in certain instances, we are obliged to refuse access to personal information based on the grounds contained in the provisions of Chapter 4 of Part 2 and Chapter 4 of Part 3 of the Promotion of Access to Information Act 2 of 2000, as amended.
- 20.4 In the event that a particular ground of refusal applies, we will not provide you access to such personal information.
- 20.5 Should personal information be disclosed to you in response to any requests as aforesaid, you are hereby notified of your right to request correction, deletion and/or blocking of the personal information, in line with section 24 of the Protection of Personal Information Act 4 of 2013, as amended.
- 20.6 Should we hold your personal information, you are likewise entitled to:
- 20.6.1 Request access to any personal information held by us,
- 20.6.2 Request the correction of such information in cases where your information has changed or is no longer accurate; and/or
- 20.6.3 Request the deletion of the personal information.
- 20.7 Where you are a registered member of our organisation, you are able to access or update your personal information held by us by sending an email to us and requesting such access and/or update as the case may be.
- 20.8 In other cases, if you wish to request the correction or deletion of personal information or the destruction or deletion of a record of personal information in terms of section 24(1) of POPI, you must submit a request to us on Form 2, which may be accessed at <https://www.justice.gov.za/legislation/notices/2018/20181214-gg42110-rg10897-gon1383-POPIregister.pdf>.
- 20.9 We, or our information officer, will render such reasonable assistance, as may be necessary and free of charge, to enable you to complete Form 2.
- 20.10 Please feel free to contact us at any time should you have any further questions in respect of personal information.

21. **WITHDRAWAL OF CONSENT AND RIGHT TO OBJECT TO PROCESSING OF PERSONAL INFORMATION**

- 21.1 You are hereby informed that you may revoke your consent to us processing your personal information at any time by simply sending an email to us or our Information Officer. However, the revocation of such consent will not affect the lawfulness of continued processing where legal grounds authorise us to continue processing such information.
- 21.2 Withdrawing consent will not affect the lawfulness of the processing that was conducted by us between the time of consent and withdrawal.
- 21.3 As far as processing your personal information is not based on consent but another legal basis, you can object to this data processing.
- 21.4 We hereby provide notification that you may, in terms of section 11(3)(a) of POPI, object, at any time, to the processing of personal information, where we process personal information: -
- 21.4.1 In order to protect a legitimate interest of yours;
- 21.4.2 Where processing is necessary for the proper performance of public law duty by a public body; and
- 21.4.3 Where processing is necessary for pursuing the legitimate interests of the responsible party, or of a third party to whom the information is supplied.
- 21.5 Should you wish to object to the processing of your personal information in terms of section 11(3)(a) of POPI, you must submit your objection to us on Form 1, in accordance with the Regulations relating to POPI.
- 21.6 The Form 1 document may be accessed through the following link:
<https://www.justice.gov.za/legislation/notices/2018/20181214-gg42110-rg10897-gon1383-POPIregister.pdf>
- 21.7 We or our information officer, undertake to render such reasonable assistance as is necessary, free of charge, to enable you to make an objection on Form 1.

- 21.8 Any objections by you must be based on reasonable grounds relating to your particular situation unless legislation provides for such processing in which case we shall continue to process such personal information in compliance with our legislative obligations.
- 21.9 In the absence of such legislative obligations, we will review and, if necessary, terminate the processing of such personal information or data.
- 21.10 You will be informed of the results of the review and receive – if the data processing is to continue nevertheless – detailed information from us about why data processing is permitted.

22. SECURITY COMPROMISES

Should we have reason to believe that your personal information has been accessed or acquired by any unauthorised person, we hereby inform you that we shall, as soon as possible, notify the Information Regulator and any affected data subjects, unless their identity cannot be established. The basis for processing your information in such cases is to comply with obligations imposed by law, in terms of section 11(1)(c) of POPI and to protect your legitimate interest in respect of your personal information in terms of section 11(1)(d) of POPI.

23. RIGHT TO LODGE A COMPLAINT WITH THE INFORMATION REGULATOR

- 23.1 You are entitled to submit a complaint to the Regulator in the prescribed manner and form, alleging any interference with the protection of their personal information.
- 23.2 In terms of the Regulations relating to POPI, any person who wishes to submit a complaint must submit such a complaint to the Information Regulator on Part I of Form 5.
- 23.3 The relevant form is accessible via the following link:
<https://www.justice.gov.za/legislation/notices/2018/20181214-gg42110-rg10897-gon1383-POPIregister.pdf>
- 23.4 The available contact details of the Information Regulator are recorded as follows:
- 23.4.1 Address: JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001;
- 23.4.2 Postal Address: PO Box 31533, Braamfontein, Johannesburg, 2017.
- 23.4.3 Email: complaints.IR@justice.gov.za.

24. **UPDATES TO THIS POLICY**

We reserve our right to amend this Policy from time to time and will do so without notice to you. The latest version of this Policy will be indicated by the date information (below). The current version of this Policy can always be accessed directly via our website.

Last Updated: 10 February 2022