



THE ASISA FOUNDATION PRIVACY NOTICE

1 IMPORTANT INFORMATION

WHO WE ARE

The ASISA Foundation, with registered address at Bridge House, Boundary Terraces, 1 Mariendahl Lane, Newlands, 7700 ("**Foundation**") is a trust with Master's Reference number IT3400/2012 and a non-profit organisation with registration number 125-121 NPO. The Foundation is also approved as a public benefit organisation.

PURPOSE OF THIS PRIVACY NOTICE

We at the Foundation respect and are committed to ensuring the privacy of the persons we deal with and that their personal information is collected and used appropriately, lawfully and transparently.

This **Privacy Notice** sets out briefly how we use your personal information in accordance with the law, especially the [Protection of Personal Information Act](#) ("**POPIA**").

In this **Privacy Notice**, "**Personal Information**" has the meaning given to it in [POPIA](#) and basically means any personal information that identifies or relates to a natural and legal person.

If you provide Personal Information to us about another person, you must inform that person about this **Privacy Notice** and get their permission (where possible) for sharing their Personal Information with us.

It is important that you read this **Privacy Notice** together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing Personal Information about you so that you are fully aware of how and why we are using your information. This **Privacy Notice** supplements the other notices and is not intended to override them.

RESPONSIBLE PARTY

The Foundation is a “[responsible party](#)” under [POPIA](#) and, as such, is responsible for the Personal Information we have about you and registered with the South African [Information Regulator](#).

We have appointed an Information Officer who is responsible for overseeing the Foundation's compliance with [POPIA](#). If you have any questions about this **Privacy Notice** or any of the Foundation's privacy practices, please contact our Information Officer using the details set out below.

CONTACT DETAILS OF INFORMATION OFFICER

Name: Koovi Moodley
Email address: kmoodley@asisa.org.za
Landline: 010 276 0970

CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

This version was last updated on 30 September 2022.

This **Privacy Notice** does not form part of any contract to provide our services. We may update this **Privacy Notice** at any time.

It is important that the Personal Information we hold about you is accurate and current. Please keep us informed if your Personal Information changes during your relationship with us.

THIRD-PARTY LINKS

Our website and social media platforms may contain links to third party websites and applications. Clicking on those links or enabling those connections may allow third parties to collect or share information about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

2 GROUNDS FOR USING YOUR PERSONAL INFORMATION

To provide our services and run our business, we will collect, use and disclose your Personal Information, including “special” Personal Information, such as health information. Where we do this, we will either rely on your consent (or the consent of your parent or guardian if you are under 18) or on lawful grounds set out in [POPIA](#), for example:

- preparing to enter into or performing a contract with you or providing our services to you;
- complying with obligations placed on us by law;
- protecting your legitimate interests;
- us having a legitimate interest to require your Personal Information.

3 WHAT PERSONAL INFORMATION DOES THE ASISA FOUNDATION COLLECT?

The exact Personal Information we collect from you depends on what you have asked us to do or what we are contracted to do for you. This may include:

- general identification and contact information;
- information that is necessary to verify your identity or age;
- your communication and marketing preferences;
- if you are an applicant or participant in one of our programmes:
 - information about your gender, age, place of residence, nationality, employment status, education and CV;
 - information we require to assess if you qualify for or to enrol you in our programmes, to perform our contract with you, to provide our services to you and to implement our programmes;
 - financial information such as bank account details and your income;
 - information regarding your personal or professional interests, demographics and experiences with the Foundation
 - if you agree videos or photographs of you or your feedback about a programme;
 - certain special Personal Information like information about health and race;
- If you are one of our funders, information we need to facilitate and administer our funding arrangement and payment information:
- If you are one of our service providers, financial information such as your bank account and tax information.

We will tell you when the Personal Information we ask for is mandatory or voluntary. If you do not

provide us with mandatory information, we may not be able to enrol you into our programmes. If you do not provide us with voluntary information, we may not be able to provide you with access to our internet services or to provide other administrative services.

If you visit our website, we collect information that is not used to personally identify you, but is aggregated to measure the number of visits, average time spent on the website and the web pages viewed, browser and device information, website and application usage data, IP addresses, and information collected through cookies. We use cookies to enhance your browsing experience. If you do not wish to accept cookies, you can adjust your internet browser settings to refuse the cookies. By continuing to use our website without changing your browser's settings, you agree to our use of cookies.

We may collect **special** (sensitive) categories of Personal Information about you. This may include your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data and any criminal convictions and offences. Please note we do not generally collect special Personal Information unless you have agreed, you provide it to us in connection with the services we are providing to you, it is necessary to exercise your or our rights in, or is required by, law or it is public information.

We will only use your Personal Information for the purposes for which we collected it unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

4 WHERE WE COLLECT PERSONAL INFORMATION FROM

We use different methods to collect Personal Information from and about you including through:

- **Direct interactions.** As far as possible, we will collect Personal Information directly from you. You may, for example, give us your Personal Information as part of an initial enquiry about our programmes or other services or once you have become a participant, funder or business partner of ours.
- **Third parties.** We may receive Personal Information about you from various third parties, such as our business partners, trainers or programme facilitators, your employer or your education institution.

- **Publicly available sources.** We may collect Personal Information from publicly available sources.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect technical data. We collect this Personal Information by using cookies and other similar technologies.

5 HOW WE USE YOUR PERSONAL INFORMATION

We will only collect and use your Personal Information for specific and lawful purposes, for example to:

- support and maintain our contractual relationship with you;
- offer and deliver our programmes or other services to you;
- update our records about you;
- communicate with you;
- determine if you qualify for our programmes;
- confirm and verify your identity for security purposes;
- carry our market research and analysis;
- comply with applicable legal and regulatory requirements such as the requirements of the Consumer Financial Education and Broad-Based Ownership Schemes;
- prevent, investigate and detect any unlawful activities, including crimes such as fraud and money laundering;
- market our services, or those of our business partners, if you have agreed.
- do market research and statistical analysis;
- determine the effectiveness of and improving our programmes;
- answer your queries and attend to your complaints; and
- conduct our business activities, such as audits and business planning;
- conduct independent monitoring and evaluation;
- where you have agreed, use or publish your feedback or photos or videos about your participation in a programme
- improve our services, including website services, and our programmes.

6 WHO WE MAY SHARE PERSONAL INFORMATION WITH

We may share Personal Information about you with certain third parties, but only for the purposes collected, where you have consented or where it is otherwise lawful. These third parties include:

- our business partners you choose to receive marketing or newsletters from;
- our business partners (for example rating agencies, funders, independent monitoring and evaluation providers, programme and implementation partners and financial institutions) to jointly develop, create, implement and monitor and evaluate our programmes, content and services;
- our third party or service providers;
- governmental, legal and regulatory bodies;
- law enforcement and fraud prevention agencies;
- your employer or educational institution.

7 OUR SERVICES

We also process your Personal Information to help us to give you the best service and improve our offerings. For example, we would like to use your Personal Information to keep you informed about our other programmes, or those of our business partners, which may be of particular interest to you.

You may opt out at any time if you don't want to receive any communications of this nature by contacting us at info@asisafoundation.org.za.

8 RETENTION OF YOUR PERSONAL INFORMATION

We keep your Personal Information only as long as is necessary to fulfill the purposes for which the information was collected or as required by law or to meet regulatory or legislative requirements or as otherwise permitted by law. Personal Information will be securely disposed of when it is no longer required.

9 AUTOMATED DECISION MAKING

Sometimes, as part of our business operations, decisions are taken about you using automated computer software and systems. These decisions do not involve human input. We do not envisage that any decisions will be taken about you using automated means, however this position may change, for example, we may start using automated decision making to assess your eligibility for our programmes, but only where it is lawful for us to do so.

10 SECURITY OF PERSONAL INFORMATION

We use appropriate technical and physical security measures to keep your Personal Information safe. When we provide your Personal Information to a third party or use a third party to collect Personal Information on our behalf, we will choose the third party carefully and require the third party to use appropriate security measures to keep your Personal Information confidential and secure.

11 YOUR RIGHTS

You have a number of rights under POPIA in connection with our use of your Personal Information. These rights include:

- a right to access your Personal Information;
- a right to correct inaccurate Personal Information;
- a right to erase data or suspend our use of Personal Information;
- a right to object to our use of your Personal Information;
- a right to withdraw consent; and
- a right to complain to the [Information Regulator](#).

Please bear in mind that if you erase or suspend our use of your Personal Information or if you object or withdraw consent, this may affect our ability to carry out the tasks mentioned above for your benefit.

If you would like to exercise any of your rights set out above, please contact us at info@asisafoundation.org.za.

Contact details of the [Information Regulator](#):

Physical address	JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
Postal address	P.O Box 31533, Braamfontein, Johannesburg, 2017
Complaints email	complaints.IR@justice.gov.za
General enquiries email	infoereg@justice.gov.za .