



THE ASISA FOUNDATION PRIVACY POLICY

INTRODUCTION

The Trustees for the time being of the ASISA Foundation – a trust established in accordance with the applicable laws of the Republic of South Africa and registered with the Master of the High Court of South Africa with Master's Reference number IT3400/2012, a registered Non-Profit Organisation in terms of the Nonprofit Organisations Act, 71 of 1997 under registration number 125-121 NPO and approved as a Public Benefit Organisation in terms of Section 30 (3) of the Income Tax Act 58 of 1962 with registered address at Bridge House, Boundary Terraces, 1 Mariendahl Lane, Newlands, 7700 (**"the ASISA Foundation"** **"we"**, **"us"**, **"our"**) respects, and is committed to ensuring, the privacy of every person who visits or uses this website, www.asisafoundation.org.za. This privacy policy (this **"policy"**) has been put together to explain how we may collect, use, share, retain and generally process your personal information obtained during your interactions with us (whether online, in writing or verbally) or which is collected or received in any other manner. This policy further explains your choices and rights in relation to our processing of your personal information.

Any visit to or use of this website is deemed to include an acceptance of this policy. Please ensure that you have read, fully understand and agree with the provisions contained in this policy before browsing or using this website.

The ASISA Foundation shall not process any personal information relating to a person under the age of 18 years (**"minor"**) unless it has obtained consent from that person's parent or legal guardian and, if requested by the ASISA Foundation, obtained a copy of the minor's identity document. If this website is being accessed by the parent or guardian of a child under the age of 18 years, and personal information pertaining to that child is being provided by the parent or guardian, then they hereby expressly consent to the ASISA Foundation processing such information according to the further provisions of this Privacy Policy.

This policy may be revised from time to time to take into account any changes in applicable laws, our Programmes (as defined below), this website or any aspect related to our business generally. We therefore encourage you to monitor this policy periodically to note any changes made to it.



WHAT PERSONAL INFORMATION DOES THE ASISA FOUNDATION COLLECT?

The ASISA Foundation is subject to the Protection of Personal Information Act, 4 of 2013 (“**PoPIA**”)

We may collect certain information about you when you visit this website, participate in any of the consumer financial literacy and education initiatives (“**Participants**”) initiated and implemented by the ASISA Foundation (“**Programmes**”) across various platforms, provide funding to the ASISA Foundation (“**Funders**”), provide goods or services to us (“**Service Providers**”), offer support to the ASISA Foundation in any manner or form (“**Stakeholders**”) or apply for a job including but not limited to–

- information about the content and Programmes you express an interest in when you use this website;
- your name and contact information, including email address and company details which you may submit to the ASISA Foundation when you interact with us on this website;
- information about your location or similar location-based information;
- information regarding your personal or professional interests, demographics, experiences with the ASISA Foundation and contact preferences in order to provide you with further correspondence about the ASISA Foundation;
- information from Funders for invoicing, concluding contracts and other administrative purposes (where such information relates to your contact details and invoicing information):
- names, contact details, financial and tax information from suppliers and professional service providers so that we can place orders/instruct you and make payment in respect of any goods or services we receive; and
- names, contact details from Stakeholders;
- Personal details from Participants, including but not limited to, name, title, contact details; identify numbers; passport numbers; gender; race, disability, nationality, employment status, level of education, for the purposes of:
 - assessing your suitability for the Programme;
 - contacting you to evaluate the effectiveness of the Programmes;



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- contacting you to communicate with you and keep you informed of any updates or changes to the Programme;
 - ensure compliance with relevant legislation;
 - incorporating into our publications and videos to be shared on social media platforms, any photographs taken or feedback provided by you during the Programme
- the information you provide in your curriculum vitae, in our application/intake form and supporting documentation/information during the recruitment process purely for the purposes of assessing your suitability for the role, for contacting you to progress your application and to take up any references you have provided.

In general, you may navigate this website without directly providing the ASISA Foundation with any personal information. Any domain name information that the ASISA Foundation collects is not used to personally identify you but is instead aggregated to measure the number of visits, average time spent on this website and the web pages viewed. Such other information includes browser and device information, website and application usage data, IP addresses, demographic information such as marketing preferences, geographic location, home language, and information collected through cookies and other technologies or information that has been anonymised or aggregated. The ASISA Foundation uses this information to improve its contents. If we link this information with your personal information, we will treat such linked information as personal information.

To enroll and participate in our Programmes, there is some information which we require Participants to provide us either because of legal requirements or because we need that information to implement the Programmes.

We will tell you when the personal information requested is mandatory, or if it is voluntary. If you do not provide us with mandatory personal information, we may be unable to enroll you into our Programmes.

You can choose not to provide voluntary personal information to us when requested. However, if this is necessary to enroll you in our Programmes, provide you with access to our Internet Services, or to perform administrative functions, we may be unable to do these things.

We do process information about you which is considered to be a "special personal information" (this may include details about your race or ethnicity, trade union

memberships, genetic or biometric data). We will only ask questions which relate to special categories of data where we are permitted to do so by the law and in certain circumstances we will also give you an option to “prefer not to say” as a response to any questions which concern any special personal information

WHERE DO WE COLLECT PERSONAL INFORMATION FROM

As far as possible, we will always collect personal information about you directly from you, except in the following circumstances:

- Where personal information about you is collected from a public record, or from another source if the information has already been made public by you or on your behalf with your consent;
- where you have given us your express consent to collect your personal information from another source;
- where the collection of your personal information from another source will not prejudice any of your legitimate interests;
- where the collection of personal information from another source is necessary to maintain our legitimate interests or those of any third party, we are permitted to share that information with;
- where the collection of personal information directly from you would prejudice the purpose for that collection; or
- where the collection of personal information directly from you is not reasonably practicable in the circumstances.

LEGAL BASIS FOR OUR PROCESSING OF YOUR PERSONAL INFORMATION

We rely on one or more of the following reasons for processing your personal information –

- you consenting to our processing your personal information for a specific purpose;
- where processing is necessary for the performance or conclusion of a contract to which you are a party;
- where processing is necessary to achieve the ASISA Foundation's legitimate interests, for example the management, operations and improvement of our



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Programmes (to the extent that they don't unjustifiably and unlawfully limit your interests or rights which require protection);

- where processing is necessary to comply with an obligation imposed by law;
- where processing is necessary to protect your legitimate interests; and
- where processing is necessary to pursue the legitimate interests of a third party to whom the personal information is lawfully supplied.

HOW WE USE YOUR PERSONAL INFORMATION

We use the personal information provided by you for the following purposes ("**purpose/s**") -

- to update the ASISA Foundation's records about you and for the purpose of retaining records about you;
- to communicate with you in the course of the ASISA Foundation's ordinary business activities;
- to offer and deliver our Programmes to Participants;
- to facilitating the participant's participation in the Programme
- to determine whether or not you are eligible to participate in any of our Programmes;
- to carry out our contractual obligations;
- to process your personal information in relation to marketing and promotional activities based on your consent when your personal information was collected;
- to comply with an obligation imposed by law;
- to comply with an obligation imposed by the trust deed that governs the ASISA Foundation;
- research, training and statistical analysis with the aim of:
 - determining the effectiveness of the Programmes;
 - ensuring adherence to the legal requirements for Consumer Financial Education and Broad-Based Ownership Schemes;
 - improving the ASISA Foundation's Programmes and content and by making them easier to use and by providing access to certain sections of this website;

- to prevent or detect any unlawful activities;
- responding to your enquiries and complaints or processing your requests in relation to your personal information;
- to follow up on any enquiries and complaints as part of the ASISA Foundation's funders, stakeholders and beneficiary's care procedures; and
- to conduct audits and business planning;
- contacting you for market research purposes and/or independent monitoring and evaluation.

RETENTION OF YOUR PERSONAL INFORMATION

Your personal information is retained by us for our business purposes and to comply with any applicable laws and regulations. To the extent not specifically prohibited or prescribed by applicable laws, we will retain your personal information for periods that we believe are reasonably necessary to serve our legitimate business interests.

When we no longer have an ongoing legitimate business need to process your personal information, we will either delete or de-identify it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and keep it from any further processing until deletion is possible.

RIGHTS AVAILABLE TO YOU IN RELATION TO YOUR PERSONAL INFORMATION

You have the right to control the manner in which your personal information is processed by the ASISA Foundation, including the following rights–

- to obtain from us confirmation as to whether or not personal data concerning you is processed, and where that is the case, you have the right to request and get access to that personal data;
- to update and correct your personal information that is held by us;
- in certain cases, and to the extent not prohibited by applicable laws, you may request us to remove your personal information, partially or completely;
- to request us to limit processing of your personal information to any one or more of the Purposes listed above (note that this may impact the accessibility of our programmes);

- in certain cases, to object to processing of your personal information, including with regards to profiling. You have the right to opt-out from any communications from us (whether marketing or otherwise). You may withdraw any consent previously provided in relation to the collection, use and processing of your personal information; and/or
- to escalate any complaint in relation to your personal information to the Information Regulator, whose contact details are:

JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

P.O Box 31533

Braamfontein, Johannesburg, 2017

Complaints email: complaints.IR@justice.gov.za

General enquiries email: info@justice.gov.za.

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you.

We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes

To ascertain whether you are eligible for, and, to send a request with regards to, any one of the above rights please send an email to info@asisafoundation.org.za.

We may charge a small fee, to the extent lawfully prescribed or permissible, for any such request where we believe the request to be unfounded, repetitive or excessive.

Before processing any one of the above-listed requests, we may need to request specific information from you to help us confirm your identity. This is a security measure to ensure that personal information is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

PROTECTION OF YOUR PERSONAL INFORMATION

We maintain technical, physical and administrative security measures aimed at protecting your personal information against accidental or unlawful access, damage, alteration, loss or destruction, by implementing reasonable and appropriate physical, administrative,



organizational and technical safeguards. We require the same standards of protection from any third parties to whom we disclose your personal information.

Despite the above security measures, the transmission of data over the internet cannot be guaranteed to be 100% secure and protected. Accordingly, we cannot ensure or warrant the security of any information you send to us or receive from via electronic transmission. This is particularly true for information you send to us via email, which we cannot guarantee is protected in transit. Once we receive your information, we apply the methods mentioned above to ensure its protection while in our possession. If you are concerned about submitting your personal information to us electronically, please contact us to enquire about making other arrangements.

SHARING OF PERSONAL INFORMATION WITH THIRD PARTIES AND LINKS TO THIRD PARTY WEBSITES

There are instances when we need to share your personal information with third parties, all to the extent necessary for, and incidental to, the delivery of and participation in our Programmes and/or your use of this website. These include sharing your information with –

- entities with whom we have partnered (for example, service providers, rating agencies, funders, independent monitoring and evaluation providers, financial institutions or otherwise) to jointly develop, create, implement and monitor and evaluate our Programmes, content and services;
- the ASISA Foundation's Associates, implementation partners and service providers who may, directly or indirectly, render certain services to the ASISA Foundation or to you or in undertaking activities linked to the operation of such services on the ASISA Foundation's behalf; or
- third parties, where the disclosure is in compliance with legal and/or contractual requirements that the ASISA Foundation is subject to, including, but not limited to, intergovernmental agreements.

Given the nature of our business and information technology infrastructure, your personal information may be transferred to other countries, some of which may have different data protection laws to those that are applicable in the country in which you reside. We will at all times ensure that your personal information is protected in terms of this Policy. You consent to your personal information being transferred to other countries regardless of the data protection laws applicable in those countries.



Our website and social media platforms may contain links to third party websites and applications. We are not responsible for and make no representations or warranties in relation to the privacy practices or content of any third-party websites and applications. Your use of such websites and applications is subject to the applicable third-party privacy statement and is at your own risk.

USE OF COOKIES AND OTHER TRACKING TECHNOLOGIES

COOKIES

Cookies are small pieces of data, that act as a tracking file, sent from a website and stored on the user's computer by the user's web browser while the user is browsing. A cookie enables us to analyse usage patterns on our website and tailor the website to your needs. Most web browsers are set to accept cookies, however if you do not wish to accept cookies you can adjust your internet browser settings to refuse the cookies. Please note that some parts of this website may not function fully if you disallow cookies.

Cookies do not personally identify you, but rather your browser. The cookies simply operate as a unique identifier, which help us to know what our users find interesting and useful in this website. We do not link this information back to other information that you have provided to us, unless required by law. We do not store any personal information inside cookies.

We use cookies to enhance your browsing experience. By continuing to use our website without changing your browser's settings, you agree to our use of cookies.

We may engage third party services from time to time for website monitoring, reporting and analysis purposes. Those services may also use cookies and gather anonymous web usage information (as described above) through this website.

Note that we do not use cookies for tracking purposes.

OTHER TRACKING TECHNOLOGIES

Do Not Track ("**DNT**") is a web browser setting that requests that a web application disables its tracking of an individual user. When you choose to turn on the DNT setting in your browser, your browser sends a special signal to websites you encounter while browsing to stop tracking your activity. We honour DNT signals and do not track, plant cookies, or use advertising when a DNT browser setting is activated.



CONTACT US

Should you have any queries regarding this Policy or the manner in which your personal information is processed, please feel free to contact us as follows –

Information Officer
The trustees for the time being of the ASISA Foundation Trust
Bridge House
Boundary Terraces
1 Mariendahl Lane
Newlands
7700

info@asisafoundation.co.za

Last revised September 2021