



## **Hlanganisa Community Fund for Social and Gender Justice**

### **PRIVACY POLICY STATEMENT**

#### **1. Introduction**

We respect the privacy of everyone who visits this website. As a result, we would like to inform you regarding the way we would use your Personal Information. We recommend that you read this Privacy Policy Statement so that you understand our approach towards the use of your Personal Information. By submitting your Personal Information to us, you will be treated as having given your permission – where necessary and appropriate – for disclosures referred to in this policy. By using this web site, you acknowledge that you have reviewed the terms of this Privacy Policy Statement and agree that we may collect, use, and transfer your Personal Information in accordance therewith.

If you do not agree with these terms, you may choose not to submit any personal information to Hlanganisa. If you do not consent to the provisions of this Statement, or parts of the Statement, Hlanganisa may not be able to provide its products and services to you. This Privacy Statement forms part of our Site Terms and Conditions of Use and such shall be governed by and construed in accordance with the laws of South Africa. This Privacy Policy Statement explains how we obtain, use, and disclose your personal information, as is required by the Protection of Personal Information Act, 2013 (POPI Act). At Hlanganisa, we are committed to protecting your privacy and to ensure that your Personal Information is collected and used properly, lawfully, and openly.

#### **2. The information we collect**

##### **Collection of Personal Information**

We collect and process your Personal Information mainly to provide you with access to our services, to help us improve our offerings to you and for certain other purposes explained below. The type of information we collect will depend on the purpose for which it is collected and used. We will only collect information that we need for that purpose.

You may provide personal information to us either directly or indirectly (through an agent acting on your behalf, or an introducer), by completing an application form for our services or requesting further information about our services, whether in writing, through our website, through our social media platforms, over the telephone or any other means. We collect information directly from you where you provide us with your personal details, for example when you apply for funding from us or when you submit enquiries to us or contact us. Where possible, we will inform you what information you are required to provide to us and what information is optional. The information provided by you as a user of our services, are used to effectively communicate with and/ or identify you. We may collect the following information about you:

- Your name
- Your address
- Your email address
- Your phone number
- Bank details
- Identity number
- Other content you submit to our web site

We may also collect your personal information from your appointed agent, any regulator, or other third party that may hold such information. We also collect information about you from other sources as explained below.

### **Collection of Non-Personal Information**

We may automatically collect non-Personal Information about you such as the type of internet browsers you use or the website from which you linked to our website. We may also aggregate details which you have submitted to the site (for example, the services you are interested in). You cannot be identified from this information, and it is only used to assist us in providing an effective service on this website.

Your personal information is not shared with any external parties (person or business) for whatever reason, without your written consent. Personal data excludes any details about yourself which you voluntarily have made public on any social media platforms, blog, chat room, classifieds, community page or discussion boards.

### **3. How we use your information**

We will use your Personal and Non-Personal Information only for the purposes for which it was collected or agreed with you, for example:

- To confirm and verify your identity or to verify that you are an authorised user/ owner for security purposes
- To carry out our obligations arising from any contracts entered into between you and us
- To notify you about changes to our service
- For market research purposes
- To assist with business development
- For the detection and prevention of fraud, crime, or other malpractice
- To conduct market or customer satisfaction research or for statistical analysis via email, telephone, or other means such as at events
- For audit and record keeping purposes
- In connection with legal proceedings
- We will also use your Personal Information to comply with legal and regulatory requirements or industry codes to which we subscribe, or which apply to us, or when it is otherwise allowed by law
- For monitoring and auditing site usage
- Evaluate the use of the site and services
- Analyse the effectiveness of our advertisements, competitions, and promotions
- Personalise your website experience, as well as to evaluate (anonymously and in the aggregate) statistics on website activity, such as what time you visited it, whether you've visited it before and what site referred you to it

- Make the site easier to use and to better tailor the site and our products to your interests and needs
- Help speed up your future activities and experience on the site. For example, a site can recognise that you have provided your Personal Information and will not request the same information a second time
- Collect information about the device you are using to view the site, such as your IP address or the type of Internet browser or operating system you are using, and link this to your Personal Information so as to ensure that the site presents the best web experience for you
- To contact you regarding products and services which may be of interest to you, provided you have given us consent to do so or you have previously requested a product or service from us and the communication is relevant or related to that prior request and made within any timeframes established by applicable laws
- Suggest products or services (including those of relevant third parties) which we think may be of interest to you
- Offer you the opportunity to take part in competitions or promotions.
- You can opt out of receiving communications from us at any time. Any direct marketing communications that we send to you will provide you with the information and means necessary to opt out
- To respond to your queries or comments
- To prevent and control of any disease
- Where we collect Personal Information for a specific purpose, we will not keep it for longer than is necessary to fulfil that purpose, unless we have to keep it for legitimate business or legal reasons. In order to protect information from accidental or malicious destruction when we delete information from our services we may not immediately delete residual copies from our servers or remove information from our backup systems

#### **4. Disclosure of Personal Information**

We may disclose your Personal Information to our service providers who are involved in the delivery of services to you. We have agreements in place to ensure that they comply with these privacy terms.

We may share your Personal Information with, and obtain information about you from:

- Third parties for the purposes listed above
- Other companies we believe it will enhance the services and products we can offer to you, but only where you have not objected to such sharing
- Other third parties from whom you have chosen to receive marketing information

We may also disclose your information:

- Where we have a duty or a right to disclose in terms of law or industry codes
- Where we believe it is necessary to protect our rights

#### **5. Personal Information Security**

We are legally obliged to provide adequate protection for the Personal Information we hold and to stop unauthorised access and use of personal information. We will, on an on-going basis, continue to review our security controls and related processes to ensure that your Personal Information is secure.

Our security policies and procedures cover:

- Physical security
- Computer and network security
- Access to personal information
- Secure communications
- Security in contracting out activities or functions
- Retention and disposal of personal information
- Acceptable usage of personal information
- Governance and regulatory issues
- Investigating and reacting to security incidents

When we contract with third parties, we impose appropriate security, privacy, and confidentiality obligations on them to ensure that Personal Information that we remain responsible for, is kept secure.

We will ensure that anyone to whom we pass your Personal Information agrees to treat your information with the same level of protection as we are obliged to.

## **6. Access to your Personal Information**

You have the right to request a copy of the Personal Information we hold about you. To do this, simply contact us at the numbers/addresses listed on our home page and specify what information you would like. We will take all reasonable steps to confirm your identity before providing details of your personal information.

Please note that any such access request may be subject to a payment of a legally allowable fee, as laid down in our POPI Act Policy.

## **7. Access to, correction and deletion of your Personal Information**

You have the right to ask us to update, correct or delete your personal information. We will take all reasonable steps to confirm your identity before making changes to Personal Information we may hold about you. We would appreciate it if you would take the necessary steps to keep your Personal Information accurate and up to date by notifying us of any changes we need to be aware of.

## **8. Definition of Personal Information**

According to the POPI Act “**Personal Information**” means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person. The POPI Act, which has more specific examples if you need them, can be found at the following link:

[www.gov.za/documents/download.php?f=204368](http://www.gov.za/documents/download.php?f=204368)

## **9. Right to object**

In terms of the POPI Act (POPIA) section 18. (h) (iv) you have the right to object to the processing of personal information as referred to in section 11(3) of the POPIA.

## **10. Right to lodge a complaint**

In terms of the POPI Act (POPIA) section 18. (h) (v) you have the right to lodge a complaint to the Information Regulator (South Africa) (IRSA). The IRSA contact details are:

JD House  
27 Stiemens Street  
Braamfontein  
Johannesburg, 2001

P.O Box 31533, Braamfontein, Johannesburg, 2017

**General enquiries email:**

[enquiries@inforegulator.org.za](mailto:enquiries@inforegulator.org.za)

**Complaints email addresses:**

**POPIA Complaints**

[POPIAComplaints@nforegulator.org.za](mailto:POPIAComplaints@nforegulator.org.za)

**PAIA Complaints**

[PAIAComplaints@nforegulator.org.za](mailto:PAIAComplaints@nforegulator.org.za)

## **11. Changes to this privacy policy statement**

Please note that we may amend this Privacy Policy Statement from time to time. Please check our website periodically to inform yourself of any changes.

## **12. How to contact us**

If you have any queries about this notice or believe we have not adhered to it or need further information about our privacy practices or wish to give or withdraw consent, exercise preferences or access or correct your personal information, please contact us at the numbers/addresses listed on our website [www.hlanganisa.org.za](http://www.hlanganisa.org.za) and in the [Hlanganisa PAIA Manual](#).