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## PRIVACY POLICY

September 2023 | Version 1.2

### INTRODUCTION

Welcome to our privacy policy. We are Sinani (Registration: 1691-27 NPO) and this is our plan of action when it comes to protecting your privacy. We respect your privacy and take the protection of personal information seriously. The purpose of this policy is to describe the way we comply with the Protection of Personal Information Act (“POPIA”) under South African law in the collection, storage, usage, and protection of personal information that can be associated with you or another specific natural or juristic person and can be used to identify you or that person.

### AUDIENCE

This policy applies to you if you are:

- a visitor to our website; or
- someone participating in ministry, services, visits, meetings, events, or counseling we provide, whether online, telephonically or in person.

### PERSONAL INFORMATION

Personal information includes:

- certain information that we collect automatically when you visit our website;
- certain information collected on registration (see below);
- certain information collected on submission; and
- optional information that you provide to us voluntarily at any other time (see below);

but excludes:

- information that has been made anonymous so that it does not identify a specific person;
- permanently de-identified information that does not relate or cannot be traced back to you specifically;
- non-personal statistical information collected and compiled by us; and
- information that you have provided voluntarily in an open, public environment or forum, whether online or in person (because the information has been disclosed in a public forum, it is no longer confidential and does not constitute personal information subject to protection under this policy).

### SPECIAL PERSONAL INFORMATION

Depending on the nature of your participation in services, visits, meetings, events or counseling we provide, whether online, telephonically or in person as a donor, volunteer, or beneficiary, we may also collect special personal information including:

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### ***Common examples***

Common examples of the types of personal information which we may collect and process include your:

- identifying information – such as your name, date of birth, or identification number of any kind;
- contact information – such as your phone number or email address;
- address information – such as your physical or postal address;
- demographic information – such as your gender, marital status, race, or ethnicity; or
- pictures and videos – such as when we capture your images during a ministry or some other event.

### ***Sensitive personal information***

Depending on the services that you require, we may also collect sensitive personal information including your:

- financial information – such as your bank account details;
- sensitive demographic information – such as your race or ethnicity;
- medical information – such as information about your physical or mental health;
- sexual information – such as information about your sex life or sexual orientation;
- criminal information – such as information about your commission or alleged commission of any offence or about any related legal proceedings;
- beliefs – including your political or religious beliefs.

### **ACCEPTANCE**

#### ***Acceptance required***

You are required to accept all the terms of this policy when you visit our website or interact with us in any way, including seeking ministry, counseling, prayer, support or help that we may offer, whether online, telephonically or in person. If you do not agree with anything in this policy, then you should not use our website or interact with us in any way.

#### ***Deemed acceptance***

By accepting this policy, you are deemed to have read, understood, accepted, and agreed to be bound by all of its terms.

#### ***Legal capacity***

Our website is not directed to individuals younger than 18 years of age and we request that these individuals do not provide personal information through our website. We wish to protect the privacy of people under the age of 18. If you are younger than 18 years of age, please get a parent, guardian or other competent person's permission before using our website or otherwise providing us with personal information. If you are under 18 years of age and are seeking to participate in youth or children's services, meetings or counseling we provide, we require a record of consent for your participation under the terms of this policy from your parent, guardian or another competent person.

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### ***Your obligations***

You may only send us your own personal information or the information of another data subject where you have their permission to do so.

### **CHANGES**

We may change the terms of this policy at any time by updating this web page. The version of this policy that you read on this website is our latest and valid policy. Continuing to use the website or to participate in services, visits, meetings, events or counseling we provide whether online, telephonically or in person following notification of a change to the terms, the changed terms will apply to you and you will be deemed to have accepted those updated terms. If you do not agree with the changes, then you should stop using the website or interacting with us in any way.

### **COLLECTION**

#### ***On registration***

Once you register with us either via the website one-time donation submission, join the Sinani Volunteer opps WhatsApp group, attend a fundraiser, course, camp, feeding program or any activity, looking-in meeting or for any ministry, service, course, event, meeting or counseling, whether provided online, telephonically or in person, you will no longer be anonymous to us. The personal information we collect on registration may include:

- your name and surname;
- your email address;
- your telephone number;
- your postal address or street address; and
- your personal circumstance, for example, gender, marital status, dependents, occupation.

If you elect to make a once-off donation via our website, your personal information may be processed by SnapScan (our payment gateway service provider). We do not process your bank details during this process, and we do not have access to it at any time. We will use this personal information to prepare and cater for your participation to communicate with you regarding the services, visits, events, courses, meetings or counseling you may have registered for and for any legitimate purposes we deem appropriate, as well as any other purposes set out in this policy.

#### ***On order or request***

When you order any goods or request services, support or counseling from us, you will be asked to provide us with additional information on a voluntary basis in order for us to provide such goods, services, support and counseling.

#### ***Photography and filming at our meetings***

We may commission photography or filming during our meetings, events and courses for use in our internal and external promotional material. If you attend our meetings, events or courses, you may appear on the resulting images in a way that personally identifies you. You can ask us to remove your image or render it unidentifiable if we have already recorded you. You can also ask us to exclude you from the filming by asking the camera operator not to include you in the filming. We will use our best efforts to accommodate your requests, except where we have a lawful justification not to do so or doing so is not possible.

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### ***From browser***

We automatically receive and record Internet usage information on our server logs from your browser, such as your Internet Protocol address (IP address), browsing habits, click patterns, version of software installed, system type, screen resolutions, colour capabilities, plug-ins, language settings, cookie preferences, search engine keywords, JavaScript enablement, the content and pages that you access on the website, and the dates and times that you visit the website, paths taken, and time spent on sites and pages within the website (usage information). Please note that other websites visited before entering our website might place personal information within your URL during a visit to it, and we have no control over such websites. Accordingly, a subsequent website that collects URL information may log some personal information.

### ***Cookies***

Where we use any cookies, please refer to our Cookies Policy for information on how we deal with them.

### ***Web beacons***

Our website may contain electronic image requests (called a single-pixel gif or web beacon request) that allow us to count page views and to access cookies. Any electronic image viewed as part of a web page (including an ad banner) can act as a web beacon. Our web beacons do not collect, gather, monitor or share any of your personal information. We merely use them to compile anonymous information about our website.

### ***Purpose for collection***

We may process any information emanating from a request for goods or services or other optional information that you provide to us for the purposes that you indicated when you agreed to provide it to us. The processing may include gathering your personal information, disclosing it to relevant staff or leaders, and combining it with other personal information. We generally collect and process your personal information for various purposes, including:

- goods or services purposes – such as collecting orders or requests for and providing our goods or services;
- professional support purposes – such as drawing on professional counseling support or perspectives in our service to you;
- marketing purposes – such as pursuing lawful related marketing activities;
- business purposes – such as internal audit, accounting, or other proposed and actual transactions; and
- legal purposes – such as handling claims, complying with regulations, or pursuing good governance.

In addition to any other processing, when we process your captured images, we do so as part of our core mission to mobilise church members and equip them to support the needs of orphans, vulnerable communities, and widows. We believe capturing these images not only encourages participation but also raises awareness of the plight of orphans. We therefore believe that by processing these images, it helps us fulfil our core objectives and does not adversely affect those we photograph or film.

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### ***Consent to collection***

We will obtain your consent to collect personal information:

- in accordance with applicable law;
- when you provide us with any registration information, request any goods or services or provide optional information. Use

### **OUR OBLIGATIONS**

We may use your personal information to fulfil our obligations to you.

### **MESSAGES AND UPDATES**

Upon your registration with us, we may send administrative messages and email updates to you. We may also send you promotional messages and add you to WhatsApp chat groups. You can choose to opt-out of these promotional messages or chat groups.

### **DISCLOSURE**

#### ***Sharing***

- We may share your personal information with affiliated ministries and partner churches, in which case we will seek to require the affiliates and partners to honour this privacy policy;
- banking partners as required by credit card association rules for inclusion on their list of terminated merchants (in the event that you utilise the services to receive payments and you meet their criteria); and

#### ***Regulators***

We may disclose your personal information as required by law or governmental audit.

#### ***Law enforcement***

We may disclose personal information if required:


- by a subpoena or court order;
- to comply with any law; and
- to protect the safety of any individual or the general public.

#### ***No Selling***

We will not sell personal information. No personal information will be disclosed to anyone except as provided in this privacy policy.

#### ***Employees***

We may need to disclose personal information to our careworkers, volunteer leaders in the centres and administrative staff that require the personal information to perform their services towards you and do their jobs.

Decorative geometric patterns consisting of colorful triangles and zig-zag lines are located in the bottom-left and bottom-right corners of the page.

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## CHANGE IN SENIOR LEADERSHIP

If we undergo a change in leadership, we may assign our rights to the personal information we process to a successor. We will disclose the transfer on the website. If you are concerned about your personal information migrating to a new owner, you may request us to delete your personal information.

## SECURITY

We take the security of personal information very seriously and always do our best to comply with applicable data protection laws. Our hosting company will host our website in a secure server environment that uses a firewall and other advanced security measures to prevent interference or access from outside intruders. We authorise access to personal information only for those employees who require it to fulfil their job responsibilities. We implement disaster recovery and incident response procedures where appropriate.

## ACCURATE AND UP TO DATE

We will try to keep the personal information we collect as accurate, complete and up to date as is necessary for the purposes defined in this policy. From time to time, we may request you to update the personal information you provided us at registration. You are able to review or update any personal information that we hold on you by emailing us or phoning us. Please note that in order to better protect you and safeguard your personal information, we take steps to verify your identity before granting you access to your account or making any corrections to your personal information.

## RETENTION

We will only retain your personal information for as long as it is necessary to fulfil the purposes explicitly set out in this policy, unless:

- retention of the record is required or authorised by law; or
- you have consented to the retention of the record.

During the period of retention, we will continue to abide by our non-disclosure obligations and will not share or sell your personal information. We may retain your personal information in physical or electronic records at our discretion.

## TRANSFER TO ANOTHER COUNTRY

We may transmit or transfer personal information outside of the country in which it was collected to a foreign country and process it in that country. Personal information may be stored on servers located outside the country in which it was collected in a foreign country whose laws protecting personal information are comparable to that of POPIA. Such transfer will be completed strictly according to POPIA regulations. You consent to us processing your personal information in a foreign country under such conditions.



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## **UPDATING OF REMOVING**

You may choose to correct or update the personal information you have submitted to us, by contacting us by phone at 072 628 3696 or e mail: [finance@sinani.org](mailto:finance@sinani.org). Please address such correspondence to our Information Officer.

## **LIMITATION**

We are not responsible for, give no warranties, nor make any representations in respect of the privacy policies or practices of linked or any third-party websites.

## **ENQUIRIES**

If you have any questions or concerns arising from this privacy policy or the way in which we handle personal information, please contact us by phone at 072 628 3696 or email [finance@sinani.org](mailto:finance@sinani.org) and speak to our Information Officer.