



## 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 is 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 in July 2025.

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 LEGAL BASIS FOR OUR PROCESSING OF YOUR PERSONAL INFORMATION**

To provide our services and run our business, we may collect, use and disclose your Personal Information. Where we do this, 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 our legitimate interests;
- where processing is necessary to comply with an obligation imposed on us by law;
- where processing is necessary to protect your legitimate interests; and
- where processing is necessary to pursue our legitimate interests or those of a third party to whom the Personal Information is supplied.

## **3 WHAT PERSONAL INFORMATION DOES THE FOUNDATION COLLECT?**

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

- general identification and contact information, including information that is necessary to verify your identity;
- information about your location or similar location-based information and demographics;
- information we require to assess, manage and administer our relationship with you;
- bank account details and tax information for purposes of invoicing or payment;
- information regarding your communications and marketing preferences for purposes of our newsletters and other publications and to provide you with updates and information relevant to you;

- photographs and videos of you or feedback from you, if you have agreed or where we record meetings or classes you attend;
- if you are an applicant or participant in one of our programmes:
  - information about your gender, age, place of residence, nationality, race, 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 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.

If you visit our website, we generally 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.

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 provide you with our services or give effect to your requests.

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;
- operating our business day to day;

- communicate with you and send you information about what we do, and what is happening in the industry;
- address you queries and concerns;
- conduct market research and statistical analysis;
- keep and update our records about you;
- communicate with you;
- determine if you qualify for our programmes;
- confirm and verify your identity for security purposes;
- 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;
- conduct our business activities, such as audits and business planning;
- measure and improve our services, including our programmes and website services;
- market our services, or those of our business partners, if you have agreed;
- conduct independent monitoring and evaluation.
- where you have agreed, use or publish your feedback or photos or videos about your participation in a programme.

## **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:

- third parties you choose to receive marketing communications 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 service providers, such as our IT service providers, platform providers, implementation and monitoring and evaluation partners;
- governmental and regulatory bodies;
- law enforcement and fraud prevention agencies;
- your employer or educational institution.

## **7 CROSS-BORDER TRANSFERS**

Given the nature of our business and information technology infrastructure, your Personal Information may be transferred to other countries for processing. We will only transfer your Personal Information abroad if it is permitted under POPIA, for example where the other country provides an adequate level of legal protection of your Personal Information, or you have consented to such transfer.

## **8 OUR SERVICES**

We strive to continuously provide you with the best service and improve our offerings. We would like 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](mailto:info@asisafoundation.org.za).

## **9 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.

When your Personal Information is no longer required, we securely disposed of it.

## **10 USE OF 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. Please note that some parts of our 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 or you have agreed. We do not store any Personal Information inside 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.

## **11 AUTOMATED DECISION MAKING**

We do not currently make decisions about you that do not involve human input and are only based on automated means. However, should this position change, for example, if we start using automated decision making to assess your eligibility for our programmes, we will only use automated decision making if it is lawful for us to do so and we have notified you.

## **12 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.

## **13 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.

Contact details of the Information Regulator:

<b>Physical address</b>	JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
<b>Postal address</b>	P.O Box 31533, Braamfontein, Johannesburg, 2017
<b>Complaints email</b>	<a href="mailto:complaints.IR@justice.gov.za">complaints.IR@justice.gov.za</a>
<b>General enquiries email</b>	<a href="mailto:infoereg@justice.gov.za">infoereg@justice.gov.za</a> .

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](mailto:info@asisafoundation.org.za).