AFRICA FOUNDATION

PRIVACY & DATA PROTECTION

POLICY & PROCEDURES

APPLICABILITY:	All Hillsong Africa Foundation Staff, Contractors and Consultants, Volunteers and Visitors, Board members, Partner organisations, Beneficiaries, Supporters and Donors, Members of the public
VERSION:	Version v001 (October 2024)
AUTHORISED BY:	HAF Managing Director
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HILLSONG AFRICA FOUNDATION recognises the importance of protecting the privacy and the rights of individuals in relation to their personal information. This document outlines Hillsong Africa Foundation's policy on how the organisation uses and manages personal information provided to or collected by it.

Hillsong Africa Foundation is bound by complying with the laws and regulations set out in the Protection of Personal Information Act (POPIA), and where necessary, the European General Data Protection Regulations (GDPR).

INTRODUCTION

Hillsong Africa Foundation collects and administers a range of personal information for the operational and charitable purposes of the organisation. The organisation is committed to protecting the privacy of personal information it collects, holds and administers.

Hillsong Africa Foundation recognises the essential right of individuals to have their information administered in ways which they would reasonably expect – protected on one hand, and made accessible to them on the other. These privacy values are reflected in and supported by our core values and philosophies and also reflected in our Privacy Policy, which is compliant with the The Protection of Personal Information Act (POPIA) which became effective on July 1, 2021.

Hillsong Africa Foundation is bound by laws which impose specific obligations when it comes to handling information. The organisation has adopted the following principles contained as a minimum standard in relation to handling personal information.

Hillsong Africa Foundation will:

- Collect only information which the organisation requires for its primary function;
- Ensure that stakeholders are informed as to why we collect the information and how we administer the information gathered;
- Use and disclose personal information only for our primary functions or a directly related purpose, or for another purpose with the person's consent;
- Store personal information securely, protecting it from unauthorised access; and
- Provide stakeholders with access to their own information, and the right to seek its correction.

SCOPE AND RESPONSIBILITIES

Hillsong Africa Foundation's Managing Director and Board are responsible for developing, adopting and reviewing this policy.

The HAF Managing Director is responsible for the implementation of this policy and the Operations Manager is responsible for monitoring changes in Privacy legislation, and for advising on the need to review or revise this policy as and when the need arises.

This policy applies to Board members, HAF Managing Director and staff of Hillsong Africa Foundation.

PRIVACY PROCESS

Collection

Hillsong Africa Foundation will:

- Only collect information that is necessary for the performance and primary function of the organisation.
- Collect personal information only by lawful and fair means and not in an unreasonably intrusive way.
- Notify stakeholders about why we collect the information and how it is administered.
- Notify stakeholders that this information is accessible to them.
- Collect personal information from the person themselves wherever possible.
- If collecting personal information from a third party, be able to advise the person whom the information concerns, from whom their personal information has been collected.
- Collect sensitive information only with the person's consent or if required by law. (Sensitive information includes health information and information about religious beliefs, race, gender and others).
- Collect sensitive information about an individual if such collection is necessary to prevent or lessen a serious and imminent threat to the life or health of any individual, where the individual whom the information concerns:
    - is physically or legally incapable of giving consent to the collection; or
    - physically cannot communicate consent to the collection; or
- Hillsong Africa Foundation may, in limited circumstances, be required to collect health information about an individual if:
    - the information is necessary to provide a health service to the individual; and
    - the information is collected as required or authorised by or under law and in accordance with rules established by competent health or medical bodies that deal with obligations of professional confidentiality which bind the organisation.
- Determine where unsolicited information is received, whether the personal information could have been collected in the usual way, and then if it could have, it will be treated normally. (If it could not have been, it must be destroyed, and the person whose personal information has been destroyed will be notified about the receipt and destruction of their personal information).

Use and Disclosure

Hillsong Africa Foundation will:

- Only use or disclose information for the primary purpose for which it was collected or a directly related secondary purpose.
- For other uses, Hillsong Africa Foundation will obtain consent from the affected person.
- In relation to a secondary purpose, use or disclose the personal information only where:
    - a secondary purpose is related to the primary purpose and the individual would reasonably have expected us to use it for such purposes;
    - the person has consented; or
    - certain other legal reasons exist, or disclosure is required to prevent serious and imminent threat to life, health or safety.

- In relation to personal information which has been collected from a person, use the personal information for direct marketing, where that person would reasonably expect it to be used for this purpose, and Hillsong Africa Foundation has provided an opt out and the opt out has not been taken up.
- In relation to personal information which has been collected other than from the person themselves, only use the personal information for direct marketing if the person whose personal information has been collected has consented (and they have not taken up the opt-out).
- In each direct marketing communication with the individual, Hillsong Africa Foundation draws to the individual's attention, or prominently displays a notice, that he or she may express a wish not to receive any further direct marketing communications.
- State in Hillsong Africa Foundation Privacy Policy whether the information is sent overseas and further will ensure that any overseas providers of services are as compliant with privacy as Hillsong Africa Foundation is required to be. Such disclosures will only be made if:
    - the overseas recipient of the information is subject to a law, binding scheme or contract which effectively upholds principles for fair handling of the information that are substantially similar to the National Privacy Principles;
    - the individual consents to the transfer;
    - the transfer is necessary for the performance of a contract between the individual and the organisation, or for the implementation of pre contractual measures taken in response to the individual's request;
    - the transfer is necessary for the conclusion or performance of a contract concluded in the interest of the individual between the organisation and a third party; or
    - the organisation has taken reasonable steps to ensure that the information which it has transferred will not be held, used or disclosed by the recipient of the information inconsistently with the National Privacy Principles.
- In relation to the overseas transfer of personal information, if it is impractical for Hillsong Africa Foundation to receive the person's consent to that transfer, Hillsong Africa Foundation must have sufficient reasons to believe that the person would likely give consent could they be contacted.
- Provide all individuals access to personal information except where it is a threat to life or health or it is authorised by law to refuse and, if a person is able to establish that the personal information is not accurate, then Hillsong Africa Foundation must take steps to correct it. Hillsong Africa Foundation may allow a person to attach a statement to their information if Hillsong Africa Foundation disagrees it is inaccurate.
- Where for a legal or other reason we are not required to provide a person with access to the information, consider whether a mutually agreed intermediary would allow sufficient access to meet the needs of both parties.
- Make no charge for making a request for personal information, correcting the information or associating a statement regarding accuracy with the personal information.
- Each written direct marketing communication with the individual must set out Hillsong Africa Foundation's business address and telephone number and, if the communication with the individual is made by fax, telex or other electronic means, a number or address at which the organisation can be directly contacted electronically.
- If the disclosure of sensitive information is necessary for research, or the compilation or analysis of statistics, relevant to public health or public safety and it is impracticable for Hillsong Africa Foundation to seek the individual's consent before the use or disclosure and the use or disclosure is conducted in accordance with guidelines approved by The Protection of Personal Information Act (POPIA)
  the organisation may make such a disclosure.

- If Hillsong Africa Foundation has sufficient reasons to believe that an unlawful activity has been, is being or may be engaged in, and the disclosure of personal information becomes a necessary part of its investigation of the matter or in reporting its concerns to relevant persons or authorities, the organisation may make such disclosures.
- Hillsong Africa Foundation may further disclose personal information if its disclosure is mandated by an enforcement body or is required for the following:
    - the prevention, detection, investigation, prosecution or punishment of criminal offences, breaches of a law imposing a penalty or sanction or breaches of a prescribed law;
    - the enforcement of laws relating to the confiscation of the proceeds of crime;
    - the protection of the public revenue;
    - the prevention, detection, investigation or remedying of seriously improper conduct or prescribed conduct;
    - the preparation for, or conduct of, proceedings before any court or tribunal, or implementation of the orders of a court or tribunal.

- For the purpose of this Clause, Hillsong Africa Foundation must make a written note of the use or disclosure.

Data Storage and Security

Hillsong Africa Foundation will:

- Implement and maintain steps to ensure that personal information is protected from misuse and loss, unauthorised access, interference, unauthorised modification or disclosure.
- Before Hillsong Africa Foundation discloses any personal information to an overseas recipient, including a provider of IT services such as servers or cloud services, take reasonable steps to establish that they are privacy compliant. Hillsong Africa Foundation will have systems which provide sufficient security.
- Take reasonable steps to ensure the information collected is accurate, complete, up to date, and relevant to the functions we perform.

Destruction and De-identification

Hillsong Africa Foundation will:

- Destroy personal information once it's not required to be kept for the purpose for which it was collected, including from decommissioned laptops and mobile phones.
- Change information to a pseudonym or treat it anonymously if required by the person whose information Hillsong Africa Foundation holds and will not use any government related identifiers unless they are reasonably necessary for our functions.

Openness

Hillsong Africa Foundation will:

- Ensure stakeholders are aware of Hillsong Africa Foundation's Privacy Policy and its purposes.
- Make this information freely available in relevant publications and on Hillsong Africa Foundation's website.
- On request by a person, Hillsong Africa Foundation must take reasonable steps to let the person know, generally, what sort of personal information it holds, for what purposes, and how it collects, holds, uses and discloses that information.

Access and Correction

Hillsong Africa Foundation will:

- Ensure individuals have a right to seek access to information held about them and to correct it if it is inaccurate, incomplete, misleading or not up to date.
- If the individual and Hillsong Africa Foundation disagree about whether the information is accurate, complete and up to date, and the individual asks Hillsong Africa Foundation to associate with the information a statement claiming that the information is not accurate, complete or up to date, Hillsong Africa Foundation will take reasonable steps to do so.
- Hillsong Africa Foundation will provide to the individual its reasons for denial of access or a refusal to correct personal information.
- Hillsong Africa Foundation can withhold the access of an individual to his/her information if:
    - providing access would pose a serious and imminent threat to the life or health of any individual;
    - providing access would have an unreasonable impact upon the privacy of other individuals;
    - the request for access is frivolous or vexatious;
    - the information relates to existing or anticipated legal proceedings between the organisation and the individual, and the information would not be accessible by the process of discovery in those proceedings;
    - providing access would reveal the intentions of the organisation in relation to negotiations with the individual in such a way as to prejudice those negotiations;
    - providing access would be unlawful;
    - providing access would be likely to prejudice an investigation of possible unlawful activity; or
    - an enforcement body performing a lawful security function asks Hillsong Africa Foundation not to provide access to the information on the basis that providing access would be likely to cause damage to the security of the country.
- Where providing access would reveal evaluative information generated within the organisation in connection with a commercially sensitive decision making process, Hillsong Africa Foundation may give the individual an explanation for the commercially sensitive decision rather than direct access to the information.
- If Hillsong Africa Foundation decides not to provide the individual with access to the information on the basis of the above mentioned reasons, Hillsong Africa Foundation will consider whether the use of mutually agreed intermediaries would allow sufficient access to meet the needs of both parties.

- Hillsong Africa Foundation may charge for providing access to personal information. However, the charges will be nominal and will not apply to lodging a request for access.

Identifiers and Anonymity

- Hillsong Africa Foundation will not adopt as its own identifier of an individual an identifier that has been assigned by any third party. It may however adopt a prescribed identifier by a prescribed organisation in prescribed circumstances.
- Hillsong Africa Foundation will not use or disclose the identifier assigned to an individual by a third party unless:
    - the use or disclosure is necessary for the organisation to fulfil its obligations to the

agency; or
    - the use or disclosure is by a prescribed organisation of a prescribed identifier in prescribed circumstances.
- Hillsong Africa Foundation will allow people from whom the personal information is being collected to not identify themselves or use a pseudonym unless it is impracticable to deal with them on this basis.

Making information available to third parties

- Hillsong Africa Foundation can release information to third parties where it is requested by the person concerned.

EXTERNAL PRIVACY DISCLOSURES – HILLSONG AFRICA FOUNDATION AND YOUR PERSONAL INFORMATION

What is your personal information?

When used in this privacy policy, the term "personal information" has the meaning given to it in the Act. In general terms, it is any information that can be used to personally identify you. This may include your name, address, telephone number, email address and profession or occupation. If the information we collect personally identifies you, or you are reasonably identifiable from it, the information will be considered personal information.

What personal information do we collect and hold?

We may collect the following types of personal information:

- name;
- mailing or street address;
- email or other electronic addresses address;
- telephone number;
- age or birth date;
- gender;
- race;
- profession, occupation or job title;
- any disability information;
- police clearance indicating that there is no current criminal record (this is mandatory when interacting with minors and the vulnerable)
- any additional information relating to you that you provide to us directly through our websites or indirectly through use of our websites or online presence, through our representatives in person or otherwise;
- information you provide to us through sign-ups and customer surveys.

We may also collect some information that is not personal information because it does not identify you or anyone else. For example, we may collect anonymous answers to surveys.

How do we collect your personal information?

We collect your personal information directly from you unless it is unreasonable or impracticable to do so. When collecting personal information from you, we may collect in ways including:

- through your access and use of our website;
- during conversations between you and our representatives; or
- when you complete an application, inquiry, pledge or donation form.

What happens if we can't collect your personal information?

If you do not provide us with the personal information described above, some or all of the following may happen:

- we may not be able to include you in communication on our various activities;
- we may not be able to provide the requested products or services to you, either to the same standard or at all;
- we may not be able to provide you with information about products and services that you may want, including information or updates on projects or appeals you have given to;
- we may not be able to provide you with a donation receipt;
- we may be unable to tailor the content of our websites to your preferences and your experience of our websites may not be as enjoyable or useful.

For what purposes do we collect, hold, use and disclose your personal information?

We collect personal information about you so that we can perform our business activities and functions and to provide the best possible quality of customer service.

We collect, hold, use and disclose your personal information for the following purposes:

- to provide products and services to you and to send communications requested by you;
- to answer enquiries and provide information or advice about existing and new products or services;
- to process donations and provide you with a receipt for any donations given by you;
- to provide you with access to protected areas of our website;
- to assess the performance of the website and to improve the operation of the website;
- to conduct business processing functions including providing personal information to our related bodies corporate, contractors, service providers or other third parties;
- for the administrative, marketing (including direct marketing), planning, product or service development, quality control and research purposes Hillsong Africa Foundation, its related bodies corporate, contractors or service providers;
- to provide your updated personal information to our related bodies corporate, contractors or service providers;
- to update our records and keep your contact details up to date;
- to process and respond to any complaint made by you; and
- to comply with any law, rule, regulation, lawful and binding determination, decision or direction of a regulator, or in co-operation with any governmental authority of any country (or political sub-division of a country).

We also collect information regarding our volunteers and partners:

- In relation to personal information of volunteers and partners, our primary purpose of collection is to assess and (if successful) to engage the volunteer or partner, as the case may be.
- We also obtain personal information about volunteers who assist the organisation in its functions or conduct associated activities, such as to enable the organisation and the volunteers to work together.

Your personal information will not be shared, sold, rented or disclosed other than as described in this Privacy Policy.

To whom may we disclose your information?

We may disclose your personal information to:

- our employees, field workers, project strategic partners, related bodies corporate, contractors or service providers for the purposes of operation of our website or our business, fulfilling requests by you, and to otherwise provide products and services to you including, without limitation, web hosting providers, IT systems administrators, mailing houses, couriers, payment processors, data entry service providers, electronic network administrators, debt collectors, and professional advisors such as accountants, solicitors, business advisors and consultants;
- suppliers and other third parties with whom we have commercial relationships, for business, marketing, and related purposes; and
- any organisation for any authorised purpose with your express consent.

We may combine or share any information that we collect from you with information collected by any of our related bodies (within Africa).

Direct marketing materials

We may send you direct marketing communications and information about our products and services that we consider may be of interest to you. These communications may be sent in various forms, including mail, SMS, fax and email, in accordance with applicable South African marketing laws, such as the Protection of Personal Information Act, 4 of 2013 (POPIA) and the Consumer Protection Act, 68 of 2008 (CPA). If you indicate a preference for a method of communication, we will endeavour to use that method whenever practical to do so. In addition, at any time you may opt-out of receiving marketing communications from us by contacting us (see the details below) or by using opt-out facilities provided in the marketing communications and we will then ensure that your name is removed from our mailing list.

We do not provide your personal information to other organisations for the purposes of direct marketing.

How can you access and correct your personal information?

You may request access to any personal information we hold about you at any time by contacting us (see the details below). Where we hold information that you are entitled to access, we will try to provide you with suitable means of accessing it (for example, by mailing or emailing it to you). We may charge you a fee to cover our administrative and other reasonable costs in providing the information to you. We

will not charge for simply making the request and will not charge for making any corrections to your personal information.

There may be instances where we cannot grant you access to the personal information we hold. For example, we may need to refuse access if granting access would interfere with the privacy of others or if it would result in a breach of confidentiality. If that happens, we will give you written reasons for any refusal.

If you believe that personal information we hold about you is incorrect, incomplete or inaccurate, then you may request of us to amend it. We will consider if the information requires amendment. If we do not agree that there are grounds for amendment then we will add a note to the personal information stating that you disagree with it.

What is the process for complaining about a breach of privacy?

If you believe that your privacy has been breached, please contact us using the contact information below and provide details of the incident so that we can investigate it.

Our procedure for investigating and dealing with privacy breaches is in the Hillsong Africa Foundation Complaints Handling Policy.

Do we disclose your personal information to anyone outside Africa?

We may disclose personal information to our related bodies corporate and third party suppliers and service providers located overseas for some of the purposes listed above.

We take reasonable steps to ensure that the overseas recipients of your personal information do not breach the privacy obligations relating to your personal information.

We may disclose your personal information to entities located outside of Africa, including the following:

- our related bodies corporate;
- our data hosting and other IT service providers; and
- field workers and project strategic partners.

Security

We take reasonable steps to ensure your personal information is protected from misuse and loss and from unauthorised access, modification or disclosure. We may hold your information in either electronic or hard copy form. Personal information is destroyed or de-identified when no longer needed.

As our website is linked to the internet, and the internet is inherently insecure, we cannot provide any assurance regarding the security of transmission of information you communicate to us online. We also cannot guarantee that the information you supply will not be intercepted while being transmitted over the internet. Accordingly, any personal information or other information which you transmit to us online is transmitted at your own risk.

Links

Our website may contain links to other websites operated by third parties. We make no representations or warranties in relation to the privacy practices of any third party website and we are not responsible for

the privacy policies or the content of any third party website. Third party websites are responsible for informing you about their own privacy practices.

Changes to our privacy policy

We may change this privacy policy from time to time. Any updated versions of this privacy policy will be posted on our website.

Contacting us

If you have any questions about this privacy policy, any concerns or a complaint regarding the treatment of your privacy or a possible breach of your privacy, please contact our Operations Manager at natalie.gibson@hillsong.co.za

We will treat your requests or complaints confidentially. Our representative will contact you within a reasonable time after receipt of your complaint to discuss your concerns and outline options regarding how they may be resolved. We will aim to ensure that your complaint is resolved in a timely and appropriate manner.

REVIEW

As part of our commitment to effective and ongoing improvement, Hillsong Africa Foundation will ensure that we monitor the effectiveness of our Privacy and Data Protection policies and procedures on an ongoing basis and appropriately update our policy and procedures based on organisational learning and/or updated best practice regarding privacy and data collection practices.

This policy will be reviewed every **three years** by theHAF Managing Director in consultation with the HAF Board and relevant staff and stakeholders as appropriate.

COMMITMENT AND DECLARATION

I, _____ [full name], have read and understood the above Privacy and Data Protection Policy and agree to adhere to it and the associated procedures in their entirety.

Sign: _____ Date: _____