

## **OVERVIEW**

### SA INFANTRY ASSOCIATION MEMBER

Your privacy is important to us. We strive to ensure that our use of your personal information or personal data is lawful, reasonable, and relevant to our business activities, with the goal of improving our services and your experience.

This privacy notice sets out what personal information we collect from you when you use our platform (which could be our online platform, mobile site, an application or any other electronic platform), how we collect your personal information, why we collect it and how we use it, and related matters.

Please read this privacy notice carefully to understand our views and practices regarding your personal information and how we will treat it (even if you're a long-standing site user) and contact us if you need any clarity or assistance, using the contact details set out at the end of this policy.

This privacy notice is applicable to the South African Infantry Association (SAIA). This privacy notice should be read in conjunction with the SAIA Constitution..

Website: [www.sainfantry.co.za](http://www.sainfantry.co.za)

Facebook: South African Infantry Association

## **PRIVACY NOTICE**

This privacy notice applies to you as member of the SAIA, namely a person who accesses our platforms, regardless of the device which you use to access it (e.g. a computer, mobile phone, tablet etc.).

This privacy notice does not apply to other parties' sites, products or services, such as sites linked to, from or advertised on our site, or sites which link to or advertise our site.

What is Personal Information?

Personal information refers to information about an identifiable person, such as your name and surname, gender, age, date of birth, contact details (phone number and email) and address, physical location, ID number among other identifiers.

Other information which might be “personal” information may include:

- “device and device event information”: IP address, unique device identifier, the nature of the device which you used to access our site, the geographic location of your device, hardware model and settings, operating system details, browser type and version, browser language, system activity and crashes;
- “location information”: We may use various technologies to determine your actual location, such as geographical data from your device (which is usually based on the GPS or IP location); and

### **How we collect your personal information**

We collect your personal information in three ways, namely

- actively from you when you apply for membership.
- passively from your device when you use our platforms;

- passively from social networking sites (subject to your privacy settings); and

*Active collection of personal information*

Some areas of our site may require you to submit certain information in order for you apply for SAIA Membership or Ordering Regalia or submitting an enquiry.

Our site may also collect personal information from you by asking you specific questions and by permitting you to communicate directly with us, for example via e-mail and feedback forms.

In these situations, we will

- ask you for specific information;
- inform you at each information point what information is required and what information is optional

The information we may actively collect from you may include your:

- identifying information (e.g. your name, surname, force number, gender, date of birth, profile and physical location);
- contact details (e.g. e-mail address and phone number)

*Passive collection of personal information from your device*

We passively collect some of your personal information from the device which you use to access and navigate through our platform(s), using various technological means.

We also use cookies and anonymous identifiers which enable our computer system to recognise you when you next visit our site, to distinguish you from other site users and to improve our service to you. Please refer to our Cookie Policy below.

*Passive collection of personal information from social networking sites (with your permission)*

There are two kinds of information which we collect from social networking sites, namely basic information and extended information.

### **Basic information**

Basic information is information which you have put on a social networking site which you have made public in accordance with your privacy settings on the relevant social networking site.

This could include your name and surname, your profile picture or its URL, your e-mail address, the physical location of your device, your gender, your date of birth, and any other information which you have decided to share publicly (i.e. the information which you have put on your social networking site profile for anyone to see).

We will access your basic information from the SAIA Facebook Group site only:

- with your permission; and
- in line with your privacy settings on the relevant social networking site.

### **Extended information**

Extended information is information which you have put on a social networking site over and above the basic information. This could include your additional identifying information and contact details, biographical information, educational history, personal preferences, your "friends" or contacts on the social networking site, your "likes" and "dislikes", information you have "shared", your recommendations to your friends or other social networking site contacts, your game scores and rankings, and any other information which you have put on, or actions you have done, on a social networking site, and any

other information which you permit us, from time to time, to passively collect from a social networking site.

You can decide the layers of extended information which you want to share with us and manage it through the relevant social networking site.

## **Why we collect your personal information**

We use the information we collect to provide, maintain, and improve our services, to develop new ones, and to protect us, our services and our users. We constantly strive to improve our users' experience, and so we also use the information we collect in order to offer you information and content which is more appropriately tailored for you.

We may collect and use your personal information to:

- establish and verify your identity;
- maintain and update our databases;
- communicate with you in various ways (determined by you in your privacy settings), such as e-mail, post, telephonically, SMS notifications, instant messaging.
- keep a record of our communications with you and your communications with us;
- fulfill any contractual obligations we may have to you or any third party;
- provide you with value added services;
- to identify and inform you of points of interest or goods and services of interest near to your location, using your location information;
- improve the content of our site and our products;

- customise our site to your preferences and tailor information and content for you to ensure that it is presented in the most effective manner for you and for your device;
- to compile and use statistical information about you and other users and their access to and use of our site, browsing habits, click-patterns, preferences, demographics etc which we may use to improve our products and services;
- diagnose and deal with technical issues and customer support queries and other user queries, such as problems with our site, determine the optimal and fastest route for your device to use in connecting with our site, and administer, maintain and secure our platforms;
- detect, prevent or deal with actual or alleged fraud, security or the abuse, misuse or unauthorised use of our site and contravention of this privacy notice;
- comply with the law or with any legal process; and
- Other activities not specifically mentioned which are lawful, reasonable, relevant to our business activities, and the minimum necessary and adequate for us to provide our platforms, and our products and services.

We will get your permission before collecting or using your personal information for any other purpose.

### **Compulsory and Optional Information**

Only the following information is compulsory: Your name, surname, registered e-mail address or mobile number.

### **How long do we keep your personal information?**

We retain all personal information which we collect from you (except for the information referred to below) unless there is a valid technical,

legal or business reason for us to delete, destroy or de identify it ("retained information").

We will not retain the following information if you ask us not to –

- your contacts information as contemplated in 'Passive collection of personal information from social networking sites (with your permission);
- communications which we have sent on your behalf as contemplated in 'Passive collection of personal information from social networking sites (with your permission) 'above;
- the content of your public communications via our site with site users or third parties for as long as the relevant site feature remains active.

We may keep all retained information for two years after cancelling and or failing to renew your membership:

Notwithstanding the above, and any other provision of this privacy notice, we may keep some or all your personal information if and for as long as:

- we are required by law, a code of conduct or a contract with you to keep it;
- we reasonably need it for lawful purposes related to our functions and activities;
- we reasonably need it for evidentiary purposes; or
- you agree to us keeping it for a specified further period.

### **Disclosure of your personal information**

We will not disclose, for commercial gain or otherwise, your personal information other than as set out in this privacy notice or with your permission.

We may disclose or share your personal information to or with:

- your SAIA Branch in order to provide them with information to incorporate you into their branch;
- governmental agencies, exchanges and other regulatory or self-regulatory bodies if we are required to do so by law or if we reasonably believe that such action is necessary to:
  - comply with the law or with any legal process;
  - protect and defend the rights, property or safety of us, our affiliates or our customers, employees, contractors and agents or any third party;
  - detect, prevent or deal with actual or alleged fraud, security or technical issues or the abuse, misuse or unauthorised use of our site and/or contravention of this privacy notice;
  - protect the rights, property or safety of members of the public (if you provide false or deceptive information about yourself or misrepresent yourself as being someone else, we may proactively disclose such information to the appropriate regulatory bodies and/or commercial entities).

We will get your permission before disclosing your personal information to any third party for any other purpose.

### **Security**

All information you provide to us is stored on those of our trusted partner services.

We implement appropriate, generally accepted technical and organisational measures to protect your personal data against unauthorised or unlawful processing, accidental loss, destruction or damage, including encryption where appropriate.



Unfortunately, the transmission of information via the Internet is not completely secure. We will do our best to protect your personal information, but we cannot guarantee 100% security of your data transmitted to our servers using the internet and any transmission is at your own risk.

We take reasonable technical and organisational measures to secure the integrity of information we collect about you, using accepted technological standards to –

- prevent unauthorised access to or disclosure of your personal information; and
- protect your personal information from misuse, loss, alteration or destruction.

In particular:

- We do not require your credit card details, Internet banking details or PIN numbers for any purpose. If we need to make a payment to you, we will send you an e-mail requesting your banking details and make payment directly into your chosen bank account. We will keep the payment records (for finance, recordkeeping and audit purposes) on secure servers. We will not disclose your banking details to any third party except to the extent necessary to process and record payments.
- From time to time we review our information collection, storage and processing practices, including physical security measures, to keep up to date with best practice.
- We create a secure back-up for operational and safety purposes.

### **Linking to third party sites**

We are not responsible for the privacy practices of a third-party site to which there may be a link on our site or to which you may log in from our site (e.g. integrated social networking services).

We advise you to read the privacy notice of each site which you visit and to determine your privacy settings in accordance with your personal preferences.

## **EXERCISE YOUR RIGHTS**

This privacy notice gives effect to many of our responsibilities as a responsible party or a data controller in terms of the applicable legislation in the respective countries where we operate.

If you have a concern about the way we are handling your information, for example if you feel we:

- are unlawfully processing your personal information;
- are not keeping your personal information secure;
- are misusing of your personal information;
- are keeping personal information about you for longer than is necessary;
- hold inaccurate personal information about you;
- have disclosed personal information about you;
- have collected personal information for one reason and is using it for something else; or
- have accessed your personal information without your authorization.

If you have any queries or questions regarding your personal information or how we process it, please complete the form below to log a query. This email address is actively monitored, and we endeavor to respond to all requests within 1 month.

- If possible, please supply all or any of the following information in order to assist us in the process:
- Full name of the person lodging the complaint
- Contact details such as email address and telephone number
- How the personal data was collected (if known)
- All necessary information (such as your account number and what you think we have done wrong)
- The timeframe over which the suspected wrongdoing occurred (if known)
- Any evidence in support of the complaint

## Log a Privacy Query

In order to verify your identity should you request a copy of your data or information about your data, we may ask for a copy of your passport, driving license, national identity card or birth certificate.

Name

Surname

Email

Contact Number

Force Number

Data Privacy Query

Right to Access

Right to be Forgotten

Right to Rectification

Right to Object to Processing

I am not a Robot – What is  $7+2$ ? (Enter the answer)

Submit (Button)

Contact the SA Information Regulator

While we try to respond as promptly as possible, resolution times will vary depending on the nature of the complaint. Our DPO will liaise with our relevant departments to investigate your complaint. You will be notified of the outcome of your complaint as well as any action taken.

If you remain unhappy after the appeals process you may forward your complaint to the Information Regulator:

[infoereg@justice.gov.za](mailto:infoereg@justice.gov.za)

or the Information Regulator (South Africa):

SALU Building,

316 Thabo Sehume Street,

PRETORIA

Tel: 012 406 4818

Fax: 086 500 3351

More information can be found at <http://www.justice.gov.za/infoereg/>

## **Abusive, persistent or vexatious correspondence and complaints**

For the purposes of lodging complaints, it is the complaint which must be vexatious and not the individual making the complaint.

While we differentiate between people who make numerous complaints because they think things have gone wrong and people who are simply being difficult, we do understand that sometimes complainants act in distress, and we will make reasonable allowance for that.

We may decide not to attend to the complaint based on one or more of the following reasons:

- Persisting in a complaint after being advised that there are insufficient or no grounds for your complaint.
- Refusing to co-operate with the complaints process, without good reason, but still wanting your complaint to be resolved, including a failure or refusal to specify the grounds of a complaint despite offers of assistance, changing the basis of the complaint as inquiries of a complaint despite offers of assistance.
- Changing the basis of the complaint as inquiries are made and introducing trivial or irrelevant new information and expecting this to be considered and commented on.
- Submitting repeat complaints, after the complaint procedure has been completed essentially about the same issues, with additions/variations which the Complainant then insists on being treated as new complaints and put through the full complaint procedure again.
- Refusing to accept the outcome of the procedure after its conclusion, repeatedly arguing the point, complaining about the outcome, and/or denying that an adequate response has been given.

## COOKIES

Our online platform uses cookies. Insofar as those cookies are not strictly necessary for the provision of our online platform, we will ask you to consent to our use of cookies when you first visit our online platform.

### About Cookies

A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

### **Why we use cookies**

We use cookies for the following purposes:

- Authentication - we use cookies to identify you when you visit our online platform and as you navigate our online platform;
- Status - we use cookies to help us to determine if you are logged into our online platform;
- Personalisation - we use cookies to store information about your preferences and to personalise our online platform for you;

- Advertising - we use cookies to help us to display advertisements that will be relevant to you; and
- Analysis - we use cookies to help us to analyse the use and performance of our online platform and services.
- Accuracy – we use cookies to help us ensure our records are complete and up to date.

The information which we may passively collect from your device may include your identifying information, contact details, device and device event information, site activity information, log information, telephony log information, location information, unique application numbers (see "[How we collect your personal information](#)") and any other information which you permit us, from time to time, to passively collect from your device.

The names of these cookies change from time to time and sometimes from session to session. If you have a query about a specific cookie, please contact us with the name and value of the cookie so that we can identify its purpose.

### **Managing Cookies**

Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

[Clear, enable, and manage cookies in Chrome](#)

[How to clear browser cache/history/cookies in Opera](#)

[Delete and manage cookies in Internet Explorer](#)

[Protect your privacy in Mozilla Firefox](#)



[Manage cookies and website data in Safari](#)

[Microsoft Edge, browsing data, and privacy](#)

If you block cookies for this online platform, you may not be able to use all the features available on the site.



## **Your rights as a data subject**

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- **Right of access**

You have the right to annually request a copy of the information that we hold about you.

## **Right to rectification**

You have a right to insist that we correct data that we hold about you that is inaccurate or incomplete.

- **Right to be forgotten**

In certain circumstances you can ask for the data we hold about you to be erased from our records.

- **Right to restriction of processing**

Where certain conditions apply you have a right to restrict the processing of your data.

- **Right to data portability**

You have the right to have the data we hold about you transferred to another organisation or provided to you in a machine-readable word format.

- **Right to object to processing**

You have the right to object or remove your consent for certain types of processing.

- **Right to raise a complaint**

You have the right to complain if you have cause to be concerned about the way we capture, treat or process your personal information.

**Changes to this policy**

We may change this privacy notice from time to time. If we do so, we will post the revised policy on our site and take reasonably practicable steps to ensure that you are aware of the updated privacy notice (including, if we have your e mail address, e-mailing you notifications of the updated privacy notice).

Privacy Notice Version: Version 1.0

Effective Date: 1 July 2021

Previous versions: N/A