

# **PRIVACY POLICY**

In compliance with the Protection of Personal Information Act 4 of 2013 ("POPI")

#### INTRODUCTION

Welcome to the privacy policy of the South African Communist Party. The South African Communist Party ("the SACP") is a common law association and a political party registered with the Electoral Commission of South Africain terms of the Electoral Commission Act, 1996 (Act No. 51 of 1996).

This document serves as the SACP's Privacy Policy ("policy") as envisaged by the Protection of Personal Information Act 4 of 2013 ("POPI").

The SACP respects your privacy and take the protection of personal information very seriously. We acknowledge that the protection and processing of personal information has become a global phenomenon and poses great risks.

We acknowledge that the right to privacy enshrined in section 14 of the Constitution of the Republic of South Africa, 1996 ("Constitution") forms the cornerstone of protection of personal information and must provide guidance on how we process personal information.

The SACP shall comply with the provisions of POPI in all respects. The SACP acknowledges your right to protection against the unlawful collection, retention, dissemination and use of personal information, subject to justifiable limitations that are aimed at protecting other rights and important interests.

In this regard it is important to remember that some of those other rights include the right to form political parties and to participate in political activities, as well as the right to enjoy regular and free elections.

To balance these rights with your right to privacy political parties are allowed to process certain personal information of voters and potential voters during the course of campaigning for elections and while canvassing for support.

# INDEX

1.	KEY DEFINITIONS
2.	INFORMATION OFFICER (INTERNAL)4
3.	INFORMATION REGULATOR (EXTERNAL)5
4.	ACTION PLAN AND INFORMATION POLICIES
5.	DESCRIPTION OF BUSINESS ACTIVITIES6
6.	PROCESSING OF PERSONAL INFORMATION THAT WE COLLECT
7.	CONDITIONS FOR THE LAWFUL PROCESSING OF PERSONAL INFORMATION10
8.	RETENTION AND DELETION OF PERSONAL INFORMATION12
9.	YOUR RIGHTS12
10.	YOUR DUTY13
11.	FORMS
12.	SECURITY SAFEGUARDS13
13.	DATA SUBJECT PARTICIPATION14
14.	STEPS IN EVENT OF A COMPROMISE15
15.	CROSS-BORDER TRANSMISSION OF PERSONAL INFORMATION15
16.	PERSONAL INFORMATION OF CHILDREN15
17.	ACCOUNT NUMBERS16
18.	NEWSLETTERS AND DIRECT MARKETING16
19.	CONCLUSION AND DATE OF IMPLEMENTATION

## 1. KEY DEFINITIONS

The following definitions contained in section 1 of POPI are of importance:

'data subject' means the person to whom personal information relates;

'information officer' refers to the person(s) identified herein;

'information compliance committee' refers to a committee that the Information Officer(s) may elect to consitute to assist the Information Officer(s) in its role as information officer(s);

**'personal information'** means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to–

(a) information relating to the race, gender, sex, pregnancy, marital status, national, ethnic, or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language, and birth of the person;

(b) information relating to the education or the medical, financial, criminal or employment history of the person;

(c) any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier, or other assignment to the person;

(d) the biometric information of the person;

(e) the personal opinions, views, or preferences of the person;

(f) correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;

(g) the views or opinions of another individual about the person; and

(h) the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person;

**'processing'** means any operation or activity or any set of operations, whether or not by automatic means, concerning personal information, including-

(a) the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;

(b) dissemination by means of transmission, distribution or making available in any other form; or

(c) merging, linking, as well as restriction, degradation, erasure or destruction of information;

'record' means any recorded information-

(a) regardless of form or medium, including any of the following:

(i) Writing on any material;

(ii) information produced, recorded or stored by means of any tape-recorder, computer equipment, whether hardware or software or both, or other device, and any material subsequently derived from information so produced, recorded or stored;

(iii) label, marking or other writing that identifies or describes any thing of which it forms part, or to which it is attached by any means;

(iv) book, map, plan, graph or drawing;

(v) photograph, film, negative, tape or other device in which one or more visual images are embodied so as to be capable, with or without the aid of some other equipment, of being reproduced;

(b) in the possession or under the control of a responsible party;

(c) whether or not it was created by a responsible party; and

(d) regardless of when it came into existence;

**'responsible party'** means a public or private body or any other person which, alone or in conjunction with others, determines the purpose of and means for processing personal information;

**'special personal information'** means information relating to the religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life or biometric information or the criminal behaviour of a data subject.

## 2. INFORMATION OFFICER (internal)

In accordance with the provisions of POPI, the SACP has appointed the following Information Officer:

Information Officer:	Ms Hlengiwe Nkonyane
Email:	informationofficer@sacp.org.za
Tel:	(011) 339 3621/2

The Information Officer shall be at liberty to appoint a Deputy Information Officer should he/she so chose.

The SACP's Information Officer(s) are responsible for:

- developing, implementing, monitoring and maintaining a compliance framework;
- ensuring that a risk analysis is done at least on a quarterly basis to ensure continued compliance with POPI;
- the encouragement of compliance by the SACP, with the conditions for the lawful processing ofpersonal information;
- dealing with requests and complaints made to the SACP pursuant to POPI and PAIA;
- working with the Information Regulator in relation to investigations in relation to the SACP;
- otherwise ensuring compliance by the SACP with the provisions of this Act; and
- as may be prescribed by POPI.

The SACP's Information Officer(s) may elect to constitute an information compliance committee to assist the Information Officer(s) in its role as information officer(s). The Information Officer(s) may determine who serves on this committee.

Should you have any questions/complaints/suggestions regarding the processing of personal information, we encourage you to contact the SACP's Information Officer.

You are further invited to contact our Information Officer(s) regarding issues specifically pertaining to-

- Any objection to the processing of your personal information;
- A request for the deletion/destruction/correction of your personal information or records; and/or
- The submission of a complaint relating to the processing of your personal information.

Our Information Officer(s) have been duly appointed by the SACP and have been registered with the Information Regulator accordingly.

## 3. INFORMATION REGULATOR (external)

Should you prefer not to contact our offices directly regarding any personal information related issues, you may forward your complaint/request directly to the Information Regulator at:

inforeg@justice.gov.za

## 4. ACTION PLAN AND INFORMATION POLICIES

We have worked closely with our legal representatives to ensure compliance with POPI and the lawful and secure processing of your personal information. This processed involved the following steps:

- Conducting a risk analysis and developing a POPI action plan;
- Obtaining the necessary resolutions and appointing our Information Officer and Deputy Information Officer(s);
- Developing our POPI Policies (see below); and
- Implementing a strategy and a review process for continued compliance with POPI in future.

With the assistance of our legal representatives, we have developed and implemented the following policies regulating the processing of personal information in the SACP-

- Risk analysis
  - We have identified certain areas that carry more risk than others, specifically relating to those wherein third parties are involved or where mass volumes of electronic data are stored, and have implemented further measures to secure the security of personal information herein;
  - These measures include cybersecurity checks and updates, and the implementation of Operator Undertakings.
- Privacy Policy
  - An external document (this document) available to outside parties explaining how we process personal information and all else POPI-related;
- POPI Policy
  - An internal document specifically applicable to our employees wherein they acknowledge that they are aware of the provisions of POPI and undertake to comply with our Information Policies;

- An internal guideline highlighting the principles applicable to processing of personal information in our business;
- Operator Undertakings
  - We have worked closely with third parties who may have access or deal with any personal information held by us and inquired on whether they are aware of the provisions of POPI;
  - These third parties have provided us with undertakings, confirming that they will only process personal information in line with the purpose that it was provided to them for and in line with the principles enshrined in POPI.
- Developing an action plan for ensuring continued future compliance and review, which will include an undertaking which is to be signed by all party officials, public representatives, candidates and volunteers who are to deal with the personal information of voters in the ordinary course of party work and activities.

#### 5. DESCRIPTION OF BUSINESS ACTIVITIES

The South African Communist Party is a political party that participate in political activities in the national, provincial and local spheres of government in the Republic of South Africa. It has representation in the National Parliament, Provincial Government and Local Government.

The SACP in its representative activities acts in the public interest in terms of section 38(d) of the Constitution of South Africa and as an association in the interests of its members under section 38(e).

#### 6. PROCESSING OF PERSONAL INFORMATION THAT WE COLLECT

The SACP processes personal information of voters from various sources. The information that the SACP collects, depending on the information you share with us directly or indirectly, are:

- your name;
- identity number;
- address;
- email;
- telephone details;
- gender;
- date of birth;
- race;
- ethnic origin;
- personal opinions, view or preferences;
- political persuasion;

The processing of the above information involves greater risk, and as such we take special care to protect this information. Our security measures implemented are discussed under "SECURITY SAFEGUARDS" below. We have worked closely alongside our legal representatives and IT service providers to identify any risks associated herewith and have implemented the measures reflected hereinbelow to combat these risks.

# 6.1 Since our formation in 2000 we have been collecting personal information FROM and BY:

- The National and Municipal Voter's Roll. In accordance with Section 16 of the Electoral Act 73 of 1998, we may access the voters roll for election purposes. The information so obtained usually includes your identity number, name, street address and contact details. The information assists us to verify the accuracy of the information and legitimacy of the roll to ensure free and fair elections;
- Our duly elected public representatives in the performance of their duties;
- Activists;
- Petitions;
- Political events;
- Information tables;
- Call canvassing centres;
- Membership enrollment with the party;
- Information obtained online:
- when you register on the SACP's website.
- from your internet browser;
- 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 personal information;
- Cookies
  - We may place small text files called 'cookies' on your device when you visit our website. These files do not contain personal information, but they do contain a personal identifier allowing us to associate your personal information with a certain device. These files serve a number of useful purposes for you, including:
    - granting you access to age restricted content;
    - tailoring our website's functionality to you personally by letting us remember your preferences;
    - improving how our website performs; and
    - > allowing third parties to provide services to our website.
    - Your internet browser generally accepts cookies automatically, but you can often change this setting to stop accepting them. You can also delete cookies manually. However, no longer accepting cookies or deleting them will prevent you from accessing certain aspects of our website where cookies are necessary. Many websites use cookies and you can find out more about them at <u>www.allaboutcookies.org</u>.

- We collect certain information from cookies that we may send to your computer to try and give you a personalised experience.
- Third party cookies
  - Some of our software use their own cookies or widgets on our website. We have no access to or control over them. Information collected by any of those cookies or widgets is governed by the privacy policy of the company that created it, and not by us.
- 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.
- The nature and extent of our existing data base of supporters and potential supporters
  - We have, since our formation of the SACP, built and maintained a data base of the particulars of supporters and potential supporters which are used to communicate with this group of voters and potential voters as part of our ordinary activities and specifically when we campaign in the run-up to elections. This data base uses the voters roll as a point of departure, to which we have added additional information that has been obtained while campaigning. This data base has been built mindful of the right to privacy of voters and potential voters and we have taken care over the years to implement the requests made by certain individuals to exclude them from the communication with voters and potential voters during campaigning.

# 6.2 IN TERMS OF THIS POLICY we will process personal information and special personal information in the following circumstances and on the following conditions:

- We process personal information for <u>lawful purposes</u> relating to the SACP's activities, political principals and objectives under the following circumstances:
  - You have consented thereto;
  - o It is necessary to conclude or perform under a contract we have with you;
  - The law requires or permits it;
  - o If it is required to protect or pursue your legitimate interest;
  - For the proper performance of a public law duty by a public body;
  - Processing is necessary for pursuing a legitimate interests of ours or of a third party to whom the information is supplied
- We process special personal information:
  - When you are a SACP member or employee and the information is necessary to achieve the aims or principles of the SACP;

Page 9

- of a National Election, Local Government Election or a Referendum;
- If we need to create, use or protect a right or obligation in law;
- $\circ$  ~ If the processing is required for campaigning for the SACP or one if its causes.
- We will only process personal information of a person received from third parties if:
  - The third parties provide us with your necessary consent to share the information with us;
  - $\circ$   $\quad$  You are informed of this privacy policy.

0

# 6.3 WHY do the SACP need to process your personal information?

Personal information may be obtained to:

- Verify the accuracy of the common voters roll in order to ensure elections are free and fair;
- Helping to add voters to the voters roll;
- Helping to educate voters on their political rights;
- Communicate with you and others as part of our political activities;
- Identifying supporters and their concerns;
- Canvass possible members and candidates in scheduled elections
- Send you important information regarding changes to the legislation or any current political issues;
- Inform you about voting formalities;
- Inform you about registration weekends and logistical aspects thereabout;
- Investigate dishonesty, malpractice, or other seriously improper conduct by, or unfitness or incompetence of, persons concerned in the provision of banking, insurance, investments or other financial services or in the management of bodies corporate;
- Protect members of the public against dishonesty, malpractice or other seriously improper conduct by, or the unfitness or incompetence of, persons authorised to carry on any profession or other activity.
- Request donations from our known supporters;
- Carry out market research and analysis of trends;
- Distribute SACP newsletters and informative circulars;
- Manage our infrastructure and business operations, and to comply with internal policies and procedures.
- Process payment instructions;
- Resolve complaints;
- Comply with applicable laws and regulatory obligations (including laws, directives, sanctions and rules relating to anti-money laundering and anti-terrorism, comply with legal process;
- Establish and defend legal rights;
- For any related purpose to the SACP's activities.

## 7. CONDITIONS FOR THE LAWFUL PROCESSING OF PERSONAL INFORMATION

The SACP is committed to the fulfilment of the following condition imposed by POPI:

- 1. Accountability
- 2. Processing limitation
- 3. Purpose specification
- 4. Further processing limitation
- 5. Information quality
- 6. Openness
- 7. Security safeguards
- 8. Data subject participation

Our approach in fulfilment of each of the above is discussed below.

## 7.1. ACCOUNTABILITY

The SACP is committed to ensuring that your personal information will only be processed in accordance with the provisions of POPI and in line with the purpose for which it was supplied to us.

## 7.2. PROCESSING LIMITATION

Personal information will only be-

- Processed lawfully and in a reasonable manner;
- Processed for a specific purpose and reason for which it was supplied to us; and
- Collected directly from the data subject, subject to justifiable limitations in execution of our services insofar as allowed by POPI.

As mentioned above, personal information will only be processed by the SACP on one of the following grounds listed in POPI:

- Consent;
- Processing is necessary to carry out actions for the conclusion or performance of a contract;
- Processing complies with an obligation imposed by law on the responsible party;
- To protect a legitimate interest of a data subject;
- For the proper performance of a public law duty by a public body;
- Processing is necessary for pursuing a legitimate interests of ours or of a third party to whom the information is supplied.

## 7.3. PURPOSE SPECIFICATION

Data subjects will always be made aware of the purpose for which their personal information is being processed.

As mentioned above, section 18 of POPI requires from the SACP to ensure you are aware that yourpersonal information may be processed by us in execution of the SACP's activities and will be usedsolely for this purpose.

Personal information will always be collected directly from the data subject, unless-

- The information has been made public;
- Consent is obtained;
- The collection from a third party would not prejudice a legitimate interest of the data subject;
- The collection of the information from another source is necessary for the conduct of legal proceedings or to maintain a legitimate interest of ours or of a third party to whom the information is supplied;
- The collection directly from the data subject would prejudice a lawful purpose of the collection; or
- Compliance is not reasonably practicable in the circumstances of the particular case.

Data subjects will be notified by the SACP once their personal information is collected,

unless-

- Consent has been granted for the collection thereof;
- Failure to notify would not prejudice a legitimate interest of the data subject;
- It is collected for purposes of legal proceedings;
- Notification would prejudice a lawful purpose of the collection;
- Notification is not reasonably practicable in the circumstances of the particular case; or
- The information will not be used in a form in which the data subject may be identified, or unless the information is merely for historical, statistical or research purposes.

#### 7.4. FURTHER PROCESSING LIMITATION

In line with the previous paragraph ('PURPOSE SPECIFICATION'), any further/subsequent processing of your personal information will still be done in accordance with original purpose and only when processing thereof is necessary in the circumstances described above.

## 7.5. INFORMATION QUALITY

Upon collecting your personal information, the SACP will take all steps necessary to ensure the correctness of your personal information. All of your personal information is stored securely for if and when we require same to be processed (refer to "Security Safeguards" below).

In order for us to execute our political mandate, we kindly request that you provide us with your accurate and complete personal information required by us to fulfil our services. Lastly, we kindly request that you update us of any changes to your personal information for us to endorse same in our records.

## 7.6. OPENNESS

Your personal information will be stored in a secure system, as explained later on under 'SECURITY SAFEGUARDS'. Our goal with this Privacy Policy is to ensure that a data subject is made aware of:

- What information is collected and from where;
- Our name, address and contact details;
- The purpose for which personal information is collected;
- Whether or not the supply of personal information is mandatory or voluntary;
- Consequences of failure to provide personal information;
- Any particular law authorising the collection of personal information;
- Their right to access or rectify the information;
- Their right to object to the processing of their personal information; and
- Their right to lodge a complaint to the Information Regulator and the details of the Information Regulator.

#### 8. RETENTION AND DELETION OF PERSONAL INFORMATION

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 your personal information, or you can keep your information up to date via our website's self-canvass functionality. 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 but at all times in accordance with the provisions of POPI.

Should a data subject request removal of the data subject's personal information, this instruction shall be processed by the Information Officer of the SACP to the extent as requested by the data subject and insofar as the personal information is captured and processed within the SACP by the SACP. The deletion of personal information shall take place within a reasonable period.

## 9. YOUR RIGHTS

Kindly be advised that, as a data subject, you have the right to-

- 1. Be informed that your personal information is being collected;
- 2. Be informed that your personal information has been accessed by an unauthorised person;
- 3. Establish whether we hold your personal information and request access thereto;
- 4. Request deletion, destruction or correction of your personal information;
- 5. Object to the processing of your personal information (on reasonable grounds);

- 6. Object to the processing of your personal information for purposes of direct marketing;
- 7. Not be subject to a decision based solely on the automated processing of your personal information;
- 8. Submit a complaint to the Information Regulator;
- 9. Institute civil proceedings regarding an alleged interference with your personal information.

#### 10. YOUR DUTY

In order for the SACP to properly comply with its obligations, we kindly request that you provide us with your accurate and complete personal information required by us to fulfil our mandate.

Lastly, we kindly request that you update us of any changes to your personal information for us to endorse same in our records.

#### 11. FORMS

Kindly contact our Information Officer to inquire on the following:

- Form 1- objection to processing of personal information;
- Form 2- request for correction or deletion of personal information;
- Form 4- consent in respect of direct marketing for the purposes of fundraising; and
- Form 5- complaint regarding an interference with personal information.

You are encouraged to complete these forms and present them to our Information Officer, alternatively the Information regulator, whichever may be applicable.

#### **12. SECURITY SAFEGUARDS**

In order to protect your personal information, the SACP will-

#### 12.1 IN RESPECT TO THE MANAGEMENT OF OUR ELECTRONIC DATA BASE:

- Implement reasonable, appropriate, technical and organisational measures; and
- Notify data subjects and the Information Regulator of any security compromises as soon as reasonably possible and state:
  - Possible consequences;
  - Steps taken to address the compromise;
  - Recommendation to data subject on what steps to take;
  - Identity of person who accessed the information (if known).

Kindly refer to 'STEPS IN EVENT OF A COMPROMISE' in paragraph 10 below.

We have implemented the following physical and software/electronic safeguards-

- Electronic data:
  - Strong passwords;
  - Encryption;
  - Regular software updates;
  - Secured all devices;

- Regular backups of data; and
- Employee training and awareness programs.

We work closely alongside our IT service providers to ensure that our safeguarding mechanisms are frequently updated and reviewed.

- Physical safeguards:
  - Our hard copy files are stored off-site in a secure storage unit equipped with-
    - Alarm system;
    - Armed response 24 hours a day;
    - In a secure complex;
    - Security guards patrolling the surrounding areas; and
    - Secure locks on all access points.
  - Our offices are further equipped with-
    - Alarm system;
    - All access points are securely locked;
    - Armed response 24 hours a day; and
    - Security guards patrolling the office's surrounding areas.

Furthermore, all our agreements with third party operators have been reviewed and/or Operator Undertakings have been provided to ensure compliance by third parties with POPI.

#### 12.2 IN RESPECT OF OUR PERSONAL INTERACTION WITH VOTERS DURING CAMPAIGNING

Implement reasonable, appropriate, technical and organisational measures aimed at ensuring that the personal information obtained from voters and potential voters in respect of the political persuasion during canvassing and campaign activities is treated in a lawful manner consistent with the authority afforded by POPI to process such personal information.

These measures will include the introduction of a specific chain of custody of any hard copies of sections of our existing data base which will be entrusted to party officials, public representatives, members and volunteers in order to enable the canvassing of voters and potential voters during campaigns, as well as the requirement that any of the aforesaid persons be familiarised with this policy and their duty to treat the personal information entrusted to them on a temporary basis in a manner consistent with this Policy and POPI.

#### **13. DATA SUBJECT PARTICIPATION**

Data subjects can request confirmation from the SACP on whether we hold personal information and/orthe correct personal information. Data subjects can further request for such information to be deletedor destroyed.

The SACP will not process special personal information unless expressly provided for in POPI and unlessspecifically necessary for the purpose for which it was provided to us for.

#### Page | 15

#### 14. STEPS IN EVENT OF A COMPROMISE

The following steps will be taken by us in the unlikely event of a data breach/information compromise:

- Notify our service provider;
- Attempt to establish (internal analysis)-
  - Whether there was in fact a breach;
  - What data, if any, was compromised;
  - Which parties were affected; and
  - The extent of the compromise.
- Draft an internal report with the assistance of our IT service providers;
- Notify affected persons of the breach;
- Notify the Information Regulator of the breach;
- Cooperate with our service providers and data subjects to prevent any processing of the compromised data; and
- Review our safeguarding structures to prevent a reoccurrence.

#### 15. CROSS-BORDER TRANSMISSION OF PERSONAL INFORMATION

We do not transfer information to foreign countries other than for purposes of storing data onto servers which the SACP leases from third parties. The processing of the above information involves greater risk, and as such we take special care to protect this information. Our security measures implemented are discussed under "SECURITY SAFEGUARDS" below. We have worked closely alongside our legal representatives and IT service providers to identify any risks associated herewith and have implemented applicable measures to combat these risks.

We will ensure that the cross-border transmission of your information complies with the standards set out in POPI, alternatively a higher standard as required in the destination countries (for example, the General Data Protection Regulation applicable in the European Union).

We will not send your personal information abroad unless-

- Consent has been provided;
- It is required to perform in terms of a contract; or
- The foreign laws are equally or stricter than those contained in POPI.

#### 16. PERSONAL INFORMATION OF CHILDREN

The SACP will only process personal information of children where consent has been provided by a competent person (parent or guardian) or where otherwise authorised by POPI. The SACP acknowledges that the processing of the above information involves great risk, and as such we take special care to protect this information.

#### **17. ACCOUNT NUMBERS**

The SACP will never sell, obtain or disclose your account number (whether this relates to any sort of bank account details, credit card numbers or credit application numbers) to any person without your consent.

## 18. NEWSLETTERS AND DIRECT MARKETING

As a political party most of the direct marketing we embark upon is aimed at campaigning for support for the SACP. This type of direct marketing does not fall within the ambit of direct marketing regulated by POPI. Nonetheless we will ensure that we give voters and potential voters a simple manner in which to indicate to us that they would like to be exclude from our direct marketing activities for the purposes of a specific campaign.

Our direct marketing aimed at fundraising is however the type of direct marketing that is regulated by POPI and therefore you will only receive direct marketing aimed at fundraising if we have obtained your explicit prior consent thereto.

Communications received from the SACP will always clearly identify the SACP as the sender and provide you with a reasonable opportunity to unsubscribe at any time.

## **19. CONCLUSION AND DATE OF IMPLEMENTATION**

This Policy will come into operation on 1 July 2021.

The SACP is committed to complying with POPI and the SACP acknowledge every individual's right to protection against the unlawful collection, retention, dissemination and use of personal information, subject to justifiable limitations that are aimed at protecting other rights and important interests.

Kindly contact the SACP's Information Officer for any queries relating to the processing of personal information.



## **POPI OBJECTION FORM – FORM 1**

In compliance with the Protection of Personal Information Act 4 of 2013 ("POPI")

We are committed to safeguarding your privacy and the confidentiality of your personal information and are bound by POPI.

Please submit your objection to the SACP Information

Officer(s): Address to: The Information Officer

Email Address: Informationofficer@sacp.org.za

## A. <u>Particulars of Complainant:</u>

Name & Surname:	
Identity Number:	
Postal Address:	
Contact Number:	
Email Address:	

## B. Details of Objection:



## C. Desired Outcome:



#### D. Signature:

Date:	
Place:	
Sign:	

Where we are unable to resolve your complaint, to your satisfaction you have the right to complain to the Information Regulator.

The Information Regulator:

Address: 33 Hoof Street Forum III, 3rdFloor, Braampark, Johannesburg

Email: <a href="mailto:inforreg@justice.gov.za">inforreg@justice.gov.za</a>



# REQUEST FOR CORRECTION OR DELETION OF PERSONAL INFORMATION - FORM 2

In compliance with the Protection of Personal Information Act 4 of 2013 ("POPI")

We are committed to safeguarding your privacy and the confidentiality and accuracy of your personal information and are bound by POPI.

Please submit your request to the SACP Information

Officer(s): Address to: The Information Officer

Email Address: Informationofficer@sacp.org.za

## A. <u>Particulars of Complainant:</u>

Name & Surname:	
Identity Number:	
Postal Address:	
Contact Number:	
Email Address:	

## B. Details of Request:



## C. Desired Outcome:



#### D. Signature:

Date:	
Place:	
Sign:	

Where we are unable to attend to your request to your satisfaction you have the right to complain to the Information Regulator.

The Information Regulator:

Address: 33 Hoof Street Forum III, 3rdFloor, Braampark, Johannesburg

Email: inforreg@justice.gov.za



## CONSENT IN RESPECT OF DIRECT MARKETING - FORM 3

In compliance with the Protection of Personal Information Act 4 of 2013 ("POPI")

We are committed to safeguarding your privacy and the confidentiality and accuracy of your personal information and are bound by the provisions of POPI.

Please submit your request to the SACP Information

Officer(s):Address to: The Information Officer

Email Address: Informationofficer@sacp.org.za

#### A. <u>Particulars of Data Subject:</u>

Name & Surname:	
Identity Number:	
Postal Address:	
Contact Number:	
Email Address:	

B. Consent

I, the undersigned, acknowledge and understand the rights and obligations that I have in terms of POPI. I hereby consent to the processing of my personal information by the SACP for the purpose of direct marketing by means of any form of electronic communication, including automatic calling machines, facsimile machines, SMSs or e-mail for the purpose of the SACP's activities pertaining to the sourcing of donations and fundraising.

#### C. Signature:

Date:	
Place:	
Sign:	



## **POPI COMPLAINT FORM – FORM 4**

In compliance with the Protection of Personal Information Act 4 of 2013 ("POPI")

We are committed to safeguarding your privacy and the confidentiality of your personal information and are bound by POPI.

Please submit your complaint to the SACP Information

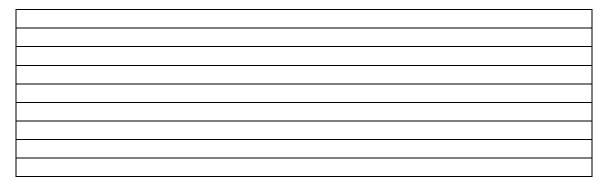
Officer(s): Address to: The Information Officer

Email Address: Informationofficer@sacp.org.za

## A. <u>Particulars of Complainant:</u>

Name & Surname:	
Identity Number:	
Postal Address:	
Contact Number:	
Email Address:	

## B. Details of Complaint:



## C. Desired Outcome:



#### D. Signature:

Date:	
Place:	
Sign:	

Where we are unable to resolve your complaint, to your satisfaction you have the right to complain to the Information Regulator.

The Information Regulator:

Address: 33 Hoof Street Forum III, 3rdFloor, Braampark, Johannesburg

Email: <a href="mailto:inforreg@justice.gov.za">inforreg@justice.gov.za</a>