

## ASISA FOUNDATION WAGEWISE PRIVACY POLICY

### INTRODUCTION

The ASISA Foundation (ASISA Foundation Trust. Masters Ref: IT3400/2012 with NPO number: 125-121 and PBO number 930047384) (“**we**”, “**us**”, “**our**” or “the Foundation”) respects, and is committed to ensuring, the privacy of every person who visits or uses this website (means [www.wagewise.co.za](http://www.wagewise.co.za))

This privacy policy (this “**policy**”) has been put together to explain how we may collect, use, share, retain and generally process your personal information obtained during your interactions with us (whether online, in writing or verbally) or which is collected or received in any other manner. This policy further explains your choices and rights in relation to our processing of your personal information.

Any visit to or use of this website is deemed to include an acceptance of this policy. Please ensure that you have read, fully understand and agree with the provisions contained in this policy before browsing or using the website.

This website is not intended to be browsed by children who are 18 years of age or younger, and we do not intentionally collect or maintain information about anyone falling within that age category.

This policy may be revised from time to time to take into account any changes in applicable laws, our services, this website or any aspect related to our business generally. We therefore encourage you to monitor this policy periodically to note any changes made to it.

### WHAT PERSONAL INFORMATION DOES ASISA FOUNDATION COLLECT?

The Foundation is subject to the Protection of Personal Information Act, 4 of 2013 (“**PoPIA**”), which is not yet of full force and effect.

We may collect certain information about you when you visit this website, including –

- information about the content and services you express an interest in when you use this website;
- your name and contact information, including email address and company details which you may submit to us when you interact with us on this website;

- information about your location or similar location-based information;
- information regarding your personal or professional interests, demographics, experiences with our services and contact preferences in order to provide you with further correspondence about our services.

In general, you may navigate this website without directly providing any personal information. Any domain name information that the Foundation collects is not used to personally identify you but is instead aggregated to measure the number of visits, average time spent on the website and the web pages viewed. Such other information includes browser and device information, website and application usage data, IP addresses, demographic information such as marketing preferences, geographic location, home language, and information collected through cookies and other technologies or information that has been anonymised or aggregated. The Foundation uses this information to improve its contents. If we link this information with your personal information, we will treat such linked information as personal information.

You can choose not to provide personal information to us when requested. However, if this is necessary to provide you with our services, access to our Internet Services, or to perform administrative functions, we may be unable to do these things.

We do not, and will not (unless we are strictly required by law) process the following categories of personal information: Race or ethnic origin; political opinions; religious or philosophical beliefs; trade union memberships; genetic or biometric data; health or mortality; sex life or sexual orientation; and criminal behavior.

#### **LEGAL BASIS FOR OUR PROCESSING OF YOUR PERSONAL INFORMATION**

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 the Foundation's legitimate interests, for example the management, operations and improvement of our business (to the

extent that they don't unjustifiably and unlawfully limit your interests or rights which require protection);

- where processing is necessary to comply with an obligation imposed by law;
- where processing is necessary to protect your legitimate interests; and
- where processing is necessary to pursue the legitimate interests of a third party to whom the personal information is lawfully supplied.

### **HOW WE USE YOUR PERSONAL INFORMATION**

We use the personal information provided by you for the following purposes ("Purpose/s") -

- to update our records about you and for the purpose of retaining records about you;
- to communicate with you in the course of ordinary business activities;
- research, training and statistical analysis with the aim of improving content and services by making them easier to use and by providing access to certain sections of this website;
- to prevent or detect any unlawful activities;
- responding to your enquiries and complaints or processing your requests in relation to your personal information;
- to follow up on any enquiries and complaints as part of our customer care procedures; and
- contacting you for market research purposes.

### **RETENTION OF YOUR PERSONAL INFORMATION**

Your personal information is retained by us for our business purposes and to comply with any applicable laws and regulations. To the extent not specifically prohibited or prescribed by applicable laws, we will retain your personal information for periods that we believe are reasonably necessary to serve our legitimate business interests.

When we no longer have an ongoing legitimate business need to process your personal information, we will either delete or de-identify it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely

store your personal information and keep it from any further processing until deletion is possible.

## **RIGHTS AVAILABLE TO YOU IN RELATON TO YOUR PERSONAL INFORMATION**

You have the right to control the manner in which your personal information is processed by us, including the following rights–

- to obtain from us confirmation as to whether or not personal data concerning you is processed, and where that is the case, you have the right to request and get access to that personal data;
- to update and correct your personal information that is held by us;
- in certain cases, and to the extent not prohibited by applicable laws, you may request us to remove your personal information, partially or completely;
- to request us to limit processing of your personal information to any one or more of the Purposes listed above (note that this may impact the accessibility of our services);
- in certain cases, to object to processing of your personal information, including with regards to profiling. You have the right to opt-out from any communications from us (whether marketing or otherwise). You may withdraw any consent previously provided in relation to the collection, use and processing of your personal information; and/or
- to escalate any complaint in relation to your personal information to the Information Regulator once PoPIA is effective.

To ascertain whether you are eligible for, and, to send a request with regards to, any one of the above rights please send an email to [info@asisa.org.za](mailto:info@asisa.org.za).

We may charge a small fee, to the extent lawfully prescribed or permissible, for any such request where we believe the request to be unfounded, repetitive or excessive.

Before processing any one of the above-listed requests, we may need to request specific information from you to help us confirm your identity. This is a security measure to ensure that personal information is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

## **PROTECTION OF YOUR PERSONAL INFORMATION**

We maintain technical, physical and administrative security measures aimed at protecting your personal information against accidental or unlawful access, damage, alteration, loss or destruction, by implementing reasonable and appropriate physical, administrative, organizational and technical safeguards. We require the same standards of protection from any third parties to whom we disclose your personal information.

Despite the above security measures, the transmission of data over the internet cannot be guaranteed to be 100% secure and protected. Accordingly, we cannot ensure or warrant the security of any information you send to us or receive from via electronic transmission. This is particularly true for information you send to us via email, which we cannot guarantee is protected in transit. Once we receive your information, we apply the methods mentioned above to ensure its protection while in our possession. If you are concerned about submitting your personal information to us electronically, please contact us to enquire about making other arrangements.

## **SHARING OF PERSONAL INFORMATION WITH THIRD PARTIES AND LINKS TO THIRD PARTY WEBSITES**

Confidentiality of your personal information is important to us. We will not sell, rent or lease your personal information to independent third parties for commercial purposes, including but not limited to direct marketing purposes.

Unless we have your permission, we will not use or share your personal information in ways unrelated to the ones described in this Policy or disclosed to you when you provide us with your personal information.

There are instances when we need to share your personal information with third parties, all to the extent necessary for, and incidental to, the performance of our services and/or your use of this website. These include sharing your information with –

- entities with whom we have partnered (financial institutions or otherwise) to jointly create and offer our content and services;
- the Foundation's Associates who may, directly or indirectly, render certain services to the Foundation or to you or in undertaking activities linked to the operation of such services on our behalf; or

- third parties, where the disclosure is in compliance with legal and/or contractual requirements that we are subject to, including, but not limited to, intergovernmental agreements.

Through your use of our services and this website, you consent to the sharing of your personal information in the above instances.

Given the nature of our business and information technology infrastructure, your personal information may be transferred to other countries, some of which may have different data protection laws to those that are applicable in the country in which you reside. We will at all times ensure that your personal information is protected in terms of this Policy. You consent to your personal information being transferred to other countries regardless of the data protection laws applicable in those countries.

Our website may contain links to third party websites and applications. We are not responsible for and make no representations or warranties in relation to the privacy practices or content of any third-party websites and applications. Your use of such websites and applications is subject to the applicable third-party privacy statement and is at your own risk.

## **USE OF COOKIES AND OTHER TRACKING TECHNOLOGIES**

### 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. A cookie enables us to analyse usage patterns on our website and tailor the website to your needs. Most web browsers are set to accept cookies, however if you do not wish to accept cookies you can adjust your internet browser settings to refuse the cookies. Please note that some parts of this 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. We do not store any personal information inside cookies.

We use cookies to enhance your browsing experience. By continuing to use our website without changing your browser's settings, you agree to our use of 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.

#### OTHER TRACKING TECHNOLOGIES

Do Not Track ("**DNT**") is a web browser setting that requests that a web application disables its tracking of an individual user. When you choose to turn on the DNT setting in your browser, your browser sends a special signal to websites you encounter while browsing to stop tracking your activity. We honour DNT signals and do not track, plant cookies, or use advertising when a DNT browser setting is activated.

#### **CONTACT US**

Should you have any queries regarding this Policy or the manner in which your personal information is processed, please feel free to contact us as follows – [info@asisa.org.za](mailto:info@asisa.org.za).

Any complaint regarding the processing of your personal information may also be lodged with the Information Regulator once PoPIA is effective.

**Last revised April 2020**