

**THE BRENTHURST FOUNDATION PROPRIETARY LIMITED**  
**PRIVACY POLICY**

**1 INTRODUCTION**

- 1.1 We understand that your privacy and the security of your personal information is extremely important. This policy sets out what we do with your personal information, what we do to keep it secure, from where and how we collect it, as well as your rights in relation to the personal information we hold about you.
- 1.2 This policy applies if you interact with us including through our social media, intern application process, business card exchange, newsletter, or otherwise by using our website.
- 1.3 If you don't want to read all the detail, here are the things we think you'd really want to know:
- 1.3.1 We share your personal information with third parties where it is necessary to provide services to you or to perform our functions.
- 1.3.2 We use a number of third parties to process your personal information on our behalf linked to the purpose(s) for which we collected your personal information.
- 1.3.3 You have a number of rights over your personal information and the different ways in which you can exercise those rights is set out in this notice under paragraph 8.
- 1.3.4 We also use your information to display more relevant online material relating to our services/functions on our website, on other websites and online media channels.

**2 WHO ARE WE?**

When we say “**we**” or “**us**” in this policy, we are referring to The Brenthurst Foundation Proprietary Limited.

**3 WHAT SORTS OF PERSONAL INFORMATION DO WE HOLD?**

In order to interact with you we will collect, hold and use the following personal information –

- 3.1 information that you provide to us such as your name, address, identification number, telephone number, email address, and any feedback you give to us, including by phone, email, or when you communicate with us via social media or our website;

- 3.2 information about the services that we provide to you or the functions we perform (including for example, the things we have provided to you, when and where, the way you use our services, and so on);
- 3.3 your profile with us, including your email address and chosen password;
- 3.4 information about whether or not you want to receive marketing communications from us;
- 3.5 information about any device you have used to access our services (such as your device's make and model, browser or IP address); and
- 3.6 your contact details and details of the emails and other electronic communications you receive from us, and how you interact with them. For example whether the communication has been opened, if you have clicked on any links within that communication and the device you used. We do this because we want to make sure that our communications are useful to you, so if you don't open them or don't click on any links in them, we know we need to improve our services.

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

Whenever we process your personal information we have to have something called a "legal basis" for what we do. The different legal bases we rely on are –

- 4.1 **Consent** -You have told us you are happy for us to process your personal information for a specific purpose(s).
- 4.2 **Legitimate interests** - The processing is necessary for us to conduct our business, but not where our interests are overridden by your interests or rights.
- 4.3 **Performance of a contract** - We must process your personal information in order to be able to provide you with one of our products or services.
- 4.4 **Legal obligation** - We are required to process your personal information by law.

#### 5 **HOW DO WE USE YOUR PERSONAL INFORMATION?**

We may use your information in the following ways –

- 5.1 **To provide perform our functions** - we need to use your personal information to perform our functions insofar as they relate to you and to our interactions with you.
- 5.2 **To improve interactive experience with us** - we try to understand the community we serve so that we can improve your interactive experience with us.
- 5.3 **Analytics and profiling** - we use your personal information for statistical analysis and to help us understand you more.
- 5.4 **Contacting you** - we use your personal information to contact you. This may be in relation to a service update, an issue you have raised with us, to conduct market research or to ask for your feedback.

## 6 **PERSONAL INFORMATION SHARING**

We may share information about you with –

- 6.1 companies or third parties affiliated to us;
- 6.2 partners or agents involved in delivering the services offered by us;
- 6.3 partners or agents that conduct satisfaction surveys and any other surveys related to our functions;
- 6.4 companies who are engaged to perform services for or on our behalf;
- 6.5 law enforcement agencies, regulatory organisations, courts or other public entities if we are required by law to do so;
- 6.6 emergency services; and
- 6.7 with any entity or forum wherein we may protect ourselves against fraud or exercise our rights.

## 7 COOKIES AND SIMILAR TECHNOLOGIES

We use cookies to help give you the best experience on our website. Our cookies policy is available at <https://www.iubenda.com/privacy-policy/44746073/cookie-policy>

## 8 YOUR RIGHTS

8.1 You have a number of rights under data protection legislation which, in certain circumstances, you may be able to exercise in relation to the personal information we process about you.

8.2 These include –

8.2.1 the right to access a copy of the personal information we hold about you;

8.2.2 the right to correction of inaccurate personal information we hold about you;

8.2.3 the right to restrict our use of your personal information;

8.2.4 the right to be forgotten; and

8.2.5 the right to object to our use of your personal information.

8.3 Where we rely on consent as the legal basis on which we process your personal information, you may also withdraw that consent at any time.

If you are seeking to exercise any of these rights, please contact our Information Officer at [accounts@thebrenthurstfoundation.org](mailto:accounts@thebrenthurstfoundation.org). Please note that we will need to verify your identity before we can fulfil any of your rights under data protection law. This helps us to protect the personal information belonging to our customer against fraudulent requests. You may also refer to our PAIA and POPIA Manual for details.

## 9 AUTOMATED DECISION MAKING AND PROFILING

We do not use any purely automated processing processes to bring about a decision – including profiling – on the establishment, implementation or termination of an employment relationship.

## 10 HOW LONG WILL WE KEEP YOUR PERSONAL INFORMATION FOR?

We will keep your personal information for the purposes set out in this privacy policy and in accordance with the law and relevant regulations. We will never retain your personal information for longer than is necessary.

## 11 SECURITY

We take protecting your personal information seriously and are continuously developing our security systems and processes. Some of the controls we have in place are –

- 11.1 we limit physical access to our buildings and user access to our systems to only those that we believe are entitled to be there;
- 11.2 we use technology controls for our information systems, such as firewalls, user verification, strong data encryption, and separation of roles, systems and data;
- 11.3 systems are proactively monitored through a “detect and respond” information security function;
- 11.4 we utilise industry standards to support the maintenance of a robust information security management system; and
- 11.5 we enforce a “need to know” policy, for access to any data or systems.

## 12 CONTACT US

If you would like to exercise one of your rights as set out in the “Your Rights” section above, or you have a question or a complaint about this policy, or the way your personal information is processed, please contact our Information Officer by email on [accounts@thebrenthurstfoundation.org](mailto:accounts@thebrenthurstfoundation.org).

## 13 INFORMATION REGULATOR (SOUTH AFRICA)

The Information Regulator (South Africa) is an independent body established in terms of section 39 of POPIA. The Information Regulator is empowered to monitor and enforce compliance by public and private bodies with the provisions of the POPIA Act. They may be accessed at –

- 13.1 JD House  
27 Stiemens Street

Braamfontein  
Johannesburg, 2001

- 13.2 **Contact:** [inforeg@justice.gov.za](mailto:inforeg@justice.gov.za) or  
**Complaints:** [complaints.IR@justice.gov.za](mailto:complaints.IR@justice.gov.za)

#### 14 **POLICY REVISION**

This privacy policy is subject to review and amendment without prior notice. However, we undertake to ensure that any amendments hereto are communicated on our publicly available platforms such as our website, for the benefit of the general public, our customers, and any other persons whom may be affected by this policy.

#### 15 **VERSION CONTROL**

Last updated June 2021.