



Privacy and Personal Data Protection Policy

1. INTRODUCTION

- a. Welcome to **Corruption Watch (RF) NPC and NPO (operating as “Corruption Watch”)** (registration number **2011/118829/08**) Privacy and Data Protection Policy (“**Privacy Policy**”). Please note that Corruption Watch is a Non-Profit Organisation (with NPO number 102-843-NPO), duly registered in accordance with the laws of, and operating in, the Republic of South Africa.
- b. Corruption Watch respects your privacy and is committed to protecting your personal data. This Privacy Policy will inform you as to how we look after and process your personal data when you provide it to us or when it is collected from you, for example by virtue of you filing a report, when you contract with us, your use of our various services or when you visit our Website (regardless of where you visit it from). This Privacy Policy serves to inform you about your privacy rights and how the law protects you and your personal information when Corruption Watch processes it.
- c. Please ensure that you read all the provisions below, and our other Corruption Watch rules and policies which may apply from time to time and be made available to you, to understand all of your, and our, rights and duties. Some terms referred to below are not defined in order, or may be defined in our other applicable rules and policies.
- d. Please use the following links to jump to the relevant sections described in this Privacy Policy:

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2. IMPORTANT INFORMATION AND WHO WE ARE

a. Purpose of this Privacy Policy

- i. This Privacy Policy aims to give you information on how Corruption Watch collects and processes your or your child's/ward's personal data through any form of your engagement with Corruption Watch such as reporting allegations of corruption, using our online services, general services or Website, including any data you may provide through any of our online platforms or gateways (collectively, "**Website**") or providing to us generally, in any way whatsoever (such as when attending consultations, completing report forms, contracting with Corruption Watch, participating in surveys, participating in events or signing up for newsletters).
- ii. This Privacy Policy complies with, and facilitates the obligations required from, the European Commission's *General Data Protection Regulation, 2016/679* ("**GDPR**") as well as the South African *Protection of Personal Information Act, No. 4 of 2013* ("**POPI**"), as amended. **However, please be aware that due to the nature of some of the information you may share with us and we subsequently process – specifically relating to the existence of fraud, corruption or the perpetration of serious crimes in South Africa – our processing of your personal information is also subject to allowances and requirements provided by South African laws related to discovering, preventing, reporting and/or fighting such corruption, or suspected corruption, criminal or terrorist activities, in South Africa and elsewhere, as provided for in various additional South African statutes.**
- iii. **Due to the nature of our services as an NPC and NPO specifically focused on combating corruption and dealing with related crimes, we may process not only your personal data, but also special categories of personal data, biometric data and data concerning health, data relating to minors and sensitive information.**
- iv. It is important that you read this Privacy Policy together with any other privacy policy or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you or any minor or person in your guardianship, so that you are fully aware of how and why we are using your data. This Privacy Policy supplements the other notices and is not intended to override them.
- v. By accepting this Privacy Policy, you warrant that you have read, understood and agree to it and these terms, and expressly consent to our processing of your personal information on the conditions contained herein.
- vi. If you are a parent or guardian of a minor whose personal data we process pursuant to this Privacy Policy, you warrant that you have read, understood and agree to this Privacy Policy, and hereby expressly consent to Corruption Watch's processing of your child's/ward's personal data as per this Privacy Policy.
- vii. Users with citizenships from jurisdictions other than of South Africa/EU, please note that Corruption Watch complies with all South African/EU data protection laws when processing your personal information pursuant to the Services as we are a South African entity operating in the South African market with occasional EU data subjects. Should other foreign data protection law be applicable in any regard to your use of the Services and/or the Website in any way, including how we may process your personal information, please contact Corruption Watch at compliance@corruptionwatch.org.za who will gladly engage you on its application and your rights.

b. **Controller and Processor**

- i. Corruption Watch is the data controller and is responsible for your personal data (collectively referred to as "Corruption Watch", "we", "us" or "our" in this Privacy Policy) in instances where we decide the processing operations concerning your personal data. Sometimes we also operate as a processor of personal data on behalf of a third-party data controller, where that data controller's privacy terms will apply, but we will draw your attention to them, when applicable. The terms "user", "you" and "your" are used interchangeably in these terms and refer to all persons accessing the Website or engaging with Corruption Watch for any reason whatsoever, including your child or ward for which you are responsible and on whose behalf you accept this Privacy Policy.
- ii. We have appointed a data representative at Corruption Watch who is responsible for overseeing questions in relation to this Privacy Policy. If you have any questions about this Privacy Policy, including any requests to exercise your legal rights, please contact the representative using the details set out below.

c. **Our Contact Details**

i. Our full details are:

- | | |
|---|--|
| ▪ Full name of legal entity: | Corruption Watch (RF) NPC and NPO |
| ▪ Name or title of data representative: | Matshidiso Dibakwane |
| ▪ E-mail address: | datarep@corruptionwatch.org.za |
| ▪ Postal address: | P O Box 30630 Braamfontein 2017 |
| ▪ Telephone number: | 011 242-3900 |

- ii. You have the right to make a complaint at any time to your territory's specific South African, European Union or UK information regulator's office (such as the **Information Regulator's Office of South Africa** <http://www.justice.gov.za/infocreg/> or the **UK Information Commissioner's Office** www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach any such regulator, so please contact us in the first instance.

d. **Changes to the Privacy Policy and your Duty to Inform us of Changes**

- i. This Privacy Policy version was last updated on 21 July 2021 and historic versions are archived and can be obtained by contacting us.
- ii. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

e. **Third-Party Links on Website or otherwise**

- i. The Website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements or terms. When you leave our Website, or engage with such third parties, we encourage you to read the distinct privacy policy of every third-party you engage with.

3. THE DATA WE COLLECT ABOUT YOU

- a. Personally identifiable information ("personal data", or "personal information"), means any information about an individual, both natural and juristic entities, from which that entity can be identified. It does not include data where the identity has been removed (anonymous data).
- b. We may collect, use, store and transfer ("**process**") different kinds of personal data about you which we have grouped together as follows:

i.	Identity Data	including first name, maiden name, last name, username or similar identifier, marital status, identify or passport number, employment status, title, date of birth and gender;
ii.	Contact Data	including physical address, delivery address, email address, social media contact details and fax and telephone numbers;
iii.	Financial Data	including bank account details, third-party payment provider information and payment card details;
iv.	Transaction Data	including details about payments to and from you, contracts, contractual terms, contract fees, signups, subscriptions, invoices and other details of products and services you have obtained from us;
v.	Social Media Data	including all information accessible on your publicly available profiles such as images, photos, photo tags, videos, memes, likes, followers, groups that you belong to on social media, comments, posts and stories; trending hashtags and polls that you follow;
vi.	Technical Data	including internet protocol address/es, your login data, browser type and version, time zone setting and location, cookies, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access the Website;
vii.	Profile Data	including your Website username and password, your interests, preferences, feedback and survey responses;
viii.	Biometric Data	including personal data resulting from specific technical processing relating to the physical, physiological or behavioural characteristics of a natural person, which allow or confirm the unique identification of that natural person, such as facial images or dactyloscopic data characteristics;
ix.	Data Concerning Health	including the physical or mental health status, the details of health service providers or characteristics of a natural person;
x.	Special Categories of	including race, sexual orientation, political affiliation, trade union membership,
	Data	ethnic or cultural origin or religious affiliation;
xi.	Usage Data	including information about how you use our organisation, Website, surveys, events and services; and
xii.	Marketing and Communications Data	including your preferences in receiving notices and marketing from us and our third parties and your communication preferences.

- c. We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific Website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Policy.
- d. **We do collect Special Categories of Personal Data about you (this includes details about your race or ethnicity, criminal complaints, information about your health and genetic and biometric data), for which you hereby expressly give consent to Corruption Watch. We process Special Categories of Personal Information in accordance with South African laws requiring us to do so, and also because Corruption Watch is an organisation that requires such personal information to operate, which you understand and expressly consent to. We enforce additional special precautions regarding the safety and integrity of any Special Categories of Information provided to us.**
- e. Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or

are trying to enter into with you (for example, to provide you with services or allow your access to the Website). In this case, we may have to cancel Website access or services you have with us, but we will notify you if this is the case at the time.

4. HOW IS YOUR PERSONAL DATA COLLECTED?

- a. We use different methods to collect data from and about you including through:
 - i. **Direct interactions:** You may give us your Identity, Contact, Special Categories of Data, Biometric, Data Concerning Health and Financial Data by filling in various Corruption Watch forms, Website forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - a. consult with us;
 - b. complete report forms;
 - c. use our Website;
 - d. contact us via social media;
 - e. complete an attendance register;
 - f. contact us via SMS;
 - g. contact our hotline;
 - h. contact us via fax;
 - i. liaise with us for media purposes;
 - j. make a donation;
 - k. subscribe to our services or any publications;
 - l. provide any services to us as a service provider or independent contractor on contract with us;
 - m. request information to be sent to you;
 - n. attend any Corruption Watch event; or
 - o. give us some feedback.
 - ii. **Automated technologies or interactions:** As you interact with our Website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We may collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies.
 - iii. **Third parties or publicly available sources:** We may receive personal data about you from various third parties and public sources as set out below:
 - a. Technical Data from the following parties:
 - i. analytics such as Google Analytics, based in Ireland, Google Forms based in Ireland; Mailchimp based in the United States; Astech CRM based in South Africa;
 - ii. social networks such as Facebook based in the United States; Twitter based in the United States; LinkedIn based in the United States; Instagram based in the United States; and YouTube based in the United States;
 - iii. survey data such as Survey Monkey based in the United States; Google Forms based in Ireland;
 - iv. plug-in software and tools from Gravity Forms based in the United States; and Mailchimp based in the United States;

- v. marketing platforms such as Honey Badger Solutions based in South Africa; Daily Maverick online publication based in South Africa; BizCommunity online publication based in South Africa; and
- vi. search information providers such as Nicework CC based in South Africa; Google based in Ireland; Bing based in the United States; and various other internationally authorised operators;
- b. Investigative Data from Inoxico based in South Africa;
- c. Contact, Financial, IT and Transaction Data from providers of technical, payment and delivery services such as Mailchimp based in the United States; Paygate based in South Africa; LinkServ based in South Africa; Salesforce based in the United States; GivenGain based in Switzerland; Filepounder based in South Africa; Standard Bank based in South Africa; and Hambisana IT Services based in South Africa; and
- d. Identity, Market Research Data and Contact Data from publicly available sources such as KLA based in South Africa; Facebook based in the United States; Twitter based in the United States; LinkedIn based in the United States; Instagram based in the United States; and YouTube based in the United States.

5. HOW WE USE YOUR PERSONAL DATA

- a. We will only use your personal data when the law allows us to and for legitimate reasons, which you hereby expressly understand and consent to. Most commonly, we will use your personal data in the following circumstances:
 - i. where we need to consult with you or act on the engagement we are about to enter into or have entered into with you;
 - ii. where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests; and/or
 - iii. where we need to comply with a legal or regulatory obligation.
- b. Purposes for which we will use your personal data:
 - i. We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are, where appropriate.
 - ii. Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table on the following pages.
 - iii. **All Special Categories of Data will not be used for any marketing, nor be provided to any External Third Parties and its use will be strictly reserved for limited and necessary purposes for your participation as an engagee with Corruption Watch.**

PURPOSE / ACTIVITY	TYPE OF DATA	LAWFUL BASIS FOR PROCESSING INCLUDING BASIS OF LEGITIMATE INTEREST	SPECIFIC EXTERNAL THIRD PARTY TO WHOM THE INFORMATION IS PROVIDED (IF ANY)
To engage with you regarding the reporting of a crime	<ul style="list-style-type: none"> a) Identity b) Contact c) Financial d) Transaction e) Marketing and Communications f) Biometric g) Data Concerning Health h) Special Categories of Personal Data i) Social Media data j) Usage Data k) Technical Data 	<ul style="list-style-type: none"> a) Express consent b) Performance of a contract with you c) Necessary to comply with a legal obligation d) Necessary for our legitimate interests (to keep our records updated and to study how engagees use our services) e) Necessary for our legitimate interests (to develop our services and grow our organisation) 	<ul style="list-style-type: none"> Independent Police Investigative Directorate, Pretoria Office of the Public Protector, Pretoria SAPS Anti-Corruption Unit SAHRC, Johannesburg Health Sector Anti-Corruption Forum, Pretoria Local Government Anti-Corruption Forum Infrastructure Build Anti-Corruption Forum Special Investigating Unit, Pretoria Directorate for Priority Crime Investigations, Pretoria
To contract with you as a service provider to Corruption Watch	<ul style="list-style-type: none"> a) Identity b) Contact c) Financial d) Transaction e) Marketing and Communications f) Social Media g) Market Research Data 	<ul style="list-style-type: none"> a) Performance of a contract with you b) Necessary to comply with a legal obligation c) Necessary for our legitimate interests (to keep our records updated and to study how engagees use our services) d) Necessary for our legitimate interests (to develop our services and grow our organisation) e) Express consent 	<ul style="list-style-type: none"> Douglas and Velcich Management Chartered Accountants SA, Johannesburg South African Revenue Service, Pretoria Department of Labour, Pretoria Companies and Intellectual Property Commission, Pretoria Kapara Insurance Brokers, Sandton

<p>To process research data provided by you as a result of you opting into a research study or project</p>	<ul style="list-style-type: none"> a) Identity b) Contact c) Financial d) Transaction e) Marketing and Communications f) Social Media g) Market Research Data h) Usage i) Technical Data 	<ul style="list-style-type: none"> a) Performance of a contract with you b) Necessary to comply with a legal obligation c) Necessary for our legitimate interests (to keep our records updated and to study how engagees use our services) d) Necessary for our legitimate interests (to develop our services and grow our organisation) e) Express consent 	<p>National Business Initiative, Sandton</p> <p>Human Sciences Research Council, Pretoria</p> <p>Overseas Development Institute, London, United Kingdom</p> <p>Transparency International Secretariat, Berlin, Germany</p>
<p>To allow you to use the Website, or register you as a new Website user or participant in any Corruption Watch event</p>	<ul style="list-style-type: none"> a) Identity b) Contact c) Usage d) Marketing and Communications e) Technical Data 	<ul style="list-style-type: none"> a) Performance of a contract with you b) Express consent c) Necessary for our legitimate interests (to keep our records updated and to study how engagees use our services) d) Necessary for our legitimate interests (to develop our services and grow our organisation) 	<p>WordPress, San Francisco</p> <p>Google Forms, Ireland</p> <p>WebinarJam, San Diego</p>
<p>To process and service your payment for any services rendered to Corruption Watch</p> <p>To manage payments, fees, donations and charges</p>	<ul style="list-style-type: none"> a) Identity b) Contact c) Financial d) Transaction e) Marketing and Communications f) Usage g) Technical Data 	<ul style="list-style-type: none"> a) Performance of a contract with you b) Necessary for our legitimate interests (to make or receive necessary organisation payments) c) Express consent 	<p>Cloudsmith, Johannesburg</p> <p>Salesforce, San Francisco</p> <p>Linkserv, Durban</p> <p>Filepounder, Johannesburg</p> <p>Paygate, Johannesburg</p> <p>Facebook, Menlo Park</p> <p>Donors</p>

<p>To manage our relationship with you which may include notifying you about changes to our terms or Privacy Policy or services</p>	<ul style="list-style-type: none"> a) Identity b) Contact c) Profile d) Marketing and Communications e) Social Media 	<ul style="list-style-type: none"> a) Performance of a contract with you b) Necessary to comply with a legal obligation c) Necessary for our legitimate interests (to keep our records updated and to study how engagees use our services) d) Express consent 	<p>WordPress, San Francisco</p> <p>MailChimp, Atlanta</p> <p>Facebook, Menlo Park</p> <p>Twitter, San Francisco</p>
<p>To enable you to partake in a Corruption Watch event or complete a survey or project</p>	<ul style="list-style-type: none"> a) Identity b) Contact c) Profile d) Usage e) Marketing and Communications f) Technical Data g) Social Media 	<ul style="list-style-type: none"> a) Performance of a contract with you b) Necessary for our legitimate interests (to study how engagees use our services, to develop them and grow our organisation) c) Express consent 	<p>GivenGain, Villars-sur-Ollon</p> <p>Alliance for Rural Democracy, Johannesburg</p> <p>Pandor Consulting, Sandton</p> <p>Independent Consultant, Mr. Allan Chaumba, Cape Town,</p> <p>Tshikululu Social Investments, Johannesburg</p> <p>Anglo American, London</p> <p>Transparency International Australia, Melbourne</p>
<p>To administer and protect our organisation and this Website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<ul style="list-style-type: none"> a) Identity b) Contact c) Technical d) Usage e) Profile 	<ul style="list-style-type: none"> a) Necessary for our legitimate interests (for running our organisation, provision of administration and IT services, network security, to prevent fraud and in the context of an organisation restructuring exercise) b) Necessary to comply with a legal obligation c) Express consent 	<p>NiceWork, Johannesburg</p> <p>Cloudsmith, Johannesburg</p> <p>Salesforce, Johannesburg</p>

<p>To market our own services to other organisations or External Third Parties</p>	<ul style="list-style-type: none"> a) Identity b) Contact c) Profile d) Marketing and Communications e) Social Media 	<ul style="list-style-type: none"> a) Necessary for our legitimate interests (for running our organisation, provision of services and marketing) b) Express consent 	<p>SABC, Johannesburg</p> <p>Facebook, Menlo Park</p> <p>Google, Mountain View</p> <p>Twitter, San Francisco</p> <p>Media in general, All / national</p> <p>News 24, Johannesburg</p> <p>TimesLive, Johannesburg</p> <p>BDLive, Johannesburg</p> <p>Daily Maverick, Johannesburg</p> <p>ENCA, Johannesburg</p> <p>IOL, Johannesburg</p> <p>Mail&Guardian, Johannesburg</p>
<p>To deliver relevant Website and social media content and services to you and measure or understand the effectiveness of the information we serve to you</p>	<ul style="list-style-type: none"> a) Identity b) Contact c) Profile d) Usage e) Marketing and Communications f) Technical g) Social Media 	<ul style="list-style-type: none"> a) Necessary for our legitimate interests (to study how engagees use our services, to develop them, to grow our organisation and to inform our marketing strategy) b) Express consent 	<p>MailChimp, Atlanta</p>
<p>To use data analytics to improve our Website, Social Media, services, engagee relationships and experiences</p>	<ul style="list-style-type: none"> a) Technical b) Usage c) Profile d) Identity e) Social Media 	<ul style="list-style-type: none"> a) Necessary for our legitimate interests (to define types of engagees for our services, to keep our Website and Social Media updated and relevant, to develop our organisation and to inform our marketing strategy) b) Express consent 	<p>Google Analytics, Ireland</p>

To make suggestions and recommendations to you about events or services that may be of interest to you	<ul style="list-style-type: none"> a) Identity b) Contact Technical c) Usage d) Profile e) Marketing and Communications f) Social Media 	<ul style="list-style-type: none"> a) Necessary for our legitimate interests (to develop our services and grow our organisation) b) Express consent 	MailChimp, Atlanta
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c. Marketing

- i. We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. To manifest your rights attached to any marketing sent to you, please use the in-built prompts provided on those communications, or contact us.
 You will receive marketing communications from us if you are an existing data subject of ours, such as having requested information from us, having participated in any Corruption Watch service or event, or if you provided us with your details when registering for a workshop and, in each case, you have not opted-out of receiving that marketing.
 You can opt-out of such marketing at any time with us by unsubscribing to the newsletter using the link provided therein, or by contacting us.

d. Promotional services from us

- i. We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which events, services and offers may be relevant for you (we call this marketing).

e. Third-Party Marketing

- i. By providing your express acceptance to this Policy, you are expressly consenting to us sharing your personal information with entities within the Corruption Watch or its affiliates, for the purposes of marketing, but which sharing and marketing processing shall be subject to the limits and conditions of this Policy.
 We will never provide your data to external third party companies for marketing purposes, until we obtain additional express consent from you to do so.

f. Opting Out

- i. You can ask us or third parties to stop sending you marketing messages at any time by logging into the Website and checking or unchecking relevant boxes to adjust your marketing preferences or by following the opt-out links on any marketing message sent to you, or by contacting us at any time.
- ii. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of your use of the Website, our services, or your participation in any Corruption Watch event.

g. Change of Purpose

- i. We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with

the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

- ii. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.
- iii. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

6. DISCLOSURES OF YOUR PERSONAL DATA

- a. We may have to share your personal data with the parties set out below for the purposes set out in the table above.
 - i. Internal Third Parties as set out in the [Glossary](#);
 - ii. External Third Parties as set out in the [Glossary](#);
 - iii. Specific third parties listed in the table above;
and/or
 - iv. Third parties to whom we may choose to sell, transfer, or merge parts of our organisation or our assets. Alternatively, we may seek to acquire other organisations or merge with them. If a change happens to our organisation, then the new owners may use your personal data in the same way as set out in this Privacy Policy.
- b. We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions and standards.

7. INTERNATIONAL TRANSFERS

- a. We share your personal data within Corruption Watch and its parent organisation, and this may involve transferring and processing your data outside of South Africa.
- b. Whenever we transfer your personal data out of the country, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:
 - i. We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
 - ii. Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.
 - iii. Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the US.
- c. Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of South Africa.

8. DATA SECURITY

- a. We have put in place appropriate security measures to prevent your personal data from being lost, used or accessed in an unauthorised way, altered or disclosed by using industry- standard security

including but not limited to: firewalls, antivirus, encryption, regular backups and secure network access. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a legitimate need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

- b. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

9. DATA RETENTION

We use Google Analytics (GA) for aggregated, anonymised website traffic analysis. In order to track your session usage, Google drops a cookie (_ga) with a randomly-generated ClientID in your browser. This ID is anonymised and contains no identifiable information like email, phone number, name, etc. We also send Google your IP Address. We use GA to track aggregated website behaviour, such as what pages you looked at, for how long, and so on. This information is important to us for improving the user experience and determining site effectiveness. If you would like to access what browsing information we have - or ask us to delete any GA data - please delete your _ga cookies, reach out to us via our contact channels, and/or install the Google Analytics Opt-Out Browser Add-On: (<https://tools.google.com/dlpage/gaoptout>).

- a. We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.
- b. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.
- c. Details of retention periods for different aspects of your personal data are available from us by contacting us.
- d. In some circumstances you can ask us to delete your data; see below for further information.
- e. In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

Express Cookies provision

- a. The Website may make use of “cookies” to automatically collect information and data through the standard operation of the Internet servers. “Cookies” are small text files a website can use (and which we may use) to recognise repeat users, facilitate the user’s on-going access to and use of a website and allow a website to track usage behaviour and compile aggregate data that will allow the Website operator to improve the functionality of the Website and its content, and to display more focused advertising to a user by way of third-party tools.
- b. The type of information collected by cookies is not used to personally identify you. If you do not want information collected through the use of cookies, there is a simple procedure in most browsers that allows you to deny or accept the cookie feature. Please note that cookies may be necessary to provide you with certain features available on our Website, and thus if you disable the cookies on your browser you may not be able to use those features, and your access to our Website will therefore be limited. If you do not disable “cookies”, you are deemed to consent to our use of any personal information collected using those cookies, subject to the provisions of this Policy and our other policies or terms.

10. YOUR LEGAL RIGHTS

- a. Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please contact us to find out more about, or manifest, these rights:
 - i. request access to your personal data;
 - ii. request correction of your personal data;
 - iii. request erasure of your personal data;
 - iv. object to the processing of your personal data;
 - v. request a restriction of processing your personal data;
 - vi. request transfer of your personal data; and/or
 - vii. right to withdraw consent.
- b. **No fee usually required**
 - i. You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.
- c. **What we may need from you**
 - i. We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data 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.
- d. **Time limit to respond**
 - i. We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

11. GLOSSARY

a. **LAWFUL BASIS**

- i. **Legitimate Interest** means the interest of our organisation in conducting and managing our organisation to enable us to give you the best service and the most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.
- ii. **Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
- iii. **Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.
- iv. **Express consent** means the confirmed express consent you have provided to our processing of your personal data by accepting this Privacy Policy.

b. **THIRD PARTIES**

- i. **Internal Third Parties** means other parties who operate within Corruption Watch, acting as joint controllers or processors, such as employees or independent contractors, and who are based in South Africa and provide IT and system administration services and undertake reporting. ii. **External Third Parties** means:
 - a. service providers acting as processors based in South Africa who provide IT and system administration services;
 - b. South African or other national governments and/or their respective authorities pursuant to our adherence with anti-corruption and crime-fighting legislation;
 - c. professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in South Africa who provide consultancy, banking, legal, insurance and accounting services as required; and/or
 - d. European Union regulators and other authorities acting as processors or joint controllers based in the United Kingdom or European Union who may require reporting of processing activities in certain circumstances.

c. **YOUR LEGAL RIGHTS**

- i. You have the right to:
 - a. **Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
 - b. **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
 - c. **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no valid reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. **Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be communicated to you, if applicable, at the time of your request.**
 - d. **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your

fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

- e. **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - i. if you want us to establish the data's accuracy;
 - ii. where our use of the data is unlawful but you do not want us to erase it;
 - iii. where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
 - iv. you have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.
- f. **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform on a contract with you.
- g. **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain Website access or services to you. We will advise you if this is the case at the time you withdraw your consent. **Please take note that regardless of your right to withdraw consent under the GDPR and POPI, other South African legislation applies and may require that we continue to process your data in order to comply with anticorruption and crime-fighting legislation, which you expressly understand and agree to.**