



Privacy Policy

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1. INTRODUCTION

- 1.1 This is the privacy policy of Seriti Institute (hereafter “Seriti”), a non-profit organisation with Registration Number:078-483-NPO. This policy sets out how Seriti obtains, uses and discloses information, following the requirements of the Protection of Personal Information Act No. 4 of 2013 (hereafter “the Act”).
- 1.2 Seriti is committed to protecting the privacy of its data subjects and ensuring that all information is used reasonably, securely and in a manner that is relevant to our business activities and in accordance with applicable laws. In adopting this Privacy Policy, we wish to balance our legitimate interests and your reasonable expectation of privacy.
- 1.3 This policy applies to all Seriti’s dealings with both natural and juristic persons, in the course of Seriti’s work in helping communities and social partners reach their goals by delivering innovative and comprehensive solutions to enhance their social impact.

Website:	http://www.seriti.org.za
Telephone number:	011 262 7700 / 082 907 5997
Facebook:	https://facebook.com/SeritiInstitute/
Twitter:	https://twitter.com/SeritiInstitute/
LinkedIn:	https://www.linkedin.com/company/seriti-institute/

2. ABOUT SERITI INSTITUTE

Seriti Institute is a development facilitation agency that helps communities and social partners reach their goals by delivering innovative, sustainable, and comprehensive solutions to enhance socioeconomic impact. It does this by providing technical support, programme/project management and implementation, facilitated learning and promoting civic-driven change and accountability.

3. DEFINITIONS

Cookies	A small text file (up to 4KB) is created by a website that is stored in the user's computer either temporarily for that session only or permanently on the hard disk (persistent cookie). Cookies provide a way for the website to recognize you and keep track of your preferences
Data Subject	The person to whom Personal Information relates – e.g., information attained from donors, programmes, projects, beneficiaries, implementors, employees of Seriti and service providers.
Consent	Any voluntary, specific and informed expression of will in terms of which permission is given for the processing of personal information.

Operator	An operator is a person who processes personal information for a responsible party in terms of a contract or mandate.
Personal information	Information related to an identifiable, living, natural person and, where applicable, an identifiable, existing juristic person.
Processing	Any activity, automated or manual, concerning personal information. Such activity may include, but is not limited to, collection, receipt, recording, organisation, storage, collation, retrieval, alteration, updating, distribution, dissemination by means of transmission, erasure, or destruction of personal information.
Seriti Programmes	Without limitation, these include programme and project management, project implementation, Seriti Partner, Facilitated Learning Events, Civic Driven Change and Advocacy.
Special personal information	This is very sensitive personal information that requires stringent protection. Special personal information includes, but is not limited to, religious beliefs, political affiliations, race and ethnic origin, health, sex life and biometric information.
Third parties	A person or group with whom personal information may be shared for further processing.

4. SERITI'S ETHICAL BUSINESS CONDUCT

Seriti strives to maintain a high standard of integrity in all its operations and business relationships, both inside and outside Seriti, this relates to our dealings with employees, associates, potential employees, partners, beneficiaries, and service providers. By doing so, we enhance Seriti's position as an employer of choice, a partner of choice and an organisation of choice within a highly competitive marketplace. Our objective is to sustain and fulfil expectations by:

- Being open, fair, and transparent in our business relationships with outside parties.
- Honouring the commitments that we make to partners, and clients.
- Promoting candid two-way communications to ensure that each party's agenda and perspectives are well understood; and
- Seeking to resolve issues and disagreements constructively.

5. COLLECTION OF PERSONAL INFORMATION

- 5.1. Seriti collects and receives large volumes of personal information directly and indirectly from the data subjects through various source documents not limited to the following: application forms, webinars, training or workshops, attendance registers, agreements, contracts and public sources.
- 5.2. Information is collected by Seriti Institute in the following manner:

- ❖ directly from the data subject, from beneficiaries, funders, donors, employees, associates, board members or another duly authorised representative who may seek or request Seriti’s services.
 - ❖ from juristic entities i.e., social partners, implementors of Seriti programmes in various provinces, training providers, or other service providers that are providing or provided Seriti with services.
 - ❖ from Seriti’s own records relating to its previous supply of services or responses to the data subject’s request for services; and/or from a relevant public or equivalent entity.
- 5.3. The type of information we collect will depend on the need for which it is collected and will be processed for that purpose only. Seriti Institute collects the following information:
- ❖ **Identity Information** – this includes information concerning your name, title, date of birth, gender, race, copies of your identity documents and identity number, driver’s license number in the case of staff members and associates, qualifications, immediate family details for pension plans and emergencies, contact details and health information of visitors for Covid-19 symptom checking.
 - ❖ **Contact Information** - may include residential or postal addresses, e-mail addresses and telephone numbers, next of kin contact details, and other HR purposes as well as company secretarial information that has been disclosed.
 - ❖ **Financial Information** - which includes tax or payroll information for internal stakeholders, banking details, salary information and pension information for the administration of our employee pension fund and transactions of payments made to service providers or received from donors and funders.
 - ❖ **Technical Information** – may include profile information notwithstanding passwords and usernames for staff accessing internal databases and this may include communication on our social media platforms.
 - ❖ **Website** – usage of information may include access to and use of the Seriti website: www.seriti.org.za, feedback forms, site comments, and cookies to optimise the user’s experience.
 - ❖ **Marketing and Communications Information** - includes your preferences in respect of receiving marketing information from Seriti and or our third parties and your communication preferences.
- 5.4. In accordance with Sections 34 and 35 of the Act, Seriti does not process personal information concerning any child unless Seriti has obtained prior consent from the parent and/or guardian.

6. USE AND / DISCLOSE AND DISTRIBUTION OF PERSONAL INFORMATION

- 6.1. Seriti will only use a data subject’s personal information for business purposes and in a manner that is consistent with the purpose for which consent has been given unless Seriti reasonably considers that it is necessary to process it for another purpose that is compatible with the original purpose.
- 6.2. In the case of personal information being collected indirectly or distributed to third parties and or donors, it will be used in line with the purpose for which the information was collected. No personal information will be distributed to third parties unless prior written consent or approval has been given by the data subject.

- 6.3. Seriti may also identify the personal information and use it for research, surveys, reporting to donors, funders, and communication to improve Seriti's service offering.

7. RETENTION AND RESTRICTIONS

- 7.1. In accordance with Section 14 of the Act, Seriti will only retain personal information for as long as needed to carry out the purposes for which it was collected. Where the law requires Seriti to keep personal information post its use for a specified period, all personal information will be kept securely in Seriti's internal databases for the duration specified by law.
- 7.2. Seriti will afford the data subject a reasonable opportunity, taking all considerations relating to the use of the personal information into account, to request access to the record.
- 7.3. Records may also be retained if retention is required by a contract between the donors/parties, or the data subject has consented to the retention of the record.

8. INFORMATION QUALITY

- 8.1. In accordance with Section 16 of the Act in terms of information quality, Seriti will take reasonably practicable steps to ensure that the personal information is complete, accurate, not misleading and updated where necessary.
- 8.2. The use and/or processing of personal information will also be limited to the purpose which will be stipulated upon collection and the purpose for which written consent has been granted. Therefore, Seriti may not process a data subject's personal information in any other manner other than that for which written consent has been given unless required by law.
- 8.3. Data subjects may be prompted periodically by a Seriti representative to update the personal information that Seriti holds. Failure to reply to the prompts to update personal information will result in the assumption that all information that is on Seriti's systems is accurate.

9. OPENNESS AND RIGHTS OF DATA SUBJECTS

- 9.1. Seriti will not collect or process personal information without the prior written consent of the data subject. The persons to whom disclosure may be made will be specified in the consent form. Should Seriti deviate from the initial written consent, additional written consent will be sought for further processing.
- 9.2. Consent is normally sought explicitly or implication, actions and behaviour that may amount to consent. This includes signing an agreement or ticking a tick box on an application form or taking pictures during Seriti's implementation of projects.
- 9.3. Data subjects have the right to:
 - ❖ Data subjects have the right to be informed whether Seriti holds their personal information and to view any personal information Seriti may hold. Furthermore, data subjects have the right to be informed as to how that information was collected and to whom their personal information has been disclosed.
 - ❖ Data subjects have the right to ask Seriti to update, amend or delete their personal information on reasonable grounds. Seriti relies largely on data subjects to ensure that their personal information is sure and correct.

- ❖ Withdraw or revoke their consent at any time. The withdrawal of consent must be communicated to the Information Officer in writing within the reasonable notice timeframe.
- ❖ Should the withdrawal of consent result in the interference of legal obligations, then the withdrawal will only be effective if Seriti agrees to the same in writing.
- ❖ Seriti will inform the data subject of the consequences of the withdrawal where it will result in Seriti being unable to provide the requested information and/or services and/or financial or other benefits.
- ❖ The withdrawal of consent is not retrospective and will not affect disclosures of personal information that have already been made.

10. SAFEGUARDS, SECURITY, AND INCIDENT MANAGEMENT

- 10.1. Seriti has implemented and continues to implement security safeguards so that all personal information that is held by Seriti remains strictly confidential and protected against loss or theft, unauthorised access, disclosure and use.
- 10.2. All information collected, storage and processing practices, including physical security will be occasionally reviewed, to ensure that we keep abreast of good practice. Despite the above measures being taken when Processing Personal Information, Seriti will not guarantee that your Personal Information is 100% secure.
- 10.3. In terms of Section 21 of the Act, Seriti endeavours to notify the responsible party immediately where there are reasonable grounds to believe that the personal information of a data subject has been accessed or acquired by any unauthorized person.
- 10.4. Anyone processing personal information on behalf of Seriti must—
- process such information only with the knowledge or authorization of Seriti; and
 - treat the personal information which comes to their knowledge as confidential and must not disclose it;
 - unless required by law or during the proper performance of their duties.
- 10.5. Seriti has a few policies and procedures in place that detail the protocols around security breaches, disaster recovery and incident management. These include the IT Policy and the Seriti Policies and Procedure all of which are available to the public on request.

11. QUERIES AND OBJECTIONS

All questions and queries relating to personal information must be directed to Seriti’s Information Officer with the following details:

Postal Address	P O Box 1265, Kelvin, 2054
Address	Building 2, Jacaranda Place, Western Woods Office Park, 145 Western Service Road, Woodmead, 2191

Telephone number	011 262 7700
Information Officer	Ms. Juanita Pardesi
Email Address	info@seriti.org.za

12. AMENDMENTS TO THIS POLICY

This document may be reviewed and amended at any time. All amended terms shall be effective automatically and immediately upon the posting of the revised Agreement on our website.

13. APPROVAL OF POLICY

This Policy was approved by the Seriti Board of Directors on 10 December 2021.