



**SCOUTS**<sup>®</sup>  
South Africa

# SCOUTS South Africa Privacy Notice

Revision Date: 1 July 2022/v1

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## **Executive Summary**

The Protection of Personal Information Act, 4 of 2013 ("POPIA") became effective on 1 July 2021. POPIA regulates the processing of personal information of persons, whether natural or juristic persons. The aim of POPIA is to protect the right to privacy, including the protection of information and how personal information is to be collected, stored, and managed.

Protecting your privacy is important to us. For us, it is more than just making sure we comply with the relevant legislation; you trust us with your personal information and we respect that trust. This Privacy Notice explains why and how we collect, process, use and store your personal information.

We request personal information when you or your child joins as a member. If you do not want us to process your personal information at all then it will not be possible to be a member of SSA. Where possible we use the minimum amount of personal information that we need to achieve the purpose. Sometimes we ask for additional personal information which is optional (i.e. we would like you to share it with us, but you do not have to).

This Privacy Notice sets out the various forms that are used within scouting as well as the retention of these records (see section 7). Apart from POPIA, other legislation also applies to the processing and retention of your personal information. For instance, the Children's Act 38 of 2005.

To ensure the records are securely stored and the child safety is paramount, personal information is shared with 3<sup>rd</sup> parties who are under an obligation to protect your personal information. We will not sell your information.

When using the online shop and various SSA websites we collect some personal information (see sections 12-14).

If you are an adult member of SSA then you may need to collect and process personal information on our behalf which makes you an agent or 'Operator' of SSA. This Privacy Notice sets out what you should do and how to ensure you are keeping data secure in your care. It is important that you follow these guidelines.

You have the right to request what personal information we have about you or your child, by following the procedure set-out in this Privacy Notice.

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## 1. Introduction

The Protection of Personal Information Act, 4 of 2013 ("POPIA") became effective on 1 July 2021. POPIA regulates the processing of personal information of persons, whether natural or juristic persons.

The aim of POPIA is to protect the right to privacy, including the protection of personal information and how personal information is to be collected, stored, and managed (or 'Processed').

POPIA created an Information Regulator that checks that organisations like SCOUTS South Africa (SSA) manage personal information in a responsible manner that respects your privacy.

This privacy notice explains why and how we collect, process, use and store your personal information. If you have any questions please contact the Information Officer for SSA.

## 2. Our Organisation

SSA is governed by a Constitution as an independent, non-political, non-Governmental, non-profit and educational movement for boys, girls and adults open to all without distinction of origin, race, creed, sexual orientation or gender identity in accordance with the purpose, principles and method of the World Organisation of the Scout Movement conceived by the Founder Robert Baden-Powell and stated in the Constitution.

SCOUTS South Africa (SSA) NPO is an association governed by a [constitution](#)

Board members: Can be found [here](#)

Management: Can be found [here](#)

Head Office contact details:

Postal address: SSA National Office, 124 Belvedere Road, Claremont, 7700

Physical address: SSA National Office, 124 Belvedere Road, Claremont, 7700

E-mail address: [popia@scouts.org.za](mailto:popia@scouts.org.za)

Telephone number: 068 069 9463

Internet site address: <https://scouts.org.za>

Contact details of regional offices can be found [here](#)

Name of Information Officer: Mariska de Beer

Role: CEO

Postal address: SSA National Office, 124 Belvedere Road, Claremont, 7700

Physical address: SSA National Office, 124 Belvedere Road, Claremont, 7700

E-mail address: [popia@scouts.org.za](mailto:popia@scouts.org.za)

Telephone number: 068 069 9463

### **3. What is this notice about?**

In your day-to-day dealings with SSA we obtain personal information about you. We want you to know exactly what that personal information is and what we do with it.

### **4. Other legislation that applies to your personal information**

Apart from POPIA, other legislation also applies to the processing and retention of your personal information. For instance, the Children's Act 38 of 2005. This means that from time to time we will be obliged to process your personal information in a certain way (or keep it for a certain period) to comply with our legal obligations under those acts.

### **5. This notice may change from time to time**

From time to time, we may amend this notice to accommodate changes in our business or services or if the legal requirements change.

### **6. The processing of your personal information**

When you personally, or on behalf of your child, apply to become a member of SSA, we collect, through various forms and processes, personal information necessary to help us give you and/or your child as safe a journey, as possible. We need to safeguard the children in our care and we want to ensure you receive the necessary training to help us do this.

If you do not want us to process your personal information at all then it will not be possible to be a member of SSA. Where possible we use the minimum amount of personal information that we need to achieve the purpose. Sometimes we ask for additional personal information which is optional (i.e. we would like you to share it with us, but you do not have to).

We use various means of collecting and processing personal information over your personal information life cycle as a member of SSA.

#### **6.1. Adult Member Application form**

There are separate application forms for adults and youth members. We do request the following compulsory information: Name, Surname, ID number, Address, Contact information, Gender. If you do not agree to share compulsory information with us, then you will not be able to become a Member.

We further collect the following optional information:

- Medical conditions: Members meet regularly, often on a weekly basis and take part in numerous activities. If an incident occurs that may require medical attention, you are likely to get better medical care if you tell us of any pre-existing medical conditions that you have as well as your medical aid details.
- Religion: The Scout programme has a spiritual aspect; we would like to respect your religious belief in activities that may include spiritual components as well as ensure you do not consume food that is not permitted under your religion.

- Ethnicity and Gender: We are a NPO and therefore need to do fundraising to deliver the best programme. To be able to fundraise we need to give sponsors statistics of our membership ethnicity and gender. We do not provide specific details of ethnicity and gender to our sponsors and so this information is de-identified when provided to them.
- Photographs and videos of members participating in event: These are used to promote scouting and to get funding from sponsors.

Use of photographs and images:

SSA has a legitimate interest to take and use photographs at Scout Group meetings and large public events and it is not possible to ask for consent. Photographs that include 2 or more people in a public place will be considered to be 'public' photographs. Unless you have already provided your consent in the Member Application form, we will ask for your verbal consent if: the photograph is of only you or it contains special personal information (like information about your health but excluding facial recognition).

You will be asked to confirm that you will adhere to the Constitution, Organisation Rules and Policies of SSA – as set out in the Adult Member Application form.

The hard copy Application forms for adults will be held for a maximum of six months, by which time the data will be captured on the Membership Management System (MMS), currently Scouts.Digital. The form will then be destroyed.

Where possible, the consent section of the application form will be scanned and uploaded on the MMS and the hard copy destroyed, otherwise it will be kept in storage at a safe document storage facility.

The information captured on the MMS will be archived once a member leaves the Movement – this will be done on an annual basis. The hard copy consent forms will be kept in storage and on an annual basis destroyed for all members that we have been notified of that passed away that year.

A record of the name, surname and Scout Group associated with an individual will be kept indefinitely for historical records. Details of Rovers who achieve the BP award and the details of the merit and meritorious Awards achieved by Adults will be kept indefinitely, for historical purposes.

When an adult's personal information is uploaded on the MMS, the ID document of the individual must be uploaded on to the MMS. This triggers the population of a Form 29, in terms of the Children's Act 38 of 2005, which, with the ID, is automatically emailed to a dedicated email address that is only received by SSA staff who require access to fulfill their duties. The ID is deleted from the MMS at the end of the day in which it is sent to the CEO. The Form 29, with a copy if the ID is sent, by the CEO or her specifically designated agent, to the Department of Social Development for them to do a check against the Sexual Offenders database of the Department of Justice. The Department of Social

Development replies with a letter to the CEO with a list of names and ID numbers of all applications stating if the record is clear or not. This information is captured on the MMS. As soon as an answer is received from the Department of Social Development, the original email is deleted.

Within six months of applying for membership a Criminal Clearance Certificate/Police Clearance needs to be sent by the adults to [policeclearance@scouts.org.za](mailto:policeclearance@scouts.org.za). Access to this mailbox is only provided to SSA staff who require access to fulfill their duties. The date of the Criminal Clearance verification is captured on the MMS within 30 days of receipt. The consent form and copy of ID and outcome of the Criminal Clearance verification - if this was done by SSA - is kept in safe storage facility for five years.

## **6.2. Youth Application form**

There are separate application forms for adults and youth members. We do request the following compulsory information: Name, Surname, ID number, Address, Contact information, Gender. If you do not agree to share compulsory information with us, then your child/ward will not be able to become a Member.

We further collect the following optional information:

- Medical conditions: Members meet regularly, often on a weekly basis and take part in numerous activities. If an incident occurs that may require medical attention, we will understand your conditions or special circumstances.
- Medical aid information for youth: If we do need to take the youth member to a doctor or hospital, we will have the information at hand.
- Religion: The Scout programme has a spiritual aspect; we would like to respect your religious belief in activities that may include spiritual components as well as ensure you do not consume food that is not permitted under your religion.
- Ethnicity and Gender: We are a NPO and therefore need to do fundraising to deliver the best programme. To be able to fundraise we need to give other organisations statistics of our membership ethnicity and gender.
- Photographs and videos of members participating in events: These are used to promote scouting and to get funding from sponsors.

Use of photographs and images:

Scouts has a legitimate interest to take and use photographs at Scout Group meetings and large public events and will not ask for consent. Photographs that include 2 or more people in a public place will be considered to be 'public' photographs. Unless you have already provided your consent in the Member Application form, we will ask for your verbal consent if: the photograph is of only you or it contains special personal information (like information about your health but excluding facial recognition).

You will be asked to confirm that you have read the Child Protection Policy and the Safe Scouting Policy.

The parents or guardians of Youth members, will fill in an application form each time the youth member moves from one branch to another (when they start Meerkats, Cubs or Scouts). Where possible the Youth member application form will be captured on the MMS and the hard copy destroyed within six months. Where this is not possible, it will be kept in storage at a safe document storage facility. The same applies for the consent section of the Application form.

The Records of a youth member (under the age of 18) that does not become an adult member will be kept until the youth reaches the age of 21.

A record of the name, surname and Scout Group associated with an individual will be kept indefinitely for historical records. If the Cub achieved Leaping Wolf and the Scout achieved Springbok, the record of the name, surname, date and Scout Group name will be kept for historical purposes.

### **6.3. Youth taking part in activities off site**

If activities are taking place away from the normal meeting place (as stipulated in the SSA Safe Scouting Policy), a **Parent Consent for Activities form** need to be signed.

We do request the following compulsory information: Name, Surname, MMS Membership number, Address, Contact information, Gender. If you do not agree to share compulsory information with us, then you or your child will not be able to take part in the activity. Gender is required so that the ablution and sleeping arrangements can be considered to enable the activity to align with our Safe Scouting Policy.

We further collect the following optional information:

- Medical conditions: If an incident occurs that may require medical attention, we will understand your conditions or special circumstances.
- Medical aid information: If we do need to take the youth member to a doctor or hospital, we will have the information at hand.
- Religion: The Scout programme has a spiritual aspect, we would like to respect your religious belief in activities that may include spiritual components as well as ensure you do not consume food that is not permitted under your religion.

You will be asked to give consent for your child/ward to take part in the activities. Without this consent the youth member may not take part in the activity.

These forms will be kept for a period of six months after the activity by the activity organiser.

Use of photographs and images:

Scouts has a legitimate interest to take and use photographs at large public events and will not ask for consent. Photographs that include 2 or more people in a public place will be considered to be 'public' photographs. Unless you have already provided your consent (see below) we will ask for your verbal consent if: the photograph is of only you or it



contains special personal information (like information about your health but excluding facial recognition).

#### 6.4. Other forms and record keeping

Name	Personal Information	Retention
Advancement records for Youth (under the age of 18 years)	<p>As a youth member progresses through the Advancement programme for Meerkats, Cubs and Scouts, the requirements achieved and the badges earned will be recorded, either on the MMS system, in a file, or on a chart.</p> <p>As progression is part of the youth programme, it cannot be destroyed whilst the youth is a member.</p>	<p>This information will be kept <b>until a youth turns 21</b>. If the Youth joins as an adult the record of the highest advancement badge achieved will be kept on record with the other adult records.</p>
Adult Role applications (RALA1)	<p>To apply to fulfil a role with in SSA, the Adult member needs to fill in a Role Application form (RALA1).</p> <p>We do request the following compulsory information: Name, Surname, MMS Membership number, Contact information, training completed in SSA.</p> <p>Optional information requested is:</p> <ul style="list-style-type: none"> <li>• Scouting or work-related experience related to the role; and</li> <li>• Motivation for what makes you the right person for the role.</li> </ul> <p>Depending on the role applied for, you may be asked for references prior to an interview.</p>	<p>The RALA1 form (and if references were contacted, that information as well) will be <b>destroyed six months</b> after your successful appointment in the role and you have received the Warrant or Appointment.</p> <p>If you were not successful in the application of the role, the RALA1 will be <b>destroyed within three months</b> after the appointment process has been completed.</p>
Application for Warrant (RALA2)	<p>This form is used for the processing of the Warrant/Appointment of an adult leader.</p> <p>We do request the following compulsory information: Name, Surname, MMS Membership number, Date of Birth, role to be appointed as in SSA.</p>	<p>The RALA2 form will be kept for <b>five years</b> from the date of appointment.</p>

Name	Personal Information	Retention
	This form will also be used for a renewal of warrant. Your Full name and Surname will be on the form. You will be required to agree to abide by the rules and policies of the organisation and sign the form.	
Nomination for a role	A member may nominate another member for a role advertised in the Movement. The following personal information of the nominator and nominee is captured in the form: Surname, First Name, Gender, Contact numbers, current position in Scouting and Group name. A motivation is requested from the nominator.	This form will be kept for <b>3 months</b> after the appointment has been made.
Exit interview form	The Exit interview form is used to gather valuable insight into why members leave and enable us to better the movement. This form is optional to fill in. The following personal information is gathered: Full names and surname, date of birth, age, Scout Group, length of service, training completed and reason for exit. Specific details are asked on their experience.	The form will be kept for <b>6 months</b> to enable the Adult Support team to summarise the responses received over the time period. The personal information will be removed from the summary.
Moments that Matter	Moments that Matter is an informal assessment review process between the adult leader and their next-in-line adult leader.	The adult leader and next-in-line Adult leader should keep the form for <b>one year</b> from the creation of the document until such time that the next review process starts. The next-in-line adult leader will keep the form in a locked cabinet or secure hard drive.
Request for Cancellation of a Warrant	This form is used to request cancellation of your Warrant. The following personal information is on the form: Full names and Surname, Date of Birth, ID number, Known as, Group name and a motivation for the cancellation request.	The form will be kept for <b>12 months after cancellation date</b> . The responsible party will keep the

Name	Personal Information	Retention
		form in a locked cabinet or secure hard drive.
Request for Suspension of a Warrant	This form is used to apply for suspension of your Warrant. The following personal information is on the form: Full names and Surname, Date of Birth, ID number, Known as, Group name and a motivation for the suspension request.	The form will be kept for <b>12 months after expiry of the suspension</b> . The responsible party will keep the form in a locked cabinet or secure hard drive.
Adult Member Transfer Form	This form is used when an adult leader moves from one Group or Region to another. Personal information that is required is: Full name and surname, sex, Date of Birth, Contact number, email address, physical address, position held in Group, history of training completed and involvement of parents in Scouting.	Once the transfer is captured on the MMS the form is destroyed. If you are not yet registered on the MMS, the form will be kept in a locked cabinet or secure hard drive for <b>six months</b> during which time you will be registered.
Youth and Rover Member Transfer form	This form is used when a youth member or Rover moves from one Group or Region to another. Personal information that is required is of the youth members and guardian/adult: Full name and surname, gender, date of birth, contact number, email address, physical address, position held in Group, history of training completed and involvement of spouse in Scouting.	Once the transfer is captured on the MMS (i.e. you have the new role) the form is destroyed. If you are not yet registered on the MMS, the form will be kept in a locked cabinet until you are registered or for <b>six months</b> .
Recognition and Award Forms	We have several awards we may give to adults. These award forms include Service, Commendation, Gallantry, Merit, Meritorious conduct and National citation.  All these forms request personal information of the nominator as well as the possible recipient. The following information is requested: Full names, Length	These forms are kept until <b>12 months after the award was awarded</b> . The outcome of the award is captured in a spreadsheet as well as on the MMS system, which is kept for historical purposes.

Name	Personal Information	Retention
	of service, role in Scouting, contact details, email address, details of service rendered, and details of specific incidents that will qualify individual for award, reference names, contact details and email addresses.	
Rovers (young adults 18-30 years of age) Advancement progress	Rovers progress through the Advancement programme and as the Awards and Bars are achieved, they will be recorded, either on the MMS system, or in a file or on a chart.	As progression is part of the Rover training programme, the records cannot be destroyed whilst the Rover is a member in that Branch.  This information will be kept for <b>three years after the Rover has left the Movement</b> . If the Rover becomes an adult leader, the record of the highest advancement badge achieved will be kept on record in line with the other adult records.
Den, Pack and Scout Activity Permit Application form	Youth and adult leaders leading an activity for a Den, Pack or Troop needs to apply for a permit from the next-in-line adult leader. The following personal information is requested when you fill in the form: Name and surname, Role, Group name, contact numbers, email, next in line adult leader name, contact number and email, contact details of the owner where activity/event is hosted, emergency name and contact for one parent and one adult leader not going on the activity/event, first aider name and contact details.	These forms are kept for <b>six months after the completion of the activity</b> , if no incident occurred. If an incident occurred, the Permit Application is sent to the national office where it is kept in a locked cabinet or safe document storage facility (such as Metrofile) until the <b>youth member turns 21 or for 3 years if the incident involved an adult</b> .

Name	Personal Information	Retention
Incident Report Form	<p>If a Notifiable Incident, as per the Safe Scouting Policy, occurs at a Scout Group meeting or activity/event, the Incident Report is filled in by the adult leader. The following personal information is requested:</p> <p>Name of injured person, address, contact number, date of birth, gender, type of injury, details of the incident, name of the first aider and or the Medical personal who attended to the patient, address and contact number.</p>	<p>This form is kept for <b>until the youth member turns 21 or for three years</b> in the case of an adult.</p>
Adult Training Application forms	<p>To partake in an adult leader training event or activity, you will need to fill in an application form. This could be either a paper form or done on the MMS. The following personal information is requested: Name and surname, ID number, occupation, address, contact details, email, previous training completed, Scout group name.</p>	<p>These forms are kept for <b>6 months after the end of the course</b> in a locked cabinet by the Course director.</p>
Forms used in relation to the Code of Conduct	<p>The Member Code of Conduct and Disciplinary Policy has various forms relating to complaints, grievances and disciplinary action. These guide the members involved through the respective process. The following personal information is requested: Full name, contact details, MMS number, Group name, statement of incident, charge, record of investigation, sanction, reasons for sanction.</p>	<p>Documents are stored at regional and national offices in locked cabinets <b>for as long as the sanction stands. In the case of termination this will stand until the person dies.</b></p>

**7. Your personal information is used to ensure that you and your child benefits**

We use email to communicate about important policy changes, activities and opportunities within the Movement. Each adult member will be subscribed to the mailing lists. We encourage Parents to subscribe to the mailing list to ensure they do not miss important notices.

**8. Sharing your personal information with other organisations**

SSA shares your personal information with:

(a) Scouts.Digital

Scouts.Digital is the Membership Management system used by SSA. SSA is using our best best efforts for operators (sub-contractors) to be POPIA compliant. You are able to view and correct some of your personal information on the MMS by logging in.

(b) WOSM National Scout Organisations

Where youth and adult members will be travelling abroad to represent SSA. See Section "Members travelling".

(c) Nevetec and Afriswitch

Nevetec and Afriswitch are the agencies responsible for the criminal clearance verification. SSA has the license to process the applications for criminal clearance verification. The consent forms and copy of the ID of the applicants need to be kept for 5 years by SSA.

(d) South African Police Services

When requested by the South African Police Service to provide personal information of members, SSA will do so.

(e) Microsoft

SSA make use of Office365 for emails, Sharepoint, Tamas and Azure. Personal information is shared to offer the service to members.

(f) Auditors

SSA makes use of SpriggAbbot Inc to audit the annual financial statements.

We will not make any of your personal information available to other 3<sup>rd</sup> parties or make them public unless:

- you have agreed to it for a particular purpose, or
- it is required for the purposes of any legal/judicial process.

We will never sell your personal information.

We may compile, use and share any information that does not relate on any particular individual ('de-identified information'), and we own and reserve the right to use non-personal statistical information gathered and compiled by us.

## **9. Members travelling**

When members attend Scout events in South Africa and abroad, their personal details need to be shared with the organisers. Some of the organisers and the activities may be located in countries that may not have the same levels of protection of personal information as South Africa. If this is the case, we will get your specific, explicit and informed consent to send your personal information to a country that does not have sufficient data protection.

## **10. Your rights and preferences**

You have the right to know what personal information we have about you, to correct it and to opt-out of any marketing.

You have the right to:

- ask what personal information we hold about you;
- ask what personal information was sent to any other third party;
- ask us to update, correct or delete any out-of-date or incorrect personal information we hold about you;
- unsubscribe from any marketing correspondence we may send you;
- object to the processing of your personal information.

While you have the right to object to us processing your personal information, this does not necessarily mean that we will delete or stop processing your personal information. If, for example, we have a legitimate need to keep your personal information for court proceedings we will not delete your personal information even if you have requested us to do so. We will inform you of our decision within 21 working days of your request.

You can request access to the personal information we hold about you by contacting our national POPIA Information officer at [popia@scouts.org.za](mailto:popia@scouts.org.za).

## **11. Online shop**

If you use the SSA online shop (<https://shop.scouts.org.za/>) we collect the following personal information: Name and surname, date of birth, gender, citizenship, nearest city, non-personal click patterns, email address, IP address, and ID or passport number.

We gather, store and use the above information for the following purposes:

- To greet you when you access the site;
- To inform you (if you have agreed to this) of facts regarding your access and use of the site;
- To inform you of competitions and promotions offered by SSA or its partners;
- To set up non-personal statistics about internet habits, click patterns and access to the site;
- To verify your identity when you make a transaction through SSA;



- To ensure the products are received by the addressee.
- The above information is either gathered electronically through the use of “cookies”, or provided by you voluntarily. You can regulate the use of “cookies” independently with your personal search engine settings.
- You can choose to not receive any information from SSA and its partners.

We use a third party payment gateway for payments and we do not have access to the personal information they collect. Please read their privacy notices to understand their use of your personal information.

Certain personal information (such as your full name, delivery address, email address and contact details) may be passed on to the courier company to ensure delivery of the products you have purchased.

## **12. We conduct surveys from time to time**

We send out surveys from time to time. You can choose to respond or not. Personal information is removed when results are shared.

## **13. We collect information when you use the ScoutWiki and our websites**

We operate the following websites (our service):

<https://www.scouts.org.za/>

<https://scoutwiki.scouts.org.za>

<https://easterncapenorth.scouts.org.za/>

<https://easterncapesouth.scouts.org.za/>

<https://freestate.scouts.org.za/>

<https://gauteng.scouts.org.za/>

<https://kzn.scouts.org.za/>

<https://limpopo.scouts.org.za/>

<https://mpumalanga.scouts.org.za/>

<https://northerncape.scouts.org.za/>

<https://northwest.scouts.org.za/>

<https://westerncape.scouts.org.za/>

When browsing our websites the following personal information may be collected: first name and surname, email, physical address, cookies and usage data.

The type of information we collect includes the URL you came from, IP address, domain type, browser type, the country and telephone code where your device is located, the web pages viewed during your visit, the advertisements you clicked on, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, and any search terms you entered on our websites (user information). We use this information to help us improve our websites and online services.

### **13.1. We use cookies to optimise your website experience, but you can opt-out**

A cookie is a small piece of information stored by your browser on your device. It may contain some personal details, the contents of your shopping basket, and date and time information in an encrypted format, which can be recalled when you return to our websites. These speed up our identification, ordering and delivery processes.

We use cookies to identify the device you use to connect to our website. We use anonymous cookies to collect data about how you use our websites, so that we can improve and optimise your website experience.

You may disable the use of cookies by configuring your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do so, you may not be able to enjoy all of the features and functionality of the websites.

Examples of Cookies we use:

- **Session Cookies.** We use Session Cookies to operate our Service.
- **Preference Cookies.** We use Preference Cookies to remember your preferences and various settings.
- **Security Cookies.** We use Security Cookies for security purposes.

You can opt-out of Google Analytics for Display Advertisers and out of customised Google Display Network advertising by visiting Google's Ad Preferences Manager.

### **13.2. Sending a message to our contact system**

When you send a message via a contact form, we collect the data you have given to us in that message in order to obtain confirmation that you are entitled to receive the information you have requested and then to provide to you the information you need. We record your request and our reply. We do not keep any personally identifiable information associated with your message, such as your name or email address.

### **13.3. Information you post on our websites**

We may reuse information you send to us by posting to a ScoutWiki page, within and for the benefit of SSA. We allow the information to be read, edited, renamed, or deleted, and we reserve a right to use it in any way we decide.

If you provide information to us with a view to it being read, copied, downloaded or used by other people, we accept no responsibility for what that third party may do with it. It is up to you to satisfy yourself about the privacy level of every person who might see your information. If it is available to the entire world, you have no control whatever as to how it is used so please be cautious with the information you upload.

### **13.4. Use of Personal Information**

We use the collected personal information for various purposes:

- To provide and maintain the Service
- To notify you about changes to our Service
- To allow you to participate in interactive features of our Service when you choose to do so
- To provide technical support
- To provide analysis or valuable information so that we can improve the Service
- To monitor the usage of the Service
- To detect, prevent and address technical issues
- To verify your identity for security purposes
- For marketing our services and products
- Information which does not identify any individual may be used in a general way by us or third parties, to provide class information, for example relating to demographics or usage of a particular page or service.

### **13.5. Website usage information**

We may use software embedded in our website (such as JavaScript) to collect information about which pages you view and how you reach them, what you do when you visit a page, the length of time you remain on the page, and how we perform in providing content to you. We do not presently associate such information with an identifiable person.

### **13.6. Analytics**

We may employ third party companies and individuals to facilitate our Service ("Service Providers"), to provide the Service on our behalf, to perform Service-related functions or to assist us in analysing how our Service is used.

These third parties have access to your Personal Information only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

#### **13.6.1. Google Analytics**

Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Service. This data is shared with other Google services. Google may use the collected data to contextualise and personalise the ads of its own advertising network. You can opt-out of having made your activity on the Service available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js, and dc.js) from sharing information with Google Analytics about visits activity. For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <https://policies.google.com/privacy?hl=en>

### **13.7. Third-Party sites**

To the extent allowed by law, we are not responsible for the privacy practices of a third party site to which there may be a link on the websites, or for any claims, loss or damage arising from these.

We advise you to read the privacy policy of each site which you visit and to determine your privacy settings in accordance with your personal preferences.

We are not liable if you suffer losses or damages when visiting third party websites by following a link to that website from the SSA Website. You accept that there may be risks when you use such third party websites, and you do so at your own risk.

### **13.8. Children's Privacy**

If you are under 18, you may use our website only with consent from a parent or guardian (a 'competent person'). If you are a parent or guardian and you are aware that your child has provided us with Personal Information without your permission, please contact us. If we become aware that we have collected Personal Information from children without verification of parental consent, we take steps to remove that information from our servers.

### **14. Donors**

We benefit from donations from members of the public who support our work, and we hold personal information about these donors so that we can process donations, and tell donors about our work and campaigns and how they can support us further. We may hold the following type of information:

Name, Surname, email address, physical address, contact numbers.

### **15. Employees (past, present and future)**

As an employer, we need to keep information relating to each member of staff and contractors who has a contract with us. This will include the pre-employment stage, references, and records relating to the time they worked for us including probationary, appraisal and disciplinary information. The South African Revenue Service requires that we keep this personal information for seven years.

We also hold personal information that allows us to pay salaries. Personal information we may hold about staff includes the following:

- name and contact details
- length and periods of service (and absence from service)
- details of training you receive
- details of your experience, qualifications, occupation, skills
- details of next of kin
- age/date of birth
- details of any health conditions
- details of disclosure checks if applicable
- details of any dependents
- information that allows us to pay salaries
- references, and records relating to the time they worked for SSA,
- probationary, appraisal and disciplinary information.

Much of this personal information will be taken from the job application form.

## **16. Keeping personal information secure**

Everyone who handles personal information (including employees, members and volunteers) must make sure it is held securely to protect against unlawful or unauthorised processing and accidental loss or damage. In most cases, personal information must be stored in appropriate systems and encrypted when taken off-site. The following is general guidance for everyone working within Scouting, including employees, members and volunteers in Scouting.

- You must only store personal information on networks, drives or files that are password protected and regularly backed up.
- You should have proper entry-control systems in place, and you should report any stranger seen in entry-controlled areas.
- You should keep paper records containing personal information secure. If you need to move paper records, you should do this strictly in line with data protection rules and procedures.
- You should not download personal information to mobile devices such as laptops and USB sticks unless necessary. Access to this information must be encrypted (password protected) and the information should be deleted immediately after use.
- You must keep all personal information secure when travelling.
- Personal information relating to members and volunteers should usually only be stored on the membership database or other specific databases which have appropriate security in place.
- When sending larger amounts of personal information by post, you should use registered mail or a courier. Memory sticks should be encrypted.
- When sending personal information by email this must be appropriately authenticated and password protected.
- Do not send financial or sensitive information by email unless it is encrypted.
- You should not share your passwords with anyone.
- Different rights of access should be allocated to users depending on their need to access personal or confidential information. You should not have access to personal or confidential information unless you need it to carry out your role.
- Before sharing personal information with other people or organisations, you must ensure that they are POPIA compliant.
- In the event that you detect or suspect a data breach or compromise, you should follow your defined breach response process.

### **16.1. Note on encryption, padlock symbols and other trust marks**

We use Let's Encrypt certificates to verify our identity to your browser and to encrypt any data you give us.

## **17. We will inform you if your privacy is ever compromised**

Although we cannot prevent all security threats, we have measures in place to minimise the threat to your privacy. We will let you know of any breaches which affect your personal information.

You have a right to lodge a complaint to the Information Regulator, the details of which are:

Physical address: JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

Complaints email: [complaints.IR@justice.gov.za](mailto:complaints.IR@justice.gov.za)

General enquiries email: [inforeg@justice.gov.za](mailto:inforeg@justice.gov.za)

Website: <https://www.justice.gov.za/inforeg/index.html>

## **18. Protection of Personal Information Act and other laws**

If this privacy notice or any provision in this privacy notice is regulated by or subject to POPIA or other laws, it is not intended that any provision of this privacy notice contravenes any provision of POPIA or such other laws. Therefore, all provisions of this privacy notice must be treated as being qualified, to the extent necessary, to ensure that the provisions of POPIA and such other laws are complied with.

No provision of this privacy notice:

- does or purports to limit or exempt us from any liability (including, without limitation, for any loss directly or indirectly attributable to our gross negligence or wilful default or that of any other person acting for or controlled by us) to the extent that the law does not allow such a limitation or exemption;
- requires you to assume risk or liability for the kind of liability or loss, to the extent that the law does not allow such an assumption of risk or liability; or
- limits or excludes any warranties or obligations which are implied into this privacy notice by POPIA (to the extent applicable), or other applicable laws or which we give under POPIA (to the extent applicable), or other applicable laws, to the extent that the law does not allow them to be limited or excluded.

## **19. General**

Our relationship and any dispute of whatsoever nature relating to or arising out of this privacy notice whether directly or indirectly, shall be governed by the laws of the Republic of South Africa without giving effect to any principle of conflict of laws.

Our failure to exercise or enforce any right or provision of this privacy notice shall not constitute a waiver of such right or provision.

Each provision of this privacy notice, and each part of any provision, is removable and detachable from the others. As far as the law allows, if any provision of this privacy notice, or part of a provision, is found by a court or authority of competent jurisdiction to be invalid, illegal or unenforceable (including, without limitation, because such provision is inconsistent with the laws of another jurisdiction), it must be treated as if it was not

included in this privacy notice and the rest of this privacy notice will still be valid and enforceable.