

## PRIVACY NOTICE

*(This is an ever-evolving document, please continue to visit our website from time to time for the latest version)*

**THE WARRIOR INSTITUTE NPC**, a not for profit company registered in South Africa under registration number 2019/364285/08 and having its registered address at 7 Wodin Rd, Newlands, 7700 (**"The Warrior Project"**, **"we"**, **"our"**).

We are committed to complying with applicable data protection laws and set out below details regarding our approach to data protection in all our operations.

### **Information we collect from you when you visit our website**

Our website uses automatic systems of data collection, such as cookies. A cookie is a device transmitted to the hard disk of a user. Cookies do not contain intelligible information but allow linking between you and your personal information, such as your IP address and other information about your experience on the website. The information and data are gathered directly and automatically by the website. We process information collected by cookies in a collective and anonymous way in order to optimise the website for the needs and preferences of its users. Please access the information on your Internet browser if you wish to delete cookies after using the website. If you have started the procedure of deleting cookies, we can't ensure that all of our web pages will be displayed and that all of our services will be available to you.

We use Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses cookies to help a website's operator analyse how users use the site. The non-personal information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers located around the world. Google will use this information for evaluating your use of the website, compiling reports on website activity for website operators, and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by them. You may refuse the use of cookies by selecting the appropriate settings in your web browser; however, please note that if you do this, you may not be able to use the full functionality of the website. By using the website, you consent to the processing of data about you by Google in the manner and for the purposes set forth above.

Google Analytics collects information anonymously. It reports website usage trends without identifying individual visitors. You can opt out of Google Analytics without affecting how you use the website. For more information on opting out of being tracked by Google Analytics across all websites you use, visit <https://support.google.com/analytics/answer/181881>. For more information on the Google Privacy Policy, visit <https://policies.google.com/privacy>.

### **Information we collect from suppliers and professional service providers**

We collect names, contact details, financial and tax information from suppliers and professional service providers so that we can place orders/instruct you and make payment in respect of any goods or services we receive. We do this with the intention of contracting with you or for the performance of a contract we have with you.

### **Information we collect from partner organisations and funders**

We collect names, contact details, financial and tax information from partner organisations and funders so that we can receive funds or services in collaboration with you. We do this with the intention of contracting with you or for the performance of a contract or understanding we have with you.

### **Information we collect from you when you sign up as an ambassador or complete our contact form**

When you sign up as an ambassador and opt in to receive our newsletter, we collect your name, surname, age and email address so that we can send our newsletter to. We will only use the information you provide for this purpose and you will be able to opt-out of receiving this at any time.

When you complete our contact form, we collect your name, surname, email address and any other information you provide so that we can contact you or respond to your enquiry. We will only use the information you provide for this purpose.

### **Information we collect from you when you complete the 'Help us Help You' contact form after taking the Healthy Relationship Test**

When you take the Healthy Relationship Test, we do not receive any personal information that you submit that is identifiable (linked to your name) unless you request our assistance by completing the Help us Help You contact form.

When you complete this Help us Help You form, we collect your name, contact details, preferred contact method and time, your responses to the assessment and other information you provide to us so that we can connect you with people who are qualified and experienced in assisting victims of violence and abuse. We do this by sharing the information contained in the contact form and the results of your assessment with the specialised team at TEARS Foundation, who have the resources available to help victims of abuse in various locations and with various needs across South Africa. An appropriately experienced and qualified member of the TEARS Foundation interventionist team will contact you to see how they can help you, and if necessary, walk you through whatever process you embark on.

Our legal basis for collecting and processing your personal information in this way is that it is in your legitimate interest, and in respect of special personal information (i.e. answers to 'sexual aspects' questions) we rely on your consent.

### **Processing, protecting and transferring personal information**

Personal information held by us is processed by appropriate members of staff for the purposes for which the information was provided. We may share your personal information within our organisation and outside the country of your residence including:

- Professional advisors,
- IT providers;
- Partners (e.g. TEARS Foundation, Law For All) and/or funders;
- Direct marketing providers; and
- Government bodies.

We share your information for the purposes of:

- Complying with a legal obligation;
- Tracking and measuring the impact of the work that we do;
- Performing the contract we have with you; or
- Our legitimate interest in the effective running of our organisation.

All our third party service providers within the organisation are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third party service providers to use your personal information for their own purposes. We only permit them to process your personal information for specified purposes and in accordance with our instructions.

### **Retention of your Data**

We will not retain your personal information longer than the period for which it is needed and in compliance with applicable law. We determine retention periods in respect of information we hold based on:

- Legal obligations relating to minimum periods to retain data;
- The purposes for which we process the personal information and whether we can achieve those purposes through other means;
- Whether the information is required for reporting and analysis purposes relating to our operations;
- The amount, nature, and sensitivity of the personal information;
- The potential risk of harm from unauthorised use or disclosure of the personal information.

### **General Description of Information Security Measures**

We take appropriate technical and organisational steps to ensure the security of your personal information including policies and procedures around use of technology and devices, IT security, document retention and destruction and data breach procedures. Only persons within our organisation which require your personal information for the performance of their work have access to that information and we do not transfer your information outside of the organisation or your resident country unless we are satisfied that the personal information will be afforded an equivalent level of protection.

We employ up to date technology to ensure the confidentiality, integrity and availability of the personal information under our care. Measures include, but are not limited to:

- Virus protection software and update protocols.
- Encryption where possible.
- Electronic access control.
- Secure setup of software making up the IT infrastructure.
- Outsourced service providers who process personal information on behalf of us are contracted to implement security controls.
- Policies and procedures are implemented to ensure the security of your information.
- Ongoing security awareness training of employees and contractors.

### **Your rights in relation to your information**

Subject to certain limitations on certain rights, you have the following rights in relation to your information:

- **Request access** to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information 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. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Withdraw consent** to our use of your information at any time where we rely on your consent to use or process that information. Please note that if you withdraw your consent, this will not affect the lawfulness of our use and processing of your information on the basis of your consent before the point in time when you withdraw your consent.

Should you have any queries regarding this privacy notice or would like to enforce any rights you may have under applicable data protection laws, please contact us at:

**Yvonne Wakefield**  
**yvonne@thewarriorproject.org.za**

We will endeavour to respond to any such requests as soon as is reasonably practicable and in any event within statutory time-limits in the applicable country. In some instances, we may be able to charge a fee for responding to your request and will advise you of this and any applicable amount prior to responding.

You should be aware that certain information is exempt from the right of access. This may include information which identifies other individuals, or information which is subject to legal privilege.

You should also be aware that in some instances, if you do not provide information or you exercise any rights regarding the deletion or restriction of your information or object to the processing of your information or withdraw consent, we may not be able to perform the contract we have with you or comply with our legal obligations.

Where you request access to your information, we are required by law to use all reasonable measures to verify your identity before doing so. These measures are designed to protect your information and to reduce the risk of identity fraud, identity theft or general unauthorised access to your information.

You also have the right to lodge a complaint with the relevant supervisory authority, details of which are set out below:

JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001  
P.O Box 31533, Braamfontein, Johannesburg, 2017  
Complaints email: [complaints.IR@justice.gov.za](mailto:complaints.IR@justice.gov.za)  
General enquiries email: [infoereg@justice.gov.za](mailto:infoereg@justice.gov.za).

#### **Automated decision-making**

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you.

We do not envisage that any decisions will be taken about you using automated means, however, we will notify you in writing if this position changes.

#### **Changes to our Privacy Notice**

Any changes made to this privacy notice in the future will be posted on the website and, where appropriate, notified to you by e-mail. Please check frequently to see any updates or changes to this notice.

September 2022