

ZA-ITwww02

Website privacy notice

Privacy Notice

This is the privacy notice of [Global Christian Company – trading As The Identity Channel]. In this document, "we", "our", or "us" refer to [GLOBAL CHRISTIAN MARKETING COMPANY].

We are company number [SOUL PROPRIETOR] registered in [SOUTH AFRICA].

Our registered office is at [40b ELANDSLAAGTE STREET, Hazelwood Pretoria 0081].

Introduction

This privacy notice aims to inform you about how we collect and process any information that we collect from you, or that you provide to us. It covers information that could identify you ("personal information") and information that could not. In the context of the law and this notice, "process" means collect, store, transfer, use or otherwise act on information. It tells you about your privacy rights and how the law protects you.

We are committed to protecting your privacy and the confidentiality of your personal information. Our policy is not just an exercise in complying with the law, but a continuation of our respect for you and your personal information.

We undertake to preserve the confidentiality of all information you provide to us and hope that you reciprocate.

Our policy complies with the Protection of Personal Information Act 2013.

The law requires us to tell you about your rights and our obligations to you in regard to the processing and control of your personal information.

Except as set out below, we do not share, sell, or disclose to a third party, any information collected through our website.

1. Information Officer

We have appointed an Information Officer who is responsible for ensuring that our policy is followed.

If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact our Information Officer, [Kobus Bosman] at [power@theidentitychannel.com].

2. Information we process

We may collect, use, store and transfer different kinds of personal information about you. We have collated these into groups as follows:

Your identity includes information such as first name, last name, title, date of birth, and other identifiable information that you may have provided at some time.

Your contact information includes information such as billing address, delivery address, email address, telephone numbers and any other information you have given to us for the purpose of communication or meeting.

Your financial information includes information such as your bank account and payment card details.

Transaction information includes details about payments or communications to and from you and information about the products and services you have purchased from us.

Technical information includes your internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.

Your profile includes information such as your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.

Marketing information includes your preferences in receiving marketing from us; communication preferences; responses, and actions in relation to your use of our services.

We may aggregate anonymous information such as statistical or demographic data for any purpose. Anonymous information is information that does not identify you as an individual. Aggregated information may be derived from your personal information but is not considered personal information in law because it does not reveal your identity.

For example, we may aggregate profile information to assess interest in a product or service.

However, if we combine or connect aggregated data with your personal information so that it can identify you in any way, we treat the combined data as personal information, and it will be used in accordance with this privacy notice.

3. Special personal information

Special personal information is data about your race or ethnicity, religious or philosophical beliefs, sex life, political opinions, trade union membership, information about your health and biometric data.

It also includes information about criminal convictions and offences.

We do not collect any special personal information about you.

OR

We may collect special personal information about you if there is a lawful basis on which to do so.

4. If you do not provide personal information we need

Where we need to collect personal information by law, or under the terms of a contract, we have with you, and you fail to provide that information when requested, we may not be able to perform that contract. In that case, we may have to stop providing a service to you. If so, we will notify you of this at the time.

The bases on which we process information about you

5. Information we process because we have a contractual obligation with you

When you create an account on our website, buy a product or service from us, or otherwise agree to our terms and conditions, a contract is formed between you and us.

In order to carry out our obligations under that contract, we must process the information you give us. Some of this information may be personal information.

We may use it in order to:

- verify your identity for security purposes
- sell products to you

- provide you with our services
- provide you with suggestions and advice on products, services and how to obtain the most from using our website

We process this information on the basis there is a contract between us, or that you have requested we use the information before we enter into a legal contract.

We shall continue to process this information until the contract between us ends or is terminated by either party under the terms of the contract.

6. Information we process with your consent

Through certain actions when otherwise there is no contractual relationship between us, such as when you browse our website or ask us to provide you more information about our business, including [\[job opportunities and\]](#) our products and services, you provide your consent to us to process information that may be personal information.

Wherever possible, we aim to obtain your explicit consent to process this information, for example, by asking you to agree to our use of cookies.

If you have given us explicit permission to do so, we may from time to time, pass your name and contact information to selected associates whom we consider may provide services or products you would find useful.

We continue to process your information on this basis until you withdraw your consent or it can be reasonably assumed that your consent no longer exists.

You may withdraw your consent at any time by instructing us [\[at power@theidentitychannel.coms or www.theidentitychannel.com\]](mailto:power@theidentitychannel.com). However, if you do so, you may not be able to use our website or our services further.

7. Information we process for the purposes of legitimate interests

We may process the information on the basis there is a legitimate interest, either to you or to us, of doing so.

Where we process your information on this basis, we do after having given careful consideration to:

- whether the same objective could be achieved through other means

- whether processing (or not processing) might cause you harm
- whether you would expect us to process your information, and whether you would, in the round, consider it reasonable to do so

For example, we may process your information on this basis for the purposes of:

- record-keeping for the proper and necessary administration of our [\[organizational or business\]](#)
- responding to unsolicited communication from you to which we believe you would expect a response
- protecting and asserting the legal rights of any party
- insuring against or obtaining professional advice that is required to manage [\[organizational or business\]](#) risk
- protecting your interests where we believe we have a duty to do so

8. Information we process because we have a legal obligation

Sometimes, we must process your information in order to comply with a statutory obligation.

For example, we may be required to give information to legal authorities if they so request or if they have the proper authorization such as a search warrant or court order.

This may include your personal information.

Specific uses of information you provide to us

9. Information provided on the understanding that it will be shared with a third party

Our website allows you to post information with a view to that information being read, copied, downloaded, or used by other people.

Examples include:

- posting a message on our forum
- tagging an image
- clicking on an icon next to another visitor's message to convey your agreement, disagreement or thanks

In posting personal information, it is up to you to satisfy yourself about the privacy level of every person who might use it.

We do not specifically use this information except to allow it to be displayed or shared.

We do store it, and we reserve a right to use it in the future in any way we decide.

Once your information enters the public domain, we have no control over what any individual third party may do with it. We accept no responsibility for their actions at any time.

Provided your request is reasonable and there is no legal basis for us to retain it, then at our discretion, we may agree to your request to delete personal information that you have posted. You can make a request by contacting us at [power@theidentitychannel.com or www.theidentitychannel.com].

10. Complaints regarding content on our website

Our website is a publishing medium. Anyone may register and then publish information about himself, herself or some other person.

We do not moderate or control what is posted.

OR

We attempt to moderate user generated content, but we are not always able to do so as soon as that content is published.

If you complain about any of the content on our website, we shall investigate your complaint.

If we feel it is justified or if we believe the law requires us to do so, we shall remove the content while we investigate.

Free speech is a fundamental right, so we have to make a judgment as to whose right will be obstructed: yours, or that of the person who posted the content that offends you.

If we think your complaint is vexatious or without any basis, we shall not correspond with you about it.

11. Information relating to your method of payment

First option:

We store information about your debit or credit card or other means of payment when you first provide it to us.

We store this payment information [at your request] in order to make repeat purchasing of goods and services easier next time you visit our website.

[We also store it to help us prevent fraud.]

We take the following measures to protect your payment information:

- We keep your payment information encrypted on our servers.
- We do not keep all your payment information so as:
 - a) to prevent the possibility of our duplicating a transaction without a new instruction from you;
 - b) to prevent any other third party from carrying out a transaction without your consent
- Access to your payment information is restricted to authorized staff only.
- If we ask you questions about your payment information, we only show [partial detail OR the first four OR the last four digits of the debit or credit card number], so that you can identify the means of payment to which we refer.
- [Other...]

We automatically delete your payment information [after X days OR when a credit or debit card expires].

Second option:

Payment information is never taken by us or transferred to us either through our website or otherwise. Our employees and contractors never have access to it.

At the point of payment, you are transferred to a secure page on the website of [WorldPay / OPayo / PayPal] or some other reputable payment service provider. That page may be branded to look like a page on our website, but it is not controlled by us.

12. Information about your direct debit

When you agree to set up a direct debit arrangement, the information you give to us is passed to our own bank [name of bank] for processing according to our instructions. We [do / do not] keep a copy.

[We keep this information only for the duration of the direct debit arrangement.]

13. Job application and employment

If you send us information in connection with a job application, we may keep it for up to [three years] in case we decide to contact you at a later date.

If we employ you, we collect information about you and your work from time to time throughout the period of your employment. This information will be used only for purposes directly relevant to your employment. After your employment has ended, we will keep your file for [seven years] before destroying or deleting it.

14. Communicating with us

When you contact us, whether by telephone, through our website or by e-mail, we collect the information you have given to us in order to reply with the information you need.

We record your request and our reply in order to increase the efficiency of our [business/organization].

We do not keep any personally identifiable information associated with your messages, such as your name or email address.

OR

We keep personally identifiable information associated with your messages, such as your name and email address so as to be able to track our communications with you to provide a high-quality service.

15. Complaining

When we receive a complaint, we record all the information you have given to us.

We use that information to resolve your complaint.

If your complaint reasonably requires us to contact some other person, we may decide to give to that other person some of the information contained in your complaint. We do this as infrequently as possible, but it is a matter for our sole discretion as to whether we do give information, and if we do, what that information is.

We may also compile statistics showing information obtained from this source to assess the level of service we provide, but not in a way that could identify you or any other person.

16. Affiliate and business partner information

This is information given to us by you in your capacity as an affiliate of us or as a business partner.

It allows us to recognize visitors that you have referred to us, and to credit to your commission due for such referrals. It also includes information that allows us to transfer the commission to you.

The information is not used for any other purpose.

We undertake to preserve the confidentiality of the information and of the terms of our relationship.

We expect any affiliate or partner to agree to reciprocate this policy.

Use of information we collect through automated systems when you visit our website

17. Cookies

Cookies are small text files that are placed on your computer's hard drive by your web browser when you visit any website. They allow information gathered on one web page to be stored until it is needed for use on another, allowing a website to provide you with a personalized experience and the

website owner with statistics about how you use the website so that it can be improved.

Some cookies may last for a defined period, such as one day or until you close your browser. Others last indefinitely.

Your web browser should allow you to delete any you choose. It also should allow you to prevent or limit their use.

Our website uses cookies. They are placed by software that operates on our servers, and by software operated by third parties whose services we use.

[When you first visit our website, we ask you whether you wish us to use cookies. If you choose not to accept them, we shall not use them for your visit except to record that you have not consented to their use for any other purpose.](#)

[If you choose not to use cookies or you prevent their use through your browser settings, you will not be able to use all the functionality of our website.](#)

We use cookies in the following ways:

- to track how you use our website
- to record whether you have seen specific messages we display on our website
- to keep you signed in to our website
- to record your answers to surveys and questionnaires on our website while you complete them
- to record the conversation thread during a live chat with our support team

[\[We provide more information about the cookies we use in our cookie policy\].](#)

18. Personal identifiable information from your browsing activity

Requests by your web browser to our servers for web pages and other content on our website are recorded.

We record information such as your geographical location, your Internet service provider and your IP address. We also record information about the

software you are using to browse our website, such as the type of computer or device and the screen resolution.

We use this information in aggregate to assess the popularity of the webpages on our website and how we perform in providing content to you.

If combined with other information we know about you from previous visits, the information possibly could be used to identify you personally, even if you are not signed in to our website.

19. Our use of re-marketing

Re-marketing involves placing a cookie on your computer when you browse our website in order to be able to serve you an advert for our products or services when you visit some other website.

We may use a third party to provide us with re-marketing services from time to time. If so, then if you have consented to our use of cookies, you may see advertisements for our products and services on other websites.

Disclosure and sharing of your information

20. Information we obtain from third parties

Although we do not disclose your personal information to any third party (except as set out in this notice), we sometimes receive information that is indirectly made up from your personal information from third parties whose services we use.

[No such information is personally identifiable to you.](#)

21. Third-party advertising on our website

Third parties may advertise on our website. In doing so, those parties, their agents or other companies working for them may use technology that automatically collects information about you when their advertisement is displayed on our website.

They may also use other technology such as cookies or JavaScript to personalize the content of, and to measure the performance of their adverts.

We do not have control over these technologies or the information that these parties obtain. Accordingly, this privacy notice does not cover the information practices of these third parties.

22. Credit reference

To assist in combating fraud, we share information with credit reference agencies, so far as it relates to clients or customers who instruct their credit card issuer to cancel payment to us without having first provided an acceptable reason to us and given us the opportunity to refund their money.

23. Information may be processed outside South Africa

Our websites are hosted in [\[United States of America\]](#).

We may also use outsourced services in countries outside South Africa from time to time in other aspects of our business.

Accordingly, information obtained within South Africa or any other country could be processed outside South Africa.

[For example, some of the software our website uses may have been developed in the United States of America or Australia.](#)

Control over your own information

24. Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes.

25. Access to your personal information

At any time you may review or update personally identifiable information that we hold about you, by signing in to your account on our website.

To obtain a copy of any information that is not provided on our website you should contact us to make that request.

After receiving the request, we will tell you when we expect to provide you with the information, and whether we require any fee for providing it to you.

26. Removal of your information

If you wish us to remove personally identifiable information from our website, you should contact us to make your request.

This may limit the service we can provide to you.

27. Verification of your information

When we receive any request to access, edit or delete personal identifiable information we shall first take reasonable steps to verify your identity before granting you access or otherwise taking any action. This is important to safeguard your information.

Other matters

28. Use of website by children

We do not sell products or provide services for purchase by children, nor do we market to children.

If you are under 18, you may use our website only with consent from a parent or guardian

We collect information about all users of and visitors to these areas regardless of age, and we anticipate that some of those users and visitors will be children.

Such child users and visitors will inevitably visit other parts of the website and will be subject to whatever on-site marketing they find, wherever they visit.

29. Encryption of data sent between us

We use Secure Sockets Layer (SSL) certificates to verify our identity to your browser and to encrypt any data you give us.

Whenever information is transferred between us, you can check that it is done so using SSL by looking for a closed padlock symbol or another trust mark in your browser's URL bar or toolbar.

30. How you can complain

If you are not happy with our privacy policy or if you have any complaint then you should tell us.

[\[power@theidentitychannel.com\]](mailto:power@theidentitychannel.com).

If a dispute is not settled, then we hope you will agree to attempt to resolve it by engaging in good faith with us in the process of mediation or arbitration.

31. Retention period for personal data

Except as otherwise mentioned in this privacy notice, we keep your personal information only for as long as required by us:

- to provide you with the services you have requested;
- to comply with other law, including for the period demanded by our tax authorities;
- to support a claim or defence in court.

32. Compliance with the law

Our privacy policy has been compiled so as to comply with the law of every country or legal jurisdiction in which we aim to do business. If you think it fails to satisfy the law of your jurisdiction, we should like to hear from you.

However, ultimately it is your choice as to whether you wish to use our website.

33. Review of this privacy policy

We may update this privacy notice from time to time as necessary. The terms that apply to you are those posted here on our website on the day you use our website. We advise you to print a copy for your records.

If you have any question regarding our privacy policy, please contact us at kobus@kobusbosman.com

Explanatory notes

Privacy policy notice

General notes

The Protection of Personal Information Act 2013 was passed in 2013. However, it commenced on 1st July 2020 with a grace period of one year starting from the commencement date.

The law applies conditions for the lawful processing of the personal information collected by the businesses in South Africa.

You must review your privacy notice to make sure your business complies with the Act. You should also check how customers and visitors can access personal information held about them, and adopt procedures for obtaining compliance to collect and use personal information.

Using this template as the basis for your privacy notice

Your privacy policy should be concise (while also being comprehensive), transparent, easy to understand and easily accessible.

We aim to balance those qualities in this document. However, we cannot know exactly how your business works, so you may need to edit the document significantly in certain places.

Paragraph specific notes

Numbered notes refer to specific numbered paragraphs in the template.

Identification of the owner of the website

Identify the business or the organization that operates the website. Using the domain name as the business name may not be enough. You should provide a business or organization name and an address.

In practice, you may decide that you do not want to provide your name and address (for your own privacy reasons). You may be more likely to get away with doing this if you don't trade from your website.

If you have appointed an information officer, you should name that person here using words such as "Our Information Officer is [\[Kobus Bosman\]](#)". Most businesses or organizations that use this template will not be large enough to require one.

Introduction

Leave these items in place unless there is a good reason to edit or remove. Each of these items has been carefully considered in the context of this document and has been included for a purpose.

The first paragraph sets out the purpose of the document and explains terms used throughout it.

The second and the third paragraphs aim to reassure readers that you take privacy seriously.

The fourth paragraph demonstrates awareness of the Act and compliance.

1 Information officer

Unless your organization processes large volumes of personal information, you are unlikely to be required to appoint an information officer.

If you have nominated an individual, you may mention him or her in this paragraph.

Otherwise, you can delete this section.

2 Information we process

The Act only applies to personal information.

Any of these paragraphs can be deleted or edited, although the ones in blue are most likely to be those that either do or don't apply.

3 Special personal information

If you process certain types of personal information, you are required to disclose that you do so.

Use either the first two sentences or the last one.

4 If you do not provide the personal information we need

This is a reminder to your customer or visitor that you may not be able to provide services if you are not given information.

The bases on which we process information about you

A requirement of the Act is that you tell the data subject why you process the information and use the information collected for that purpose only.

Most websites will process different types of information for different reasons. The two most likely to apply are “Contract” (after the visitor has accepted your terms and conditions) and “Consent” (after the visitor has agreed to your use of his or her information – usually by taking some affirmative action such as clicking on a button). Some information may also be processed because of a legal requirement or a legitimate interest.

The reasons why you process the information arise as a result of the basis. If there is a contract, there is a contractual obligation to carry out the service. If the basis is consent, then there will probably be some benefit to the data subject of you using the information.

You may want to edit these sections in minor ways (certainly where we have highlighted in blue).

More importantly, you should make design changes to how your website works so as to obtain explicit consent or have a visitor agree to your terms earlier in your relationship.

For most websites, a contract is the strongest basis for processing. If you can design your website experience such that a visitor agrees to your terms early on, before providing personal information, you will have fewer grounds for complaints. For example, you might reduce the requirement to provide detailed information when a visitor registers a basic account on your website, but place more content or functionality in an area of the website that requires the visitor to have such an account. At the registration point, the visitor must tick a box to say that he or she has read and agrees to your terms and conditions.

If you are relying on consent, then you might design a banner to appear when a visitor first arrives at your website (for example, encouraging him or her to read your cookies policy). That banner might have two buttons – one that gives explicit agreement and one that doesn’t. If the visitor does not give explicit consent, then you redirect him or her to another “safe” website or state that certain functionality will be limited.

Legitimate Interest is a basis that is fairly subjective. For it to be used, you must have decided that there is a legitimate interest, that processing the information is necessary to protect that interest, and that the data subject’s interests (or other interests) do not override it. In some circumstances, it is most appropriate, but if possible, we would recommend using Contract or Consent as better alternatives. The reason is simply that the data subject is less likely to complain if he or she has clearly asked you to process his or her data.

Data subjects have a legal right to see the personal information you hold about them. You need both an internal process as to how to provide this, and a means for the data subject to request the information.

If the data subject is a registered visitor, then providing his or her information in an account area is a good way of providing this data. You can also provide a way of giving consent to use of the information in the same place.

If the data subject does not have an account, then you should give either an e-mail address or a physical address to which the data subject can send a request for his or her information.

Lastly, for each basis, you need to state when you stop processing the data. We suggest that you don't edit our text.

Specific uses of information you provide to us

This section provides more information about specific types of information. The paragraphs within it are as much designed to reassure a visitor reading your policy than to aid compliance with the law.

9 Information provided on the understanding that it will be shared with a third party

This paragraph serves as a reminder that information that a visitor posts on your website may be available for public viewing, and that you cannot be held responsible if someone else copies it and uses it without the author's permission.

It creates a licence for you to use it in any way you wish, which may be useful.

You should provide a way for someone to contact you and request that content is removed. This could be as simple as an e-mail address.

10 Complaints regarding content on our website

This paragraph is a reminder to visitors that moderation of all user generated content is not always viable.

It shows that you take complaints about content seriously, and also that a decision to remove content remains with you.

11 Information relating to your method of payment

There are two options here. Delete whichever is not relevant.

The first covers the situation where you do record card information. You should edit the "measures to protect your information" so that they are relevant to your business.

The second covers the situation where card information stays with the payment service provider.

If you don't take payment at all, of course, delete this paragraph entirely.

12 Information about your direct debit

If you do not take payment by direct debit, delete this paragraph. Otherwise, edit the wording in blue appropriately.

13 Job application and employment

The purpose of this paragraph is to set out for how long personal information is processed.

14 Communicating with us

We suggest you keep this paragraph in your notice. However, you should edit it to suit how your organization works.

15 Complaining

This paragraph deals with how information collected as a result of a complaint is used. It should not be confused with an explanation of how to complain (which is dealt with later). We suggest you leave this paragraph as is.

16 Affiliate and business partner information

Information relating to affiliates is not subject to the Act. This paragraph should reassure business partners.

17 Cookies

The start of this paragraph is an explanation of what cookies are.

It is good practice to display a message when a visitor first comes to your website, asking whether he or she accepts the use of cookies. The paragraph in blue supports this.

We take the approach here of not listing every single cookie.

The reason is that you do not know this information yourself, especially if you use third party add-ons or plug-ins to your website. For example, Google provides visitor tracking software (Analytics) that is popular. It could at any point, change the name or purpose of the many cookies it uses without telling you.

There are so many cookies that software you use is likely to place that to list them here would increase the size and complexity of the notice, and to keep the notice up-to-date as they change would be time consuming.

Listing every cookie's file name, purpose and expiration period could be done in a separate cookie notice, linked from this paragraph.

We prefer the approach of explaining in what ways they are used. Add or delete to this list as appropriate.

18 Personal identifiable information from your browsing activity

Most web servers log requests for pages. We suggest you leave this paragraph as is, even if you don't use this information.

19 Our use of re-marketing

Re-marketing is the name given to the practice of advertising your products and services on third party websites based on pages on your website that the visitor has already seen.

It requires you as the website owner to be the client of an advertising service provider.

When a visitor visits a page of your website, the advertiser's software through your website places a cookie on the visitor's computer. When he or she visits another webpage on a third party website, you can choose whether or not to pay to show him or her an advert for your product or service.

For example, you might sell fruit from your website. A visitor visits a page about the health benefits of eating a particular tropical fruit. Later, the same visitor visits another website about cookery, and specifically a page that describes a recipe that requires the tropical fruit. Both your website and the cookery website use the same advertising service provider. You can choose to pay to have your adverts for that tropical fruit to be displayed on the cookery website.

The advertising service provider usually allows you to specify exactly what criteria must be met in order to display your advert, making re-marketing a cost-efficient way of advertising.

Some people feel very strongly about re-marketing. It can elicit fears of "being followed around the web", particularly if the topic of the advert is sensitive.

You can choose to delete this paragraph entirely if you do not use re-marketing. However, keeping it in place will allow you to experiment with different types of display marketing later.

Disclosure and sharing of your information

20 Information we obtain from third parties

This paragraph is a reminder to visitors that you may use third party information provision services. Delete if not appropriate to your organization.

21 Third party advertising on our website

Delete if not appropriate to your organization.

22 Credit reference

We suggest that you leave this paragraph in place even if you have no immediate intention of liaising with debt collectors. It may be a useful “reminder” to users of your website.

23 Information may be processed outside South Africa

If you want to be as compliant as possible, you should identify carefully whether you use services outside South Africa. You may use, for example, a US-based online software service to provide your chat system.

In practice, it might be very difficult to identify exactly where software has been written, whether the software house processes your information in any way, and where this might take place.

The clause giving examples (in blue) could be deleted if you don't want possibly to mislead readers.

Control over your own information

Under the Act, a data subject has a right to access information about him or her, and a right for that information to be kept up-to-date and only for as long as required.

You should leave these three paragraphs in place, editing the addresses.

Other matters

28 Use of website by children

You cannot form a contract with a child. So a child cannot agree to your terms and conditions, which means that he or she cannot agree to your terms regarding the use of his or her information. Additionally, only a parent or guardian can give consent.

So it is very difficult to have a lawful basis for processing personal information about children.

Additionally, personal information about children is regarded as more sensitive than the same information about an adult. The consequences of breaches could be much greater.

We suggest you edit this paragraph to suit your website and keep it in.

29 Encryption of data sent between us

This paragraph is included to reassure visitors. If you do not use SSL then remove the paragraph.

30 How you can complain

This paragraph sets out standard wording that tells visitors how to make a complaint.

It gives you a strong argument to use arbitration or mediation as a means of resolving a complaint, rather than going to court.

In any case, you must tell visitors to your website about their right to complain to the supervisory body, the Information Regulator.

31 Retention period for personal data

This paragraph is a catch-all if the information is not provided elsewhere.

Basic South African law relating to limitation for bringing a claim, contract matters, tax and other areas often requires data to be retained for seven years. You will be “safe” if you specify that period for commercial transactions.

32 Compliance with the law

Leave this paragraph in place.

33 Review of this privacy policy

Leave this paragraph in place.