

Privacy Policy

Responsibility for Policy	Managing Director
Approving Authority	Managing Director
Status of policy	Approved
Last Review	25 August 2026
Next Review	25 August 2028

1. Overview

- 1.1. We are Life Choices, a registered nonprofit organisation (086-084-NPO) based in Cape Town, South Africa. This is our Privacy Policy that applies to all engagements with you.
- 1.2. By working with us, you trust us with your information, and we take that responsibility seriously. We will engage with you and provide our services in a manner that is in accordance with our values: Respect, Integrity, Growth, Accountability and Ubuntu.

2. Audience

- 2.1. The primary audience of this policy is every one of our data subjects (such as school learners, trainees, employees and service providers). This policy applies to any person who is a beneficiary of our programmes; the parent of such beneficiary; current, past and prospective employees; current, past or prospective service providers; or anyone else who engages with us through communications or by attending any of our events.

3. Purpose and scope

- 3.1. The specific aim of this policy is to describe how we collect and use your personal information in a way that complies with the Protection of Personal Information Act 4 of 2013 (POPIA). If you are unsatisfied with how we have processed your personal information, please see Clause 15 that covers our External Complaints Resolution process for complaints related to personal information.
- 3.2. If you would like to know how we handle access requests for the information we hold, please read our [PAIA Manual](#).

4. Accepting this policy

- 4.1. You accept this policy if you continue engaging with us after you become aware of the policy in any way, visit any website or digital platform of ours, or sign a Consent Form or any other agreement. If you do not agree with anything in this policy, you should stop voluntarily engaging with us, receiving our benefits, goods or services, or being a service provider.
- 4.2. **Children and others who lack legal capacity**
 - 4.2.1. If you are younger than 18 years old (or generally do not have legal capacity to conclude legally binding contracts), you may not engage with us or use any digital platform or website of ours without assistance from a guardian or competent person.
 - 4.2.2. We protect the privacy of children (those under the age of 18) and those who lack legal capacity. If you lack legal capacity, please get a competent person's written permission before you engage with us.

5. Agreement between us and you

- 5.1. This Privacy Policy and our other terms, together with any other form that we may ask you to fill in or sign, form the basis of our agreement with you about the processing of your personal information. They go together with any other terms or agreement that we already have with you, including any signed Non-Disclosure Agreement (NDA).

6. What is personal information?

- 6.1. Personal information is any information that allows a living person or existing legal entity (like a company) to be identified by us or others. Examples of personal information are those specific identifiers that allow us to identify you and include everything set out in the section below called “Collecting and using personal information”.

7. When we use your personal information

7.1. General purposes for using information:

The main purpose for using personal information is to run our educational, developmental and wellness programmes to improve the life skills of children, young adults and their caregivers. Carrying out this mandate involves us forming relationships with you and possibly working with other private bodies and public bodies. Our general reasons for using personal information include:

- 7.1.1. Providing skills development and support to children and young adults through our programmes;
- 7.1.2. Supporting and tracking the progress of our programmes’ alumni, including assisting with job placements;
- 7.1.3. Building our staff by creating job openings, receiving and evaluating job applications, and filling positions;
- 7.1.4. Maintaining a record of our employees in compliance with labour laws and for accountability purposes, during the employment term and after it has ended;
- 7.1.5. Improving our services by analysing usage terms;
- 7.1.6. Managing our IT infrastructure to ensure continued operation;
- 7.1.7. Managing our internal governance through mechanisms such as contract management and internal audits;
- 7.1.8. Maintaining a record of a service provider’s provision of goods or services to comply with applicable laws and accountability requirements, during and after the service provider’s contract; and
- 7.1.9. Complying with any ruling by a court or regulatory authority such as the Information Regulator.

7.2. Collecting and using personal information

We may collect and use your personal information when you:

- 7.2.1. Contact us, sign a Consent Form or another contract, subscribe to receive our newsletter or other updates, or receive benefits, goods and services from us or our partners;
- 7.2.2. Apply for a job position or placement in any of our programmes;
- 7.2.3. Provide details such as your name, email address, phone number or company information to us or our authorised third parties to confirm your identity (including your

- gender and race);
 - 7.2.4. Get a reference number or code assigned to you to identify you in our systems;
 - 7.2.5. Share documents with us for legal or business purposes;
 - 7.2.6. Apply for a job position or placement in any programme run by us; or
 - 7.2.7. Interact with any website or digital platform of ours on which we use cookies.
- Your publicly available personal information (such as your business address or VAT number) may also be part of the information that we collect for purposes described in this policy, including preparing invoices, writing proposals or soliciting donations.

7.3. Your rights

Under POPIA, you have various rights, some of which we have listed below or mentioned elsewhere in this policy.

- 7.3.1. **Request access to information we hold on you:** You may request access to any of your personal information that we hold, to view the information or receive a copy. Please see our [PAIA Manual](#) for more information.
- 7.3.2. **Updating or removing:** You may choose to correct, update or delete your personal information by clicking on the relevant menu on any of the pages on our digital platforms or emailing us.
- 7.3.3. **Withdrawal of consent or objection to processing:** You may withdraw your consent where we are relying on consent as a lawful justification for processing. We may disregard such objection or withdrawal of consent when we have another justification for continuing to process your personal information.
- 7.3.4. **Security of your personal information:** You have a right to have your personal information protected by us using appropriate and reasonable security measures. Our security measures are described below.

8. Accuracy and availability of your personal information

- 8.1. We will try to keep the personal information that we collect as accurate, available and reliable as possible for the purposes defined in this policy. However, this may sometimes not be possible due to various unavoidable factors such as scheduled and unscheduled maintenance to our systems or at our offices.
- 8.2. We may request an update to your personal information. Please assist with such updates or corrections when requested to do so, because we will not be responsible for any issues that result from you not assisting. When you notice your personal information is not correct, please correct it or let us know if you are unable to do so.

9. Sharing your information

- 9.1. We will not sell or unlawfully share your personal information. We will only share the information with:
 - 9.1.1. Staff, service providers or trusted partners who help us deliver our mandate; and
 - 9.1.2. Donors and other parties with whom we are required or permitted by law to share your personal information for the purposes of delivering on our mandate or running our operations.
- 9.2. All parties who access your information will be bound by confidentiality obligations.

10. Transfer to another country

- 10.1. We may sometimes have to send your personal information to a location outside of South Africa. We will aim to only transfer the personal information to another country if it has similar privacy laws to South Africa's and provides an adequate level of protection, or to recipients who can guarantee the protection of the personal information at the same standard as us.

11. Security of your information

11.1. Reasonable steps that we take

We take reasonable steps to protect your personal information, including:

- 11.1.1. Securely storing information using cloud services;
- 11.1.2. Receiving assistance from IT personnel who oversee our security needs;
- 11.1.3. Encrypting devices and securing our systems;
- 11.1.4. Using multi-factor authentication and other security measures;
- 11.1.5. Regularly backing up information;
- 11.1.6. Using locked filing cabinets and rooms, and periodically shredding paper-based information;
- 11.1.7. Limiting staff access privileges so that only authorised or necessary staff can access the information at any time; and
- 11.1.8. Training our staff on confidentiality and data protection.

- 11.2. We recognise that some personal information is more sensitive in nature and requires more protection or consideration. Under POPIA, that information is mostly identified as special personal information. POPIA also places great emphasis on protecting information like account numbers. We accept this increased responsibility to protect account numbers and special personal information and will exercise extra caution when handling that information. The increased sensitivity of that information requires that you also be more careful when providing it to us or accessing and using it.

11.3. Complete security is not possible

While we work hard to keep your information safe, no system is completely secure. We encourage you to also take precautions when sharing information online. If you experience a problem or loss that is caused by information you provided to us, your computer being compromised in some way or by something beyond our control, we cannot take responsibility for causing the problem.

12. Emails and communication with us

- 12.1. Emails you send us will be monitored for viruses, security and compliance. To improve communication, we may also track whether you open emails we send. You can opt out of certain optional communications (such as our mailing lists that you subscribe to) at any time by clicking 'unsubscribe' in the email or contacting us directly.
- 12.2. We may take steps to verify your identity before continuing any engagement or granting you access to your personal information for any corrections or updates.
- 12.3. If you have any questions about how we handle your personal information, please contact us at this email address: info@lifechoices.co.za . If you are an employee, please use the internal Human Resources email address to submit your query.

13. Governance of data protection by us

- 13.1. The law automatically designates the head of our organisation as an Information Officer. Any matter arising out of this policy will be handled by the Information Officer (or any person assigned to assist with the matter). While the Information Office will assign certain responsibilities to select persons, the ultimate responsibility will always reside with the Information Officer, and all those individuals will report their activities to the Information Officer.

14. Complaints to us and the Information Regulator

14.1. Complaints to us

You have a right to lodge a complaint at any time with the Information Regulator when you are dissatisfied with how we have used your personal information. Before proceeding, please first get in touch with us by sending an email to info@lifechoices.co.za and give us an opportunity to resolve your complaint. Please follow the process set out in Clause 15 below, unless you are an employee. If you are an employee, please follow the internal Human Resources complaints/grievance process.

14.2. Complaints to the information Regulator

If you are still unsatisfied with our resolutions, you may appeal to the Information Regulator against our final determination. To facilitate the Information Regulator's involvement, you must visit the complaints page on the Information Regulator's website, which can be found here:

<https://inforegulator.org.za/complaints/>

The Information Regulator's contact details are as follows:

Woodmead North Office Park
54 Maxwell Drive, Woodmead, Johannesburg, 2191
Tel: 010 023 5200

15. External Complaints Resolution process

- 15.1. This External Complaints Resolution process governs how Life Choices resolves any genuine complaints from unsatisfied data subjects.
- 15.2. The primary audience is every person outside of Life Choices whose personal information Life Choices processes (i.e. data subjects who are not employees of the organisation). It applies to any person who is unsatisfied with how Life Choices has processed their personal information under the Protection of Personal Information Act 4 of 2013 (POPIA). The person or organisation lodging the complaint is hereafter referred to as "the complainant".
- 15.3. Any complaints that relate to PAIA and access to information are outside the scope of this policy and are handled according to the PAIA Manual.
- 15.4. **Complaints a data subject may lodge**
- The data subject should use this complaints process where they are genuinely unsatisfied with how we have processed their personal information. A complaint can only be lodged if the data subject believes that we are:
- 15.4.1. Misusing their personal information;
 - 15.4.2. Not keeping their personal information safe;
 - 15.4.3. Keeping their personal information for longer than necessary or allowed by POPIA;
 - 15.4.4. Holding outdated or inaccurate personal information without affording the data subject a chance to correct the personal information;

- 15.4.5. Accessing or disclosing the personal information without authorisation;
- 15.4.6. Wrongfully refusing to give the data subject proper access to the personal information; and
- 15.4.7. Taking too long to respond to the data subject's reasonable requests (or to process a request even after the complainant followed the right process in lodging the request).

15.5. Information required when lodging a complaint

- 15.5.1. All complaints must be lodged in writing and accompanied by the necessary supporting documents or information. Before submitting a complaint, a complainant will need to provide the following information to enable us to assist effectively:
 - 15.5.1.1. Full name of the complainant, or person lodging the complaint on behalf of a complainant, if applicable;
 - 15.5.1.2. Contact details, such as email address or telephone number;
 - 15.5.1.3. A description of how the complainant believes we obtained the information;
 - 15.5.1.4. A detailed description of the complainant's allegations, including all necessary information and context;
 - 15.5.1.5. Any evidence in support of the complaint, including emails, files, names of departmental officials, reference numbers, screenshots, pictures or other communications; and
 - 15.5.1.6. A confirmation of whether the complainant has fully read this complaints process and the rest of the Privacy Policy. The data subject will need to confirm whether they understood our complaints process and what we are generally authorised to do with personal information.

15.6. Complaints Resolution Process

- 15.6.1. **Step 1:** Any member of the public wanting to lodge a complaint must send an email to the Managing Director or Information Officer on info@lifechoices.co.za who will forward a copy of the Complaints Form to the complainant. Should the Managing Director/Information Officer not be available, the Administrator may also forward this form to the complainant, making a note of the nature of the complaint, and informing the Managing Director/Information Officer as soon as they are available.
- 15.6.2. **Step 2:** The complainant must complete the form sent to them and forward it back to the Managing Director for investigation. If the form was given to them by hand, the complainant may hand it in to the Administrator, who must give it to the Managing Director as soon as possible thereafter.
- 15.6.3. The person receiving the form must check that all fields have been completed and that nothing has been omitted. If there are omissions, the complainant must be asked to complete the form in full so that a thorough investigation may be conducted.
- 15.6.4. Life Choices will not process or accept any anonymous complaints as these make it difficult for us to investigate and resolve.
- 15.6.5. **Step 3:** The Managing Director/Information Officer must acknowledge receipt of the Complaint Form within 5 business days after receiving it. The Managing Director must then inform the complainant of how long it will take for them to receive feedback. Generally, giving feedback will take between 10 to 15 business days, depending on the complexity of the complaint.
- 15.6.6. **Step 4:** The Managing Director must conduct a full investigation into the nature of the complaint, interviewing all relevant parties who could assist in understanding and

resolving the matter.

- 15.6.7. Step 5: The Managing Director must compile a report of the findings. This form must be filed in the Complaints File kept with the Managing Director.
- 15.6.8. Step 6: The Managing Director must contact the complainant as soon as the investigation is done and inform them of the outcome.
- 15.6.9. While the complainant may be contacted telephonically to inform them of the findings, they must also receive feedback in writing (which may include communication via email).
- 15.6.10. A copy of this correspondence must be attached to the Complaints Form which will be filed in the Complaints File at the end of the complaints process.
- 15.6.11. Step 7: The Managing Director will take any necessary corrective action to prevent the incident or complaint from arising again. This may include disciplinary action against employees or formulating and implementing new organisational policies.
- 15.6.12. Note: Should the complaint be levelled against the Managing Director, a Board member must be designated to handle the matter to completion.
- 15.7. Should the complainant be dissatisfied with how their complaint was handled or the outcome, they may appeal in writing by asking for the matter to be reconsidered. The Managing Director will require at least another 10 business days to consider the appeal and take any necessary action. The Managing Director will inform the complainant of the final determination, including the associated reasons.
- 15.8. The above resolution times may vary depending on the complexity of the complaint and the amount of information required to resolve it.
- 15.9. Abusing the complaints process**
 - 15.9.1. This complaints process applies to complainants who reasonably believe that Life Choices has unlawfully or wrongly processed their personal information and are willing to comply with each step in the complaints process.
 - 15.9.2. We will strictly monitor the language complainants use, how often they complain, and whether they comply with the complaints process.
 - 15.9.3. We will disqualify or disregard complaints that are abusive, threatening or submitted in bad faith and flag the complainants for future correspondence. Responding to abusive complaints will include recording the complainant's details and, where necessary, sharing such information with the Information Regulator or the South African Police Service.
 - 15.9.4. If we determine that correspondence or a complaint is abusive, we will inform the complainant of such determination and what corrective action the complainant needs to take. Possible corrective action may include the complainant having to stop the abusive action and apologise. The complainant's failure to do so will be viewed by us as a final refusal to cooperate.

16. Record keeping (data retention)

- 16.1. We will generally retain a full record of our engagements with you, including any complaints you lodge, for at least five years. Often, keeping information for that period is necessary either to comply with any possible statutory retention periods or external and internal audits that are done for accountability efforts. We may retain your personal information in physical or electronic records at our discretion.

17. Updates to this policy

- 17.1. To ensure ongoing compliance with our data protection obligations, we will internally review and possibly update this policy at least every two years, especially if there are new developments in the data protection landscape.
- 17.2. The latest version will always be available on our website, with the date of the most recent update clearly shown. If the latest policy is not available on the website, it will be available on your written request.

Life Choices Commitment, as appropriate:

1. Issue guidelines to familiarise Managers/Supervisors and Staff with the Policy.
2. Maintain and update this Policy.
3. Deal with any problems promptly providing an efficient service for both Managers/Supervisors and Staff.
4. Review all policy, procedure and guideline documents on a regular basis.
5. Provide relevant formal training courses necessary to assist with the implementation of this policy.

MANAGING DIRECTOR'S POLICY CONFIRMATION



MIGNON HARDIE
MANAGING DIRECTOR

Originally signed this **25 August 2026**