# Privacy

In the following chapters you will find information about how your personal data are treated. Your data may be collected during your navigation on our website or as a consequence of the services that we provide you. In order to take advantage of all the services offered by our website, it is necessary for us to collect and treat your personal data. The treatment of your personal data may consist in collecting, organising, storing, analysing, interpreting, modifying, selecting, comparing, using, connecting, blocking, communicating, cancelling and destructing data. The treatment of your personal data follows the principles of lawfulness and correctness, in compliance with the current law and the South African Electronic Communications and Transactions Act, 2002 No. 25 of 2002. With this privacy notice, we like to inform you about the data we collect, why the collection is necessary, and also of your rights in connection with the treatment of your data.

### **Owner of the Treatment**

The Owner of the Treatment of your personal data on this website site is The Human Rights Front of South Africa with legal offices at 220 Beckett Street, Arcadia, Pretoria, Gauteng, 0083, ZA.

NPC#: K2018563477

For more information, please contact us using the following addresses:

Tel: +27 12 344 5719

Mobile: +27 64 493 1577

E-Mail: <u>humanrightsfrontsa@gmail.com</u>

Internet: niniastardigital.wixsite.com/humanrightsfrontsa

### **Purposes of the treatment**

We treats your data for the following purposes:

- to fulfil legal obligations
- to fulfil contractual obligations
- to make available the requested information and deliver the agreed services

- to monitor system efficiency
- to carry marketing activities, such as forwarding commercial information and advertising material, market research activities
- to safeguard obligations (e.g.: payments)
- to ascertain the level of satisfaction for the quality of the products and services offered

# Type of treatment

Your personal data are treated manually, but also electronically, mainly through the use of automated processes, depending on the objectives. In this case, we specifically use databases and computerised platforms that may be managed by both us and third parties. Each type of treatment guarantees the respect and the confidentiality of the data treated. We store such data and general information in the database and in the servers as log files. In order to provide you with a unique navigation experience, we need to collect some technical data that are necessary for the correct operation of the website:

- Browser type and browser version
- Operating system
- The "referrer" website
- The on our website linked webpages
- Date and time of access
- IP address
- Other similar data and information

The legal basis for this type of treatment is article 6 of the GDPR. By accessing the website, computerised systems and management software automatically and indirectly collect and/or manage this number of data and information.

At first, the collection of these data in anonymous format is static. However, later on the data are treated to ensure a high level of protection and safety for any data that we collect.

#### Period of data conservation

In compliance with current laws, the owner of the treatment has defined different periods of data conservation depending on their usage:

- As far as handling and answering your questions about products and activities, your
  personal data will be stored for a period of time strictly necessary for processing your
  request.
- 2. As far as managing activities connected with the navigation through our website, your personal data will be stored for a period of time strictly necessary to satisfy your requests.
- 3. As far as internal management and operational activities (for example time of conservation of invoices, administration, and tax information), your personal data will be treated for a period of time in line with the legal requirements for the specific purpose.
- 4. As far as the handling of disputes and litigations, your personal data will be stored for the whole time strictly necessary for pursuing such matters, and in any case not beyond the applicable prescription limits.

### **Use of cookies**

In order to constantly improve the navigation of our website, our company uses cookies. Cookies are text files containing data, which during the navigation to a website are stored in the visitor's computer through the browser. The storage of these data is necessary for the access recognition. You can delete any cookies stored in your computer at any time through the settings of your browser, or even set the browser so that cookies are no longer stored in the future. Should you decide on the latter, we cannot ensure that you will be able to use our website normally, and some services and functionalities may no longer be available. More information on cookies and their usage is available in the <u>dedicated</u> section.

### **Contact form**

Should you decide to contact us using the contact form on our website, you will be asked to enter some personal data. This enables us to process your query. This is also the reason why the corresponding fields of the contact form are marked with an asterisk, or in any other way, as

mandatory fields. The entering of personal or sensitive data other than those marked as mandatory will be at your discretion. Failure to enter, even in part, the mandatory information marked with an asterisk or similar character may result in the impossibility for us to answer your requests or deliver the requested services. The forwarding of requests using the contact form constitutes your implicit acceptance of the treatment of your personal data. The data that you transmit are treated and stored for a period of time strictly necessary for the processing of your request.

# **Profiling**

Profiling is any type of automated personal data processing activity that consists in using the information to assess, analyse and predict certain aspects of a natural person. For this type of marketing activities we signed agreements with third parties.

# Collaboration with third parties

When we work with our suppliers and use third-party services, we make sure that they are contractually obliged to apply the same privacy/safety standards that we apply, and that such standards are also followed. Such third parties, who act as owners of the treatment of the personal data, guarantee that the data received are not stored and used for purposes other than the contractually agreed. Within the framework of these technical agreements, the mail addresses made available to them are encrypted using technologies such as "hashing", so that any other parties are unable to obtain the original addresses.

It may happen that we need to transfer your data to third parties in Non South African Countries. This transfer of the data may be necessary if the servers (meaning the physical locations where the data are stored) or if the premises of our suppliers are in countries outside South Africa. Should we be forced to transfer your data to a country outside South Africa, it is our responsibility to ensure that they are treated with appropriate safety standards.

### Disclosure of your data

In principle, the personal data are not forwarded. Only in some specific cases, personal data may be disclosed to the following suppliers:

 Subcontractors for technical checks and analysis, payments, identification and addressing services, suppliers of analysis services or credit insurance companies

- Public administration or authorities, should this be required by law
- Credit institutions with whom we undertake commercial relations for the handling of credits / debits, financial reasons
- Any physical or legal persons, public and/or private (legal, administrative and fiscal consultants, courts of laws, chambers of commerce, etc.), if the data transfer is necessary or relevant for providing our service activities.

# **User rights**

The affected person's rights may be exercised by the same, and/or by a named person, by sending a written request with acknowledgement of receipt or e-mail to the owner of the treatment, Mr. Byron Bernard, at the operational address of the company The Human Rights Front of South Africa, 220 Beckett Street, Arcadia, Pretoria, Gauteng, 0083, ZA. The affected person has the right to obtain a copy of the data in our possession, which will be made available in accordance with the terms of current regulations.

In specific cases, we do reserve the right to store some information for legal purposes (for example in case of suspected fraud, or breach of the general terms and conditions). Should you believe that your rights have been violated, you can contact the relevant data protection authorities or take legal action.

Below we are summarizing the rights of an affected person:

- Right to receive confirmation of the data treatment
   Each affected person has the right to ask the owner of the personal data treatment if the data
   are being treated. Anyone wishing to exercise this right may contact us at any time.
- Right of information
   Each affected person has the right to obtain at any time and free of charge information
   regarding the treatment of their own personal data. The notification must contain the following information:
  - the purposes of the treatment
  - the types of personal data being treated
  - the recipients and/or the categories of recipients to which the treated personal data
     may have received, with particular reference and attention to any recipients

outside South Africa, or international organizations. Moreover, as far as transfer of the data to countries outside South Africa, the user also has the right to receive additional information regarding the safety guarantees in place during the treatment

- the period of conservation contemplated for the treatment and the storage of the personal data
- the possibility to issue a complaint with the data protection authorities
- in those cases when the personal data were not collected or treated by the company, the possibility of obtaining appropriate information on their source and origin
- the possibility of automated decisions, even when contemplated by art. 22, par. 1 and 4 of the GDPR on the profiling of personal data, and in this case obtain appropriate and supported information regarding the logics followed for such decisions and the possible consequences that this solution may bring for the affected person.

#### • Right of correction of personal data

The affected person has the right to request the immediate correction of any errors in their own personal data.

#### Right of cancellation

The affected person has the right to ask the owner of treatment to immediately delete their own personal data, if at least one of the following conditions is met and that the processing of the personal data is not required:

- The affected person has been collected and processed in a different way and is no longer necessary.
- The data subject withdraws the authorisation to the treatment, granted in accordance with art. 6, paragraph 1, letter a) of the GDPR, or art. 9, paragraph 2, letter a) of the GDPR, but also if the treatment is in violation of other data protection regulations.

- The affected person disagrees the treatment according to art. 21, paragraph 1, of the GDPR, and demonstrates that there are no legitimate reasons for their processing.
- The personal data are not being treated in a compliant way.
- The cancellation of the personal data is required to fulfil a legal obligation
   contemplated by national or South African laws, to which the owner of treatment
   must abide.
- The personal data have been treated following the requests of services by a minor, in compliance with the provisions of art. 8, paragraph 1 of the GDPR.

#### • Right of limitation of the treatment

The affected person has the right to ask the owner of treatment to limit the processing if one of the following conditions persists:

- The correctness of the personal data is disputed by the affected person. The limitation shall apply for a period of time that will give the responsible person the possibility to verify the correctness of the personal data.
- The treatment is not in compliance with current laws; the affected person refuses the cancellation of the personal data, asking instead their limitation.
- The owner of the treatment no longer needs the personal data for the purpose of the treatment, but the data subject requires the same to assert, exercise or defend their rights for legal action.
- The affected person has disagreed with current treatment according to art. 21,
   paragraph 1 of the GDPR and it has not yet been clarified if the legitimate reasons
   of the owner of the treatment have priority on those of the affected person.

#### Right of data transmission

The affected person has the right to receive, in a structured format, or in any case in a format readable by a data processing machine, the personal data originally delivered to the owner of treatment. The affected person has the right to transfer these data to another owner of treatment.

Moreover, based on the provisions of art. 20, paragraph 1 of the GDPR, the affected person

has the right to request that data will be directly transferred from the original owner to the new owner if a technical solution for both parties is available.

#### Right of disagreement

The affected person has the right to object at any time to the treatment of their own personal data due to reasons resulting from their specific situation. This also applies to profiling.

In case of objection to the treatment of personal data, we will interrupt the treatment, unless we can provide valid reasons to continue and such reasons do not affect the interests, the rights and the freedom of the affected person in a negative way and unless the treatment is necessary for affirmation, exercising and defence of legal affairs.

Automated decisions, including profiling

The affected person has the right to disagree on automated data treatment, including profiling, that has legal consequences and a significant impact, unless the decision is taken to fulfil or abide by the terms of a contract between the affected person and the owner of the treatment.

If the terms of a contract between the affected person and the owner of treatment include processing a certain request, with the explicit consent of the same, we will implement reasonable measures to safeguard the rights and freedom of the affected person.

Right to withdraw the consent to the data treatment
 The affected person has the right to withdraw at any time the consent to the treatment of their own personal data previously granted to the owner of the treatment.

#### Place of the data treatment

The treatment of the personal data that you have transmitted is mainly happening within our working structures, in the departments where the individual responsible for such treatment is located. The agreed contractual activities will only take place in South Africa.

Any transfers, in part or in full, of the contracted services to a different country shall be subjected to the approval of the customer, and can only take place if the data guarantee and safety conditions do agree with art. 44 and subsequent to the GDPR.

For further information, please contact us at the addresses indicated in the "Copyright" section.

#### **Newsletter**

The forwarding of a newsletter containing commercial information complies with your previous consent or with the existing legal requirements. Our newsletter contains information on our company activities, our services, offers and news (for example, new communication platforms, suggestions, travel recommendations and offers, offers that are complementary to your travels, vouchers, competitions, and indications on how to participate in the blog). These communications may also be sent by our commercial partners. The frequency of our newsletter depends on the topics. In any case, before sending our newsletters, we make sure that we have received your preliminary consent through a system called Double Opt-in, in accordance with the provisions of art. 6, paragraph 1, letter b) of the GDPR. The recipient's details may be transmitted to our technical partners for the newsletter sending. This collaboration is regulated by a personal data treatment sub-owner contract, as required by the GDPR. In compliance with current regulations, it is our duty to monitor and store the received consent for the newsletter. For this purpose, we store your subscription and confirmation of willingness to accept the newsletter. The personal data that you forward to us on such occasions are only used for the personalisation and heading of the newsletter. The subscription can be cancelled at any time in the newsletter itself. The period of conservation of the data is equal to the period of use of the service and the subscription itself.

# **SSL** certificate

We treat personal data collected on the website using computerised processes. Personal data is protected by Secure Socket Layer (SSL) encryption. This technology protects the user from the risk of unintentional disclosure of personal data when using an unprotected connection.

The user is notified when accessing a protected connection by a padlock icon. By clicking the padlock icon, the user can then make sure that the SSL certificate is valid and up to date.