



# PRIVACY POLICY

## JUNE 2021

### 1. INTRODUCTION

McGregor Arts Community Project (MACP) is a voluntary association which is a registered non-profit organisation (NPO), registration number 151-551, in accordance with the laws of South Africa. We have our registered address at PO Box 361, McGregor, 6708, South Africa.

This privacy policy tells you how MACP will use, store, process and protect your personal information as required by the Protection of Personal Information Act 2020 (POPIA) and any other applicable data protection legislation.

We are the "responsible party" for purposes of POPIA and other applicable data protection legislation in respect of all personal information you submit to us via our website ([www.poetryinmcgregor.co.za](http://www.poetryinmcgregor.co.za)), our social media and other related URLs, and/or any ancillary services and/or in any visit, correspondence and/or communication with us.

### 2. CONFIDENTIALITY

In order for us to engage with you, you will have to share information with us. It is important that you trust us to protect it and keep it confidential.

As a NPO we take the issues of privacy, data protection, confidentiality and the protection of intellectual property very seriously. We also know how important confidentiality and privilege is to you.

We respect your privacy and will protect your personal information by taking the following steps:

- we will treat your personal information as strictly confidential
- we will take appropriate technical and organisational measures to ensure that your personal Information is kept secure and is protected against unauthorised or

unlawful processing, accidental loss, destruction or damage, alteration, disclosure or access

- we will promptly notify you if we become aware of any unauthorised use, disclosure or processing of your personal information
- we will provide you with reasonable evidence of our compliance with our obligations under this privacy policy on reasonable notice and request
- upon your request, we will promptly return or destroy any and all of your personal information in our possession or control
- we undertake not to keep your personal Information longer than the period for which it was originally needed, unless we are required by law to do so, or you consent to us keeping the information for a longer period

### **3. THE PERSONAL INFORMATION WE COLLECT**

In this privacy policy "personal information" means any information of a personal nature by which you can be identified as an individual such as your name, postal address, email address, telephone number, home country, postal code, fax number, gender, age, financial details, and/or company name, business information and VAT number.

#### **3.1 General**

When you wish to participate in any MACP events or membership groups you may complete any number of forms (for example participating in Poetry in McGregor, launching a book at Poetry in McGregor and joining friends of Poetry in McGregor). The information required will. Include, for example, your name, address, email address and telephone numbers.

To send you a quote or invoice you, we might collect your publicly available personal information from the Internet. For example, your address or VAT registration number.

#### **3.2 Website**

When you use the Website, we may collect certain information that is not personal information such as your operating system, browser type, and Internet service provider. This type of information does not identify you personally.

We may collect, process and store the following information (which may include personal information) about you:

- information that you provide by filling in forms on the Website
- information about your device software and hardware, including the unique internet mobile equipment identity (IMEI), number of your mobile telephone, the unique integrated circuit card identity (ICCID) number of your SIM cards in your device, your email address, personal internet protocol (IP) address, and mobile phone number

- your geographic location information based on your mobile network operator's tower details, GPS (Global Positioning System) and/or WIFI communications network location
- the date and time, country and the IP address of the device from which you connect to our Website
- information that we may ask you for if you report a problem with our Website
- details of your visits to our Website, including, but not limited to, traffic data, location data, weblogs and other communication data and the resources that you access
- if you contact us, we may keep a record of that correspondence

We may also collect information (which may include personal information) that our Website users provide, such as new or deleted comments and keyword searches.

The supply of your personal information is voluntary; however, you acknowledge that we cannot make certain services available to you on the Website if you do not wish to supply such personal information.

We may use a third-party company to monitor website traffic, which may, in some instances, store your information, including the personal information you submit to such third parties.

By continuing to use the Website, you consent to processing, collection, storage, retention and use of the personal information you provide for the purposes set out in this privacy policy, and you consent to our collection of any changes or updates that you may provide to any information you provide that is collected by us. If you do not agree to this privacy policy, please do not use the Website.

## **4. HOW WE USE AND DISCLOSE YOUR PERSONAL INFORMATION**

### **4.1 Use of your information**

We may use your personal information:

- to verify and keep a record of your identity
- to respond to your enquiries/provide you with information you request
- to invite you to attend events we hold
- to process your wish to participate in Poetry in McGregor
- to process your wish to purchase tickets for Poetry in McGregor
- to process your wish to join Friends of Poetry in McGregor
- with your express consent, to add your name and email address to our mailing list so that you can receive news about Poetry in McGregor
- to ensure that content from our Website is presented in the most effective manner for you and for your computer and/or mobile device
  - to monitor and analyse the conduct on the Website to ensure compliance with laws, reduce the likelihood of fraud and other risk-prevention purposes

- in aggregate form, for internal business purposes such as generating statistics and developing our strategic and marketing plans
- to allow you to participate in interactive features on our Website, when you choose to do so
- to carry out any contracts that may form between us

We may also use information provided by you to:

- enforce agreements and terms and conditions between us, monitor user activity, such as keyword searches or new postings, and more effectively manage traffic on the Website
- assist you with technical difficulties.

We will not use your personal information for any purpose (other than as stated above) without your express consent.

#### **4.2 Disclosure of your information**

We will not use or disclose your personal information to third parties without your express consent other than in terms of the provisions of this privacy policy, unless the use or disclosure is:

- required to comply with applicable law, order of court or legal process served on MACP; and/or
- disclosure is necessary to protect and defend the rights or property of MACP.

We may also disclose information about our users to law enforcement officials in the good faith belief that such disclosure is reasonably necessary to enforce this privacy policy, respond to claims that any content violates the rights of third parties; or protect our legitimate interest and/or the rights, property, or our personal safety or the personal safety of our users or the general public.

We will be entitled to disclose your personal information to our agents, advisors, employees and/or third-party service providers and suppliers (including payment providers) who assist us to interact with you via our Website, mobile communications and/or email, and thus need to know your personal information in order to assist us and to communicate with you properly and efficiently.

We will ensure that all such employees and/or third-party service providers having access to your personal information are bound by appropriate and legally binding confidentiality and non-use obligations in relation to your personal information.

We will only transfer data overseas where we are satisfied that adequate levels of protection are in place to protect any information held in that country or that the service provider acts at all times in compliance with applicable privacy laws. Where required under applicable laws we will take measures to ensure that personal information handled in other countries will receive at least the same level of protection as it is given in this privacy policy.

## **5. STORAGE AND SECURITY OF PERSONAL INFORMATION**

We will do our best to protect your personal information, and we will use technology that will help us to do this. However, the transmission of information via the internet is not completely secure and we cannot guarantee the security of your information transmitted to our Website. Any transmission of your information to our Website is entirely at your own risk. Once we have received your information, we will use strict procedures and security features such as encryption and locking of computers to try to prevent unauthorised access. We also backup your personal information regularly.

We may, from time to time, transfer, store or host your personal information on servers outside of South Africa. We will at all times ensure that appropriate security safeguards are in place to secure and protect such personal information held in another country or that the service provider acts at all times in compliance with applicable privacy laws. Where required under applicable laws we will take measures to ensure that personal information handled in other countries will receive at least the same level of protection as it is given in this privacy policy.

We will ensure that all hard-copy documents are kept in a secure office with access limited to those Board and staff members who require access for the purposes of running MACP.

## **6. COOKIES**

In order to give you a more user-friendly experience on our Website and improve your future visits we may collect information about your computer using cookies. "Cookies" are small text files transferred by a web server to your hard drive and thereafter stored on your computer. The types of information a Cookie collects include the date and time you visited the Website, your browsing history, your preferences, and your username.

This information includes, where available:

- your operating system
- browser type
- third-party software installed on your device
- installation and uninstallation rates
- the language of your device and computers manufacturer
- screen size and model of the device

- any other technical information for system administration and to report aggregate information to our advertisers

This is statistical data about our users' browsing actions and patterns and does not identify any individual.

In some instances, our third-party service providers may use cookies on the Website. We cannot control, or access cookies used by third-party service providers. This privacy policy covers only cookies used by us, and not any cookies used by third parties.

You have the ability to either accept or decline the use of cookies on your computer, whether you are registered with us or not. Typically, you can configure your browser to not accept cookies. However, declining the use of cookies may limit your access to certain features of the Website. For example, you may have difficulty using certain interactive features of the Website.

## **7. EMAIL INSPECTION**

We will inspect all emails you contact us with via the email addresses that we provide on this website. We do this to check for viruses, and reserve the right to monitor and inspect all material and information transmitted over our system. We may also monitor whether you read emails that we send you.

## **8. THIRD PARTIES**

We may use third-party service providers to monitor our users' interests. In addition, the Website may occasionally contain links to third-party websites. If you click on the links to third-party websites, you leave the Website.

We are not responsible for the content of these third-party websites or for the security of your personal information when you use the third-party websites and this privacy policy does not govern information used or stored by these websites. These third-party service providers and third-party websites may have their own privacy policies governing the storage and retention of your personal information that you may be subject to. They may also collect information that is not personal information such as your browser specification, or operating system. We therefore recommend that when you enter a third party's website, you review its privacy policy.

You agree that we are not liable for any of the following:

- the content, security, operation, use, accuracy or completeness of any such third-party websites; or the products or services that may be offered or obtained through them; or the accuracy, completeness, or reliability of any information obtained from a third-party website

- the ownership or right of use of any licensor of any software provided through any third-party website
- any content featured on third-party website that are accessed through the links found on the Website
- any failure or problem that affects the products or services of a third-party website, for example any telecommunication service provider, internet service provider, electricity supplier, local or other authority.

## **9. GENERAL**

If you provide information to MACP, you:

- warrant that all information (including personal information) that you provide to us is accurate, truthful and current information
- undertake not to impersonate or misrepresent any person or entity or falsely state or otherwise misrepresent your affiliation with anyone or anything
- acknowledge that we may verify your identity and your personal information through an automated email verification process and/or with third party service providers.

To the extent that this privacy policy or any provision in this privacy policy is regulated by or subject to the POPIA or other data protection legislation it is not intended that any provision of this privacy policy contravenes any provision of POPI or other data protection legislation. Therefore, all provisions of this privacy policy must be interpreted as being qualified, to the extent necessary, to ensure that the provisions of POPIA or other data protection legislation are complied with.

## **10. NOTIFICATION OF CHANGES**

We reserve the right to change this privacy policy from time to time, and at our sole discretion. We may send you a notice regarding material changes to this privacy policy, but we encourage you to check this privacy policy regularly for any changes. If you provide us with personal information and/or continue to use our Website after any change in this privacy policy, you will be deemed to have accepted those changes.

## **11. CHILDREN**

We do not knowingly collect personal information of children. If you are under 18 years of age, please do not use our Website without the consent of your legal guardian.

## 12. CONTACT US

You have the right to access, review and correct personal information that you have provided to us, or to object to our use of your information. You can do so by emailing us at [info@poetryinmcgregor.co.za](mailto:info@poetryinmcgregor.co.za)

We may also send you any legally required notifications and other notifications, including but not limited to, service related notices (for example, we may send you a notice regarding server problems or scheduled maintenance to the Website).

You also have the right to lodge a complaint with the Information Regulator if you think we are in breach of any applicable data protection legislation.

See <https://www.justice.gov.za/infoereg/>