



Privacy Policy

1. General

The Pan African Federation of Accountants, Registration number: 094-631-NPO (hereinafter referred to as “PAFA” or “we” or “us”) recognise the importance of protecting your personal information and your right to having your personal information kept private. PAFA ensures that it adheres to all applicable data protection laws and has the implemented safeguards to ensure that your personal information is kept safe from unauthorised access.

This Privacy Policy relates to the collection and use of personal information you may supply to us through your use of any of our communication channels, events page(s) and website(s) (including the Africa Congress of Accountants (hereinafter referred to as “ACOA”)) for any purpose. This policy governs the manner in which your personal information will be dealt with.

2. Personal Information

PAFA aligns its definition of “personal information” with that as set out in the Protection of Personal Information Act, 2013 (POPIA). All specific information that identifies you that is provided to us via any of our communication channels will be classified as personal information. This includes but is not limited to personal information that is provided to us in the course of our business, while obtaining an online registration to our events, enquiries via e-mail, or for the purpose of recruitment or potential employment.

To help you understand this policy, we include the explanations of the terms ‘personal information’ and ‘process’ as used in POPIA:

Personal information is any information relating to an identifiable natural or juristic person. Some examples are race, gender, marital status, nationality, age, physical or mental health, disability, language, education, identity number, telephone number, email, postal or street address, biometric information and financial, criminal or employment history.

Process means any operation or activity, whether automated or not, concerning personal information, including collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation, use, dissemination by means of transmission, distribution or making available in any other form, merging, linking, as well as blocking, degradation, erasure or destruction of information. “Processing” will have a similar meaning.

3. What personal information do we collect from you?

PAFA collects and processes different types of personal information to provide services to you. Such information is collected transparently throughout our various processes.

Should you decide to register or engage with us and/or use any of our services, you thereby expressly consent to us (1) processing the personal information that you provide to us or that is provided to us by other responsible parties that you have consented to process your personal information and (2) using the following types of information about you when you use any of our communication channels or any portal:

Information that is automatically collected:

We might use Cookies (small text files stored in your browser) and other techniques to follow your movements on our website. These collect information that makes the website remember you and tells us how you use our website. This, in turn, helps us make our website relevant to your interests and needs.

They also help us find information once you have logged in or help us link your browsing information to you and your personal information, for example, when you choose to register for an event. We may use a persistent Cookie (a Cookie that stays linked to your browser) to record your details so we can recognise you if you visit our website again.

Cookies by themselves cannot be used to discover your identity. Cookies do not damage your computer. You can set your browser to notify you when you receive a Cookie. This enables you to decide if you want to accept it or not. If you choose not to accept Cookies from our website this may limit its functionalities or performance.

4. When do we collect your personal information?

When you utilise any of our communication channels, contents, or services.

5. Processing of Information

In terms of POPIA, personal information must be processed for a specified purpose. We will process your personal information only for a legitimate business purpose and a necessary function of your engagement with any of our communication channels, services or any portal and you have expressly consented to this or in instances where same is permissible by law.

We use your personal information in order to do the following:

- identify you;
- provide the services and products you have requested;
- process your requests or instructions;
- manage the services we provide to you;
- follow the laws of the country where we are domiciled, for the time being South Africa;
- offer our Stakeholders (Third Parties) products and services to you, unless you have opted out from receiving such material;
- perform the necessary checks for the purpose of recruitment or potential employment;
- to enable you to provide us with your contracted services;
- for permissible reasons as provided for by POPIA or any other regulatory instrument;
- to improve our content, services, or website.

Personal information will only be retained by PAFA for as long as necessary to fulfil the purposes for which that personal information was collected, or as permitted in terms of applicable law.

You should not provide us with any personal information, where the provision of same will be considered to be in breach of this policy or POPIA.

You warrant that the personal information disclosed to us is directly from you as the user or in connection with the services and all such personal information is lawfully yours to provide. You also warrant that any personal information provided to us by a third-party, was obtained by that third-party from you and lawfully provided to us with your express consent to that responsible party to do so.

6. Sharing of Information

PAFA does not and will not sell or provide personal information to third parties for independent use. We may, however, share personal information with our business partners and/or associates if the sharing of such information is required to provide any of our services or products to you, to protect our or your legitimate interest. However, our business partners and/or associates will adhere to using your information only as directed by PAFA. PAFA will enter into written agreements with such third-party service providers to ensure that they comply with applicable laws pursuant to the processing of personal information provided to it by PAFA from time to time.

PAFA may transfer personal information to a third party who is in a foreign country to administer certain services but may only do so subject to the provisions of POPIA. Whenever we transfer your personal information to a foreign country, we will ensure a similar degree of protection by (1) transferring the information only to countries that have been deemed to provide an adequate level of protection for personal information or (2) ensuring our agreements with such parties provide such level of protection.

Below is a list of instances of where we may disclose your personal information to third parties. Please note that the list below is not exhaustive:

- Personal information, as well as information of your attendance at our events, with various professional accountancy organisations.
- When any regulatory authority for the applicable sectors requests same.
- To comply with any regulation passed under relevant legislation, or any legal process.
- To enforce and protect our rights and property (including intellectual property) and/or where we have a legitimate interest to do so.
- When you have expressly authorised us to do so.
- If we undergo a change in business registration or location.
- In the interest of national security.
- For the purpose of recruitment or potential employment within PAFA.

7. Third Party Links

This privacy policy only applies to PAFA's use of data. Our websites, services or products may, from time-to-time, contain links to use or be on external sites. PAFA is not responsible for the privacy policies, or the content of such sites and we recommend that you read the privacy policies of any external site you use or access through any of our communication channels. Similarly, if you are directed to our website from a third party, we are not responsible for the privacy policy or practices of the third party. We recommend you read their privacy policy.

8. Protection of Information

We value the information that you choose to provide us and will therefore take reasonable steps to protect your personal information from loss, misuse or unauthorised alteration and/or access. The information we maintain concerning our members, communities, all our employees and potential job applicants is

stored in databases stored in the cloud or network that ensures the privacy and confidentiality of that information.

PAFA uses reputable ICT, data and software service providers to prevent any unauthorised access to your personal information. We procure up to date and latest software in line with the latest global developments in security technology to ensure that your personal information stored with us is adequately secured and protected at all times.

You must always keep your personal information confidential and ensure that you do not disclose it to anyone.

Should you at any time feel that you no longer wish to be contacted by us for any purpose whatsoever, you should advise us to that effect via [email](#).

We retain all data that is required for us to discharge our business activities for historical, statistical and research purposes. We have established appropriate safeguards against the records being used for any other purposes.

PAFA will furnish you with a reasonable opportunity to object (opt-out) to the use of your personal information for PAFA's marketing purposes when collecting the personal information and on the occasion of each communication to the data subject for purposes of direct marketing.

9. Your Rights and Obligations

You have a right to access personal information that we hold about you and where such access is necessary for you to exercise and/or protect any of your rights.

In terms of POPIA, you have the following rights with regards to your personal information:

- Have your personal information processed in accordance with lawful processing conditions;
- Be informed about how your personal information is being used;
- Access personal information we hold about you in terms of section 10 below;
- Challenge the accuracy or completeness of your personal information in PAFA's records at any time;
- Request us to correct any mistake in your personal information that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully;
- Require us to delete or destroy a record of personal information where we are no longer authorised to retain the information;
- Object to automated decision making which results in legal effects concerning you or similarly significantly affects you;
- Object in certain situations to our continued processing of your personal information in certain circumstances.

While it is our policy to respect the rights of individuals, please be aware that your rights are subject to certain exemptions provided for in terms of legislation.

10. Access to Personal Information Request

To request access to your personal information held by us, you must follow the process outlined in our Access to Information Manual ("Manual") for a personal access request. The Manual can be requested via [email](#).

11. Feedback

If you have any questions, concerns or complaints about this policy or non-compliance with this policy or POPIA, you may contact our Information Officer to address your query. You can contact the Information Officer via the following:

Information Officer: Alta Prinsloo
Email: ceo@pafa.org.za
Postal address: P.O. Bag x32, Northlands, 2116
Physical address: 17 Fricker Road, Sandton, 2196

To enable us to assist you efficiently, your query should contain sufficient details including sufficient facts, dates and supporting documentation. You should also include your contact details.

If the matter is not resolved to your satisfaction, you have the right to lodge a complaint with the Information Regulator under the provisions of POPIA. The contact details of the Information Regulator are as follows:

Postal address: PO Box 31533, Braamfontein, Johannesburg, 2017
Physical address: JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
Complaints: POPIAComplaints@inforegulator.org.za
General enquiries: enquiries@inforegulator.org.za

Please ensure that you have read and understood the terms and conditions of this privacy policy before you provide us with your personal information. We reserve the right in our sole discretion to amend this policy from time to time. Save as expressly provided to the contrary in this policy, the amended version of the Privacy Policy shall supersede and replace all previous versions thereof.

Acceptance of the terms and conditions contained in this policy is voluntary. PAFA does however require your acceptance to enable us to effectively offer services to you, liaise with you, exercise our right, or enforce obligations as they arise from the applicable relationship and comply with applicable laws.

12. Policy review

The Information Officer as the policy owner is responsible for ensuring this policy is maintained and that it addresses relevant legal, regulatory, and other key documents.

The policy owner manages the process for updating this policy in accordance with the review timing outlined below.

This policy is subject to a triennial review and approval by the Audit and Risk Committee and the Board unless a change in legislation or regulation requires otherwise.