



PRIVACY POLICY

By accessing and using this website, communicating with us, applying for or participating in any choir activities, or otherwise providing personal information to Cape Town Children's Choir NPC (registration number 2024/656897/08) (**Company, we, us or our**), you are providing your express and voluntary consent to the processing of your personal information by us. If you do not agree with this Privacy Policy or wish to provide your consent, you must immediately stop accessing and/or using this website, providing us with your personal information or engaging with us.

1. INTRODUCTION

- 1.1. The Company collects, uses, stores and, in some circumstances, shares personal information in connection with its website and its educational, choral, fundraising and related activities.
- 1.2. The Company respects the rights of users whose personal information it processes, including their right to protection against unlawful collection, retention, sharing and use of personal information.
- 1.3. The purpose of this Privacy Policy is to provide users of the website and users who interact with the Company with information about the Company's processing activities and the manner in which their rights are protected.
- 1.4. This Privacy Policy is a general notice regarding the Company's information-processing activities. It applies while a user uses the website, applies for or participates in choir activities, attends an event, makes a donation, works or volunteers with the Company, or otherwise interacts with the Company.
- 1.5. This Privacy Policy forms part of the Company's website terms and conditions to the extent that it relates to use of the website.
- 1.6. The provisions of this Privacy Policy will, as far as possible, be incorporated into any agreement between you and the Company.

2. DEFINITIONS AND INTERPRETATION

- 2.1. In this Privacy Policy, the following words bear the following meanings:
 - 2.1.1. **consent** means any voluntary, specific and informed expression of will in terms of which permission is given by or on behalf of a data subject for the processing of personal information;
 - 2.1.2. **child** means a natural person under the age of 18 years;
 - 2.1.3. **choir activities** means the Company's educational, choral, rehearsal, audition, concert, festival, school promotional day, performance, tour, camp, outreach, fundraising and related activities;
 - 2.1.4. **competent person** has the meaning given to it in POPIA and includes, where applicable, a parent or legal guardian who may consent on behalf of a child;
 - 2.1.5. **direct marketing** means to approach a data subject, either in person or by mail or electronic communication, for the direct or indirect purpose of promoting or offering to supply goods or services, or to request a donation, sponsorship or other support;
 - 2.1.6. **information officer** means Helen Beverly Stabrey, or another person duly appointed by the Company from time to time;

- 2.1.7. **operator** means an outside third party who processes personal information for or on behalf of the Company in terms of a contract or mandate;
- 2.1.8. **personal information** means information relating to an identifiable, living natural person and, where applicable, an identifiable existing juristic person, including information that can identify a person directly or indirectly;
- 2.1.9. **POPIA** means the Protection of Personal Information Act, No. 4 of 2013, including its regulations and any applicable codes of conduct;
- 2.1.10. **PAIA** means the Promotion of Access to Information Act, No. 2 of 2000;
- 2.1.11. **process** or **processing** means any operation or activity concerning personal information, whether or not by automatic means, including collection, receipt, storage, use, disclosure, alteration, retrieval, restriction, deletion or destruction;
- 2.1.12. **special personal information** means personal information that POPIA identifies as requiring additional protection, including information concerning health, biometric information, religious or philosophical beliefs, race or ethnic origin and criminal behaviour;
- 2.1.13. **user** or **you** means a visitor to the website or any person who interacts with the Company, including a prospective or current chorister, parent, guardian, donor, supporter, employee, contractor, volunteer or service provider; and
- 2.1.14. **website** the website or any part thereof accessible at <https://www.ctcchoir.co.za/> or another URL that the Company may use from time to time.
- 2.2. Any reference in this Privacy Policy to:
 - 2.2.1. the singular includes the plural and *vice versa*;
 - 2.2.2. any one gender includes the other genders, as the case may be;
 - 2.2.3. an act, regulation or other law is to the version of that law in force at the effective date of this Policy and includes any amendment or re-enactment made to that law after the effective date of this Policy.
- 2.3. When calculating any number of days for the purposes of this Policy, the first day must be excluded and the last day of the relevant interval included, unless the last day is not a business day, then the last day will be the next succeeding business day.
- 2.4. The word “include” means “include without limitation”. Use of the word “include” or “in particular” is for illustration or emphasis only and where followed by specific examples must not be interpreted as limiting the meaning of the general wording preceding it.
- 2.5. A requirement that any Policy, request, demand or other communication made in terms of this Privacy Policy must be in writing will be met if it is in the form of a data message as defined in the Electronic Communications and Transactions Act, No. 25 of 2002, and is accessible in a manner usable for subsequent reference, provided that this policy may not be amended as such.
- 3. RESPONSIBLE PARTY**
 - 3.1. The Company is the party that collects and processes personal information for the purposes described in this Privacy Policy and is the responsible party for purposes of POPIA.
 - 3.2. The Company’s contact details are as follows:
 - 3.2.1. Information Officer email: ctcchoir@beausoleil.org.za (marked for the attention of the Information Officer).
 - 3.2.2. General email: info@ctcchoir.co.za.
 - 3.2.3. Physical address: Beau Soleil Music Centre, 12 Salisbury Road, Kenilworth, Cape Town, 7708.
 - 3.3. The Company may appoint operators from time to time to undertake particular processing activities on its behalf. The Company will require operators to process personal information only as authorised and to implement appropriate safeguards where required by POPIA.

4. WHAT PERSONAL INFORMATION IS COLLECTED

- 4.1. Depending on the user's interaction with the Company, the Company may collect and process the following categories of personal information:
- 4.1.1. names, preferred names, contact details, addresses, email addresses, telephone numbers and communications preferences;
 - 4.1.2. information relating to prospective and current choristers, including full names, addresses, date of birth, age, school name and grade, music experience, audition information, participation, attendance, rehearsal, event, festival, camp and tour information;
 - 4.1.3. information relating to parents, guardians and emergency contacts, including names and surnames, addresses, cell phone numbers, email addresses, relationship to a chorister, consent records, billing and payment information, correspondence and emergency details;
 - 4.1.4. health, allergy, dietary, welfare, medical aid, doctor name and doctor contact-number information or other special personal information voluntarily supplied or otherwise lawfully collected where this is needed for a chorister's safe participation in choir activities;
 - 4.1.5. photographs, video footage, audio recordings and other media created or received in connection with auditions, rehearsals, concerts, tours, events, publicity and choir activities, together with related permissions or consent records;
 - 4.1.6. donor, sponsor and supporter information, including names, cell phone numbers, email addresses, donation, sponsorship, payment and tax-receipt information and communication preferences. In the case of newsletter subscribers or general supporters, this may be limited to names and email addresses;
 - 4.1.7. information relating to employees, contractors, volunteers, directors and service providers, including full names, cell phone numbers, email addresses, identification, qualification, contractual, remuneration, banking, tax and compliance information, where applicable;
 - 4.1.8. information supplied through the website, including Wix Contact Us form submissions, online application-form submissions through Google Forms, email correspondence and social-media communications; and
 - 4.1.9. limited technical information generated through use of the website, such as an IP address, browser type, device and operating-system information, pages viewed, rough location information, referral information, website interaction information and Wix Analytics, YouTube or other cookie or analytics information, where used.
- 4.2. The supply of personal information is generally voluntary. However, if a user does not provide information that the Company reasonably requires to consider an application, ensure a child's safe participation, administer fees or donations, arrange an event or tour, or comply with law, the Company may not be able to provide the relevant service, activity or opportunity.

5. PURPOSE/S FOR COLLECTION AND PROCESSING OF PERSONAL INFORMATION

- 5.1. The Company collects and processes personal information only for specific, explicitly defined and lawful purposes relating to its functions and activities. It will process personal information in a manner that is adequate, relevant and not excessive in the context of the purpose for which it is processed. Any further processing will be compatible with the purpose for which the information was collected, unless otherwise permitted by POPIA or another applicable law.
- 5.2. The Company may process personal information for the following purposes:
- 5.2.1. considering applications, arranging auditions and administering choir membership and participation;
 - 5.2.2. communicating with choristers, parents, guardians, donors, supporters, staff, volunteers, service providers and other stakeholders;

- 5.2.3. planning and running rehearsals, concerts, festivals, school promotional days, competitions, tours, camps, outreach, fundraising activities and related events;
- 5.2.4. protecting the health, safety and welfare of children and others participating in choir activities;
- 5.2.5. administering fees, tour, camp and clothing payments, bursaries, donations, sponsorships, accounting, tax, insurance, governance and legal obligations;
- 5.2.6. maintaining and promoting the Company and its activities, including through photographs, video, audio, newsletters and social-media content, subject to the Company's membership, media-consent and other applicable consent processes or another lawful basis;
- 5.2.7. operating, maintaining, protecting and improving the website, administering website enquiries and managing newsletter subscriptions;
- 5.2.8. customising and displaying content including, but not limited to products, articles, listings and advertisement to a user in a way that the Company feels may interest the user or be most beneficial to them;
- 5.2.9. understanding website use and improving the relevance, functionality and performance of the website and communications sent by the Company;
- 5.2.10. sending newsletters, event notices, fundraising communications and other direct-marketing communications where permitted by law;
- 5.2.11. preventing fraud, enforcing the Company's rights and protecting the legitimate interests of the Company, users and third parties;
- 5.2.12. entering into a contract with a user and/or to enable a partner to contact the user and enter into a contract with the user;
- 5.2.13. performing any obligations under a contract with a user;
- 5.2.14. complying with any legal obligation;
- 5.2.15. enabling a user to voluntarily participate in interactive features on the website; and
- 5.2.16. notifying a user about changes to the website or services.
- 5.3. The Company processes personal information only where it has a lawful basis under POPIA. Depending on the circumstances, this may include consent, the conclusion or performance of a contract or other arrangement, compliance with a legal obligation, protection of the legitimate interests of a data subject, or the legitimate interests of the Company or a third party.
- 5.4. As permitted by POPIA, the Company may use personal information collected to compile profiles for statistical purposes. No information contained in the profiles or statistics will be able to be linked to any specific user.
- 5.5. The Company will not sell personal information to third parties.

6. COLLECTION OF PERSONAL INFORMATION

- 6.1. As far as reasonably practicable, the Company will collect personal information directly from the relevant user or, in the case of a child, from that child's parent, guardian or other competent person.
- 6.2. The Company may collect personal information from another source only where this is permitted by POPIA, including where:
 - 6.2.1. the information is contained in or derived from a public record, or has deliberately been made public by the user;
 - 6.2.2. the user or, where the data subject is a child, a competent person has consented to the collection of the information from another source;
 - 6.2.3. collection from another source would not prejudice a legitimate interest of the user;
 - 6.2.4. collection from another source is necessary to avoid prejudice to the maintenance of the law, to comply with a legal obligation, for the conduct of actual or contemplated legal proceedings, in the interests of national security, or to maintain the legitimate interests of the Company or a third party to whom the information is supplied;
 - 6.2.5. collecting the information directly would prejudice a lawful purpose of the collection; or

- 6.2.6. direct collection is not reasonably practicable in the circumstances of the particular case
- 6.3. Personal information may be collected when a user:
 - 6.3.1. uses the website, submits a Wix Contact Us form or interacts with embedded website content;
 - 6.3.2. submits an application, audition, membership or other online or paper form, including a Google Form or similar online form linked from the website;
 - 6.3.3. enrolls a child, participates in choir activities, attends an event, travels on a tour or otherwise interacts with the Company;
 - 6.3.4. makes a donation, enters a sponsorship arrangement, makes a fee, tour, camp or clothing payment, or subscribes to receive communications;
 - 6.3.5. applies to work, contract or volunteer with the Company; or
 - 6.3.6. contacts the Company by email, telephone, social media or another communication channel.
- 6.4. If the Company collects personal information from a source other than the user, it will record in writing the details of that source, including the full names and contact details of that source where applicable.
- 6.5. A user may visit the website without actively providing personal information. However, the website and its service providers may collect limited technical information for security, functionality, analytics, maintenance and improvement purposes. The Company will not use such information to identify an individual unless this is necessary and permitted by law.

7. COOKIES

- 7.1. Cookies are small text files placed on a device by a website or service provider. The website may use cookies and similar technologies, including Wix essential cookies, Wix Analytics and cookies or similar technologies associated with embedded YouTube content, to operate properly, remember preferences, understand website use, improve content and protect the website.
- 7.2. The Company may use cookies and similar technologies to:
 - 7.2.1. distinguish one user from another on the website;
 - 7.2.2. remember a user's preferences or previous interaction with the website, where the relevant functionality is used;
 - 7.2.3. estimate the website's audience size and usage patterns;
 - 7.2.4. improve the content, functionality and security of the website; and
 - 7.2.5. compile de-identified or aggregated information about website use, where appropriate.
- 7.3. The types of information that may be collected through cookies or similar technologies include device and browser information, IP address, pages visited, date and time of visits, referral information and website interaction information.
- 7.4. Third-party platforms linked to or embedded on the website, including Google Forms, Google Drive, Mailchimp, Facebook, Instagram, YouTube/Google and other social-media, video-hosting or external application-form providers, may use their own cookies or similar technologies. Those technologies are governed by the relevant third party's policies and are not controlled by the Company.
- 7.5. A user may manage cookies through their browser settings. Disabling cookies may affect the functionality of parts of the website or third-party services.

8. GENERAL CONDITIONS FOR PROCESSING PERSONAL INFORMATION

- 8.1. The Company will comply with POPIA and other applicable laws, contracts and regulations when it processes personal information.
- 8.2. The Company will act reasonably and process personal information in a manner that a data subject can reasonably expect and that is fair.
- 8.3. The Company will respect the privacy rights of data subjects. Where a less privacy-invasive means of achieving a lawful purpose is reasonably practicable, the Company will seek to use that means.

- 8.4. The Company will take reasonably practicable steps to ensure that personal information is relevant, adequate and not excessive for the purpose for which it is processed.
- 8.5. Where a reasonably practicable alternative can achieve the relevant purpose without processing personal information, or through less intrusive processing, the Company will consider and use that alternative where appropriate.
- 8.6. The Company will seek to ensure that its processing activities are proportionate to the relevant purpose and that no less privacy-invasive measure is reasonably practicable in the circumstances.
- 8.7. The Company will not process personal information in a manner that unnecessarily prejudices the rights and interests of data subjects.

9. DISCLOSURE AND SHARING OF PERSONAL INFORMATION

- 9.1. The Company may share personal information where this is necessary for the purposes described in this Privacy Policy and is permitted by law.
- 9.2. Depending on the circumstances, recipients may include:
 - 9.2.1. authorised directors and other persons who require access to personal information in order to perform their roles, including staff, conductors, administrators, volunteers and advisers, where applicable;
 - 9.2.2. Beau Soleil Music Centre, where it provides administrative, premises or operational support to the Company;
 - 9.2.3. website, hosting, DNS, email, cloud, application-form, mailing-list, payment, accounting, printing, insurance, IT and other service providers engaged by the Company, including Wix, xneelo, Mailchimp, Google Forms, Google Drive and YouTube/Google, where applicable;
 - 9.2.4. venues, event and competition organisers, transport, travel, accommodation, medical and emergency service providers where necessary for an activity;
 - 9.2.5. banks, accountants, auditors, legal advisers, insurers, regulators, the South African Revenue Service, the Companies and Intellectual Property Commission and other authorities where disclosure is required or permitted by law; and
 - 9.2.6. members of the public through the website, newsletters, Facebook, Instagram, YouTube or other media channels where photographs, video or audio recordings are shared in accordance with the Company's membership, media-consent and other applicable consent processes and any applicable law.
- 9.3. The Company will require its operators, where appropriate, to process personal information only in accordance with the Company's instructions and applicable privacy requirements.
- 9.4. Other than as stated above, the Company will not share a user's personal information with any third parties unless it has the user's express consent to do so.

10. DATA SUBJECT RIGHTS

- 10.1. Subject to POPIA, PAIA and any applicable limitations, a data subject may:
 - 10.1.1. request confirmation of whether the Company holds personal information about them and request access to that information;
 - 10.1.2. request the correction, update or deletion of personal information that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or unlawfully obtained;
 - 10.1.3. object, on reasonable grounds, to the processing of personal information in certain circumstances;
 - 10.1.4. withdraw consent where processing is based on consent, provided that this will not affect processing that occurred before the withdrawal or processing that the Company is otherwise entitled or required to perform;
 - 10.1.5. object at any time to the use of personal information for direct marketing; and
 - 10.1.6. lodge a complaint with the Information Regulator.
- 10.2. A user may exercise these rights by contacting the Information Officer at ctcchoir@beausoleil.org.za. The Company may request information reasonably necessary to

verify the requester's identity or authority. Requests for access to records will be handled in accordance with the Company's PAIA Manual. The prescribed POPIA forms for objections and requests for correction or deletion are available from the Information Regulator

11. FURTHER PROCESSING

- 11.1. The Company will not further process personal information for a purpose that is incompatible with the purpose for which it was collected, unless the further processing is permitted by POPIA.
- 11.2. In assessing whether further processing is compatible with the purpose of collection, the Company will take into account the relationship between the original and intended purpose, the nature of the information, the consequences for the data subject, the manner in which the information was collected and any contractual rights and obligations between the parties.
- 11.3. Further processing will not be regarded as incompatible where, among other things:
 - 11.3.1. the data subject or, where the data subject is a child, a competent person has consented to the further processing;
 - 11.3.2. the information is available in or derived from a public record, or has deliberately been made public by the data subject;
 - 11.3.3. further processing is necessary to avoid prejudice to the maintenance of the law, to comply with a legal obligation or revenue-collection legislation, for legal proceedings, or in the interests of national security;
 - 11.3.4. further processing is necessary to prevent or mitigate a serious and imminent threat to public health or safety or to the life or health of the data subject or another individual;
 - 11.3.5. the information is used only for historical, statistical or research purposes and appropriate safeguards are in place; or
 - 11.3.6. the further processing is otherwise permitted under POPIA or another applicable law.
- 11.4. Where the Company intends to process personal information for a materially different purpose and the further processing is not otherwise permitted, it will give the data subject any notice required by POPIA and obtain consent where necessary.

12. ACCURACY, CORRECTNESS AND COMPLETENESS OF PERSONAL INFORMATION

- 12.1. The Company will take reasonably practicable steps to ensure that personal information in its possession is complete, accurate, not misleading and updated where necessary.
- 12.2. A user who becomes aware that personal information held by the Company is inaccurate, incomplete or out of date should notify the Information Officer in writing.
- 12.3. Where the accuracy of personal information is contested, the Company will take reasonable steps to verify the information and may restrict its use pending verification where appropriate.
- 12.4. If a user has contested the accuracy of any personal information being used by the Company, it will stop using that information, without undue delay, until its accuracy has been verified.

13. SECURITY SAFEGUARDS

- 13.1. The Company takes reasonable technical and organisational measures to protect personal information in its possession or under its control against loss, damage, unauthorised destruction, unlawful access, unauthorised processing and other reasonably foreseeable risks. The safeguards applied will be appropriate to the nature of the information, the purpose for which it is processed and the systems used by the Company or its operators.
- 13.2. Depending on the relevant record or system, the measures implemented or required by the Company may include:
 - 13.2.1. role-based or need-to-know access controls, including restricting access to authorised directors, staff, conductors, volunteers, advisers, service providers and persons responsible for newsletters, website content or social-media administration only where access is required for their role;
 - 13.2.2. password protection, strong password practices and multi-factor authentication where available;

- 13.2.3. secure use of reputable cloud, email, website, DNS, mailing-list, application-form, video-hosting and other digital service providers, , including Wix, xneelo, Mailchimp and Google platforms, subject to contractual or other safeguards where required;
- 13.2.4. anti-virus, anti-malware, firewall, software-update and device-security measures where relevant to systems under the Company's control;
- 13.2.5. encryption or other security features made available by relevant systems or service providers, particularly for sensitive information and electronic communications where appropriate;
- 13.2.6. physical protection of paper records and devices, including secure storage and reasonable controls over access to premises, files and equipment;
- 13.2.7. backups or other appropriate continuity measures for important electronic records where reasonably practicable;
- 13.2.8. confidentiality obligations, reasonable training and awareness measures for authorised persons; and
- 13.2.9. measures to identify, assess and respond to actual or suspected security compromises, together with periodic review of access permissions, retention practices and safeguards.

14. NOTIFICATION OF BREACH OF SECURITY

- 14.1. If there are reasonable grounds to believe that personal information in the Company's possession or under its control has been accessed or acquired by an unauthorised person, the Company will comply with its obligations under POPIA, including by notifying the Information Regulator and affected data subjects as soon as reasonably possible after discovery of the compromise, subject to any direction from the Information Regulator.
- 14.2. Any notification will provide sufficient information, where reasonably practicable, to enable affected users to take protective measures against the possible consequences of the compromise.

15. DECISIONS BASED SOLELY ON PERSONAL INFORMATION PROCESSED

- 15.1. If the Company is required to make a decision about a user using any personal information that has been obtained, it will ensure that a record of such information and the decision made is kept for a reasonable period of time to give the user an opportunity to request access to that record.
- 15.2. The Company will allow a user a reasonable opportunity to make representations before any decision is made solely on the basis of automated processing of personal information, if that decision will affect the legal position of the user, or will otherwise adversely affect them in some manner or form.
- 15.3. The Company will always ensure that the underlying logic behind any decision made pursuant to the automated processing of personal information is sound and that this underlying logic can be communicated to the user to enable them to make representations.
- 15.4. If the Company has made a decision based on incorrect personal information, it will correct the personal information to ensure that same is correctly captured. In addition, the Company will consider whether the amended information has any impact on any decision taken and, if reasonably practicable, inform the relevant user of such steps.

16. LINKED THIRD PARTY WEBSITES

- 16.1. The website may link to or embed third-party websites and platforms, including Wix, Google Forms, Google Drive, Mailchimp, Facebook, Instagram, YouTube/Google and other social-media, video-hosting and external application-form providers. These third-party websites and platforms are not under the Company's control.
- 16.2. This Privacy Policy does not apply to third-party websites or platforms. Users should review the privacy policies and terms of those third parties before providing personal information to them.

17. DIRECT MARKETING

- 17.1. The Company may send newsletters, event notices, fundraising communications, sponsorship communications and other direct-marketing communications only where permitted by POPIA and other applicable law, including through Mailchimp or any replacement mailing-list platform used by the Company.
- 17.2. Where POPIA requires consent before the Company may send unsolicited electronic direct-marketing communications, the Company will first request that consent in the prescribed or otherwise appropriate form. The Company will not treat a person's use of the website or acceptance of this Privacy Policy as consent to direct marketing.
- 17.3. Each direct-marketing communication sent by electronic means will provide a clear opportunity for the recipient to opt out or unsubscribe, free of charge and without unnecessary formality.
- 17.4. A user may opt out of direct marketing at any time, free of charge and without unnecessary formality, by using the unsubscribe mechanism in the relevant communication or by contacting the Information Officer at ctcchoir@beausoleil.org.za.

18. CHILDREN'S PERSONAL INFORMATION

- 18.1. The Company processes personal information relating to children only where authorised by POPIA, including with the consent of a competent person where consent is required.
- 18.2. A parent, guardian or other competent person who provides personal information about a child through the website or otherwise, represents that they are authorised to do so and acknowledges the processing described in this Privacy Policy.
- 18.3. The Company may take and use photographs, video and audio recordings of choristers in connection with the Company's activities, including on the website, in newsletters, on social-media platforms and in other promotional or public-facing materials, where the necessary consent has been obtained through the Company's membership or other applicable consent process, or where such processing is otherwise permitted by law.

19. CROSS BORDER TRANSFERS OF PERSONAL INFORMATION

- 19.1. The Company may use website, cloud, email, DNS, application-form, mailing-list, social-media, video-hosting and other digital platforms whose systems, support personnel or service providers are located outside the Republic of South Africa, including Wix, Mailchimp, Google Forms, Google Drive, YouTube/Google, Facebook and Instagram.
- 19.2. The Company will transfer personal information outside South Africa only where permitted by POPIA, including where:
 - 19.2.1. the recipient is subject to a law, binding corporate rules or a binding agreement that provides an adequate level of protection for the personal information, including appropriate restrictions on onward transfers;
 - 19.2.2. the data subject or, where applicable, a competent person acting for a child has consented to the transfer;
 - 19.2.3. the transfer is necessary for the performance of a contract between the data subject and the Company, or for implementing pre-contractual measures at the data subject's request;
 - 19.2.4. the transfer is necessary for the conclusion or performance of a contract concluded in the data subject's interest between the Company and a third party; or
 - 19.2.5. the transfer is for the benefit of the data subject, it is not reasonably practicable to obtain consent, and the data subject would be likely to consent if it were reasonably practicable to obtain it.

20. RETENTION OF INFORMATION

- 20.1. The Company will retain personal information for no longer than is necessary for the purpose for which it was collected, unless a longer retention period is required or permitted by law, a contract,

legitimate operational requirements, legal proceedings, insurance requirements or the data subject's consent.

- 20.2. The Company may retain de-identified information for historical, statistical or research purposes, subject to appropriate safeguards.

21. DESTRUCTION, DELETION OR DE-IDENTIFICATION OF PERSONAL INFORMATION

When the Company is no longer authorised or required to retain personal information, it will take reasonable steps to destroy, delete or de-identify the information as soon as reasonably practicable, subject to any legal, regulatory, contractual or legitimate retention requirement.

22. CONSENT

- 22.1. Where the Company relies on consent as the lawful basis for processing personal information, it will seek consent in an appropriate form from the data subject or, where required, the competent person acting for a child.
- 22.2. A user may withdraw consent by notifying the Information Officer in writing. Withdrawal of consent will not affect the lawfulness of processing that took place before withdrawal, or processing that the Company is otherwise entitled or required to carry out.

23. LODGING AN OBJECTION

- 23.1. A data subject may, on reasonable grounds, object to the processing of personal information in the circumstances permitted by POPIA and may object at any time to direct marketing.
- 23.2. An objection should be sent to the Information Officer at ctcchoir@beausoleil.org.za, together with sufficient information to identify the relevant processing and the grounds for the objection.

24. CHOICE OF LAW

This Privacy Policy is governed by and interpreted in accordance with the laws of the Republic of South Africa.

25. AMENDMENT OF THIS PRIVACY POLICY

- 25.1. The Company may change, update, add to, remove or amend this Privacy Policy from time to time. Any amendment will take effect from the date it is published on the website.
- 25.2. Users should review this Privacy Policy periodically to remain aware of any changes.

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