breakthru
Breakthru Life Church
Living for Heaven on Earth

21A Theunis Street, Weltevreden Park, 1709 | +27 11 679 4264 | info@breakthrulife.co.za

PRIVACY STATEMENT

Protection of Personal Information Act, 4 of 2013 (POPIA)

1. Purpose of this privacy statement

Breakthru Life Church is committed to protecting the personal information of everyone it engages with, not only because the law requires it, but also as an act of goodwill and care. We strive to ensure the security, integrity and lawful use of all personal information that we process.

This statement applies to the personal information of members, visitors, volunteers, employees, contractors, suppliers, children and their parents or guardians, and any other natural or juristic person whose information the church processes.

2. Applicable laws

This statement is written in line with the Protection of Personal Information Act, 4 of 2013 (POPIA) and its regulations. It also takes into account other applicable South African laws, including the Promotion of Access to Information Act, 2 of 2000 (PAIA).

3. What information is collected?

The church collects only the information it needs for the purposes set out in section 4, and only where a lawful ground for collection exists.

a) Personal information, such as

- Name, surname and title
- Identity or passport number and date of birth
- Gender and marital status
- Contact details (telephone, email and physical or postal address)
- Family details, including the names of spouses and children
- Bank details and giving records (for example tithes, offerings and donations
- Employment and volunteer information
- Supplier and vendor registration details, BBBEE status, company name and registration number
- Regulatory compliance information, for example VAT registration and tax clearance status
- Online identifiers
- Photographs, video and CCTV footage

b) Special personal information, such as

- Religious or philosophical beliefs, including membership and ministry involvement
- Health information, for example allergies or medical needs for children, events or camps, and occupational health and safety records
- Race or ethnic origin, where required by law, for example employment equity or BBBEE reporting
- Criminal behaviour information, for example police clearance or Child Protection Register checks, which may be required for people who work with children

Special personal information is processed only where POPIA allows it. As a religious body, the church relies on section 28 of POPIA to process the religious beliefs of its members, employees and their families, and on the consent of the person, or a legal obligation, for other categories.

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4. Why is information collected?

Information is collected to carry out the ministry and operations of the church and to comply with the law, for example:

- Membership, pastoral care and ministry administration
- Children and youth ministry, events, conferences and camps
- Communication with members and visitors
- Employment and volunteer administration
- Training and development
- Procurement and supplier management
- Contractual obligations
- Health, safety and security of people and property
- Legal proceedings and regulatory compliance

5. How is information collected?

Information may be collected from the following sources, always with a lawful basis:

- Directly from the person concerned (for example forms, registrations and email)
- From a parent or guardian, in the case of children
- Between internal departments or business systems of the church
- From third parties, where the person has agreed or the law allows it (for example references or background checks)
- Through CCTV and access control systems on the church premises

6. How is information processed?

Breakthru Life Church uses personal information only for the purpose for which it was collected, or a compatible purpose. Information may be processed by means of:

- Electronic systems and databases
- Manual paper records
- Cloud services
- Web services and social media platforms

Breakthru Life Church does not make decisions about any person based solely on automated processing, whether for membership, employment, procurement or any other purpose.

7. Information sharing

Breakthru Life Church may share personal information internally between its departments and with related entities, where this is needed for the purpose for which the information was collected.

The church may also share information with service providers who process it on behalf of the church (called operators in POPIA), for example Microsoft (Microsoft 365, used for email and document storage) and Elvanto (the church membership database). These providers process information only under a written agreement that requires them to keep it confidential and secure.

Information may also be shared where the law requires it, for example with the South African Revenue Service, the Department of Employment and Labour or law enforcement agencies.

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Some service providers, including Microsoft 365 and Elvanto, store information on servers outside South Africa. The church transfers information across borders only where the recipient is subject to a law, binding agreement or binding corporate rules that provide protection substantially similar to POPIA, or where the person has consented, as required by section 72 of POPIA.

The church does not sell, rent or lease personal information to anyone.

8. Information of children

In Kids Ministry, youth ministry, events and camps, the church processes personal information of children under the age of 18. This information is processed only with the consent of a parent or legal guardian, or where the law otherwise allows it, and only for the safety, care and ministry of the child.

Photographs or video of children are published on church platforms only where a parent or guardian has consented. Access to the information of children is limited to authorised leaders and staff.

9. Information retention

Breakthru Life Church takes every reasonable step to ensure that personal information is kept only for as long as it is needed. Records that identify a person are kept only for as long as:

- An ongoing relationship with the person exists;
- The information is needed for the purpose for which it was collected;
- A law or contract requires the records to be kept; or
- The information is needed in connection with a legal claim, whichever is the longest. Thereafter, the information is deleted, destroyed or de-identified in a secure manner.

10. Rights of data subjects

Personal information is processed only where the person concerned (or a competent person, such as a parent or guardian, in the case of a child) has consented, or where one of the following grounds applies:

- Processing is needed to conclude or perform a contract with the person
- Processing is needed to comply with a legal obligation
- Processing protects a legitimate interest of the person
- Processing is needed for a public law duty of a public body
- Processing is needed to pursue the legitimate interests of the church or of a third party receiving the information

In terms of POPIA, every person has the right to:

- Be told that their personal information is being collected
- Ask what personal information the church holds about them
- Ask for their personal information to be corrected or deleted
- Withdraw consent, where processing is based on consent
- Object to the processing of their personal information
- Opt out of direct marketing communication
- Ask which third parties or service providers have received their information
- Submit a complaint to the Information Regulator

Requests can be made to the Information Officer using the contact details in section 13. The church will respond within a reasonable time.

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11. Information protection and security

Breakthru Life Church has put reasonable physical, technical and organisational measures in place to protect the personal information it holds and to reduce the risk of loss, misuse or unauthorised access. No security measure is completely without fault. These measures include:

- Software: regular updates
- Digital security: firewalls, password protection, multi-factor authentication and encryption
- Physical security: access controlled areas, locked cabinets and safes
- People: confidentiality undertakings and awareness training for staff and volunteers who handle personal information

If there are reasonable grounds to believe that personal information has been accessed or acquired by an unauthorised person, the church will notify the Information Regulator and the affected people as soon as reasonably possible, as required by section 22 of POPIA, unless a law enforcement agency or the Information Regulator directs that notification be delayed.

12. Website users

Breakthru Life Church values the privacy of visitors to its website. Personal information such as names and email addresses are collected only when it is submitted voluntarily, and it is handled responsibly.

a) Third parties

Email addresses and other personal information are kept confidential. Mailing lists are not sold, rented or leased, and personal information is not provided to any third party without permission, except to the service providers described in section 7 or where the law requires it.

b) Server logs and IP addresses

The website keeps server logs for internal statistical analysis, for example to see which areas of the site are most visited. These logs may include IP addresses, which can be personal information. They are used only for statistics and the security of the website, and are not used to identify individual visitors.

c) Cookies

Cookies are small pieces of information that a website saves in your browser. Some pages of the website use cookies to understand which areas are of interest and to improve the site. The church does not use cookies to track activity for advertising purposes.

The website uses Google Analytics, a service provided by Google, to collect anonymous statistics about how visitors use the site, such as the pages visited and the time spent on them. Google may process this information on servers outside South Africa.

When you first visit the website, a cookie banner allows you to accept or decline non-essential cookies, including analytics cookies. You can also set your browser to decline cookies, although some features of the site may then not work as intended.

d) Information requests

The website has forms that can be used to request specific information. Information provided in these forms is used only to respond to the request, in the manner described on the form, and for no other purpose. Submitting a request does not add anyone to a mailing list.

e) Mailing lists

Members of the public who wish to receive church news must subscribe and confirm the subscription by return email. Members and regular visitors whose details are recorded in the church database may receive communication relating to church life. Every email identifies Breakthru Life Church as the sender and explains how to unsubscribe, and anyone may opt out at any time.

f) External links

This statement does not apply to external websites linked from the church website. Those sites have their own privacy policies.

13. Contact information

Role	Name and portfolio
Information Officer	Darryl Reid
Deputy Information Officer	Sean de Metz: all POPIA compliance, including the database, forms, website and social media

Contact	Details
Email	info@breakthrulife.co.za
Telephone	011 679 4264
Physical address	21A Theunis Street, Weltevreden Park, Roodepoort, 1709

Information Regulator	Details
POPIA complaints	POPIAComplaints@inforegulator.org.za
General enquiries	enquiries@inforegulator.org.za
Physical address	JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
Website	https://inforegulator.org.za

14. Changes to this statement

Breakthru Life Church may update this statement from time to time. The current version is available on the church website and at the church office.