

1. Purpose of this privacy statement

Breakthru Life Church is dedicated to protecting the personal information of our employees, contractors and any other natural or juristic stakeholders not only in terms of the law but also as an act of goodwill. We strive to ensure security, integrity, and lawful use of all personal information that we process.

This policy outlines how the church will collect, process, and share information required to conduct our business.

2. Applicable laws

Our privacy policy is written in line with the Protection of Personal Information Act, 4 of 2013 (POPIA) and takes into consideration any other local laws and guidelines including Promotion of Access to Information Act, 2 of 2000 (PAIA).

3. What information is collected?

The following information may be collected for the purposes of conducting business, all in line with the prescribed legal grounds for such collection.

a) Personal information such as

- **Name and surname**
- **Identification number**
- **Contact details**
- **Geographical information**
- **Bank details**
- **Employment information**
- **Vendor registration details**
- **Financial information**
- **BBBEE status**
- **Online identifiers**
- **CCTV footage**
- **Company name**
- **Company registration number**
- **Regulatory compliance information e.g., VAT registration and tax clearance status**

- b) Special personal information such as
 - **Biometric Information**
 - **Health information**
 - **Criminal information**
 - **Personal preferences/persuasions**
 - **Ethnicity and race information**
 - **Gender**

4. Why is information collected?

Information will be collected to perform our business activities and to comply with the various applicable laws as needed for example:

- **Employment administration**
- **Membership management**
- **Training and development**
- **Procurement processes**
- **Legal proceedings**
- **Contractual obligations**
- **Health and safety**
- **Regulatory compliance**

5. How is information collected?

Information may be collected from various sources keeping in mind the legal basis of collection, these sources may include:

- **Directly from data subjects**
- **Sharing between internal parties or business systems**
- **Third parties**

6. How is information processed?

Breakthru Life Church will only use information for the purposes for which it was collected and only where needed this may be by means of:

- **Electronic systems**
- **Manual documentation**
- **Via social media**
- **Cloud services**
- **Web services**

7. Information sharing

Breakthru Life Church may share this information internally with its various departments and subsidiaries as well as with third parties. Data subjects will be made aware of any third-party sharing. Cross border sharing and

information pertaining to children will only be processed where the data subject or a competent person such as a parent or legal guardian has strictly consented.

Breakthru Life Church does not perform any automated decision making related to marketing, employment, tendering etc.

8. Information retention

Breakthru Life Church takes every reasonable step to ensure that data subjects' personal information is only processed for the minimum period necessary for the purposes set out when the information was collected.

We will retain copies of your personal information in a form that allows for identification only for as long as:

- **An ongoing relationship with you is maintained;**
- **Your personal information is necessary in connection with the purposes it was collected for;**
- **If any relevant legal claims are brought, we may continue to process your personal data for any additional time necessary in connection with that claim or**
- **Any legally required retention period, whichever the longer.**

Thereafter, the personal information will be deleted or destroyed.

9. Data subjects' rights

Information will only be processed where the data subject (or a competent person where the data subject is a child) expressly consents to the processing, unless one of the following exclusions apply:

- **Contractual obligations**
- **Legal obligations**
- **Protection of a data subject's legitimate interests**
- **Legitimate interests of the organisation**
- **Legal duties by a public body**
- **Pursuing the legitimate interests of a third party**

As per the law data subjects have a right to:

- **Withdraw consent**
- **Request data corrections and deletion**
- **Enquire as to what data is held on them**
- **To opt out of communication**
- **Enquire to what information was shared with any service provider or third-party**
- **Object to the processing of personal information**

- **Submit complaints to the Information Regulator**
- **Access to our PAIA manual**

10. Information protection / Security

Breakthru Life Church has put in place security measures for both physical and digital information to protect the data it holds. This security is in place to minimise the risk of data loss, leaks or breaches unfortunately no security measures are faultless. In the event of a breach occurring, Breakthru Life Church will inform the affected data subject(s) of such a breach as soon as reasonably possible, unless it is otherwise instructed by the Information Regulator or a law enforcement agency.

Breakthru Life Church uses various security measures to protect personal information including:

- **Software: Antivirus**
- **Digital security: Firewalls, password protection and encryption**
- **Physical security: Access controlled areas, locked cabinets and safes/strongrooms**

11. Website users

At Breakthru Life Church, ensuring the privacy of our website visitors is an important concern. We will not collect any personal information about our online visitors unless it is submitted voluntarily, in which case we will act in a responsible manner to protect your personal information.

- Third parties

- I. **We are committed to keeping e-mail addresses confidential; we will not sell, rent or lease our mailing lists to third parties, and we will not provide your personal information to any third party individuals or companies, without your permission. When filling out any request form on the Breakthru Life Church website, you may be added to our database for future communication, or for statistical purposes. You may be given the choice of being contacted by a Breakthru Life Church representative. If you specify that you do not wish to be contacted, your preference will be noted in our database and your contact data will not be used, except for statistical purposes.**

- Server logs and IP addresses

- II. **Breakthru Life Church does keep track of server logs to perform internal statistical analyses. These logs do not contain personal information, such as name or email address. The logs are used to analyse what areas of our website are most popular, to better serve our website visitors.**

- Cookies

III. **Cookies are pieces of information that a website sends to your browser, which may then be saved on your personal computer (PC). Some of our Web pages use cookies to understand what areas of our website are of interest to you, to better serve you when you return to our website. If you do not want your browser to accept cookies, you can set it to decline them. Breakthru Life Church does not use cookies to track your activities for advertising purposes. Breakthru Life Church does not sell advertising to third parties using pop-up advertising.**

- Information requests

IV. **Breakthru Life Church uses the Web to better educate customers about the happenings at the church. For this reason, we have forms on our site that can be used to request specific information. If you request information, you will receive it in the manner described on the form (email, telephone contact, etc.). We will use the information you provide, to contact you in the method you prefer, and only use it for that purpose. By providing your email address to us, you are acknowledging that we may send you periodic Church announcements, and other information related to Breakthru Life Church.**

- Mailing lists

V. **Breakthru Life Church maintains subscription mailing lists. These lists are “opt-in” lists. This means that you must subscribe to these lists using your preferred email account, and you must confirm your subscription, via return email. Users are never subscribed to these mailing lists based on requesting information. Every email sent out using our mailing list, clearly identifies Breakthru Life Church as the sender of the mail and explains how to unsubscribe from the list at the bottom of the e-mail. You will use the same preferred email address that you initially entered to “opt-in.”**

- External links

VI. **This policy does not apply to any affiliate or external links on our website and any linked sites should have their own privacy policies that should be considered.**

12. Contact information:

For more information contact or for any complaints please contact the Information Officer:

Information Officer: Darryl Reid

Deputy Information Officer: Lisa Jane Louw (Data base manager, forms & legal Compliance)

Deputy Information Officer: Minette Keeve (Website & Social media Compliance)

Deputy Information Officer: (Financial accounts and related information compliance)

Email address: info@breakthrulife.co.za

Telephone number: 011 679 4264

Physical address: 34 Kroton Street North, Weltevreden Park, 1709

If any complaints relating to Personal Information in terms of POPIA, these can be logged directly with the Information Regulator (South Africa): info@justice.gov.za <https://www.justice.gov.za/infoereg/>