Her Voice Privacy and POPIA Policy

Version 1 | Effective 15 September 2026

This Policy explains how Her Voice collects, uses, shares, protects and retains personal information through its website and related services. It also explains the choices and rights available under the Protection of Personal Information Act 4 of 2013, known as POPIA. Her Voice uses personal information only for defined and lawful purposes and applies additional safeguards to information concerning children, vulnerable participants and safeguarding matters.

1. Scope of this Policy

This Policy applies to the Her Voice website and information received through online forms, email, telephone, WhatsApp, programmes, events and other authorised channels. It covers visitors, customers, applicants, participants, parents and guardians, referrers, alumni, partners, donors, suppliers, volunteers, mentors, facilitators and service applicants.

Her Voice Group is the public umbrella brand through which the Her Voice entities and initiatives are presented. It is not the default contracting or website-operating entity.

2. Responsible parties and contact details

Her Voice International (Pty) Ltd is the primary responsible party for the website, shop, publishing, general enquiries and services unless a form, programme notice or agreement identifies another entity.

Her Voice Foundation NPC is responsible for Foundation referrals, programmes, support activities and related records. Where it uses systems administered by Her Voice International, access and use will be limited to the relevant Foundation purpose.

Primary legal entity	Her Voice International (Pty) Ltd
Registration number	2017/419890/07
Foundation entity	Her Voice Foundation NPC, registration 2014/107452/08
Information Officer role	Executive Director
Physical and service address	33 Brandt Street, Andrew Gouws Building, Kroonstad, 9500, South Africa
Privacy enquiries and requests	info@her-voice.co.za
Telephone and WhatsApp	+27 65 752 9651

3. Personal information we collect

The information collected depends on the interaction and may include:

• identity and contact details, including name, email address, telephone number, physical or delivery address and identity details where genuinely required

• age, date of birth, gender and parent or guardian details where eligibility, consent or safeguarding requires them

• education, employment, work experience, curriculum vitae, skills, business or ministry information and application responses

• programme, event, mentoring, attendance, assessment, progress, feedback, alumni and support information

• Foundation referral details, the reason for a referral, support needs and information supplied by a referrer, participant or competent person

• partnership, donor, supplier, service-provider, mentor, volunteer and professional information

• order, delivery, collection, invoice and payment-confirmation information; Her Voice does not require full card details to be sent by email or WhatsApp

• communications, enquiries, complaints, newsletter preferences and records of consent or objection

• photographs, recordings, stories or testimonials only where they are supplied for administration or separately authorised for publication

• technical information such as internet protocol address, browser or device information, website activity and cookie choices where the website systems collect it

• special personal information where it is necessary and lawfully permitted, including religious beliefs, health or wellbeing information and safeguarding-related information

4. Where information comes from

Her Voice usually collects personal information directly from the person concerned. It may also receive information from a parent or guardian, an authorised referrer, a programme partner, a funder, a host organisation, a service provider, publicly available professional sources or another person authorised or legally permitted to provide it. Where information is received indirectly, Her Voice will take reasonable steps to confirm its source, accuracy and permitted use.

5. How information is used

Activity	Purpose
Programme interest and applications	Respond to interest, assess eligibility, communicate decisions, arrange consent and administer participation.
General enquiries	Understand and answer the request, keep an appropriate service record and follow up where requested.
Foundation referrals	Receive and assess a referral, contact relevant people, coordinate authorised support and meet safeguarding or reporting duties.
Partnerships and services	Assess opportunities, conduct due diligence, prepare agreements and manage delivery, reporting and payment.
Alumni and community engagement	Maintain authorised alumni records, invite participation, measure outcomes and communicate relevant opportunities.
Newsletters	Send subscribed updates, manage preferences and record consent, withdrawal or objection.
Free resources	Provide the requested download, maintain version and distribution records and send follow-up communication only where permitted.
Orders and paid bookings	Confirm payment, fulfil or arrange collection, provide support, manage cancellations or returns and keep accounting records.
Website operation	Maintain security, prevent misuse, understand performance and apply cookie choices.

6. Lawful grounds for processing

Her Voice will rely on the lawful ground appropriate to the activity. This may be consent; steps requested before entering into a contract; performance of a contract; compliance with a legal obligation; protection of a legitimate interest of the person concerned; or a legitimate operational interest that does not unjustifiably override privacy. Consent may be withdrawn, but withdrawal does not invalidate processing that was lawful before it was withdrawn or processing that remains authorised on another lawful ground.

Her Voice will not require consent for an unrelated purpose as a condition of receiving a service. Marketing consent, participation consent and permission to publish a person's image or story will be obtained separately where appropriate.

7. Children and competent persons

For this Policy, a child is a person under 18 who is not legally competent to act without assistance in the matter concerned. Her Voice will not knowingly process a child's personal information unless POPIA permits it, including where prior consent has been given by a competent person or processing is necessary to establish, exercise or defend a right or obligation in law.

When a programme or activity involves a child, Her Voice may require parent or legal-guardian details, proof of authority, written consent, the child's age-appropriate assent and emergency or safeguarding information. Only information reasonably necessary for participation, safety and administration will be requested. A competent person may ask to review the child's information or withdraw consent, subject to any lawful reason for continued retention or processing.

A child should not submit an order, paid booking or independent programme application without the required involvement of a parent or legal guardian. If Her Voice learns that information was supplied without required authority, it will restrict or delete the information unless retention is lawfully necessary for safeguarding, evidence or another legal obligation.

8. Special personal information and safeguarding records

Her Voice is a Christian formation organisation and some voluntary programmes may involve religious or philosophical beliefs. It may also receive health, wellbeing, criminal-behaviour or other special personal information in programme, screening, support or safeguarding contexts. Such information will be collected only where relevant, with the required consent or other legal authorisation, and with access restricted to authorised people.

Safeguarding disclosures and concern records are handled under the public Safeguarding Statement and confidential internal safeguarding procedures. Confidentiality cannot be promised where information must be shared to protect a person, comply with the law, obtain appropriate support or make a required report. Information will be shared on a need-to-know basis and with due regard to the safety and dignity of the person concerned.

9. Sharing personal information

Her Voice may share relevant information with:

• authorised Her Voice personnel and entities that need it for the stated activity

• website, hosting, email, cloud-storage, form, newsletter, learning, payment, delivery and professional service providers acting under appropriate instructions

• programme partners, funders, venues, mentors, facilitators, host organisations or referral services where necessary and lawfully permitted

• parents, guardians or competent persons where their involvement is required

• regulators, law-enforcement bodies, courts, statutory authorities, child-protection organisations or emergency services where required or justified by law

• a professional adviser, insurer or auditor where confidentiality and lawful purpose are maintained

Her Voice does not sell personal information. A service provider that processes information on behalf of Her Voice must be authorised to do so, keep it confidential and maintain reasonable safeguards. Her Voice may use aggregated or de-identified information for reporting, evaluation, planning or research where individuals cannot reasonably be identified.

10. Payments and external platforms

Payments may be processed by an independent payment service. That provider may collect account or card information under its own terms and privacy notice. Her Voice ordinarily receives confirmation, reference and transaction information needed to manage the order, refund, accounting and customer support. Users should not send full payment-card details through ordinary email, website enquiry forms or WhatsApp.

The website may link to or embed third-party services such as video, podcast, social-media, application, learning or newsletter platforms. The provider's privacy terms may also apply when a person chooses to use that service. Her Voice will configure and select services with due regard to privacy and security, but does not control independent processing carried out by a third party for its own purposes.

11. Transfers outside South Africa

Some authorised technology or cloud-service providers may process or store information outside South Africa. Her Voice will permit a cross-border transfer only where POPIA allows it, including where the recipient is subject to adequate protection or a binding agreement, the person has consented, or the transfer is necessary for an applicable contract or requested service.

12. Newsletters and direct marketing

Her Voice will send newsletters or direct marketing by electronic communication only where consent or another lawful basis under POPIA applies. A person may unsubscribe or object at any time without charge or unnecessary formality by using the option in the message or contacting info@her-voice.co.za. Transactional, safeguarding, programme or service messages that are necessary for an existing interaction are not marketing messages.

13. Cookies and website analytics

The website may use strictly necessary cookies to provide security, remember essential choices and enable core functions. Analytics, embedded-media, advertising or similar non-essential technologies will be used in accordance with the Cookie Notice and the preference controls implemented for the services actually used on the site. A person may adjust available cookie choices, but blocking necessary technologies may affect website functions.

14. Information security and compromises

Her Voice uses reasonable organisational and technical measures appropriate to the information and risks involved. These include limiting access by role, confidentiality duties, secure accounts and devices, access controls, backups, staff awareness, service-provider safeguards and procedures for reporting and responding to suspected loss, misuse or unauthorised access. No system can be guaranteed completely secure, but safeguards will be reviewed and updated as risks and services change.

Where there are reasonable grounds to believe that an unauthorised person has accessed or acquired personal information, Her Voice will investigate, take reasonable containment and mitigation steps, and notify the Information Regulator and affected persons as required by POPIA.

15. Retention and deletion

Her Voice keeps personal information only for as long as necessary for the purpose for which it was collected, or for a longer period where law, contract, consent, safeguarding, reporting, evidence or a legitimate operational need permits it. The periods below are operational starting points and may be shortened or extended where a specific law, agreement, funder requirement, dispute, safeguarding need or legal hold applies.

Record or activity	Typical period	Application
General enquiries and complaints	Up to 24 months after closure	Longer if needed for an unresolved dispute, legal claim or recurring service issue.
Programme interest and unsuccessful applications	Up to 24 months after the decision	Earlier deletion may be requested unless continued retention is lawfully justified.
Participant programme and alumni records	Generally 5 years after the activity ends	May be retained longer for funder reporting, certification, safeguarding, claims or with consent.
Foundation referral and support records	Generally 5 years after closure	Sensitive records are restricted and retained only as long as the support, safeguarding and legal purpose requires.
Child consent and safeguarding records	According to the safeguarding retention schedule	Kept for as long as reasonably required to protect the child, preserve evidence and meet legal or reporting duties.
Orders invoices and payment records	At least the applicable statutory tax and accounting period	Commonly 5 years, but the period may run from a prescribed return, transaction or financial year.
Partnership supplier and service records	Generally 5 years after the relationship ends	Longer where a contract, audit, claim or law requires it.
Newsletter records	Until unsubscribe or withdrawal	A minimal suppression record may be kept to ensure the preference is honoured.
Free-resource requests	Up to 24 months after delivery	A separate newsletter subscription is retained under the newsletter rule.
Technical and security records	According to system and security needs	Kept for the shortest practical period consistent with security, investigation and legal duties.

When Her Voice is no longer authorised to retain identifiable information, it will delete, destroy or de-identify it as soon as reasonably practicable and in a manner designed to prevent reconstruction. Information subject to a dispute, correction request or legal hold may be restricted rather than deleted until the matter is resolved.

16. Rights and requests

Subject to POPIA and any lawful limitation, a person may:

• ask whether Her Voice holds personal information about them and request access to it

• ask for inaccurate, irrelevant, excessive, out-of-date, incomplete, misleading or unlawfully obtained information to be corrected or deleted

• object on reasonable grounds to certain processing based on legitimate interests

• withdraw consent where processing relies on consent

• object to direct marketing and unsubscribe from electronic marketing

• ask for processing to be restricted while accuracy or lawful use is considered

• complain about the way personal information has been handled

A request may be sent to info@her-voice.co.za. Her Voice may ask for enough information to verify identity or authority before disclosing, correcting or deleting a record. A parent, guardian, authorised representative or competent person must also show the authority on which the request is made. Her Voice will respond within the period required by applicable law and may refuse or limit a request only where the law permits it.

17. Questions and complaints

A privacy question, objection, access request or complaint should be directed first to the Her Voice Information Officer through info@her-voice.co.za or +27 65 752 9651. The request should describe the person, the information or interaction concerned and the outcome requested.

A person who is not satisfied with the response may submit a complaint to the Information Regulator of South Africa using the current process and contact details published at https://inforegulator.org.za/.

18. Changes to this Policy

Her Voice may update this Policy when its activities, systems, providers or legal obligations change. The current version and effective date will be published on the website. A material change will not justify an incompatible new use without an appropriate lawful basis and notice.

19. Related documents and legal framework

This Policy should be read with the Her Voice Website Terms, Public Safeguarding Statement, Cookie Notice, Shop and Fulfilment Policy, Returns Refunds and Cancellations Policy, and applicable participation and consent documents. It gives effect to POPIA and its regulations, read with the Promotion of Access to Information Act 2 of 2000 and other applicable South African law.