

# **HILTON CHRISTIAN FELLOWSHIP**

## **Privacy Policy**

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South Africa**

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Please note that the terms of the POPI Policy, the PAIA Manual and the Website Disclaimer are applicable to this policy document and its terms are accordingly incorporated herein as if specifically incorporated, mutatis mutandis.

PLEASE READ THIS POLICY CAREFULLY BEFORE USING THE WEBSITE.

## **1. Definitions**

1.1. “**HCF**” means Hilton Christian Fellowship, an Association Incorporated Not for Gain functioning as a church.

1.2. “HCF Webpages”: means the HCF website and all other related social media or means of communication’ including but not limited to [www.hiltonchristianfellowship.org.za](http://www.hiltonchristianfellowship.org.za) website, [www.facebook.com/Hilton Christian Fellowship](https://www.facebook.com/HiltonChristianFellowship), [www.instagram.com/hiltonchristianfellowship](https://www.instagram.com/hiltonchristianfellowship) and [twitter](https://twitter.com/hiltonchristianfellowship).

1.3. “Personal Information”: means information relating to you or any other living person or existing legal entity, including but not limited to –

1.3.1 information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;

1.3.2. information relating to the education or the medical, financial, criminal or employment history of the person;

1.3.3. any identifying number, symbol, e-mail address, physical address, telephone number or other particular assignment to the person;

1.3.4. correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;

1.3.5. the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal

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information about the person, provided that such information is not in the public domain in the same or in a different format or held by a public body and publicly accessible.

1.4. “Processing of Information” means the automated or manual activity of collecting, recording, organising, storing, updating, distributing and removing or deleting personal information.

1.5. “Site” means collectively our website/s and social media platforms.

1.6. “You” or the “user” means any person who accesses and browses the site for any purpose.

## **2. HCF Privacy Policy**

2.1. This privacy policy forms part of HCF’s Site terms and conditions. Your access to, and use of, the Site is subject always to the terms and conditions set out herein. If you do not agree with any of the terms of this privacy statement, please cease access of all HCF Webpages/Social media platforms immediately.

2.2. HCF respects, and is committed to protecting your privacy. This policy informs you of how your personal information is processed and used in terms of the relevant legislation.

2.3. This privacy statement governs the processing of personal information provided to HCF through your use of the website as well as the steps we will take to use your personal information only in ways that are compatible with this policy.

2.4. This policy is in effect for all HCF Webpages and social media platforms.

2.5. HCF Webpages and social media platforms track the content you access individually, but individual information on accessed content is deemed private and is therefore not made public.

2.6. This information is used as it relates to our business processes, customer care, and in the overall process of improving our business and service offering.

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2.7. You agree that these terms and conditions apply to your use of:

2.7.1 the website;

2.7.2. any HCF Social media platforms; and

2.7.3. any licenced third-party website or mobile application.

2.8. Regardless of the method you use to install, download or access the Site, your cell phone provider may charge you for accessing the Site or for any usage of the Site (such as data charges, sms charges). HCF is not responsible for these charges.

### **3. Your consent to this agreement**

3.1. By using HCF Webpages, you consent to the collection and use of information by us as specified in this policy.

3.2. Any changes to the privacy policy, will be posted on the Site so that you are always aware of what information we collect, how we use it, and under what circumstances we disclose it, always conforming to current legislation.

3.3. Due to legal and other developments, the HCF may amend these terms and conditions from time to time and reserves the right to change this policy without prior notice. It is your duty to remain apprised of the current version of this privacy statement. It will always be updated on this website.

3.4. By continuing to browse or use this policy statement after a revised policy statement becomes effective, your agreement to observe this privacy statement is accordingly also revised.

### **4. Processing of Personal Information**

4.1. By providing your personal information to HCF you acknowledge that it has been collected directly from you and you consent to its processing by HCF.

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4.2. Where you submit personal information, such as name, address, telephone number and email address, via an HCF Webpage e.g. through completing any online form, the following principles are observed in the processing of that information:

4.2.1. HCF will collect personal information only for a purpose consistent with the purpose for which it is required. The specific purpose for which information is collected will be apparent from the context in which it is requested and in a manner that is adequate, relevant and not excessive in the context of the purpose for which it is processed.

4.2.2. Personal information will be processed only for a purpose compatible with that for which it was collected, unless you have agreed to an alternative purpose in writing, or HCF is permitted in terms of national legislation of general application dealing primarily with the protection of personal information.

4.2.3. HCF will not disclose any personal information relating to you to any third party unless your prior written agreement is obtained, or the HCF is required to do so by law.

4.2.4. HCF will destroy or delete any personal information that is no longer needed by HCF for the purpose it was initially collected, or subsequently processed.

4.3. As permitted by the Electronic Communications and Transactions Act No. 25 of 2002, HCF 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. What Information Is Collected and How Is It Collected?**

5.1. Every computer connected to the Internet is given a domain name and a set of numbers that serve as that computer's "Internet Protocol" (IP) address.

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5.2. When a visitor requests a page from an HCF Webpage, our web servers automatically recognise that visitor's domain name and IP address.

5.3. The domain name and IP address reveal nothing personal about you other than the IP address from which you have accessed our site.

5.4. We use this information to examine website interactivity.

5.5. Our web servers do not record email addresses of visitors.

5.6. If you choose to become a member of HCF we may request your personal details, including but not limited to, name, email address, mailing address, telephone number and birth month (latter so we are able to acknowledge your birthday). This is for the purposes of registering you for such additional services, or to enhance our communications with you.

5.7. Whenever we need to request the identity of a visitor, we will clearly indicate the purpose of the enquiry before the information is requested.

5.8 Visitors to HCF are presented with a Visitor's Card requesting your name, surname, address, mobile number, email address and age bracket. This information is added to the HCF Database only when you indicate to us your desire to be included as a member.

## **6. Use of Information You Provide Us**

6.1. We use the information that you provide us (both online and offline) to respond to your requests and to communicate with you, to improve the content of our website, and to improve our service offering.

6.2. The primary goal in collecting personal information is to interact with you if you become a member of HCF.

6.3. If you choose to identify yourself by sending us an email, interacting with an email sent to you, or completing an online form, HCF employees will have access to such information to contact you for follow-up and direct pastoral purposes.

6.4. We also aggregate information on what pages you access.

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6.5. Website interaction and information submitted by you, such as survey information and/or comments or feedback, may be stored in a personally identifiable format and will be used only for internal purposes and will not be shared with people or organisations outside of HCF.

## **7. Disclosure of Information to Third Parties**

7.1. HCF Webpages and social media platforms will disclose personal information when required by law or in the good-faith belief that such action is necessary to:

7.1.1. conform to the edicts of the law or comply with a legal process served on HCF;

7.1.2. protect and defend the rights or property of the HCF or visitors to HCF Webpages;

7.1.3. identify persons who may be violating the law, the legal notice, or the rights of third parties;

7.1.4. co-operate with the investigations of purported unlawful activities;

7.2. We may share your personal information with other churches and New Covenant Ministries International (NCMI) partners when planning visits or joint ministry. Where this occurs, we require other churches and NCMI partners to honour this privacy policy and the provisions of POPI generally.

7.3. We maintain a strict “No-Spam” policy. We will also not sell or rent your email address to a third-party.

## **8. Automatic Information**

8.1. This information enables us to run site usage tools and create statistics about our site.

8.2 These statistics give us a better understanding of how our site is being used and what we can do to make it more useful to visitors.



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8.3. If you are an existing member of HCF and we have your information already on file, provided that we obtained such personal information with your authorisation or from a competent person authorised to provide such consent, we may use individual information or aggregated information to enhance our relationship with you or improve our service.

### **9. Use Of “Cookies”**

9.1. At this time HCF does not utilise “Cookies” at all. In the event of this changing we will communicate with you about changes to this policy.

### **10. How Are Single-Pixel Gifs or Tracking Scripts Used?**

10.1. The HCF website and social media platforms use both single-pixel GIF images and tracking scripts, sometimes referred to as web bugs or web beacons, to evaluate website interactivity and gather both general statistical information and individual information relating to content accessed.

10.2. The HCF uses tracking scripts that can track personal information from cookies that may have been previously placed on a user’s computer and are able to identify individually users who have interacted with email communications sent from the HCF.

### **11. Email/Other Electronic/online Communication**

11.1. HCF, from time-to-time, distributes online newsletters and notices/announcements relating to HCF services that we believe will interest HCF members.

11.2. HCF recognises that users may not wish to be contacted about new or related services; therefore, you may opt-out of any email marketing or newsletters that may result from use of the site. When you receive an email, you will be given instructions on how to remove yourself from that

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list. This opt out will not prevent HCF from sending transactional communication which we are by law required to send to you.

11.3. All our email communications are tracked to evaluate interaction success and to understand better how members are responding to communications.

11.4. HCF may use email tagging to identify the links in the email on which you click and how you interact with HCF Webpages.

## **12. Collection of Anonymous Data**

12.1. HCF may use standard technology to collect information about the use of the HCF Webpages. This technology is not able to identify individual users but simply allows the HCF to collect statistics.

## **13. Security**

13.1. HCF takes reasonable technological measures to ensure the security and integrity of information submitted to or collected by HCF Webpages, but cannot under any circumstances be held liable for any loss or other damage sustained by you as a result of unlawful access to or dissemination of any personal information by a third party.

13.2. If you suspect a breach or where a breach may have taken place and this comes to your knowledge, please contact us as soon as possible so that we can address the problem.

## **14. Links to Other Websites**

14.1. HCF has no control over, and accepts no responsibility for, the privacy practices of any third-party websites to which hyperlinks may have been provided and HCF strongly recommends that you review the privacy statement of any website you visit before you use it any further.

14.2. Because HCF is not responsible for any representations or information or warranties or content on any third-party website (including

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websites that serve as social networks like Facebook or Instagram), HCF does not exercise control over the privacy policies of these third parties and you should refer to the privacy policy of these third parties should you wish to see how they protect your privacy.

14.3. If a third party asks us for any of your personal information, we will share it with them only if:

14.3.1. you have already given your consent for the disclosure of this information to that third party; or

14.3.2. we have a legal or contractual duty to give the information to that third party.

## **15. What Else Should I Know About My Privacy When Online?**

15.1. The HCF takes all reasonable steps to protect your personal information and maintain confidentiality. However, we cannot guarantee the security or integrity of any information you transmit to us online and you agree that you do this at your own risk.

15.2. Whenever you voluntarily disclose personal information online – for example through email, discussion lists, or elsewhere – that information can be collected and used by others. In short, if you post personal information online that is accessible to the public, you may receive unsolicited messages from other parties in return.

## **16. Disclaimer**

16.1. The Website and all information, content, tools and materials are provided by HCF on an “as is” and “and available” basis, unless we inform you in writing.

16.2. HCF does not guarantee the operation of the Website or the information, content, tools or materials on the Website. You agree that you use the Website at your own risk.

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16.3. The HCF does not guarantee that (i) the Website; (ii) the information, content, tools or materials included on the Website; (iii) the servers; or (iv) that any electronic communications sent by us are free from viruses or other harmful components. The HCF will not be liable for any damages of any kind arising from your use of the Website or from any information, content, tools or materials included on or otherwise made available to you through the Website, including for direct, incidental, punitive and/or consequential damages.

16.4. We are fully committed to providing you with the best possible service. However, we are not responsible for:

16.4.1. any interrupted, delayed or failed transmission, storage or delivery of information due to power failures, equipment or software malfunction, natural disasters, fire, labour unrest, or any other cause beyond the reasonable control of HCF; or

16.4.2. any inaccurate, incomplete or inadequate information you may obtain from the Website.

## **17. Phishing and spoofing**

17.1. If you receive unsolicited e-mails that appear to be from the HCF which request you to provide personal information (such as your credit card number), or that ask you to verify or confirm your personal information by clicking on a link, it is most likely that the e-mail was sent by a “phisher” or “spoofer.”

17.2. The HCF will never ask for this type of information in an e-mail, and we strongly recommend that you do not respond to these e-mails and that you do not click on the link. Responding to “phishing” places you and your personal information at risk. The HCF cannot be responsible for any consequences resulting from your response to any email sent by a “phisher” or a “spoofer”.

## **18. Data Processing outside South Africa**

18.1. You agree that we may transfer your personal information outside South Africa:

18.1.1. if you give us an email address that is hosted outside South Africa;  
or

18.1.2. to administer certain services, for example, cloud services.

18.2. We will ensure that any country, company or person that we pass your personal information to agrees to treat your information with the same level of protection as we are obliged to.

## **19. Location data**

19.1. HCF does not collect location data of members or visitors to our premises.

## **20. Correction of Personal Information**

20.1. You have the right to know what personal information we hold about you. If you wish to receive information in this regard, please complete an 'Access Request Form' on the HCF's Privacy Hub to obtain the information you would like. We will take all reasonable steps to confirm your identity before providing details of your personal information.

20.2. Please note that we are legally entitled to charge a fee for this service which will be advised at the time of your request.

20.3. You have the right to ask us to update, correct or delete your personal information. Where we cannot delete your personal information, we will take all steps to make it anonymous. You agree that we may keep your personal information until you ask us to delete or destroy it. This is unless the law requires us to keep it or dispose thereof.

## 21. Which laws apply to this Privacy Statement

21.1. This privacy policy is governed by the laws of the Republic of South Africa, and you consent to the jurisdiction of the South African courts in respect of any dispute which may arise out of or in connection with the formation, interpretation, substance or application of this privacy statement.

## 22. Use of personal information contrary to the privacy statement

22.1. If you believe that we have used your personal information contrary to this Policy, you are requested to attempt to resolve any concerns with us. If you are not satisfied thereafter, you have the right to lodge a complaint with the Information Regulator, under the Protection of Personal Information Act.

**Address:** The Information Regulator (South Africa)  
JD House, 27 Stiemans Street, Braamfontein,  
P O Box 31533, Braamfontein,  
Johannesburg, 2017

**Complaints email:** [complaints.IR@justice.gov.za](mailto:complaints.IR@justice.gov.za)

**General enquiries email:** [inforeg@justice.gov.za](mailto:inforeg@justice.gov.za)

### **Queries:**

If you have any queries about this privacy policy please contact us at 033-3435414 or via email: [admin@hcf.org.za](mailto:admin@hcf.org.za).

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