



## **Privacy Policy**

Please read this Privacy Policy carefully to understand how your personal information will be handled by the South African Speech-Language and Hearing Association (SASLHA). Every term of this Policy is material.

### **1. ABOUT THE SOUTH AFRICAN SPEECH-LANGUAGE AND HEARING ASSOCIATION**

SASLHA is a voluntary membership association and a registered non-profit organisation. It is the acknowledged voice of speech-language therapists and audiologists in South Africa. SASLHA promotes these professions to the public and the best interests of its members in all spheres of professional activity.

Our contact details:

Address: 12 Ridge Road, La Lucia, Durban, 4051

PO BOX 1690, Umhlanga Rocks, 4320

E-mail: [admin@saslha.co.za](mailto:admin@saslha.co.za)

Telephone: 0861 113297

Website: [www.saslha.co.za](http://www.saslha.co.za)

### **2. INFORMATION OFFICER**

Our Information Officer is:

Name: Ms. Annaline Jack

E-mail: [ceo@saslha.co.za](mailto:ceo@saslha.co.za)

Telephone: +27 (0) 83 779 1123

### **3. EXPLANATION OF TERMS USED**

The following terms have the meanings assigned to them in this Privacy Policy unless the

context requires otherwise:

- 3.1 “Council” refers to the Council of SASLHA.
- 3.2 “Constitution” refers to the Constitution and By-Laws of SASLHA.
- 3.3 “Data subject” has the meaning assigned to it in POPIA and refers to the person to whom the personal information relates and includes both natural and juristic persons.
- 3.4 “HPCSA” refers to the Health Professions Council of South Africa.
- 3.5 “Member” refers to a person who has been admitted as a member of SASLHA in terms of its Constitution and includes a member enrolled in any category of membership. “Membership” has a corresponding meaning unless the context requires otherwise.
- 3.6 “Officer” refers to a member of the Council or any Committee of SASLHA.
- 3.7 “PAIA Manual” refers to the Manual compiled by SASLHA in terms of section 51 of the Promotion of Access to Information Act (Act 2 of 2000).
- 3.8 “Personal information” has the meaning assigned to it in POPIA and refers to information relating to living human beings and existing juristic persons. It includes information such as race, gender, age, medical information, identity number, contact details and confidential correspondence. “Information” has a corresponding meaning unless the context requires otherwise.
- 3.9 “POPIA” means the Protection of Personal Information Act (Act 4 of 2013) and the Regulations issued in terms thereof.
- 3.10 “Processing” has the meaning assigned to it in POPIA and refers to any operation or activity concerning personal information, such as the collection, receipt, recording, storage, updating, alteration, use, distribution, erasure or destruction of the information.
- 3.11 “SASLHA” refers to the South African Speech-Language and Hearing Association.
- 3.12 “We” / “us” refers to SASLHA.
- 3.13 “Website” means <https://saslha.co.za>.
- 3.14 “You” / “your” refers to the data subject whose personal information is processed by SASLHA.

#### **4. APPLICATION OF THE PRIVACY POLICY**

This Privacy Policy applies to personal information that we have in our possession or under our control and personal information that we collect or receive from or about you. It stipulates, amongst others, how we collect the information, the type of information collected, why that information is collected, the circumstances under which that information will be shared with others, the security measures that we have implemented to protect the information and how you may obtain access to and correct your information.

## **5. OUR COMMITMENT**

Your privacy and the security of your information are just as important to us and we want to make sure you understand how your information will be processed. We are committed to conducting our business in accordance with the law. We will, therefore, only process, which includes collect, use, store or disclose, your personal information in accordance with the law or otherwise with your consent and will always strive to keep your information confidential. We take this commitment to look after your personal information seriously. We have implemented a number of processes to make sure that your personal information is used in the right way. Furthermore, we will

- only collect the personal information that is necessary;
- only use personal information for the purposes specified in this Privacy Policy unless you are advised otherwise;
- not keep personal information longer than needed for lawful purposes; and
- only share your personal information as specified in this Privacy Policy and/or permitted in terms of the law or as otherwise agreed with you.

## **6. WHEN YOU PROVIDE PERSONAL INFORMATION ABOUT ANOTHER INDIVIDUAL / ENTITY**

You must make sure that if you provide personal information about another individual or entity to us, you may lawfully do so (e.g., with their consent). We will accept that you are acting lawfully. You should make sure that they are familiar with this Privacy Policy and understand how we will process their information.

## **7. MEMBERSHIP PORTAL AND WEBSITE**

We use YourMembership.com as our membership portal and for the hosting of our website. If you use these services, you should familiarise yourself with the legal notices of YourMembership.com, including its Privacy Policy, which is available at <https://www.yourmembership.com/privacy-policy/>. YourMembership is a member of the Community Brands family. You should therefore also familiarise yourself with the Privacy Policy of Community Brands, which is available at <https://www.communitybrands.com/legal/>. If you sign-in to YourMembership using your LinkedIn or Facebook accounts, you must familiarise yourself with the privacy policies of these social networking services and consider any permission you may have provided to them to enable your login purposes on the member

site. You can manage your account connections to Facebook or LinkedIn within the "Information & Settings" tab on YourMembership to manage connected Apps.

## **8. COLLECTION OF YOUR PERSONAL INFORMATION**

We collect personal information directly from you when you become a member of SASLHA, when you supply information on our website, when you provide information to us or when another person or entity provides information about you to us. Information may also be collected from other sources (e.g., public records), depending on the circumstances, when it is, for example, not possible to obtain the information directly from you, or, when you make information publicly available. The information that we collect is necessary to provide membership or other services to you and to fulfil the objectives of SASLHA as set out in its Constitution.

## **9. PROCESSING OF YOUR PERSONAL INFORMATION**

There are various laws that permit the processing of personal information such as POPIA. Employment laws permit the processing of employees' information.

We generally process the personal information listed below, if applicable in the circumstances, and retain it as part of our records. Other personal information may be collected and processed, if it is required in the circumstances or if you supply it voluntarily.

### Members and Former Members

Members of SASLHA are obliged to register on the membership system hosted by YourMembership.com. Certain information must be supplied on a mandatory basis as indicated when registering. Certain information is voluntary. Members also choose their own privacy settings, i.e., what information about them will be made available to other members ("the community") and the public as well as to which services they would like to subscribe. All information submitted, including information that will not be shared with other members or the public, will be available to the site administrators and may be used for support to relevant members as well as, on a de-identified basis, for training and quality control purposes. Members can update their preferences at anytime by referring back to the website. If you sign in through LinkedIn or Facebook, you should familiarise yourself with the privacy policy and related notices of these social networks. They are independent of our Privacy Policy and Website Terms and Conditions.

The following information is generally collected and processed by SASLHA and stored on Yourmembership.com:

- Full names and surnames, titles, identity numbers, age, contact details (telephone numbers and email addresses), addresses (physical, postal and practice) nationality, languages spoken, equity, gender, disability status;
- Qualifications, registered professions, employment categories, employment status, employers / practice names, fields of work, HPCSA numbers, special interests, education / experience, year of study (students);
- Records of professional development activities;
- Participation in surveys (voluntary);
- Membership fees and payment-related information;
- VAT numbers;
- IP and website addresses;
- Consent and withdrawal of consent, as may be applicable;
- Ethics complaints, if applicable; and
- Correspondence.

#### Officers (including Nominators, Nominees and Applicants for SASLHA Positions)

- Full names and surnames, titles, contact details, gender, nationality; HPCSA status, registration number and good standing, photos qualifications and information included on curriculum vitae (“CV”);
- Information included on nomination forms;
- Signatures of official signatories and proof of residence, if required by the bank;
- Remuneration, tax numbers and bank details;
- Positions held at SASLHA;
- Records of attendance and participation in meetings and SASLHA business-related matters / events; and
- Correspondence.

#### Employees and Job Applicants

- Full names and surnames, titles, identity numbers, age, contact details, positions or roles at SASLHA, nationalities, gender, race, marital status, qualifications, photos, references, next-of-kin, bank details and other information included on CVs;
- Relevant medical and disability information, including COVID-19 screening information, if applicable;

- Employment-related information such as sick certificates, performance and disciplinary records, salary information, tax numbers and employment history; and
- Correspondence.

### Bursaries

- Bursary Applicants
  - Full names and surnames, titles, identity numbers, dates of birth, age, contact details, addresses (physical, postal and residential during studies), nationality, gender, race, marital status, number of dependants as well as other information submitted on the application form and contained in supporting documents;
  - School-related information (such as school where matriculated, year matriculated, matric certificate and academic record);
  - Tertiary education;
  - University at which enrolled, student number, year of registration and study, academic record and financing details;
  - Testimonials;
  - Video clips;
  - Parents' and other family members' information (see below); and
  - Correspondence.
- Parents, Family Members and Financial Support Providers of Applicants, Providers of Testimonials
  - Full names and surnames, identity / passport numbers, contact details, physical addresses; occupations, employers' names and types, sources of income and gross monthly income, signatures on documents;
  - Bank statements;
  - Details of other persons supported by applicants' financial support providers;
  - Testimonials supplied for bursary applicants;
  - Affidavits of unemployed parents / guardians, death certificates of parents and financial statements of self-employed parents, as may be applicable, and
  - Details of other family members as required on application forms (such as names, surnames, relationship, current activities).
- Universities of Bursary Applicants
  - University name, bank details, contact details of persons at relevant departments and testimonials for bursary applicants.

## Events

- Participants at Events (Webinars and Conferences)
  - Practice names and contact details;
  - Names and surnames, titles and contact details of attendees;
  - Invoices and payment information;
  - CVs, agreements, invoices and bank details of presenters;
  - Continuing professional development (CPD) certificates; and
  - Correspondence.
  
- Applicants for Accreditation
  - Organisation or individual names, registration details, postal addresses and contact details;
  - Full names and surnames, titles and contact details of contact persons;
  - Names of account holders, addresses and VAT numbers;
  - Activity information such as title, name, qualifications and CV of presenter / author / facilitator, presentation and article;
  - Attendee records, including full names and surnames, identity numbers; HPCSA numbers;
  - Invoice and payment-related information; and
  - Correspondence.

## Suppliers, Service Providers, Vendors and Other Persons or Public and Private Bodies (e.g., Sponsors)

- Organisation names and contact details;
- Names and surnames, title, contact details, positions of relevant persons (e.g., account managers) or officers at the applicable entities;
- Names and contact details of next-of-kin of employees;
- CVs (if submitted);
- Agreements and related information;
- Invoices, bank details and payment-related information;
- Official documentation, such as newsletters and brochures;
- Entities at which bursary applicants applied for bursaries;
- COVID-19 screening information of visitors to SASLHA;
- IP addresses and consent of users who provide personal information on the website; and
- Correspondence.

## **10. CONSENT**

If you provide consent for the processing of your personal information, you may withdraw your consent at any time. This does not affect the processing of personal information that has already occurred. If you withdraw your consent, your personal information will only be processed as provided for in the law.

If you provide consent, it will be stored by us. Consent of members provided on our website will be valid for 1 year and must then be renewed. Consent provided by other users on the website will be stored with their relevant IP addresses.

## **11. OBJECTION TO PROCESSING**

When we process your personal information to protect your legitimate interests or based on the legitimate interests of SASLHA or those of a third party to whom we supply the information, you may object to our processing, if it is reasonable to do so. This must occur on the form prescribed by POPIA, available from the Information Officer. This does not affect your personal information that we have already processed. If you object and we agree with your objection, your personal information will only be processed as provided for in the law.

## **12. PURPOSE OF PROCESSING YOUR PERSONAL INFORMATION**

We generally process your personal information for the following purposes:

- to achieve our objects, such as promoting and developing the professions we represent, representing our members and facilitating learning activities;
- to manage the association;
- to enrol members, administer membership, collect membership fees and provide membership services;
- for governance purposes;
- for accreditation of CPD activities;
- for assessing bursary applications and allocating bursaries;
- for communication purposes;
- to engage with regulators and relevant public and private bodies on behalf of our members;
- for marketing purposes (subject to consent);
- to obtain sponsorship;



- for procurement;
- for historical, statistical and research purposes;
- any other lawful purpose related to our business.

### **13. DISCLOSURE OF YOUR PERSONAL INFORMATION**

We will only share relevant personal information about you with the persons and entities specified below, if it is necessary and lawful in the circumstances. We will obtain your consent, if we must share your information with any other person or entity.

#### Members and Former Members

- Relevant officers and employees who assist us to provide membership and other services and who perform functions related to our business on a need-to-know basis;
- Other members and members of the public (according to your preferences selected);
- Suppliers and service providers who must perform functions related to the administration of our business (e.g., membership record maintenance, training platform maintenance, etc.) on a need-to-know basis and subject to confidentiality undertakings;
- Conference organisers;
- Our professional and legal advisers;
- Our accountants;
- Debt collectors / attorneys when membership fees are outstanding;
- Our insurers; and
- Relevant persons or entities as required or permitted by our Constitution or the law, where we are under a duty to disclose or share your personal information in order to comply with any legal obligation or to protect the rights, property or safety of our business, employees, the public or others.

#### Officers (including Nominators, Nominees and Applicants for SASLHA Positions)

- Other officers, employees, service providers, suppliers, sponsors and vendors who assist us to provide the services and who perform functions related to our business on a need-to-know basis, subject to confidentiality undertakings where applicable;
- Banks;
- Public and private bodies engaged on behalf of members;
- Our professional and legal advisers;
- Our accountants;
- Our insurers; and

- Relevant persons or entities as required or permitted by law, where we are under a duty to disclose or share your personal information in order to comply with any legal obligation or to protect the rights, property or safety of our business, employees, the public or others.

#### Employees and Job Applicants

- Officers, other employees, service providers, suppliers, sponsors and vendors who assist us to provide the services and who perform functions related to our business on a need-to-know basis, subject to confidentiality undertakings where applicable;
- Banks;
- Next-of-kin in emergency situations;
- Public and private bodies engaged on behalf of members;
- Our professional and legal advisers;
- Our accountants;
- Our insurers;
- Law enforcement structures, including courts and tribunals; and
- Relevant persons or entities as required or permitted by law, where we are under a duty to disclose or share your personal information in order to comply with any legal obligation or to protect the rights, property or safety of our business, employees, the public or others.

#### Bursaries

- Bursary Applicants
  - Officers, employees and contractors who assist us to provide the services and who perform functions related to our business on a need-to-know basis, subject to confidentiality undertakings where applicable; and
  - Universities.
- Parents, Family Members and Financial Support Providers of Applicants, Providers of Testimonials
  - Officers, employees and contractors who assist us to provide the services and who perform functions related to our business on a need-to-know basis, subject to confidentiality undertakings where applicable.
- Universities of Bursary Applicants
  - Officers, employees and contractors who assist us to provide the services and who perform functions related to our business on a need-to-know basis, subject to confidentiality undertakings, where applicable.

## Events

- Participants at Events (Webinars and Conferences)
  - Conference organisers;
  - Other participants; and
  - Officers, employees and contractors who assist us to provide the services and who perform functions related to our business on a need-to-know basis, subject to confidentiality undertakings, where applicable.
  
- Applicants for Accreditation
  - Officers, employees and contractors who assist us to provide the services and who perform functions related to our business on a need-to-know basis, subject to confidentiality undertakings, where applicable; and
  - The HPCSA

## Suppliers, Service Providers, Vendors and Other Persons or Public and Private Bodies (e.g., Sponsors)

- Officers, employees and contractors who assist us to provide the services and who perform functions related to our business on a need-to-know basis, subject to confidentiality undertakings, where applicable; Our professional and legal advisers;
- Our accountants;
- Banks;
- Our insurers; and
- Relevant persons or entities as required or permitted by law, where we are under a duty to disclose or share your personal information in order to comply with any legal obligation or to protect the rights, property or safety of our business, employees, the public or others.

## **14. LINKS TO SOCIAL NETWORKING SERVICES**

We use social networking services such as WhatsApp, LinkedIn, Twitter and Facebook to communicate with the public about our services. When you communicate with us through these services, the relevant social networking service may collect your personal information for its own purposes. These services have their own privacy policies, which are independent of this Privacy Policy.

## **15. RECORD-KEEPING**

We maintain records of your personal information for as long as it is necessary for lawful

purposes related to the conducting of our business, including to fulfil your requests; provide services to you; comply with legal obligations; attend to legal matters; enforce agreements and our Constitution; as proof and for historical, statistical and research purposes subject to the provisions of the law.

## **16. INFORMATION SENT ACROSS THE BORDERS OF THE REPUBLIC OF SOUTH AFRICA**

Our membership system, YourMembership provided by Amazon Web Services, stores membership information on servers hosted in the United States of America (USA). If you submit information on the membership system, you agree to the storing of the information in the USA. We are not planning to send any other personal information about any data subject to any other third party in a foreign country. Should this be required, relevant data subject consent will be obtained, if required, and transfers of such information will occur in accordance with the requirements of the law.

## **17. SECURITY OF YOUR PERSONAL INFORMATION**

We are committed to ensuring the security of your personal information in order to protect it from unauthorised processing and access as well as loss, damage or unauthorised destruction. We have implemented and continually review and update our information protection measures to ensure the security, integrity, and confidentiality of your information in accordance with industry best practices. These measures include the securing of physical records; access control to electronic records; multiple layers of security mechanisms in respect of electronic records and off-site data back-ups. The security mechanisms applied to YourMembership can be viewed at <https://www.yourmembership.com/company/technology/>. In addition, only those officers, employees and service providers or suppliers that require access to your information to discharge their functions and to render services to us are granted access to your information and only if they have concluded agreements with us or provided undertakings regarding the implementation of appropriate security measures, maintaining confidentiality and processing the information only for the agreed purposes. We will inform you and the Information Regulator, if any person has unlawfully obtained access to your personal information, subject to the provisions of the law.

## **18. RIGHT TO ACCESS YOUR PERSONAL INFORMATION**

You have the right to request access to your personal information in our possession or under our control and information of third parties to whom we have supplied that information subject

to restrictions imposed in legislation. If you wish to exercise this right, please complete and submit the prescribed form to the Information Officer (available at this Officer). Costs may be applicable to such request. Please consult our PAIA Manual for further information.

## **19. ACCURACY OF YOUR PERSONAL INFORMATION**

It is important that we always have accurate information about you on record as it could impact on communication with you and the services we provide to you. You must therefore inform us as soon as any of your information has changed. Members must update their information on the membership portal. You may also request us to correct or delete any information. Such a request must be made in writing on the prescribed form to the Information Officer, which form can also be obtained from the Information Officer. You must provide sufficient detail to identify the information and the correction / deletion required. Information will only be corrected / deleted, if we agree that the information is incorrect or should be deleted. It may not be possible to delete the information or all of the information, if we may lawfully retain it. Please contact the Information Officer to discuss how we can assist you with your request. If we correct any information and the corrected information will impact on any decision made or to be made about you, we will send the corrected information to persons to whom the information has been disclosed in the past if they should be aware of the changed information.

## **20. MARKETING OF PRODUCTS AND SERVICES**

If you have given us consent, we may occasionally inform you, electronically or otherwise, about supplementary products and services offered by us that may be useful or beneficial to you. You may at any time withdraw your consent and opt out from receiving such information. You may not opt-out of membership and/or service-related communications, which are not promotional in nature.

## **21. CHANGES TO THIS POLICY**

We reserve the right in our sole and absolute discretion, to revise or supplement this Privacy Policy from time to time to reflect, amongst others, any changes in our business or the law. We will publish the updated Privacy Policy on our website. It will also be available at our offices. Any revised version of the Policy will be effective as of the date of posting on the website, so you should always refer back to the website for the latest version of the Policy. **It is your responsibility to make sure you are satisfied with any changes before continuing to use our services.**

## **22. ENQUIRIES AND COMPLAINTS**

All enquiries, requests or concerns regarding this Policy or relating to the processing of your personal information by us should be addressed to the Information Officer. You may also lodge a complaint with the Information Regulator at [complaints.IR@justice.gov.za](mailto:complaints.IR@justice.gov.za). We would appreciate the opportunity to consider your concerns before you approach the Information Regulator.

## **23. LAWS APPLICABLE TO THIS PRIVACY POLICY**

This Privacy Policy is governed by the laws of the Republic of South Africa.