Pool Family Trust
NURTURE • EMPOWER • INSPIRE

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DATA PRIVACY POLICY

At the Sarel en Hettie Pool Welwillendheidstrust ("Pool Family Trust"[1]), we value the trust our employees, customers and service providers place in us when they share their personal information with us. Without this personal information, we would not be able to function effectively, so we must protect it by following the **Protection of Personal Information Act, No. 4 of 2013 ("POPIA")**[2], the **Promotion of Access to Information Act, No. 2 of 2000 ("PAIA")**[3] and other privacy regulations' principles.

This policy sets out how we achieve that.

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[1] Also referred to as: The Trust / we / us.

[2] The Protection of Personal Information Act 4 of 2013 and its regulations (https://popia.co.za/)

[3] Promotion of Access to Information Act 2 of 2000 and regulations.
https://www.gov.za/documents/promotion-access-information-act

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1. WHY WE HAVE THIS POLICY

The Pool Family Trust is committed to protecting the privacy of personal information in line with the **POPIA**, the **PAIA**, and other relevant laws.

We have this policy to help us:

- keep our donor, volunteer, beneficiary, trustee and service provider data safe
- Protect the Trust's reputation; and
- Comply with all relevant data protection regulations, including PAIA and POPIA.

2. THE SCOPE OF THIS POLICY

This policy applies to:

- Any activity where the Trust collects, uses, stores, or shares personal information ("processing activities");
- Trustees, contractors, service providers, and partners who may access or handle personal information. All personal information held by the Trust in physical or electronic form.

3. WHY IT IS IMPORTANT TO COMPLY WITH THIS POLICY

3.1 If the Trust does not comply

Failure to comply with POPIA or PAIA could:

- Damage our reputation with beneficiaries, donors, and partners.
- Expose us to fines, penalties, or legal claims.
- Undermine trust in the governance of the Pool Family Trust.

3.2 If you do not comply

Anyone acting on behalf of the Trust must comply with this policy. Breach of this policy may result in removal of responsibilities, termination of contracts, or further legal consequences.

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4. OUR APPROACH

We adopt a risk-based approach to compliance. While we must protect all personal information,we prioritise the protection of personal information used in our important business activities that could substantially impact a data subject's right to privacy.

It is our policy to:

- Follow the principles of privacy protection in POPIA (see our POPIA policy);
- Empower users to act responsibly with personal information.; and
- Conduct personal information impact assessments.

4.1 We follow the principles of data privacy

4.1.1 Classify personal information

We identify and classify the types of personal information that we use and produce., such as:

- Beneficiaries: identification, contact, and financial details.
- Donors: contact details and banking/payment information.
- Trustees and contractors: identification and contractual details

4.1.2 Document processing activities

We document all processing activities as required under POPIA and PAIA to ensure that we can respond to requests from the Information Regulator and requests for information by data subjects or third parties.

4.1.3 Specify the purpose of processing

We only process personal information for clear and lawful purposes, such as:

- Managing Trust activities and distributions.
- Processing donations and payments.
- Meeting legal, tax, and audit obligations.

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4.1.4 Provide a legal basis for processing activities

We ensure that all processing activities have a legal basis:

- Consent from the data subject.
- Performance of a contract (e.g., paying service providers, administering donations).
- Compliance with legal obligations (e.g., SARS reporting, PAIA).
- Legitimate interests of the Trust (e.g., requesting donations, ensuring governance).

If we want to process personal information for purposes not covered in the above three legal bases, we must ask for consent to use personal information from the person or organisation before we start the activity.

4.1.5 Keep processing to a minimum

We ensure that weprocess personal information that is adequate, relevant, and not excessive, considering the purpose of the activity and where possible information is de-identified or anonymised.

4.1.6 Obtain personal information from lawful sources

We obtain personal information directly from data subjects or from lawful disclosed sources only. Other sources may be lawful in exceptional circumstances. If you are unsure, speak to the Information Officer.

4.1.7 Process transparently

Our privacy notices and POPIA Policy Statement and Manual disclose all processing activities to data subjects. The PAIA Manual also describes categories of information available for access.

4.1.8 Ensure personal information quality

We take reasonable steps to ensure that personal information is complete, accurate, not misleading, and updated when necessary.

4.1.9 Limit sharing

We only share personal information if it is legally required or with trusted service providers under written agreements.

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4.1.10 Keep personal information secure

We use reasonable physical and electronic safeguards to protect against loss, damage, or unauthorised access.

All personal information processing must comply with any of our policies, standards, processes or procedures applicable to information security.

4.1.11 Manage personal information incidents

Reports must be sent to the Information Officer and must comply with the Pool Family Trust POPIA Data Protection Policy and Procedures

4.1.12 Manage retention periods

We ensure that all records:

- are managed appropriately and following any operational or legal rules that may apply; and
- comply with the Pool Family Trust POPIA Data Protection Policy and Procedures.[4]

4.1.13 Respect data subjects' rights

We respect the rights of data subjects to exercise their right under POPIA and PAIA:

- Access their records (PAIA);
- Request correction or delete inaccurate, irrelevant, excessive, out of date, incomplete, misleading, or illegally obtained information; Withdraw consent (where consent is the legal basis);
- Object to processing their information when it is not necessary for the conclusion or performance of a contract or to comply with an obligation imposed by law.
- Lodge complaints with the Information Regulator (POPIA).

We handle all data subject requests following the Pool Family Trust POPIA Data Protection Policy and Procedures[5].

[4] See the sections: Retention of Personal Information Records and Destruction of documents.

[5] See the section: Access to Personal Information.

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4.2 We have responsible and empowered users

Anyone with access to personal information must comply with data privacy principles of this policy. They must also follow the Trust's PAIA Manual and comply with data protection legislation. Keep information confidential and secure, report incidents or suspected non-compliance immediately.

4.3 We conduct personal information impact assessments

The Information Officer must ensure that a personal information impact assessment is done before we start a new processing activity. We must assess whether the processing activity complies with the data privacy principles, identify gaps, and implement controls to close the compliance gaps.

We must conduct a personal information impact assessment before we:

- continue to process personal information as part of an activity that has not undergone a personal information impact assessment before;
- significant changes to an existing processing activity;
- use new systems or software for processing personal information; or
- share personal information with new third parties.

5. IMPLEMENTATION & REPORTING

The Trust appointed the Information Officer for the Pool Family Trust in line with POPIA and PAIA. The Information Officer is responsible for:

- Overseeing this policy and the **POPIA Framework**.
- Coordinating the PAIA Manual, privacy notices, and data protection procedures.
- Reporting to the Trustees on compliance and incidents.

The Trustees of the Pool Family Trust have the discretion to request further independent assurance on the implementation of the POPIA framework.

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6. OUR POLICY GLOSSARY[6]

Data subjects	The person or organisation to whom the personal information relates. This includes: • trustees; • beneficiaries; • donors; • service providers, contractors, and suppliers;
Incident	An incident includes: • non-compliance with this policy and any procedures relating to it; • contraventions of any data protection legislation such as POPIA and PAIA; and • security incidents such as breaches of confidentiality, failures of integrity, or • interruptions to the availability of personal information.
Processing activities	Any operation involving personal information, including collection, use, storage, sharing, modification, or destruction.
Personal information	Personal information is any information that can be used to reveal a person's identity.

[6] Also refer to Definitions in Pool Family Trust **POPIA** Data Protection Policy and Procedures

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Personal information relates to an identifiable, living, natural person, and where applicable, an identifiable, existing juristic person (such as a company), including, but not limited to information concerning:

- race, gender, sex, pregnancy, marital status, national or ethnic origin, colour, sexual orientation, age, physical or mental health, disability, religion, conscience, belief, culture, language and birth of a person;
- information relating to the education or the medical, financial, criminal or employment history of the person;
- any identifying number, symbol, email address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
- the biometric information of the person;
- the personal opinions, views or preferences of the person;
- 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;
- the views or opinions of another individual about the person; and
- 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 information about the person.

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Processing	Any operation or activity or any set of operations concerning personal information, including: • collecting, receiving, recording, organising, collating, storing, updating or modifying, retrieving, altering, consulting, or using; • disseminating through transmission, distributing, or making available in any other form; or • merging, linking, restricting, degrading, erasing, or destroying personal information.

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7. SUPPORTING DOCUMENTS

This policy must be read together with:

- The Pool Family Trust PAIA Manual.
- The Pool Family Trust POPIA Data Protection Policy and Procedures (including privacy notices and procedures).
- Any data-sharing or confidentiality agreements with third parties.

8. DOCUMENT VERSION

This policy was implemented in May 2026 and will be reviewed annually or when material changes to the law occur.