

## Privacy Policy

The Good Governance Academy (The “GGA”) strives for transparency and trust when it comes to protecting your privacy and we aim to clearly explain how we collect and process your information. It’s important to us that you should enjoy using our products, services and website(s) without compromising your privacy in any way. This policy outlines how we collect and use different types of personal and behavioural information, and the reasons for doing so. You have the right to access, change or delete your personal information at any time and you can find out more about this and your rights by contacting The GGA, using the details in the “Contact Us” section of the website: <https://thegoodgovernanceacademy.com> (“contacting us”)

This policy applies to “users” (or “you”) of The GGA website or any product or service of The GGA; that is anyone attending, registering or interacting with any product or service from The GGA. This includes event attendees, participants, registrants, website users, app users and the like.

This policy should be read in conjunction with The GGA [Terms and Conditions for Attendance and Participation](#) and ensure that you understand how The GGA collects and uses your information.

Our policies will be updated from Time-to-time. Please refer back regularly to keep yourself updated.

### **1. Purpose fo the collection and use of your information**

The information you provide to The GGA, and that which we gather based on your activity, helps us to deliver more relevant content as well as create a more seamless experience across the products and channels through which you may access that content.

We collect and store some information about you in order to deliver products and services to you, such as your subscription, or so that you can attend a Good Governance Academy event (an “Event”). We share some of that information with Wits Business

School and trusted suppliers (including payment providers and technology services) to ensure the delivery of those products and services, or to give personalised recommendations on things we think will be of interest to you. We also collect information when you use our products and services and further details are provided below.

## **2. Information collection**

The GGA requests and collects information you provide in order to provide you with our services and products. There is certain personal information that we need in order to provide the products and services that you have chosen.

Examples of the details we collect in order to provide an Event:

- First name
- Last name
- Email address
- Telephonic contact number
- Meal preference
- Name of an institution, association or club of which you are a member
- Your unique identification number for the institution, association or club (“member number”)
- Payment details

In addition to the above, examples of the details we collect could include:

- Job title
- Company
- Country
- Industry
- Gender
- Date of birth

When you use any of The GGA online platforms or apps The GGA collects information that helps it to deliver the service you have chosen and to improve your experience. This is done through Cookies and other technologies. Examples of the type of information we may collect are:

- Browser
- Email provider
- The pages you read on our websites and how you got to them
- Device
- IP address
- Internet connection
- Location

You can also volunteer to disclose additional information which may not be essential for us to deliver a service to you. By providing it you help us to ensure we communicate with you in a way that's most relevant, useful and engaging for you. We may collect and ask for additional information when you purchase, register, subscribe or make use of our products or services in any way, for example in person, via our marketing campaigns, via phone or our websites.

### **3. Information received from third parties**

The GGA works with third parties, such as institutions and associations, which provide additional information that you have shared with them. Examples of the type of information The GGA may receive are:

- Telephonic contact number
- Email address
- Postal address

Some third parties may also share further information about your interaction on our sites to help us personalise our services to you. More information can be found in the Audience Profiling section below.

### **4. Using your information**

We primarily use your information for the purpose of delivering the products and services that you have chosen and to personalise our interactions with you, which include that to:

- Fulfil your orders and/or registrations with us this includes our third party specialised payment providers;

- Manage your access to our online content and apps, and to send you content via push notifications, newsletters and subscriptions if you have requested us to do so;
- Send you service notifications related to your product or service such as subscription Event notifications, password resets and order confirmations;
- Manage queries and complaints;
- Manage your privacy preferences and to ensure you only receive communications that you have requested, which may include using your details to suppress you from communications;
- Send you administrative emails about your registration and/or account, reminders for upcoming Events, service changes, or new policies which are essential for the services that you have selected;
- Provide general location-based services (e.g. the region or country you are in), advertising or search results for our content;
- Detect and reduce fraud including fraudulent orders;
- Prevent users from posting illegal, offensive or objectionable comments on our site;
- Run promotions or if you agree to be a speaker, participant or contributor at, or in, one of our Events, projects, presentations, documents or videos. In these cases, subject to any specific terms The GGA agrees with you separately, you grant a global right to The GGA to use your name, picture, likeness, voice, biographical information and statements, for advertising, trade, publicity and promotional purposes in all media now known or discovered afterwards and on the internet.

## **5. Marketing and advertising**

We need your consent to use your information for some specific purposes such as marketing, brand response communications and personalised advertising. Ways in which we will use your information if you consent include:

- Sending marketing communications via a range of channels including email and push notifications, which you can opt-out of at any time, and if you give us marketing permission, may include special offers and related or similar products or services;
- You may elect to allow us to may pass your information to specially selected third parties who would like to contact you with information regarding their own

products and services such as other subscriptions, events or content services, in such cases, those parties are responsible for their use of your data and you should read their privacy policies carefully;

- We will ask you if you wish to opt-out of such marketing when you first sign up to receive our products or services, and you can update your preferences at any time via your online account at [economist.com](http://economist.com) or by contacting us;
- You can also opt-out of email marketing by clicking the unsubscribe link at the bottom of our emails;
- Other parts of The GGA website will inform you of how to opt out of such marketing communications, or you can find out by contacting us.

This does not apply to important service notifications such as payment confirmations or where we have some other legal basis for contacting you.

In order to deliver advertising and marketing messages that are relevant to you, we may use the information we hold about you, including details that we collate from your use of our services or third parties, such as more precise information on your location or your company's profile (i.e. company name, company size), to ensure that the advertising you see is of interest to you.

## **6. Other uses of your information**

Other than where we have asked for your consent, we mainly rely on two other separate bases to lawfully use your information. First, we need to use your information in certain ways to provide our products or services to you, in accordance with our contracts with you. In this case, it is necessary for us to use your information so that we can deliver the products or services you have chosen. Second, in certain cases, we may use your information where necessary to further our legitimate interests, where those legitimate interests are not overridden by your rights or interests, including:

- To measure attendee and user response and engagement with our products and services such as online content, email newsletters, events and special offers. This may include sharing your information with third parties who help us to analyse and measure these things.
- To ensure our products (including websites and apps) are compatible with the browsers and operating systems used by most of our visitors.

- To help us improve our customer and user experience and to support new product development. We may send customer satisfaction surveys and market research questionnaires (for which we may share your information with third party suppliers employed by us).
- To create audience profiles for personalised advertising, marketing or research and development on and off our websites –more detailed information is provided in this policy.
- To detect and reduce fraudulent activity and for other security related purposes such as to help us protect against harassment, IP infringement, crime or other security issues.
- For any purpose required by law or regulation and to verify information that we provide to third parties for compliance and audit purposes. We may share your personal data with a third-party auditing organisation so they can verify aggregated statistics about the usage of our products or review our policies, processes and procedures for compliance with relevant standards.
- You have the right to object to any of the above uses of your information, please get in touch by contacting us. We will consider all objections reasonably, but there may be legal reasons where we deem that the use of your information is still appropriate. We will explain our decision to you in a timely manner.

## **7. Social media**

The GGA publishes content on social media platforms, such as Twitter, Facebook, LinkedIn and Instagram, through both "organic" and "paid" methods to reach current and potential attendees:

- “Organic” methods describe where content and/or offers are published onto a social platform so that they may appear in your social platform’s content, without being promoted or forced to appear more prominently, e.g. The GGA’s Facebook page.
- “Paid” methods describe where content and/or offers are published onto a social platform so that they will appear more prominently, or be shown to users that do not currently follow The GGA's social pages, such as a promoted tweet on your Twitter timeline.
- We may place one or more social media platform “tags” on our website in order to better understand how The GGA may be of best value to you by providing you with the most relevant content available according to what you have chosen to

read on our own websites. These tags only record information around events to help us understand if you are registered or subscribed with us, so that we may use your reading preferences to provide more relevant content and/or offers to you, on social media platforms, such as removing Event offers from your feed if you are already registered for an Event.

- We do not have direct access to your personal data on your social media platforms.

## **8. Audience profiling**

To enable us to personalise the content and advertising you see (including on social media), we may use your interaction and browsing behaviour or preferences (such as how and what you read on our websites and our apps) to create audience profiles. This is to enable content and message personalisation, and in some cases, advertising to be delivered to you or a group of users (an audience) with similar interests to you. This can be done both on our site and on those of third parties. Please see our Cookie Policy for more information.

We may analyse your individual information to create a profile of your interests and preferences as a part of an audience. These insights are used to help us make marketing decisions so that we can ensure our messages are relevant to you. There are times we may use additional information available from external sources to help us do this effectively which is described in more detail in this policy.

You can choose to opt out of our audience profiling activity if you wish. This does not mean that you will no longer see advertisements, it just means that the advertisements you will see are no longer personalised to your interests. Please get in touch to do so by contacting us.

## **9. Using third parties**

In some instances, we disclose personal information to third parties when it is necessary to deliver a service or product, or to help us improve your experience with us, or when we are required to do so by contract or law. “Third parties” include agents, subcontractors, sponsors and other associated organisations such as Wits Business School. We have in place contracts to ensure the information remains secure and limited in use, and if we do not have a legitimate business reason to pass on your information,

we will ask you to give consent first. Some examples of when we share your information are:

- When you make a payment on any of our sites your payment will be processed by a specialist payment processor to ensure a secure transaction. All payment processors used by The GGA are compliant with required security standards. If you have any questions regarding secure transactions, please get in touch with us by contacting us.
- When you log on to your registration account, a third party provider who specialises in online account management will manage your access, which may include re-setting your password.
- When we send you an email or a push notification, these are delivered by marketing platforms. As part of this service, certain information such as message opens, clicks and formatting are recorded to help deliver the best email experience.
- When we test and launch new products, services or offers, we may work with trusted third parties to support us.
- We may also employ third parties to carry out statistical analyses and conduct surveys on our behalf, to support our advertising and content production efforts respectively.
- To provide information for auditing purposes by official regulators.
- To enhance your profile with non-personal information.
- To enable third parties such as advertisers or sponsors to contact you with information about their own products and services that may be of interest – only if you give explicit permission for us to do so.

At some point, we may use additional information such as telephone numbers or postcodes from third parties (like list brokers, researchers or telemarketing agents, who have gathered this information lawfully) to help us to contact you with important service updates via phone or email, or to help us make marketing decisions. This includes advertising (by ourselves or via advertising partners) to groups of people with particular interests. These third parties may give us access to your personal information, if you have allowed them to do so.

We may also work with third parties to identify individuals who may be interested in our products and services or in some cases our sponsors / advertisers' products and services.



These third parties may give us access to your personal information, if you have allowed them to do so.

In any communication you receive from us, through these third parties, we make sure to identify ourselves (and them) so that you know who has access to your information.

**IMPORTANT:** Please note that the collection, use, and disclosure of information by these third parties are described in their own Privacy Policies, and consequently may differ from that set out in this policy. We are not responsible for those third party Privacy Policies, and you should ensure that you have read and understood all applicable Privacy Policies before proceeding.

## **10. Retaining and storing your information**

We securely store your information, and hold it for as long as we need to in order to provide our services and products to you in accordance with (i) applicable law, or (ii) as long as is set out in any relevant contract you have with us.

We review our retention periods for personal information regularly. If you have not interacted with us in any way, we will generally no longer hold your information after 5 years (you can confirm by contacting us). Sometimes we may need to keep it for longer periods such as for tax and other financial regulatory reasons, this would typically be 7 years. We would only keep it for longer than this if we are required to by law.

If you request for us to no longer contact you, for example with marketing communications, we will retain the minimum amount of information about you so that we can ensure we remove you from any future communications. Please note that if you ask us to completely remove all information about you, and you subsequently use our products and services at a later date, we will no longer be able to recognise your previous request not to be contacted, which is why we would keep it and suppress it in line with industry standards.

### **International reach**

As the internet is a global environment and we work with third parties across the globe, collecting and using your personal information may involve the transfer of this information internationally, including the European Union. By using our products and

services you acknowledge and agree to your personal information being transferred in this way.

We maintain strict policies to ensure all information that is transferred is done so safely and securely.

## **11. Security**

We take information security seriously and have policies and procedures in place to ensure the information we hold on you remains safe. We limit who has access to your information and ensure that those who do are bound by contracts to keep your information availability restricted and safe.

## **12. Individuals under 18**

The GGA does not intentionally, or knowingly, process personal information from individuals under the age of 18. We will make every effort to delete any details of such users where a parent or guardian has informed us that these details have been collected.

## **13. Sale of data**

The GGA does not intentionally gain financial benefit from the sale of an individual's personal information. The GGA may, however, share your details with selected third parties for the purposes of delivering its Events, products and/or services, where you have opted in for us to do so. If you change your mind you can opt out by contacting us.

## **14. External links**

This Privacy Policy only applies to The GGA's use of data. Our websites, services or products may, from time-to-time, contain links to, use or be on external sites, such as that of Wits Business School. The GGA is not responsible for the Privacy Policies or the content of such sites and we recommend that you read the Privacy Policies on any external sites you use. Similarly, if you are directed to our website from a third party we are not responsible for the Privacy Policy or practices of the third party. We strongly recommend you read their policy.

## 15. Cookies

Cookies are small files that are created in your web browser when you visit any of our websites. You can find more information about the types of Cookies that we, and certain third parties use, why we use them, and how to manage them in our Cookie Policy.

## 16. Your rights

You have the right to ask us to update, delete or stop processing information we hold about you. However, please note that there are circumstances in which complete erasure of your information or ceasing to process your information will not be possible for operational, legal and business reasons. This may include if we need to provide services to you, or if you wish us to no longer contact you for marketing purposes. In this case we may need to retain some of your details securely in order to facilitate this request by, for example, keeping you on a “do not contact” or suppression list. This will be the only purpose for which your data will be used if this is the case.

## 17. Changes to this policy

From Time-to-time, we may make changes to the Privacy Policy. This may be in relation to changes in the law, best practice or changes in our services. These changes will be reflected in this statement, so you should check here regularly.

## 18. Frequently Asked Questions

**Q: How can I see what information you hold on me?**

A: You can contact us at any time, using the details in the “Contact Us” section of the website: <https://thegoodgovernanceacademy.com>.

**Q: How do I opt-out of profiling?**

A: You can contact us at any time, using the details in the “Contact Us” section of the website: <https://thegoodgovernanceacademy.com>.

**Q: How do I opt out of marketing?**

A: You can contact us at any time, using the details in the “Contact Us” section of the website: <https://thegoodgovernanceacademy.com>.

**Q: How do I make a complaint?**

A: You can contact us at any time, using the details in the “Contact Us” section of the website: <https://thegoodgovernanceacademy.com>. If you are still not satisfied with the outcome of your complaint, you may contact the South African Information regulator using the contact details provided: <https://www.justice.gov.za/inforeg/contact.html>.

**Q: How long do you hold my information for?**

A: We generally hold information for up to 5 years, after our last interaction with you. It may be 7 years or longer if required for financial, tax or legal reasons.

**Q: Can I ask you to delete my information?**

A: Yes, you can ask us to delete your information by contacting us. We will consider your request and take appropriate action which may mean that we suppress it, rather than delete it to ensure that we can still follow your preferences as to whether or not we can market to you.

**Q: How do I update my information?**

A: You can update it at any time by contacting us.

**Q: How do I manage Cookies?**

A: Please see our Cookie Policy.

**Q: What are my rights under POPIA?**

A: You have a right to ask us to correct or delete your personal information that is inaccurate, irrelevant and excessive, or which we are no longer authorised to retain. We will consider your request and take appropriate action which may mean that we

suppress it, rather than delete it to ensure that we can still follow your preferences and we remain compliant with legal and/or regulatory requirements.

**Q: What are my rights under GDPR?**

A: You have a right to ask us for information we hold about you, “Subject Access Request”.