FOUR NOMADS

PROTECTION OF PERSONAL INFORMATION

Privacy Policy

How Four Nomads NPC collects, uses, shares, protects and disposes of personal information — and the rights you hold over information about you.

Issued by the Information Officer of Four Nomads NPC in terms of the **Protection of Personal Information Act 4 of 2013**, read with the Regulations Relating to the Protection of Personal Information, 2018 as amended by Government Notice 6126 in Government Gazette 52523 of 17 April 2025. This policy also serves as the notification contemplated in section 18 of that Act.

RESPONSIBLE PARTY	Four Nomads NPC, a non-profit company incorporated in the Republic of South Africa
REGISTRATION NUMBER	2022/514801/08 (Companies and Intellectual Property Commission)
PBO NUMBER	930086019 — approved by SARS under section 30 of the Income Tax Act 58 of 1962; Section 18A approved
REGISTERED OFFICE	51 Boabab Street, Newtown, Louis Trichardt, 0920
INFORMATION OFFICER	Ndivho Ramovha — registered with the Information Regulator (South Africa), registration number 2026-068387
DOCUMENT REFERENCE	FN-POPIA-01
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1 About this policy

Four Nomads NPC works with young people, most of them school learners under the age of eighteen, in Limpopo and Gauteng. Doing that work means we hold information about children, their parents and guardians, their teachers, our donors, our volunteers and our staff. We take that seriously.

This policy explains, in plain language and without legal shortcuts:

- what personal information we collect and where it comes from;
- why we process it, and the lawful basis on which we do so;
- who we share it with, and whether it leaves South Africa;
- how long we keep it and how we protect it;
- what rights you have, and exactly how to exercise them.

It applies to all personal information processed by Four Nomads NPC, in any form — on paper, on our devices, in our email, on our website at fournomads.org, and in the messaging and file services we use to run our programmes. It applies to everyone who processes personal information for us: directors, employees, volunteers, mentors, interns and contracted service providers.

> **THIS POLICY DOES DOUBLE DUTY**
>
> It is our internal privacy policy, and it is also the notice to data subjects required by **section 18 of the Protection of Personal Information Act 4 of 2013** ("POPIA"). When we collect your personal information we will point you to this policy rather than repeat all of it each time.

A separate document, our **PAIA Manual** (reference FN-PAIA-01), explains how to request access to records that Four Nomads holds. A separate **Learner Photograph, Media and Programme Consent Form** (reference FN-CONSENT-01) is used to obtain the consent of a parent or guardian before we process a learner's personal information. Both are available on our website and from the Information Officer.

2 Who we are

Four Nomads NPC is the **responsible party** for the personal information described in this policy. That means we decide why and how it is processed, and we are accountable for it under section 8 of POPIA.

LEGAL ENTITY	Four Nomads NPC — Non-Profit Company
CIPC REGISTRATION	2022/514801/08
PBO NUMBER	930086019 · Section 18A approved
REGISTERED OFFICE	51 Boabab Street, Newtown, Louis Trichardt, 0920
GAUTENG OFFICE	17 Kolgans Street, The Reeds, Centurion, 0061
POSTAL ADDRESS	As per the registered office above
EMAIL	info@fournomads.org
WEBSITE	fournomads.org
OFFICE HOURS	Monday to Friday, 08:00 – 16:30 SAST. Closed on South African public holidays
FINANCIAL YEAR END	February
DIRECTORS	Ndivho Ramovha · Risuna Harriot Maluleke · Darrel Landsberg · Kalizya Silungwe (as registered with the CIPC)

3 Our Information Officer

Under POPIA the **head of a private body** is its Information Officer by default, and under section 55(2) an Information Officer may only take up those duties once the responsible party has registered them with the Information Regulator. Ours is registered.

INFORMATION OFFICER	Mr Ndivho Ndwamato Ramovha
CAPACITY	Head of the private body, Four Nomads NPC
REGISTRATION	Registered with the Information Regulator (South Africa) · registration number **2026-068387**
TELEPHONE	+27 (0)81 248 9372
EMAIL	ndivho@fournomads.org — the Information Officer's direct address info@fournomads.org — general enquiries; please put "Information Officer" in the subject line
POSTAL / STREET	51 Boabab Street, Newtown, Louis Trichardt, 0920
DEPUTY INFORMATION OFFICERS	None designated at the date of this policy. Section 56(1) of POPIA requires a body to designate "such a number of persons, *if any*, as deputy information officers as is necessary". Given the size of the organisation, none has been designated. If that changes, they will be registered with the Regulator and named here.

The Information Officer's duties, set out in section 55(1) of POPIA and in regulation 4 of the POPIA Regulations as amended, are to encourage compliance with the conditions for lawful processing, to deal with requests made to Four Nomads under POPIA and PAIA, to work with the Regulator on any investigation, to develop, implement, monitor and continuously improve a compliance framework, and otherwise to ensure that Four Nomads complies with POPIA.

4 Words used in this policy

These are POPIA's own definitions, shortened. Where this policy and the Act differ, the Act governs.

Personal information	Information relating to an identifiable, living natural person — and to an identifiable, existing juristic person. It includes a name, an identity number, contact details, a photograph, a voice recording, an opinion about the person, and correspondence of a private nature.
Special personal information	A narrower class: religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life, biometric information, and criminal behaviour. Sections 26 to 33 prohibit processing it except in defined circumstances.
Child	A natural person under 18 years of age who is not legally recognised as an adult.
Competent person	Any person legally competent to consent to an action or decision concerning a child — in practice the parent or legal guardian holding guardianship under section 18 of the Children's Act 38 of 2005.
Processing	Almost anything done with personal information: collecting, recording, organising, storing, updating, using, distributing, making available, merging, erasing or destroying it.
Responsible party	The person who determines the purpose of and means for processing. For the information in this policy, that is Four Nomads NPC.
Operator	A person who processes personal information for a responsible party, under that party's authority — for example our website host or an accounting firm.
Data subject	The person the personal information is about.
Consent	Any voluntary, specific and informed expression of will by which permission is given for processing. All three limbs must be satisfied. A general permission to use information "for any purpose" is not consent, because it is not specific.
The Regulator	The Information Regulator (South Africa), established by section 39 of POPIA.

5 The principles we apply

Section 4(1) of POPIA sets eight conditions for lawful processing. They are the backbone of this policy, and of how we have built our systems.

#	CONDITION	SECTIONS	WHAT IT MEANS FOR US IN PRACTICE
1	**Accountability**	s8	We, not our funders or our partner schools, are answerable for the personal information we hold. The Information Officer carries that responsibility.
2	**Processing limitation**	ss 9–12	We process lawfully, we collect the minimum we need, we rely on a proper justification under section 11, and we collect from you directly wherever we can.
3	**Purpose specification**	ss 13–14	We collect for a specific, explicitly defined and lawful purpose, and we tell you what it is. We do not keep records longer than that purpose requires.
4	**Further processing limitation**	s15	If we later want to use information for something new, it must be compatible with the original purpose — or we come back and ask you.
5	**Information quality**	s16	We take reasonably practicable steps to keep information complete, accurate, not misleading and up to date.
6	**Openness**	ss 17–18	We maintain the documentation required by sections 14 and 51 of PAIA, and we tell you when we collect your information. This policy is part of how we do that.
7	**Security safeguards**	ss 19–22	We take appropriate, reasonable technical and organisational measures to protect information, and we notify the Regulator and affected people if it is compromised.
8	**Data subject participation**	ss 23–25	You may find out what we hold about you, and have it corrected or deleted.

6 Whose personal information we process

- **Learners** who take part in our programmes — most of whom are children under 18.
- **Parents, guardians and other competent persons** who consent on a learner's behalf.
- **Teachers, principals and school officials** at partner schools.
- **Donors and funders** — individuals, companies, trusts and foundations — and their representatives.
- **Volunteers, mentors, facilitators and interns.**
- **Employees, directors and job applicants.**
- **Service providers, training partners and contractors**, and their staff.
- **Website visitors and enquirers** who contact us through our forms, email or social media.

7 What we collect, and why

We collect only what we need for the purpose concerned — this is the minimality requirement in section 10. Where a field is optional we say so when we ask for it.

7.1 Website visitors and enquirers

Our website carries three forms: a general enquiry form, a Section 18A receipt request, and a donation notification sign-up. Through them we collect your **name**, **email address**, **organisation** (optional), the **topic** you select and the **message** you write. These are sent to info@fournomads.org so that a person can reply to you. Nothing submitted through a form is stored on the website itself.

7.2 Donors and funders

For a donation and, in particular, for a **Section 18A tax receipt**, the Income Tax Act obliges us to record the **donor's name and address**, the **amount and date** of the donation, and, where the donor is a taxpayer claiming the deduction, an **identity number or company registration number** and **income tax reference number**. For corporate and B-BBEE purposes we may also hold company registration details, VAT numbers, B-BBEE certificates, contact persons, banking references appearing on proof of payment, and the correspondence and agreements that record what was given and on what terms.

7.3 Learners, and their parents or guardians

Our programme model follows a learner over several years rather than running a single workshop, so we keep a learner record. It may contain the learner's **name and surname**, **school and grade**, **year of birth or date of birth**, **gender**, a **unique Four Nomads learner identifier**, **attendance and session records**, **assessment and progress notes**, **subject and career interests**, **placement, training or bursary outcomes**, and **photographs, video or audio** where consent has been given for them. For the parent or guardian we hold the **name**, **relationship to the learner**, **contact number**, **email address** if there is one, and the **signed consent form**.

Where follow-up is by **WhatsApp** — which is how we stay in contact in low-bandwidth areas — we hold the mobile number used, and the messages exchanged.

> **WHAT WE DO NOT COLLECT FROM LEARNERS**
>
> We do not ask learners for identity numbers, home addresses, household income, medical or health information, or banking details as part of ordinary programme participation. Where a particular opportunity requires something further — a bursary application or a training provider's enrolment, for example — we will ask for it separately, explain why, and obtain fresh consent from the parent or guardian.

7.4 Partner schools, training providers and partners

Names, job titles, work contact details and correspondence of the people we deal with, together with the memoranda of understanding and reporting schedules agreed with each partner.

7.5 Volunteers, mentors, employees and directors

Identifying and contact details, curricula vitae and qualifications, references, the agreement or contract under which the person acts, records of training and attendance, and — for employees and directors — the information we are required by law to keep for payroll, tax, statutory returns and company records. Where a person will work directly and unsupervised with children, we require the screening set out in paragraph 7.6.

7.6 Special personal information

We avoid special personal information wherever we can. There are two exceptions, and we treat both as high-risk:

- **Criminal record screening** of adults who will work directly with children, and confirmation of their status against the National Child Protection Register and the National Register for Sex Offenders. This is processed under section 33 of POPIA read with Chapter 7 of the Children's Act 38 of 2005 and the Criminal Law (Sexual Offences and Related Matters) Amendment Act 32 of 2007, and is seen only by the Information Officer.
- **Race**, where a funder requires demographic reporting on programme beneficiaries, or where it is needed for B-BBEE verification. Wherever possible we report this in aggregate and de-identified form, so that no individual learner is identifiable.

We do not process health information, biometric information or information about a person's sex life as part of our programmes. A photograph of a learner is ordinary personal information; it would become *biometric* information only if we used it as a technique of personal identification, and we do not.

8 The lawful basis for processing

Section 11(1) of POPIA allows processing only where one of six justifications applies. This is which one we rely on, for what.

PURPOSE	JUSTIFICATION	WHY THAT ONE
Replying to an enquiry you send us	Consent — s11(1)(a)	You chose to contact us and gave us your details for that purpose.
Processing a learner's personal information for programme participation and tracking	Prior consent of a competent person — s35(1)(a), read with s11(1)(a)	The learner is a child, so section 34 prohibits processing unless a section 35(1) ground applies. We rely on the parent or guardian's written consent.
Taking and publishing photographs, video or learner stories	Prior consent of a competent person — s35(1)(a)	Consent is sought separately for each use, on our consent form. Consent for one use is never treated as consent for another.
Issuing Section 18A receipts and keeping donation records	Compliance with an obligation imposed by law — s11(1)(c)	Section 18A of the Income Tax Act 58 of 1962 and the Tax Administration Act 28 of 2011 require us to record and retain these details.
Company records, statutory returns, audit and the annual financial statements	Compliance with an obligation imposed by law — s11(1)(c)	Required by the Companies Act 71 of 2008 and by our PBO conditions.
Reporting to funders on what their funding achieved	Performance of a contract — s11(1)(b); legitimate interests — s11(1)(f)	Reporting is a term of our funding agreements. We report in aggregate, and name or depict an individual learner only where consent covers it.
Managing volunteers, mentors and employees	Contract — s11(1)(b); legal obligation — s11(1)(c)	Needed to conclude and perform the agreement, and to meet employment and tax obligations.
Child-protection screening of adults who work with learners	Legal obligation — s11(1)(c); s33 for the special information	Required by Chapter 7 of the Children's Act and by our own safeguarding duty.
Sending programme news and updates you asked for	Consent — s11(1)(a), read with s69	Opt-in only. An opt-out option is not consent.
Protecting our rights, and defending a claim	Legitimate interests — s11(1)(f); s11(1)(d)	Limited to what is necessary, and for as long as the matter requires.

A note on consent. Where we rely on consent, you may withdraw it at any time under section 11(2)(b). Withdrawal does not make earlier processing unlawful, and it cannot undo something already printed and distributed — but it stops any further use from the date we receive it. Where we rely on section 11(1)(d), (e) or (f), you may object at any time under section 11(3); if you object on reasonable grounds relating to your situation, section 11(4) means we may no longer process that information.

9 Children's personal information

This is the part of the Act that matters most to us, because most of the people we serve are children.

Section 34 of POPIA prohibits the processing of a child's personal information. The prohibition lifts only where one of the grounds in section 35(1) applies. For everything we do, the ground is **section 35(1)(a) — the prior consent of a competent person.**

9.1 How we obtain that consent

- In **writing, before** the learner's information is processed, on our Learner Photograph, Media and Programme Consent Form.
- From the **parent or legal guardian**, who confirms their relationship to the learner and their authority to consent.
- **Specifically, purpose by purpose.** Programme participation, internal records, printed material, our website, each named social media platform, funder reporting and press use are separate decisions with separate tick boxes. A parent may say yes to some and no to others, and the learner still takes part in the programme either way.
- **Informed** — the form states who we are, who the Information Officer is, every purpose, where the information goes, how long we keep it, and how to withdraw.
- We also record the **learner's own view**. Section 10 of the Children's Act gives a child who is of an age, maturity and stage of development to participate the right to do so, and their views must be given due consideration. If a learner does not want to be photographed, we do not photograph them, whatever the consent form says.

9.2 What we will not do

- We do not make consent to photography a condition of taking part in a programme.
- We do not publish a learner's full name together with their image and their school where that combination would identify where to find the child. Our default is a first name only.
- We do not use images of learners in paid advertising, nor sell or licence them to anyone.
- We do not use a photograph for a purpose the parent or guardian did not tick.

9.3 Two further duties we recognise

Section 28(2) of the Constitution makes a child's best interests of paramount importance in every matter concerning the child. And in *Centre for Child Law and Others v Media 24 Limited and Others* [2019] ZACC 46 the Constitutional Court held that the protection of a child's identity continues after the child turns eighteen. We therefore treat consent given today as governing the image for as long as we hold it. A learner's eighteenth birthday does not convert our archive into material we may use freely, and a former learner may ask us to withdraw their image at any time.

> PRIOR AUTHORISATION
>
> Because we rely on a section 35(1) ground, we are not required to apply to the Regulator for authorisation under section 35(2). Separately, section 57(1)(d) of POPIA requires **prior authorisation** before a responsible party transfers the personal information of children to a third party in a foreign country that does not provide an adequate level of protection. Whether publishing a photograph on an internationally hosted social media platform amounts to such a transfer is a point on which we take advice rather than assume an answer; it is one of the reasons our consent form asks separately about each platform, and names them.

10 Where we get the information

Section 12 of POPIA requires us to collect personal information directly from the data subject wherever that is possible. Mostly we do: you fill in a form, write to us, or speak to a facilitator.

We also collect indirectly, in these situations, each of which section 12(2) permits:

- from a **parent or guardian**, about a learner;
- from a **partner school**, which supplies class lists and grade information so that sessions can be arranged;
- from a **training provider, employer or bursary programme**, confirming the outcome of a placement we referred;
- from a **referee** a volunteer or applicant has named;
- from **public records and a company's own website**, when we research a potential corporate or foundation funder — limited to business contact details and publicly published information.

11 Who we share information with

We do not sell personal information, and we do not rent, trade or share our contact lists with anyone for their own marketing. We share only as set out here.

WHO	WHAT, AND ON WHAT FOOTING
Operators who process for us	Our website host, email and file storage providers, and our accounting and payroll support. Each processes only on our instruction. Section 20 of POPIA obliges an operator to process only with our knowledge or authorisation and to treat the information as confidential, and section 21 obliges us to secure that arrangement **in a written contract**.
Partner schools	Attendance and participation information about their own learners, so that sessions can be arranged and the school can account for its learners' time.
Training providers, employers and bursary programmes	Only the information needed for an opportunity a learner has been referred to, and only with the consent of the learner's parent or guardian.
Funders and donors	Narrative and statistical reports. Aggregated and de-identified as a rule. An identifiable learner story or photograph appears only where the consent form covers funder reporting.
SARS	Section 18A receipt records and the returns required of a Public Benefit Organisation.
Auditors, accountants and B-BBEE verification agencies	Access to the records they must examine, under a duty of confidentiality.
The Information Regulator	Where the Regulator requires it in an investigation or assessment, or where we must notify a security compromise.
Courts, the police and other authorities	Where we are obliged to disclose by law, by a court order, or where disclosure is necessary to protect a child from harm. A safeguarding concern about a child will be reported to the designated authorities under the Children's Act, and parental consent is not required for that.
Our insurers and legal advisers	Where necessary to establish, exercise or defend a right.

12 Sending information outside South Africa

Section 72 of POPIA restricts transfers of personal information outside the Republic. A transfer is permitted only where the recipient is subject to a law, binding corporate rules or a binding agreement that provides an adequate level of protection; or the data subject consents; or the transfer is necessary for the performance of a contract with the data subject, or for the conclusion or performance of a contract concluded in the data subject's interest; or the transfer is for the data subject's benefit and consent is not reasonably practicable.

Where we transfer information outside South Africa, this is where and why:

WHAT	WHERE	BASIS
Our website	Hosted in South Africa	No transfer arises from hosting the site itself.
Email, file storage and the software we use to run the organisation	Some providers store information on servers outside South Africa	Necessary for the performance of our functions, under an operator agreement; and, for programme information about learners, covered by the consent we obtain.
WhatsApp follow-up with learners and guardians	Operated by Meta Platforms, Inc. and its affiliates, outside South Africa	Consent of the competent person, given on the consent form, which names the platform.
Content posted to Instagram (@fournomadsnpc)	Operated by Meta Platforms, Inc. and its affiliates, outside South Africa	Consent of the competent person, given specifically for that platform. Once published to a social media platform, content is governed by that platform's terms as well as this policy, and may be seen and copied by others.

We are conscious that section 57(1)(d) of POPIA requires prior authorisation from the Regulator for the transfer of children's personal information to a third party in a foreign country that does not provide an adequate level of protection. We keep this under review with our legal advisers, and will obtain authorisation if it is required for any transfer we make.

13 How long we keep information

Section 14 of POPIA says records must not be kept longer than is necessary for the purpose they were collected for, unless the law requires it, we reasonably require it for a lawful purpose related to our functions, a contract requires it, or the data subject — or a competent person, for a child — has consented to the longer period. When a record may no longer be kept, section 14(4) requires us to destroy, delete or de-identify it as soon as reasonably practicable, and section 14(5) requires that destruction prevent reconstruction in an intelligible form.

Our retention schedule:

RECORD	RETENTION	WHY
Website enquiries and general correspondence	24 months from the last contact	Long enough to pick up a conversation again; no longer.
Learner programme records	The learner's five-year tracking cycle, then a further 3 years	Our model follows a learner for five years; the additional period allows for alumni contact and outcome verification. After that the record is de-identified and kept only as a statistic.
Signed consent forms	As long as the related information or image is held, plus 3 years	We must be able to prove the consent we relied on.
Photographs and video of learners	Until consent is withdrawn, or the retention period for the learner record expires, whichever is first	Section 14(1)(d) — retention is covered by the consent given.
Section 18A receipts and donation records	5 years from the date the related return is submitted	Section 29 of the Tax Administration Act 28 of 2011.
Accounting records, annual financial statements and company records	7 years	Section 24 of the Companies Act 71 of 2008.
Funding agreements and funder reports	7 years from the end of the agreement	Contractual and audit requirements, and the general prescription period.
Employee records	As required by the Basic Conditions of Employment Act 75 of 1997 and tax legislation — generally 5 years after the end of employment	Statutory.
Volunteer and mentor records, including screening	3 years after the person stops working with us	Safeguarding and reference purposes.
Unsuccessful job and volunteer applications	12 months	To deal with any query about the decision.

Where a dispute, investigation, audit or claim is live, we keep the records it concerns until it is finally resolved, even if a period above has expired.

14 How we keep information safe

Section 19 obliges us to secure the integrity and confidentiality of personal information by taking appropriate, reasonable technical and organisational measures, to identify the risks, to establish safeguards against them, to verify that those safeguards work, and to keep them updated. These are ours.

TECHNICAL

- Devices used for Four Nomads work are password or passcode protected and encrypted where the device supports it.
- Accounts holding personal information use strong, unique passwords and multi-factor authentication where the service offers it.
- The website is served over HTTPS. Form submissions are delivered by email and are not stored on the web server.
- Learner records are kept in access-controlled storage, not on personal devices or in personal email accounts.
- Backups are taken, and restoration is tested.

ORGANISATIONAL

- Access is on a need-to-know basis. Not everyone who works with us can see learner records.
- Everyone who processes personal information for us — staff, volunteers, mentors and contractors — is bound to confidentiality in writing and is briefed on this policy before they start.
- Every operator is engaged under a written contract that meets section 21, including a duty to notify us immediately of any compromise.
- Paper consent forms and learner records are kept in a locked cabinet at the office, and are captured and then stored securely.
- Photographs of learners are stored separately from the learner's identifying details where that is practical.
- The Information Officer reviews these measures at least annually, and after any incident.

We also ask something of you. If you send us personal information by email or WhatsApp, please send only what is needed. Email is not a secure channel, and we cannot guarantee the security of information in transit to us.

15 If information is compromised

Section 22 of POPIA applies where there are reasonable grounds to believe that personal information has been accessed or acquired by an unauthorised person. We will then:

1. **Notify the Information Regulator**, and **notify the affected data subjects** — unless the identity of a data subject cannot be established. Notification is made **as soon as reasonably possible** after the compromise is discovered, taking into account the legitimate needs of law enforcement and any measures reasonably necessary to determine the scope of the compromise and to restore the integrity of our systems. There is no fixed statutory deadline; we do not treat "as soon as reasonably possible" as licence to delay.
2. **Delay notification to data subjects only** where a public body responsible for the prevention, detection or investigation of offences, or the Regulator, determines that notification would impede a criminal investigation.
3. **Notify in writing**, by at least one of the means permitted by section 22(4): post to the last known address, email, a prominent notice on fournomads.org, publication in the news media, or as the Regulator directs.
4. **Say enough to be useful** — a description of the possible consequences, what we have done and intend to do, what we recommend you do to limit the effect, and the identity of the unauthorised person if we know it.
5. **Use the Regulator's Security Compromises Notification form** (Form SCN1) and its eServices Portal, and keep a written record of the incident, our decisions and our reasoning.

Where the compromise concerns a learner, we will notify the learner's parent or guardian as the competent person.

16 Your rights, and how to use them

YOUR RIGHT	SECTION	WHAT IT MEANS
To be told that we are collecting your information	s18	This policy, together with the notice on each form, is how we do that.
To know whether we hold information about you	s23(1)(a)	We will confirm this **free of charge**.
To get a copy, or a description, of what we hold	s23(1)(b)	Including the identity of all third parties, or categories of third parties, who have or have had access to it. We will respond within a reasonable time, in a reasonable format and in a form you can understand.
To have information corrected or deleted	s24	Where it is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully — or where we are no longer authorised to keep it.
To object to processing	s11(3)	At any time, on reasonable grounds relating to your situation, where we process on the basis of section 11(1)(d), (e) or (f). If you object, section 11(4) means we may no longer process that information.
To withdraw consent	s11(2)(b)	At any time, where our processing rests on your consent — or, for a child, on the consent of a competent person.
To object to direct marketing	s11(3)(b), s69	At any time, free of charge and without unnecessary formality.
Not to be subject to a decision based solely on automated processing	s71	We do not make decisions about people by automated means.
To be notified if your information is compromised	s22	See section 15 above.
To complain to the Regulator	s74	See section 20 below.
To civil relief	s99	You may institute a civil action for damages, irrespective of fault or negligence.

16.1 How to make a request

Write to the Information Officer at ndivho@fournomads.org, or at 51 Boabab Street, Newtown, Louis Trichardt, 0920. Tell us what you want and give us enough detail to find it, and enough to satisfy ourselves that you are who you say you are — we will not hand someone's personal information to the wrong person.

The POPIA Regulations prescribe forms, and we will accept them:

- **Form 1** — Objection to the processing of personal information (regulation 2).
- **Form 2** — Request for correction or deletion of personal information, or destruction or deletion of a record (regulation 3).

Since the amendment of the Regulations on 17 April 2025, a request does not have to be on the prescribed form: a submission that is **substantially similar** to the form is enough, and we will accept it free of charge by any reasonable means, including email, post, in person, or a message to a number we have published for the purpose. You are welcome to write us a plain letter. The forms are available at inforegulator.org.za/popia-forms and from the Information Officer.

16.2 Fees, and how long we take

Confirming whether we hold information about you is free. Where you ask for a **copy of a record**, section 23(3) allows us to charge the prescribed fee; we apply the fees for private bodies in Annexure B to the PAIA Regulations, 2021, which are set out in our PAIA Manual. We will give you a written estimate before we do the work, and we will not start until you tell us to proceed.

We aim to deal with every request within **30 days** of receiving it, which is the period PAIA sets for a request for access to a record. If we need the single further period of up to 30 days that PAIA allows, we will tell you in writing, with reasons, inside the first 30 days. Grounds on which access to a record may be refused are those in PAIA, and if we refuse we will tell you which one we rely on and why.

17 Direct marketing and the updates we send

Section 69 of POPIA prohibits direct marketing by electronic communication — automatic calling machines, fax, SMS or email — unless you have consented, or you are an existing customer within the narrow terms of section 69(3).

- We send programme news, impact updates and appeals **only to people who have asked for them**, by ticking the sign-up box on our website or telling us in writing.
- **An opt-out option is not consent.** The amended POPIA Regulations are explicit on this point, and we do not add anyone to a mailing list because they failed to untick a box.
- Where your consent is required and you have not previously withheld it, section 69(2) allows us to approach you **once** to ask for it. We use a request substantially similar to the prescribed **Form 4**. If you say no, or say nothing, we do not ask again.
- Every message we send identifies Four Nomads NPC as the sender and gives you an address to which you can send a request that the communications stop, as section 69(4) requires.
- You may unsubscribe at any time, free of charge, by replying to any message or writing to info@fournomads.org. We act on it immediately.

A receipt, a report to a funder, an answer to your enquiry, or a message about a learner's participation is not direct marketing, and you will continue to receive those for as long as the relationship requires.

18 Our website

fournomads.org is a static website hosted in South Africa.

- **Cookies.** At the date of this policy the website does **not** set advertising cookies and does **not** use third-party analytics or tracking tools. It may store small items locally in your browser where these are strictly necessary for the page to work. If we introduce analytics or any non-essential cookie, we will update this policy and ask for your consent first, where consent is required.
- **Server logs.** Our host keeps standard web server logs, which may include the IP address of a visitor, the pages requested and the time of the request. These are kept by the host for security and diagnostic purposes and we do not use them to build a profile of you.
- **Forms.** What you type into a form on our site is emailed to info@fournomads.org. It is not written to a database on the server, and the server keeps no copy.
- **Links out.** Where we link to another website or to our Instagram page, that destination has its own privacy policy and we are not responsible for it.
- **Children and the website.** Our website is written for adults — funders, partners, parents and teachers. We do not knowingly collect personal information from a child through the website. If you believe a child has sent us information through the site, tell the Information Officer and we will delete it.

19 Photographs, video and learner stories

Photographs are how we show the work, and they are also how a child becomes identifiable to strangers. We therefore treat them as a separate decision from programme participation, governed by our Learner Photograph, Media and Programme Consent Form.

- For anyone under 18, we obtain the **prior written consent of a parent or guardian**, purpose by purpose, before we take or use an image.
- For adults — volunteers, teachers, partners, donors at an event — we ask for consent at the time, and we will remove an image on request.
- We tell people when an event is being photographed, and we arrange the session so that anyone who prefers not to appear can step out of frame.
- A learner's story is told with their name changed, unless consent covers the use of their name.
- Consent may be **withdrawn at any time**. On withdrawal we stop using the image, remove it from our website and from our own social media accounts, and take it out of material still in production. We cannot recall a brochure already printed and distributed, a report already delivered to a funder, or a copy that someone else has already saved or re-shared — and we say so on the consent form so that no one is misled about what withdrawal can achieve.
- We do not use facial recognition or any other biometric technique on images of learners.

Beyond POPIA, South African common law protects a person's right to identity, and the unauthorised use of someone's image is actionable — see *Grütter v Lombard* 2007 (4) SA 89 (SCA) and *Kumalo v Cycle Lab (Pty) Ltd* (2011). We treat that as a second, independent reason to get consent right.

20 How to complain

20.1 Start with us

If you think we have mishandled your personal information, please tell the Information Officer at ndivho@fournomads.org. We will acknowledge your complaint within **5 working days** and respond substantively within **30 days**. You are not obliged to come to us first, and doing so does not affect your right to go to the Regulator.

20.2 The Information Regulator

You may lodge a complaint with the Information Regulator (South Africa) at any time. A data subject who believes that the protection of their personal information has been interfered with may complain under section 74 of POPIA. A requester who is dissatisfied with how we have dealt with a request for access to a record may complain under PAIA; there is no internal appeal against a decision of a private body, so a requester may approach the Regulator directly, on the prescribed PAIA Form 5.

INFORMATION REGULATOR (SOUTH AFRICA)

Physical Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191
Postal P.O. Box 31533, Braamfontein, Johannesburg, 2017
Telephone 010 023 5200 · **Toll free** 0800 017 160
General enquiries enquiries@inforegulator.org.za
PAIA complaints PAIAComplaints@inforegulator.org.za
Website https://inforegulator.org.za
eServices Portal https://eservices.inforegulator.org.za

POPIA complaints are now submitted through the Portal. The Regulator requires a complainant to register a user profile on its eServices Portal and to submit the complaint there, rather than by email. The prescribed POPIA complaint form is **Form 5** (regulation 7). Since 17 April 2025 the Regulator must also give a complainant a reference number within 14 days, and must provide assistance to a complainant who needs help with language or with putting the complaint in writing.

21 Changes to this policy

We review this policy at least once a year, and whenever the law changes or we start processing personal information in a new way. The current version is always the one published at fournomads.org, and the version number and date on the cover tell you which one you are reading. Where a change materially affects how we use information you have already given us, we will tell the people affected rather than rely on the website alone — and where the change requires fresh consent, we will ask for it.

22 Document control and approval

VERSION	DATE	AUTHOR	CHANGE
1.0	October 2026	Information Officer	First issue. Drafted against POPIA 4 of 2013 and the POPIA Regulations, 2018 as amended by GN 6126 in GG 52523 of 17 April 2025.

OWNER	Information Officer, Four Nomads NPC
APPROVED BY	The Board of Directors of Four Nomads NPC
BOARD RESOLUTION DATE	12 September 2026
NEXT REVIEW	October 2027
RELATED DOCUMENTS	FN-PAIA-01 PAIA Manual · FN-CONSENT-01 Learner Photograph, Media and Programme Consent Form

INFORMATION OFFICER	FOR THE BOARD OF DIRECTORS	DATE
Ndivho Ramovha	Name and capacity	12 October 2026

Four Nomads NPC · Registration No. 2022/514801/08 · PBO No. 930086019 · Section 18A approved
51 Boabab Street, Newtown, Louis Trichardt, 0920 · 17 Kolgans Street, The Reeds, Centurion, 0061
info@fournomads.org · ndivho@fournomads.org · +27 (0)81 248 9372

This policy states the law as at the date of issue. It is a compliance document prepared for Four Nomads NPC and is not legal advice to any other person. Where this policy and the Protection of Personal Information Act 4 of 2013 differ, the Act governs.