

## **PRIVACY NOTICE**

*(This is an ever-evolving document, please see our website from time to time for the latest version)*

**MOSHAL SCHOLARSHIP PROGRAM SOUTH AFRICA NPC**, a non-profit company registered in South Africa under registration number 2016/285825/08 and having its registered address at Postnet Suite 20 Private Bag X12 Greenside, 2034 ("**MSP**", "**we**", "**our**").

We are committed to complying with applicable data protection laws and set out below details regarding our approach to data protection in all our operations.

### **Information we collect from scholarship applicants and their families**

We collect the information set out in our scholarship application form for the purposes of evaluating your suitability for scholarship award and to keep in contact with you. The legal basis for the collection of this information is that we are collecting it for the purposes of potentially entering into a contract with you if you are awarded a scholarship by us.

Certain sections in our application form require families/guardians of scholarship applicants to provide personal information. A declaration form is required from these persons.

Some information we collect in the application processes is deemed "special personal information" or "special category data" under data protection laws, this includes, for example, information relating to your ethnicity, religious background and/or health. We process this information where we have a legal obligation to do so (e.g. to comply with laws relating to equal opportunity) and in other instances we rely on your consent to process this information.

In addition to using your information for the purposes of evaluating your scholarship application, we use your information for our own research purposes, evaluating our effectiveness as an organisation and to monitor your progress regardless of whether you were successful or unsuccessful in your application. Accordingly, we retain certain of your information for these purposes for an indefinite period and where possible we de-identify that information. We do this on the basis that we have a legitimate interest in fulfilling the purposes set out above and, in some instances, we may have requested your consent.

### **Information we collect from student awardees**

During your time as an MSP scholarship awardee we may request you to provide, or may obtain from the university you attend, additional economic, social, health, contact details information about special educational needs, training participation and event attendance, admissions, academic, disciplinary and other education related records. We collect this information for the purposes of assessing your ongoing suitability for the scholarship and/or the provision of support and related services including monitoring progress, assisting in training, safeguarding your welfare through providing guidance or referring you to healthcare practitioners. We will also use your contact details for the purposes of communicating with you. We do this pursuant to the contract we have with you.

We may post photos or videos of you on our website and/or social media sites or publish them in newsletters or brochures. We do this for promotion of our organisation and/or to promote you for potential employment opportunities. We will always ask for your consent prior to publishing any images of you.

### **Information we collect from alumni**

As alumni, we collect information from you relating to your employment and your contact details for the purposes of monitoring your progress, research into the effectiveness, and

for the development, of our program, for communication and for our initiatives such as pay-it-forward. We may collect your passport or identification number to assist in booking flights or accommodation for you to attend MSP events. We do this on the basis that we have a legitimate interest in processing this information for the purposes set out above.

#### **Information we collect from third parties**

We collect names, contact details and financial information of universities for the purposes of providing the scholarships and for communicating with the university regarding our students attending such universities. The basis on which we process this data is by virtue of a contract we have with each university.

We collect names and contact details of corporates and NGOs we work with on the basis that we have a legitimate interest in communicating with you, collaborating with you and informing you of students that may be suitable for recruitment.

We collect names, contact details, financial and tax information from suppliers and professional service providers so that we can place orders/instruct you and make payment in respect of any goods or services we receive. We do this on the basis of the intention of contracting with you or for the performance of a contract we have with you.

#### **Information we collect from you when you sign up to our newsletter**

When you enter your name, surname and email address on our website to receive our newsletter, you are consenting to us sending you this communication. We will only use the information you provide for this purpose and you will be able to opt-out of receiving this at any time.

#### **Information we collect from you when you visit our website**

Our website uses automatic systems of data collection, such as cookies. A cookie is a device transmitted to the hard disk of a user. Cookies do not contain intelligible information but allow linking between you and your personal information, such as your IP address and other information about your experience on the website. The information and data are gathered directly and automatically by the website. We process information collected by cookies in a collective and anonymous way in order to optimize the website for the needs and preferences of the users. Please access the information on your Internet browser if you wish to delete cookies after using the website. If you have started the procedure of deleting cookies, we can't ensure that all of our web pages will be displayed and that all of our services will be available to you.

#### **Information we collect from you when you apply for a job**

We process the information you provide in your curriculum vitae, in our application form and supporting documentation/information during the recruitment process purely for the purposes of assessing your suitability for the role, for contacting you to progress your application and to take up any references you have provided. The basis for the processing of this information is a potential employment contract may be concluded, depending on the outcome of our assessment and we have a legitimate interest in finding candidates for roles that we have. In the event that you are successful, this data will form part of your employee file.

#### **Processing, protecting and transferring personal information**

Personal information held by us is processed by appropriate members of staff for the purposes for which the information was provided. We may share your personal information within our organisation and outside the country of your residence with the donor and management (UK), our sister organisation (Israel) our trustees (Gibraltar), IT providers (UK, Israel and South Africa) and with third parties within the country of your residence, namely your university, NGOs and corporates we work with, potential employers, trainers, mentors, other students assisting us on-campus, travel agents, medical providers,

professional advisors such as accountants and lawyers, HR providers and government bodies/regulators for the purposes of:

- Complying with a legal obligation;
- Our legitimate interest in the effective running of our organisation; or
- Our legitimate interest in assisting students in their studies and development.

We take appropriate technical and organisational steps to ensure the security of your personal information including policies and procedures around use of technology and devices, IT security, document retention and destruction and data breach procedures. Only persons within our organisation which require your personal information for the performance of their work have access to that information and we do not transfer your information outside of the organisation or your resident country unless we are satisfied that the personal information will be afforded an equivalent level of protection.

### **Retention of your Data**

We will not retain your personal information longer than the period for which it is needed and in compliance with applicable law. We determine retention periods in respect of information we hold based on:

1. Legal obligations relating to minimum periods to retain data;
2. The purposes for which we process the personal information and whether we can achieve those purposes through other means;
3. Whether the information is required for reporting and analysis purposes relating to our operations;
4. The amount, nature, and sensitivity of the personal information;
5. The potential risk of harm from unauthorised use or disclosure of the personal information.

Currently we retain certain student data we collect during the application phase, through university to employment for an indefinite period for the purposes of research and evaluation of our programme. We have strict processes in place to protect the data and where possible, de-identify or aggregate data for the purposes of reporting to our trustees and donor. We may also share our research with other organisations, but this will not be in an identifiable format.

### **Your rights in relation to your information**

Subject to certain limitations on certain rights, you have the following rights in relation to your information:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.

You also have the right to object where we are processing your personal information for direct marketing purposes.

- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.
- **Withdraw consent** to our use of your information at any time where we rely on your consent to use or process that information. Please note that if you withdraw your consent, this will not affect the lawfulness of our use and processing of your information on the basis of your consent before the point in time when you withdraw your consent.

Should you have any queries regarding this privacy notice or would like to enforce any rights you may have under applicable data protection laws, please contact us at:

**Information Officer/Deputy Information Officer:  
Postnet Suite 20 Private Bag X12 Greenside, 2034  
[southafrica@moshalscholarship.org](mailto:southafrica@moshalscholarship.org)**

We will endeavour to respond to any such requests as soon as is reasonably practicable and in any event within statutory time-limits in the applicable country. In some instances, we may be able to charge a fee for responding to your request and will advise you of this and any applicable amount prior to responding.

You should be aware that certain information is exempt from the right of access. This may include information which identifies other individuals, or information which is subject to legal privilege.

You should also be aware that in some instances, if you do not provide information or you exercise any rights regarding the deletion or restriction of your information or object to the processing of your information or withdraw consent, we may not be able to process your application (for a scholarship or job or otherwise), continue funding your scholarship or use your services.

Where you request access to your information, we are required by law to use all reasonable measures to verify your identity before doing so. These measures are designed to protect your information and to reduce the risk of identity fraud, identity theft or general unauthorised access to your information.

You also have the right to lodge a complaint with the relevant supervisory authority, details of which are set out below:

JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001  
P.O Box 31533, Braamfontein, Johannesburg, 2017  
Complaints email: [complaints.IR@justice.gov.za](mailto:complaints.IR@justice.gov.za)  
General enquiries email: [inforeg@justice.gov.za](mailto:inforeg@justice.gov.za).

**Automated decision-making**

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you.

We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

**Changes to our Privacy Notice**

Any changes made to this privacy notice in the future will be posted on the website and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to this notice.

July 2021, Version 4