SOUTH AFRICAN HOCKEY ASSOCIATION

Data Protection and Privacy Policy

Effective date: **1 September 2026** | Version 2.0 | Supersedes the version dated 12 December 2022

1. Introduction and scope

1.1 The South African Hockey Association ("SAHA", "we", "us" or "our") is committed to protecting the privacy and personal information of everyone who interacts with us. This Policy explains what personal information we collect, how and why we process it, who we share it with, how long we keep it, how we protect it, and the rights you have in relation to it.

1.2 This Policy applies when you visit or use the SAHA website, the SAHA mobile application (the "SAHA App") and any related online platforms, products and services (together, the "SAHA Platforms"), whether or not you are registered or signed in, and when you interact with us as a participant, spectator, official, member, supporter or supplier.

1.3 SAHA is the responsible party (equivalent to a "controller" under the GDPR) that determines the purpose of and means for processing your personal information, and is responsible for your personal information under this Policy.

1.4 Please read this Policy carefully. By using the SAHA Platforms you acknowledge that you have read and understood it. Where the law requires your consent for a particular processing activity, we will ask for it separately.

1.5 Capitalised terms not defined in the body of this Policy have the meaning given in the Definitions section, or in the SAHA Terms and Conditions available at www.sahockey.co.za.

2. Who we are and how to contact us

2.1 Responsible party: South African Hockey Association, established in the Republic of South Africa.

2.2 Physical address: 21 North Street, Illovo, Johannesburg, South Africa.

2.3 Information Officer: In line with POPIA, we have designated an Information Officer who is responsible for our compliance with POPIA and for dealing with your requests and queries. You can contact the Information Officer at:

Name: **Phikolomzi Mbuqe**
Email: **ceo@sahockey.co.za**
Postal address: 21 North Street, Illovo, Johannesburg, South Africa.

2.4 Our Information Officer (and any Deputy Information Officers) are registered with the Information Regulator as required by POPIA.

3. The laws we comply with

3.1 We process personal information in accordance with the Protection of Personal Information Act 4 of 2013 ("POPIA"), which is the primary law governing our processing of personal information in South Africa.

3.2 We also comply with the Promotion of Access to Information Act 2 of 2000 ("PAIA"). Our PAIA manual, which explains how to request access to records we hold, is available on request from the Information Officer.

3.3 Where you access the SAHA Platforms from, or are resident in, the European Union or European Economic Area, we will also comply with the EU General Data Protection Regulation (Regulation (EU) 2016/679) ("GDPR") to the extent it applies to that processing. In this Policy, references to

"responsible party" and "operator" under POPIA correspond to "controller" and "processor" under the GDPR.

4. What personal information we collect

4.1 Overview: We collect personal information that you give us, that we generate when you use the SAHA Platforms, and that we lawfully receive from third parties. We collect only the information we need for the purposes set out in this Policy.

4.2 Account and contact information: When you create a SAHA account we collect information such as your name, email address and a password.

4.3 Profile and preference information: Information you provide in your profile and settings, your content and event preferences, and preferences we infer from how you use the SAHA Platforms.

4.4 Usage and activity information: Information about how you access and use the SAHA Platforms, including pages and content viewed, search queries, navigation, dates, times and duration of use, and interactions with our communications.

4.5 Device and technical information: Information about the device and software you use, such as device identifiers, IP address, device type and model, operating system, browser type, language settings, and system activity and crash reports.

4.6 Approximate location information: We may infer your approximate location (no more precise than region or city) from your IP address. We do not collect GPS or precise geolocation data.

4.7 Support information: Records of your interactions with our support channels, including the date, time and reason for contact and records of correspondence.

4.8 Cookies and similar technologies: Information collected through cookies and similar technologies, as described in the Cookies section.

4.9 Where you purchase a subscription, membership, ticket or other paid item, we (or our payment providers) collect the information needed to process the payment. We do not store full card details ourselves; these are handled by our payment providers.

4.10 Information when you are not signed in: When you browse the SAHA Platforms without signing in, we may still collect usage and activity information (4.4), device and technical information (4.5), approximate location information (4.6) and cookie information (4.8).

4.11 Providing your personal information is voluntary. However, some information is necessary to provide certain services, and if you do not provide it we may be unable to make those services or features available to you.

5. How we collect personal information

5.1 Directly from you, when you create an account, complete a form, communicate with us, or use the SAHA Platforms.

5.2 Automatically, through cookies and similar technologies and through your use of the SAHA Platforms.

5.3 From third parties who are lawfully permitted to share it with us, such as [service providers, event organisers, affiliated hockey bodies, and, if you use social sign-in, the relevant provider]. We are not responsible for the privacy practices of third-party services, and their own privacy policies govern the information you provide to them.

6. Why we process your personal information and our lawful basis

6.1 We process personal information only where POPIA permits. Depending on the activity, we rely on one or more of the following lawful bases: your consent; that the processing is necessary to conclude

or perform a contract with you; that it is necessary to comply with a legal obligation; that it protects your legitimate interests; or that it is necessary for our (or a third party's) legitimate interests.

6.2 We process personal information for the following purposes:

(a) to create, authenticate, personalise and maintain your SAHA account and to provide the SAHA Platforms and their features to you (contract);

(b) to process payments and manage subscriptions, memberships or ticketing (contract);

(c) to provide content and recommendations based on your preferences and use of the SAHA Platforms (legitimate interests, or consent where required);

(d) to provide customer support and to communicate with you about the SAHA Platforms, including service and administrative messages (contract / legitimate interests);

(e) to carry out research, analytics and product development, and to maintain, improve and secure the SAHA Platforms (legitimate interests);

(f) to send you direct marketing where you have consented or where we are otherwise permitted to do so (consent / legitimate interests, subject to the Direct marketing section);

(g) to comply with our legal and regulatory obligations (legal obligation);

(h) to establish, exercise or defend legal claims and to protect the rights, property and safety of SAHA, our members, users, staff and others, including to prevent and investigate fraud and misuse (legitimate interests / legal obligation); and

(i) in connection with a reorganisation, or a change in ownership or control of SAHA or its assets (legitimate interests).

6.3 Where we rely on consent, you may withdraw it at any time (see the Your rights section). Withdrawal does not affect processing carried out before withdrawal.

6.4 Where we rely on legitimate interests, we have satisfied ourselves that those interests are not overridden by your rights and interests.

7. Special personal information and children's information

7.1 Special personal information: We do not intend to collect special personal information (such as information about health, religious beliefs or biometrics) unless it is necessary and permitted under POPIA, in which case we will obtain your consent or rely on another lawful ground.

7.2 Children: Under South African law a child is a person under 18 years of age. To create a SAHA account and to contract with us you must be at least 18.

7.3 We do not knowingly process the personal information of a child except where a competent person (a parent or guardian) has consented, or where the processing is otherwise permitted under section 35 of POPIA. Where SAHA processes the information of junior players or other children (for example in connection with hockey participation), we do so on the basis of competent-person consent obtained through the relevant club, school, union or event organiser, or directly.

7.4 If you believe we have collected a child's personal information without the required consent, please contact the Information Officer and we will take appropriate steps to delete it.

8. Who we share your personal information with

8.1 We share personal information only where necessary and permitted by law. We may share it with:

(a) SAHA affiliates and affiliated hockey structures, where necessary to provide and administer the SAHA Platforms and hockey activities;

(b) operators (service providers) who process personal information on our behalf and on our instruction, under a written contract requiring them to protect it, including hosting, platform development, support, security, analytics and, where applicable, payment providers;

(c) marketing service providers who help us communicate with you, and social media and analytics providers, subject to the Direct marketing and Cookies sections;

(d) partners who make the SAHA Platforms available on our behalf;

(e) courts, regulators, law enforcement and other authorities, where required or permitted by law, or to protect our rights, property or safety or those of others; and

(f) a third party in connection with an actual or proposed reorganisation, merger, or change in ownership or control of SAHA or its assets.

8.2 We require operators to process personal information only for the purposes we specify, to keep it secure, and to notify us of any security compromise.

9. Cross-border transfers of personal information

9.1 Some of the recipients described above, or the servers and systems we use, may be located outside South Africa. Where we transfer your personal information outside South Africa, we do so only where section 72 of POPIA permits, that is where at least one of the following applies:

(a) the recipient is subject to a law, binding corporate rules or a binding agreement that provides an adequate level of protection substantially similar to POPIA and that includes provisions for onward transfers;

(b) you have consented to the transfer;

(c) the transfer is necessary to perform a contract with you, or to take steps at your request before entering into a contract;

(d) the transfer is necessary to conclude or perform a contract concluded in your interest between us and a third party; or

(e) the transfer benefits you and it is not reasonably practicable to obtain your consent, and if it were, you would be likely to give it.

9.2 Where the GDPR applies, transfers out of the EEA are made under an appropriate safeguard recognised by the GDPR, such as the European Commission's standard contractual clauses.

10. How long we keep your personal information

10.1 We keep personal information only for as long as necessary for the purposes set out in this Policy, and no longer than permitted or required by law, including for:

(a) as long as you have a SAHA account and are using the SAHA Platforms;

(b) complying with our legal, regulatory, financial and tax obligations;

(c) establishing, exercising or defending legal claims, until the relevant prescription or limitation periods expire; and

(d) research, analytics and legitimate business record-keeping.

10.2 Account retention after termination: If you close your account or your subscription ends, we will retain your account and related information for a period of 5 years after which we will delete or anonymise it, except to the extent we are required or permitted to keep it under clause 10.1.

10.3 Where appropriate, we anonymise, pseudonymise or aggregate personal information so that it can no longer be linked to you, in which case we may keep and use it without further notice to you.

11. How we protect your personal information

11.1 We maintain appropriate, reasonable technical and organisational measures to secure the integrity and confidentiality of personal information in our possession or under our control, and to protect it against loss, damage, unauthorised access and unlawful processing, as required by section 19 of POPIA.

11.2 No system is completely secure. Where you have an account, please keep your login credentials confidential and notify us promptly of any suspected unauthorised use.

12. Security compromises (data breaches)

12.1 Where there are reasonable grounds to believe that your personal information has been accessed or acquired by an unauthorised person, we will notify the Information Regulator and you as soon as reasonably possible after discovering the compromise, in accordance with section 22 of POPIA, unless a public body or the Regulator directs us to delay in order not to impede an investigation.

12.2 Our notification to you will provide sufficient information to allow you to take protective measures, to the extent we are able to provide it.

13. Your rights

13.1 Subject to POPIA (and, where applicable, the GDPR), you have the right to:

(a) Access: request confirmation of whether we hold your personal information and access to it;

(b) Correction: request that we correct information that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or unlawfully obtained;

(c) Deletion: request that we delete or destroy your personal information in the circumstances permitted by law;

(d) Object: object, on reasonable grounds, to processing based on our or a third party's legitimate interests, and object at any time to processing for direct marketing;

(e) Withdraw consent: withdraw any consent you have given, without affecting the lawfulness of processing before withdrawal;

(f) Portability (where the GDPR applies): receive certain information in a structured, commonly used, machine-readable format, or have it transmitted to another controller; and

(g) Restriction (where the GDPR applies): request that we restrict processing in certain circumstances.

13.2 How to exercise your rights: You can exercise your rights through the account settings on the SAHA Platforms where available, or by contacting the Information Officer using the details in section 2. For security we may ask you to verify your identity before acting on a request. Certain requests under PAIA may attract a prescribed fee.

13.3 We will respond to your request within the period required by law. If we cannot act on your request, we will explain why.

14. Direct marketing

14.1 We will only send you electronic direct marketing (for example by email, SMS or automated call) where:

(a) you have given your consent to receive it; or

(b) you are an existing customer whose contact details we obtained in the context of a sale, the marketing relates to our own similar products or services, and you were given the opportunity to opt out when we collected your details and in every message since.

14.2 This reflects the requirements of section 69 of POPIA. Where we rely on consent, we will obtain it in the manner POPIA requires, and we will not treat silence or inactivity as consent.

14.3 You can opt out of direct marketing at any time, at no cost, by using the unsubscribe link in any marketing message, adjusting your marketing preferences in your account, or contacting the Information Officer. You cannot opt out of service and administrative messages relating to your account.

15. Cookies and similar technologies

15.1 We and our service providers use cookies and similar technologies to operate the SAHA Platforms, remember your preferences, analyse usage, and deliver and measure advertising, subject to your consent where the law requires it.

15.2 A cookie is a small text file placed on your device. We use session cookies (which expire when you close your browser) and persistent cookies (which remain until they expire or you delete them).

15.3 The categories of cookies we use are:

(a) strictly necessary cookies, required for the SAHA Platforms to function and to keep them secure;

(b) performance and analytics cookies, which help us understand how the SAHA Platforms are used so we can improve them;

(c) functionality cookies, which remember your choices and personalise your experience; and

(d) targeting and advertising cookies, used to deliver and measure more relevant advertising, mainly set by our advertising partners.

15.4 You can manage cookies through your browser settings and, where we provide one, through our cookie preference tool. Blocking some cookies may affect how the SAHA Platforms work.

16. Automated decision-making

16.1 We use automated processing to personalise content and recommendations. This does not produce legal consequences for you or similarly significantly affect you. We do not make decisions that have legal or similarly significant effects based solely on automated processing without a lawful basis and appropriate safeguards, as contemplated by section 71 of POPIA.

17. Complaints

17.1 If you have a concern about how we handle your personal information, please contact our Information Officer first so that we can try to resolve it.

17.2 You also have the right to lodge a complaint with the Information Regulator:

The Information Regulator (South Africa)

Address: Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191

General enquiries: enquiries@inforegulator.org.za / 010 023 5200 / toll free 0800 017 160

POPIA complaints: POPIAComplaints@inforegulator.org.za

Website: www.inforegulator.org.za

18. Changes to this Policy

18.1 We may update this Policy from time to time. If we make material changes we will post the updated Policy on the SAHA Platforms and, where appropriate, notify you. The "Effective date" above shows when the current version took effect.

18.2 If there is any conflict between this Policy and the SAHA App end-user licence agreement in relation to the processing of personal information, this Policy prevails.

19. Definitions

"child" means a person under 18 years of age.

"competent person" means a person who is legally competent to consent to an action or decision on behalf of a child.

"data subject" means the person to whom personal information relates.

"operator" means a person who processes personal information on behalf of SAHA (a "processor" under the GDPR).

"personal information" means information relating to an identifiable, living natural person and, where applicable, an identifiable existing juristic person, as defined in POPIA.

"processing" means any operation concerning personal information, including collection, storage, use and disclosure.

"responsible party" means the party that determines the purpose of and means for processing personal information (a "controller" under the GDPR).

"special personal information" means has the meaning given in POPIA.