

## GEORGE WHITEFIELD COLLEGE (GWC) WEBSITE PRIVACY NOTICE

### **PRIVACY NOTICE**

This Website Privacy Notice explains how George Whitefield College NPC (“GWC”, “the College”, “we”, “us” or “our”) collects, uses, stores, shares, protects and otherwise processes personal information when you visit or use [www.gwc.ac.za](http://www.gwc.ac.za), submit information through website-linked forms, communicate with GWC, apply to study, subscribe to communications, make payments or donations, register for events, or otherwise interact with GWC through public-facing digital channels.

This Notice is intended to comply with the Protection of Personal Information Act, 2013 (“POPIA”) and should be read together with the GWC Website Terms and Conditions and the GWC PAIA Manual.

This Notice is a public-facing privacy notice and does not replace GWC’s internal POPIA Policy, Information Security Policy, Data Security Policy, Cybersecurity Policy, records retention controls, or other internal governance documents.

GWC is committed to protecting personal information and to ensuring that personal information is processed lawfully, fairly, transparently and securely.

This Notice explains:

- Who we are.
- What personal information we collect.
- How and why we use personal information.
- When we share personal information.
- How we protect and retain personal information.
- Your rights under POPIA and PAIA.
- How to contact GWC about privacy, PAIA and POPIA matters.

### **WHO WE ARE**

George Whitefield College NPC (Registration No. 2003/003197/08; NPO No. 042885) is registered with the Department of Higher Education and Training as a private higher education institution under the Higher Education Act, 1997 (Registration Certificate No. 2007/HE08/002).

GWC is an accredited, residential, Christian theological college situated in Muizenberg, Cape Town.

For purposes of this Website Privacy Notice, GWC is the responsible party for personal information processed through the website and related public-facing communication channels.

### **WHAT INFORMATION WE COLLECT**

The personal information we collect depends on how you interact with GWC and the purpose for which the information is provided or required.

We will only collect personal information that is reasonably necessary for lawful institutional, educational, administrative, legal, communication, donor, payment, safety, security or related purposes.

We may collect and process the following categories of personal information:

- Prospective students, applicants and students: name, surname, contact details, email address, identity or passport information where required, academic history, theological background, application information, student registration details, supporting documents and communication records.
- Newsletter subscribers and communication recipients: name, surname, email address, communication preferences and unsubscribe or opt-out records.
- Donors, supporters and alumni: name, contact details, billing or receipt details, donation amount, donor communication preferences, alumni engagement information and related correspondence.
- Payments and student fee transactions: student registration number, payer name, contact details, payment reference information, transaction-related records and relevant finance administration information.
- Financial data handling: when you donate, pay student fees, or complete another online payment, the transaction may be processed by an authorised third-party payment service provider. GWC does not intentionally store full credit card numbers, CVVs, internet banking credentials or full payment authentication details on its website servers. Payment information is processed in accordance with the applicable payment provider's security processes, terms and privacy notice.
- Website users and visitors: IP address, browser and device information, usage information, cookies or similar technology data, form submission records and website security logs where applicable.
- Campus visitors and event attendees: contact details, attendance information, visitor information, event registration information and records relating to campus access, safety or security where applicable.
- Special personal information and minor information: religious context, health or support information, disability information, pastoral or student support information, information relating to minors or children, and other sensitive information where lawful and necessary for the relevant purpose.

We usually collect personal information directly from you. In some cases, we may receive information from parents, guardians, schools, churches, referees, payment providers, service providers, public sources, regulators or other third parties where lawful, relevant and necessary.

Website usage information may be collected through cookies or similar technologies as explained in the cookies section below.

### **HOW WE USE YOUR INFORMATION**

GWC will use personal information only for the purpose for which it was collected, for a compatible purpose, or where otherwise permitted by law. We may process personal information to:

- Respond to enquiries and provide information about GWC programmes, events, services and institutional activities.
- Process applications, admissions, registrations, student administration and related academic processes.
- Provide academic, theological training, administrative, student support, library, registry, pastoral and institutional services.
- Send requested communications, newsletters, event information, donor, alumni, fundraising or other optional communications, subject to applicable consent or opt-out requirements.

- Acknowledge donations, issue receipts, process payments and manage student fee or finance administration.
- Where applicable, process donor information for donation receipts, acknowledgements, Section 18A certificates or other documentation required for financial, audit, tax or donor administration purposes.
- Manage campus visits, events, security, access control and health and safety requirements.
- maintain website functionality, security, analytics, service improvement and user support.
- Comply with legal, regulatory, audit, accreditation, tax, finance, higher education, PAIA, POPIA and other compliance obligations.
- Protect GWC's rights, systems, property, users, records and lawful interests.
- Investigate and respond to complaints, security incidents, privacy requests, PAIA requests or legal claims.

Where GWC processes personal information based on consent, you may withdraw that consent where legally permitted. Withdrawal of consent may affect GWC's ability to provide certain optional communications or services.

### **ONGOING SERVICES AND COMMUNICATION PREFERENCES**

Some communications are necessary for applications, admissions, academic administration, finance, donor receipts, event administration, security, legal compliance or service delivery and may not always be optional.

Optional newsletters, fundraising communications, alumni communication, event invitations, prayer letters, campaign communication or marketing communication will be sent in accordance with applicable law and any consent or preference choices available to you.

If you do not want to receive optional communications, you may opt out or unsubscribe at any time using the unsubscribe method provided in the communication or by contacting GWC.

### **WEBSITE FORMS, CONSENT AND ACKNOWLEDGEMENTS**

- Website forms may include specific privacy statements, acknowledgements or consent tick boxes depending on the purpose of the form.
- GWC should use clear wording near the point of collection so that users understand why their information is being requested and how it will be used.
- For application or enquiry forms, users should be told that their information will be processed to respond to the enquiry, assess the application or interest, and communicate about relevant academic and admissions matters.
- For newsletter, prayer letter, fundraising, alumni, campaign or other optional communications, users should be given a clear consent or subscription choice and an easy unsubscribe or opt-out method.
- For donation forms, users should be told that their information will be processed for donation administration, payment processing, donor records, receipts, tax-related documentation where applicable, and related communication.
- Any optional future fundraising or donor communication should be presented as a separate optional choice where appropriate.
- For student fee payment forms, users should be told that the information submitted will be processed to facilitate the transaction, allocate the payment, update the relevant student account record, and maintain financial records.

## **COOKIES AND WEBSITE ANALYTICS**

The GWC website may use cookies or similar technologies to enable essential website functions, improve user experience, support security, understand website usage, remember preferences, embed third-party content or support analytics and communications where applicable.

Cookies may include essential cookies, functionality cookies, analytics cookies, embedded content cookies and marketing or campaign cookies where applicable. You may manage cookies through the website consent tool where available or through your browser settings. Disabling certain cookies may affect website functionality.

## **DISCLOSURE OF INFORMATION**

GWC will not sell, rent or trade your personal information. We only share personal information where lawful and reasonably necessary for the purpose for which it was collected, for a compatible purpose, or where required or permitted by law.

We may share personal information with:

- Authorised GWC staff, departments, governance structures and representatives who require access for lawful GWC purposes.
- Operators and service providers that support GWC's website, applications, email, cloud services, learning platforms, payment processing, donations, communications, IT support, security, records management, finance, audit, legal or other institutional functions.
- Payment gateways (PayFast and PayPal), third party donation processing partners, banks or finance service providers where required to process payments, donations, refunds, receipts or transaction records.
- Government departments, regulators, statutory bodies, accreditation bodies, auditors, professional advisers or law enforcement authorities where required or permitted by law.
- Parents, guardians, emergency contacts, sponsors, churches, referees or other parties where lawful, appropriate and relevant to the relationship or purpose.

Where a service provider processes personal information on behalf of GWC, GWC will take reasonable steps to ensure that appropriate confidentiality, privacy, security and operator or data processing obligations are in place.

## **THIRD-PARTY SHARING AND EXTERNAL SERVICES**

The website may contain links to external websites, platforms, payment services, application portals, social media pages, videos, forms or third-party content. These links are provided for convenience. GWC does not control and is not responsible for the privacy practices, security, availability, content or terms of external websites or third-party services.

When you use a third-party platform or payment provider, you should review that provider's own terms and privacy notice.

## ***SPECIAL PERSONAL INFORMATION AND CHILDREN'S INFORMATION***

GWC may process special personal information where lawful, necessary and appropriate for educational, theological, administrative, pastoral, student support, health and safety, disciplinary, legal, regulatory, security or institutional purposes. This may include information relating to religious context, health, disability, student support, pastoral care, disciplinary matters or other sensitive information.

Where GWC processes personal information relating to children or minors, GWC will do so only where permitted by law, with appropriate consent or authorisation where required, and with reasonable safeguards appropriate to the nature of the information and the purpose of processing.

## ***INFORMATION SECURITY***

GWC is legally required to apply reasonable safeguards to protect personal information against loss, damage, unauthorised access, unauthorised disclosure, misuse, alteration, destruction and unlawful processing.

GWC applies appropriate organisational, technical and administrative safeguards, which may include access controls, confidentiality obligations, secure communication practices, monitoring where lawful, secure retention and disposal, incident response processes and security requirements for operators and third-party service providers.

While GWC takes reasonable steps to protect personal information, no website, electronic communication method or internet transmission can be guaranteed as completely secure. Users are responsible for using secure devices, protecting their credentials, checking the accuracy of submitted information and avoiding phishing or suspicious communications.

Where required by law, GWC will notify affected data subjects and/or the Information Regulator of a security compromise involving personal information.

## ***CROSS-BORDER PROCESSING***

Personal information may be stored, accessed or processed outside South Africa where GWC uses cloud-based systems, hosting providers, communication platforms, learning systems, payment providers, support providers or other technology service providers. Where this occurs, GWC will take reasonable steps to ensure that appropriate safeguards are in place, and that cross-border processing complies with applicable law.

## ***RETENTION AND DISPOSAL OF PERSONAL INFORMATION***

GWC retains personal information only for as long as necessary for the purpose for which it was collected, or as required or permitted by law, contract, academic administration, accreditation, financial recordkeeping, tax, audit, governance, dispute resolution, security, operational or legitimate institutional purposes.

When personal information is no longer required, GWC will take reasonable steps to securely delete, destroy, anonymise or archive the information in accordance with applicable retention and disposal requirements. Records will not be destroyed where they are subject to a pending PAIA request, POPIA request, complaint, investigation, audit, legal hold or other legal obligation.

## ***YOUR RIGHTS: ACCESS TO INFORMATION***

Subject to applicable law, you have the right to:

- Request confirmation of whether GWC holds personal information about you.
- Request access to personal information held by GWC.
- Request correction or updating of inaccurate, irrelevant, excessive, outdated, incomplete, misleading or unlawfully obtained personal information.
- Request deletion or destruction of personal information where legally permitted.
- Object to certain processing of personal information.
- Withdraw consent where processing is based on consent and withdrawal is legally permitted.
- Unsubscribe from optional newsletters or marketing communications.
- Lodge a complaint with GWC or with the Information Regulator.

Requests relating to access to records must be made in accordance with the GWC PAIA Manual and the prescribed PAIA request process. The PAIA Manual explains how to submit a request for access to records, and which prescribed forms may apply.

GWC will take reasonable steps to confirm your identity before disclosing or amending personal information. A legally allowable fee may apply to certain access requests in accordance with PAIA and related regulations.

## ***CORRECTION OF YOUR INFORMATION***

You may ask GWC to update, correct or delete personal information where legally permitted. Please keep your personal information accurate and inform GWC where your details change.

GWC may require proof of identity or supporting information before making changes to personal information.

## ***PAIA MANUAL AND ACCESS TO RECORDS***

GWC's PAIA Manual is available through GWC's website or from GWC on request. The PAIA Manual explains the categories of records held by GWC, how to request access to records, applicable forms and fees, grounds for refusal, POPIA rights and complaint routes.

PAIA and POPIA requests should be directed to GWC's Information Officer or Deputy Information Officer using the role-based contact details below.

## ***COMPLAINTS TO THE INFORMATION REGULATOR***

If you believe GWC has not processed your personal information lawfully or has not handled a PAIA or POPIA request appropriately, you are encouraged to contact GWC first so that the matter can be reviewed and addressed.

You also have the right to lodge a complaint with the Information Regulator. Current PAIA and POPIA complaint forms and guidance are available from the Information Regulator's website at <https://inforegulator.org.za>.

## **HOW TO CONTACT US**

If you have questions about this Notice, need further information about GWC's privacy practices, wish to exercise your POPIA or PAIA rights, or wish to give or withdraw consent where applicable, please contact GWC:

Physical Address: 34 Beach Road, Muizenberg, 7945, Cape Town, South Africa  
Postal Address: P O Box 64, Muizenberg, 7950, South Africa  
Telephone: +27 (0)21 788 1652  
Privacy / PAIA / POPIA Email: [informationofficer@gwc.ac.za](mailto:informationofficer@gwc.ac.za)  
General Email: [info@gwc.ac.za](mailto:info@gwc.ac.za)  
Website: [www.gwc.ac.za](http://www.gwc.ac.za)

Information Officer: Mark Lloyd Dickson

Deputy Information Officer: Joao Manuel de Freitas