

# PRIVACY POLICY

## 1 INTRODUCTION

1.1 The Protection of Personal Information Act, 4 of 2013 (POPIA) directly impacts on how the South African Wrestling Federation (“SAWF”) protects information obtained by it from its members.

1.2 POPIA prescribes basic principles of data protection which include:

1.2.1 Accountability;

1.2.1.1 this principle entails the assigning of responsibility.

1.2.2 Processing Limitation;

1.2.2.1 this principle requires that personal information may only be processed in a fair and lawful manner.

1.2.3 Purpose Specification;

1.2.3.1 this principle helps to determine the scope within which personal information may be processed by an organisation.

1.2.4 Further Processing Limitation;

1.2.4.1 once an organisation has identified and obtained consent for specific, legitimate and explicitly defined purposes, the processing of such personal information may only occur insofar as it is necessary for the fulfilment of those purposes.

1.2.5 Information Quality;

1.2.5.1 this principle entails the responsibility of organisations to ensure and maintain the quality of the personal information that they process.

1.2.6 Openness;

1.2.6.1 this principle is linked directly to an organisation’s duty to process information in a fair and transparent manner.

1.2.7 Security Safeguards; and

1.2.7.1 this principle requires that all personal information should be kept secure against the risk of loss, unauthorised access, interference, modification, destruction or disclosure

1.2.8 Data Subject Participation.

1.2.8.1 this principle empowers individuals to access and/or request the correction or deletion of any personal information held about them that may be inaccurate, misleading or outdated.

## **2 IMPACT OF POPIA ON THE SAWF AND ITS MEMBERS**

2.1 The SAWF takes the protection of all personal information held by it seriously, and will take all reasonable precautions to ensure that personal information is collected, stored, processed, maintained, cleansed and retained in a compliant manner.

2.2 Although the maintenance and development of various SAWF electronic systems are in some cases outsourced, the service providers are held accountable by the same privacy laws as the SAWF. However, for the purposes of POPIA, the SAWF is the Responsible Party.

2.3 This policy explains how the information SAWF collects about Members is used and kept securely.

## **3 INFORMATION WE COLLECT**

3.1 SAWF may collect the following information about Members through various electronic platforms.:

3.1.1 Name,

3.1.2 Email address,

3.1.3 Postal address,

3.1.4 Identity number,

3.1.5 Age,

3.1.6 Weights, and

3.1.7 any other information the Member voluntarily provide to the SAWF.

3.2 An IP address (which is a unique identifier that computers and devices use to identify and communicate with each other) which is automatically recognised by the web server may also be collected by our websites. For more information on privacy when using our websites kindly see our Website Privacy Policy available at [www.wrestline.org.za](http://www.wrestline.org.za)

#### **4 INFORMATION PROVIDED TO THE SAWF**

4.1 In becoming a registered athlete, coach, official or club volunteer, the SAWF will collect certain information about you as Members which will include your name, date of birth, gender, identity number, email address, address, telephone number, names of the SAWF affiliated clubs that you are a member off, and details of any coaching or officiating qualifications and licenses you hold (Wrestling Data).

4.2 Where you are registered through an affiliated club, the club will collect your details and pass them to the SAWF, through the province by using the Electronic Member Management System, to be able to register you.

4.3 The SAWF will also collect the full name, address and telephone numbers of two emergency contacts nominated by you.

4.4 Once registered, the SAWF will also access information via the Electronic Tournament Management System about competitions you participate in (the date, name and venue of competitions, your personal results, records, rankings).

4.5 In instances of international athletes, the SAWF may be required to provide your personal information to international sporting federations or various other wrestling federations. By attending the National Trials you expressly consent to this practice where necessary.

#### **5 HOW THE SAWF USES YOUR PERSONAL INFORMATION**

5.1 The SAWF may use your personal information for several purposes, including:

5.1.1 Administering your involvement in wrestling;

5.1.2 To fulfil a contract with you if you become a registered athlete with the

SAWF;

5.1.3 To notify you about important updates and information about the membership or service you have paid for;

5.1.4 To deal with your requests and enquiries;

5.1.5 To contact you for reasons related to your enquiry or in case of emergency;

5.1.6 To create meaningful, actionable analysis on an anonymised basis.

5.1.7 To create results for competitions that include age group classifications.

## **6 THE SAWF LEGAL BASES FOR PROCESSING YOUR INFORMATION**

6.1 The SAWF's key purpose is to encourage and enable participation in wrestling at all levels (including participation of athletes, coaches, officials and supporters) and to enable those with high athletic talent to develop and fulfil their potential by creating and supporting competition and training opportunities.

6.2 On this basis the SAWF will process your personal information on the basis of a legitimate interest in administering your involvement in the sport of wrestling to ensure the sport is running efficiently.

6.3 To administer your involvement in wrestling:

6.3.1 Administering and ensuring the eligibility of athletes, coaches and officials and others involved in the sport – this may involve the receipt of limited amounts of sensitive data in relation to disabled athletes, safeguarding concerns and police clearance requests or in relation to anti-doping matters;

6.3.2 Ensuring compliance with the current rules and regulations including those on the affiliation of clubs, constituent bodies and registration of athletes;

6.4 This will include the following:

6.4.1 The use eTMS and eMMS to obtain and maintain Athlete Data. These are administration portals where a selected number of staff can access

data to help to respond to queries, update data and perform necessary administration activity;

6.4.2 The transfer of registered members from one club to another. You will maintain the same record, but the club name associated with the record will change.

6.4.3 If you are a club secretary or club official, SAWF will provide essential information regarding your affiliation to SAWF;

6.4.4 Providing relevant and necessary information via email, text, post to you about the following:

6.4.4.1 Changes to rules and regulation;

6.4.4.2 Updates to advice and guidance relating to specific roles held within wrestling;

6.4.4.3 Transactional information relating to club affiliation and transfers athlete registration, representative teams, competition and events, coach and officiating licenses, road race licensing, courses;

6.4.4.4 Documenting the skills, knowledge and experience that you gain both formally and informally as you continue to grow your role within the SAWF;

6.4.4.5 Record keeping, research and analysis;

6.4.4.6 Maintaining records of participation in wrestling, in particular maintaining details of discipline and misconduct;

6.4.4.7 Maintaining statistics and conducting analysis on the make-up of wrestling participants;

6.4.4.8 Communicating with you to ask for your opinion on SAWF initiatives and services.

## 6.5 member registration

6.5.1 In relation to member registration specifically the SAWF also has a contractual obligation to our members to provide the service you are

registering and paying for. Therefore, the SAWF may contact you about important information about the services and exclusive benefits that form part of the athlete registration scheme that you are paying for.

## 6.6 Sharing data

6.6.1 If you become a registered Member we may share your Wrestling Data with the following bodies as part of the administration of your involvement in the sport and for purposes of delivering the tasks outlined above:

6.6.1.1 The SAWF;

6.6.1.2 Other members, affiliated associations, affiliated clubs;

6.6.1.3 Selected members of the SAWF Executive and Committees;

6.6.1.4 Team managers;

6.6.1.5 SASCOC, SRSA, and other governmental departments partnering with the SAWF;

6.6.1.6 Third party data managers who support the SAWF in managing the sport.

6.6.2 The SAWF will share only what is needed for those purposes and, where possible, will anonymise the data before sharing. If we would like to share your information for any other purpose, we will ask for your consent prior to sharing.

6.6.3 The SAWF may also share your personal information with the police and other law enforcement agencies for the purposes of crime prevention or detection.

6.6.4 If we disclose your information, we ask the organisation to demonstrate that the data will assist in the prevention or detection of crime, or that the SAWF is legally obliged to disclose it.

6.6.5 This is done on a strictly case by case basis and through a tightly controlled process to ensure we comply with data protection legislation.

## 6.7 Protecting your information

6.8 The data that SAWF collects from you may be transferred to a destination external to SAWF's own secure network. SAWF will not transfer your data outside of the South African Economic Area for storage purposes.

6.9 By submitting your personal data, you agree to this transfer, storing or processing. SAWF will take all reasonable steps to ensure that your data is treated securely and in accordance with this privacy policy. The Internet is not generally a secure medium for communication and therefore SAWF cannot guarantee the security of any information you send to the SAWF over the Internet, e-mail, social media, or other communication platforms.

6.10 Third Party Links

6.11 The SAWF Website may, from time to time, contain links to and from the websites of other sporting organisations. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that the SAWF does not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

## **7 YOUR RIGHTS**

7.1 Finding out what information the SAWF holds about you

7.1.1 Under the data protection legislation, you can ask to see any personal information that the SAWF hold about you. Such requests are called data subject access requests. If you would like to make a subject access request, please contact us at [●]. You will also need to provide two forms of identification, for example, ID document, driving licence, passport, and, if appropriate, anything about the source or location of the information you are requesting.

7.2 Service and marketing messages

7.2.1 If you are currently receiving service messages or marketing communications from the SAWF and no longer wish to do so, please notify the SAWF accordingly.

7.3 Right to be forgotten

7.3.1 In certain circumstances you can request that the SAWF delete all information it holds which identifies you. You can make this request at any time by emailing [●], but please note that the SAWF may be compelled to maintain your information due to specific legislative or regulatory requirements.

#### 7.4 Data corrections

7.4.1 You have the right to require the SAWF to correct any inaccuracies in your data free of charge. You can also exercise this right at any time by contacting the SAWF at [●]; and

7.4.2 providing the SAWF with enough information to identify you; and

7.4.3 specifying the information that is incorrect and what it should be replaced with.

#### 7.5 Data portability

7.5.1 You have the right to request a copy of your personal data for you to reuse for your own purposes across different services. You can also exercise this right at any time by contacting the SAWF at [●].

#### 7.6 Data retention

7.6.1 Any data that the SAWF collects from you will be deleted in accordance with timescales set out below:

Type of Data	Date of deletion
Wrestling Data	8 years (past 2 Olympic cycles) after an individual has not participated an active part in wrestling.
Name where an athlete has represented their country at any level	For such time as the athlete represented South Africa and for fifty years thereafter.
Coach and Official Data	For such time as an individual achieved a coach or official qualification and for fifty years thereafter.

#### 7.7 Complaints

7.7.1 If you have any concerns or complaints in relation to how the SAWF collects and/or processes your personal data, you should contact the SAWF.

## **8 AMENDMENTS TO THIS POLICY**

8.1 The executive management of the SAWF approves this policy and any amendment hereof on recommendation of the legal advisory committee.

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