

Privacy Statement

Community Development Initiatives International NPC

Reg. 2012/201981/08 | PBO 930 041 456 | IR Reg. 2025-008244

Reference: CDII/PS/2026/001 | **Version 3.7** | Effective: 16 June 2026

Plain Language Commitment. This Privacy Statement is written in plain language. If any term is unclear, contact our Information Officer before providing personal information. You should never feel pressured to share data without understanding how it will be used.

Information Officer: Louw Allan · information.officer@wemindfoundation.co.za · +27 83 399 9911

1. Who We Are

Community Development Initiatives International NPC (CDII) is a South African non-profit company focused on education, skills development, enterprise development, and community upliftment programmes. CDII operates We MiND Foundation as a division and delivers programmes through www.wemindfoundation.co.za.

Field	Detail
Full legal name	Community Development Initiatives International NPC
Registration	2012/201981/08
SARS PBO	930 041 456
SARS Tax Reference	9162706189
IR Registration	2025-008244
Registered address	02 Hotel Road, Cullinan 1000, Tshwane, Gauteng
Information Officer	Louw Allan (Johannes Lodewikus Allan)
Deputy IO	Adv. Don Leffler (designated under PAIA s17(1), as extended by POPIA s56)
IO email	information.officer@wemindfoundation.co.za
IO telephone	+27 83 399 9911

2. Scope

This statement applies to all personal information processed by CDII in connection with education, skills development, enterprise, and community programmes; donor and partner relationships; our websites; and administrative, governance, and compliance functions. It applies to all data subjects: programme participants, staff and volunteers, directors, donors, service providers, and website visitors.

3. Information We Collect

Category	Types of Information	How Collected
Programme participants	Name, ID/passport, contact details, educational history, assessment data, digital signatures, photographs, cultural preferences	Registration forms, assessment submissions, facilitator records
Staff & volunteers	Name, contact details, employment records, bank details, tax references	Employment contracts, HR records

Category	Types of Information	How Collected
Directors	Name, appointment date, contact details (ID numbers held internally, not published publicly)	MOI, CIPC filings
Donors & sponsors	Name, organisation, contact details, donation records	Donation forms, correspondence
Website visitors	IP address, browser type, pages visited, time and date, cookie data	Automatic collection; consent banner for non-essential cookies

4. Lawful Bases for Processing (POPIA s11)

Lawful Basis	POPIA	How CDII Relies on This
Consent	s11(1)(a)	Participant data; optional marketing; AI-assisted learning; photography. Consent is voluntary, specific, informed, and withdrawable at any time.
Contractual necessity	s11(1)(b)	Fulfilling obligations under programme enrolment, employment, and partnership agreements.
Legal obligation	s11(1)(c)	PAIA, POPIA, Companies Act, Income Tax Act, SARS PBO requirements, SETA/QCTO/SAQA obligations.
Legitimate interests	s11(1)(f)	Programme quality assurance, fraud prevention, security, governance and audit — balanced against data subject rights.
Vital interests	s11(1)(d)	Health or emergency contact information where safety is at risk and consent cannot be obtained.
Public interest	s11(1)(e)	Community development research where processing serves broader public benefit and meets ethical standards.

5. Purposes of Processing

We collect and use personal information only for: delivering and administering education, training, and skills development programmes; assessing learners and issuing certificates; managing donor relationships; fulfilling statutory obligations; operating digital platforms and AI-assisted tools; communicating programme updates where you have consented; conducting anonymised research; and safety, security, and fraud prevention. We will not use your information for any incompatible purpose without fresh consent or a new lawful basis.

6. Artificial Intelligence and Automated Processing (POPIA s71)

AI Use Disclosure. CDII's digital platforms may incorporate AI tools to provide personalised learning pathways, generate educational content, analyse assessment data, and assist with programme administration. All AI-generated outputs that affect a participant are reviewed by a qualified CDII professional before being actioned. No significant decision about you — such as assessment outcomes, certification, or programme eligibility — is made solely by automated means without human oversight. You have the right under POPIA s71 to request that any automated decision affecting you be reconsidered by a human being. Contact our Information Officer to exercise this right.

7. Children's Personal Information (POPIA s35)

Children's Data. CDII does not intentionally collect personal information from persons under 18 without written consent of a parent or competent person as defined in POPIA s1. If you believe a minor's data has been provided without appropriate consent, contact our Information Officer immediately.

8. Sharing Your Information

We share personal information only where necessary. We do not sell your personal information and do not share it with third parties for their own marketing purposes.

Recipient	Purpose	Safeguards
SETA / QCTO / SAQA	Learner registration, certification	Statutory obligation (s11(1)(c))
SARS / CIPC	Tax compliance, NPC statutory reporting	Statutory obligation
We MiND Foundation	Joint programme delivery	Partnership agreement; consent where required
Auditors / legal advisers	Financial audit, legal compliance	Written confidentiality agreement
Technology providers	Platform hosting, AI tools, IT support	Data processing agreements; POPIA-compliant contracts
Information Regulator	POPIA / PAIA compliance; breach notification	Statutory obligation
Employers (participants)	Learner progress reporting	Participant's prior written consent only

9. Cross-Border Transfer (POPIA s72)

CDII's primary operations and data storage are in South Africa. Where cross-border processing occurs — website hosting via Netlify, Inc. (USA), web font delivery via Google Fonts (USA), and Google Analytics 4 once activated (USA) — CDII ensures POPIA s72 compliance through the provider's standard data processing terms, supplemented by a written data processing agreement where personal information is involved. See the Cookie Policy for full details of each third-party service.

10. Data Retention (POPIA ss14-15)

Category	Retention Period	Authority
Programme / training records	5 years from completion	SAQA Act; QCTO regulations
Assessment records	7 years from date of assessment	SAQA Act; SETA accreditation requirements
Financial records (donations, invoices)	7 years	Income Tax Act s73; Companies Act s24
Employment records	3 years post-employment (minimum)	Basic Conditions of Employment Act; SARS requirements
Website visitor logs	12 months, then anonymised	Legitimate interests; security audit requirements
Consent records	3 years from last interaction	POPIA s11; burden of proof requirements

11. Security

We implement appropriate technical and organisational measures to protect personal information against unlawful access, loss, destruction, or damage. In the event of a data breach affecting your rights and interests, we will notify the Information Regulator within 72 hours and notify you as soon as reasonably practicable.

12. Direct Marketing

We send marketing communications only to persons who have consented (new contacts) or where an existing relationship permits (current participants — POPIA s69(3)). You may opt out at any time by replying UNSUBSCRIBE to any email, or by contacting the Information Officer. Opt-out is actioned within 5 business days.

13. Your Rights Under POPIA

Right	POPIA	How to Exercise	Our Response
Access	s23	Written request to IO; PAIA Form 2 required; R140 request fee (no exemption for personal records — GG 45057)	Within 30 days (extendable by 30 days)
Correction / deletion	s24	Written request to IO	Correct inaccurate or delete unlawfully held information within 30 days
Object to processing	s11(3)	Written objection to IO	Stop processing unless overriding legitimate ground demonstrated
Withdraw consent	s26	Written notice to IO	Immediate effect; does not affect prior lawful processing
Object to direct marketing	s69	Reply UNSUBSCRIBE / STOP, or contact IO	Actioned within 5 business days
Automated decision review	s71	Written request to IO	Reconsidered by qualified human; outcome within 30 days
Lodge a complaint	s74	Contact Information Regulator directly (see Section 16)	IR has jurisdiction — you may complain without approaching CDII first

Submission channels: Email: information.officer@wemindfoundation.co.za · Post: Information Officer, CDII, 02 Hotel Road, Cullinan 1000, Tshwane · Tel: +27 83 399 9911 · In person: by appointment

14. Governance and Board Accountability

CDII's Board of Directors has adopted this Privacy Statement and the CDII POPIA Compliance Programme. The Information Officer (Louw Allan) reports to the Board on POPIA compliance matters. The Deputy Information Officer (Adv. Don Leffler) assists and acts in the IO's absence.

15. Updates to This Statement

Reviewed annually or within 30 days of any material change in law, processing activities, IO structure, or a security incident. Previous versions are available from the Information Officer on request.

16. Information Regulator Contact Details

You have the right to lodge a complaint with the Information Regulator of South Africa:

Channel	Detail
POPIA complaints	POPIAComplaints@infoeregulator.org.za
PAIA complaints	PAIAComplaints@infoeregulator.org.za
General enquiries	infoereg@infoeregulator.org.za
Telephone	010 023 5200
Toll-free	0800 001 7160
Address	JD House, 27 Stiemens Street, Braamfontein, Johannesburg 2001
eServices portal	eservices.infoeregulator.org.za

Version History

Version	Date	Summary
1.0	16 Aug 2025	Initial version
3.0	1 Jun 2026	Full revision: lawful bases table; retention schedule; AI/s71 disclosure; children's data clause; cross-border transfer table; complete IR contact details; Deputy IO designation; plain language commitment
3.1	1 Jun 2026	Removed Hivekeeper references; added www.cdii.org.za as second website
3.2	1 Jun 2026	Both websites added throughout
3.3	10 Jun 2026	Phone corrected to +27 72 7113 277 throughout (CF-117).
3.4	16 Jun 2026	Domain consolidated to www.wemindfoundation.co.za (CDII's own, independently-operated domain); IO/DIO email addresses updated to the @wemindfoundation.co.za standard (CF-113/CF-116). Section 9 (Cross-Border Transfer) rewritten to reflect actual current technical arrangements — Netlify hosting, Google Fonts, and Google Analytics 4 replace the prior generic Cloudflare CDN reference.
3.5	11 Jul 2026	Statutory citation correction: Deputy IO field corrected from “designated under POPIA s17(1)” to “designated under PAIA s17(1), as extended by POPIA s56” — s17(1) is a PAIA provision, not a POPIA provision, matching the correction already applied to the PAIA Manual (v2.3).
3.6	12 Jul 2026	Statutory citation correction: Section 12 (Direct Marketing) corrected from “POPIA s69(2)” to “POPIA s69(3)” — s69(2) governs the once-off consent request to a non-customer; s69(3) is the existing-customer exception this sentence actually describes.
3.7	2 Aug 2026	Naming standardisation: Section 1 (Deputy IO field) and Section 14 (Governance and Board Accountability) updated from “Donald Bernard Leffler” and “Donald Leffler” respectively to “Adv. Don Leffler” — matching the format used for the Information Officer and consistent with the standard now applied across all CDII/We MiND documents. This is an administrative correction, not a re-adoption of this Statement; the effective date (16 June 2026) is retained unchanged, consistent with the same principle applied to the PAIA Manual v2.8. No other content changed.

Community Development Initiatives International NPC (CDII) / We MiND Foundation

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