



SACPCMP PRIVACY POLICY AND DATA PROTECTION DECLARATION

Data protection is a particularly high priority for The South African Council for the Project and Construction Management Professions (SACPCMP), as is the privacy and security of information. This privacy notice explains how we process your personal information when you visit our website/registration portals for an event and/or if you choose to be a Registered Member of the SACPCMP.

This document outlines how the SACPCMP will protect data subjects {your} information and personal data, and the controls and safeguards we provide for this data. This includes understanding, at all times, precisely what data we are storing for and about you, who (if anyone) can see that data, and whether you give permission for that data to be shared with third parties. This document applies to all SACPCMP stakeholders, including staff, associated organisations, Registered Persons, registration applicants, domains, services, and visitors to the Council's website, portals and social media pages.

The processing of personal data, such as the name, address, e-mail address, or telephone number shall be in line with the Protection of Personal Information Act (POPIA).

By means of this data protection declaration, we would like to inform you of the nature, scope, and purpose of the personal data we collect, use and process. Furthermore, data subjects are informed, by means of this data protection declaration, of the rights to which they are entitled.

The SACPCMP keeps its privacy policy under regular review and will place any updates on its web page. This privacy policy was last updated in May 2021.

Documents that relate to this document include:

- SACPCMP POPIA Manual
- SACPCMP Website/Portal terms and conditions
- The Protection of Personal Information Act

This document includes the following:

Section 1: About the SACPCMP

Section 2: The information collected by the SACPCMP

Section 3: Processing through use of the SACPCMP's legitimate interests

Section 4: Where the SACPCMP stores information collected about you

Section 5: Who your information is shared with

Section 6: Data Obtained from E-sites

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Section 10: How to contact the SACPCMP regarding your rights or to make a complaint

SECTION 1: ABOUT THE SACPCMP

The South African Council for the Project and Construction Management Professions (SACPCMP) derives its mandate from Section 22 of the Constitution of the Republic of South Africa, the relevant section dealing with freedom of trade, occupation and profession, states that “every citizen has a right to choose their trade, occupation and profession freely. The practice of a trade, occupation or profession may be regulated by law.”

The SACPCMP was thus established to regulate and promote specific Built Environment Management Professions.

It is further tasked with the protection of public interest, which is achieved by ensuring suitably qualified and registered professionals in specific Built Environment Management Professions in South Africa through promoting and enforcing high standards of professional ethics and conduct within the built environment.

The Minister of Public Works and Infrastructure is the Executive Authority of all the councils within the built environment including the SACPCMP.

The Built Environment refers to the functional area within which registered persons practice and includes all structures that are planned and/or erected above or underground, as well as the land utilised for the purpose and supporting infrastructure. The CBE and the SACPCMP Acts enjoin us to work in concert in respect of the 13 administrative functions, alongside the eight mandates of the CBE for a sustainable built environment.

SECTION 2: THE INFORMATION COLLECTED BY THE SACPCMP

Personal data is any information that personally identifies you or from which you could be identified either directly or indirectly. We may collect your personal data through your use of SACPCMP services or during interactions with Council representatives.

The categories of personal data we collect from you depends on the nature of your interaction with us, but may include the following:

- **Contact Data** – We may collect personal and/or business contact information including your first name, last name, mailing address, telephone number, fax number, email address, ID number, passport number, birth date, residential address, postal address and other similar data and identifiers.
- **Payment Data** – In limited cases, we may collect information necessary for processing payments and preventing fraud, including credit/debit card numbers, security code numbers and other related billing information.
- **Account Data** – We collect information such as how you purchased or signed up for registration services, your transaction, billing and support history, and anything else relating to the account you create.
- **Location Data** – We collect geolocation data when you enable location-based services or when you choose to provide location-related information during product registration or when interacting with our website.
- **Security Credentials Data**– We collect user IDs, passwords, password hints, and similar security information required for authentication and access to registration profiles/accounts.
- **Demographic Data** – We collect, or obtain from third parties, certain demographic data including, for example, country, gender, age, preferred language, and general interest data.
- **Preferences** – We collect information about your preferences and interests as they relate to SACPCMP Services (both when you tell us what they are or when we deduce them from what we know about you) and how you prefer to receive communications from us.

- Social Media Data – We may provide social media features that enable you to share information with your social networks and to interact with us on various social media sites. Your use of these features may result in the collection or sharing of information about you, depending on the feature. We encourage you to review the privacy policies and settings on the social media sites you use to make sure you understand the information that is collected, used, and shared by those sites.
- Body and biometric Data – When you use our services or access our premises, you might provide us with information about your body, such as fingerprints or eye scanning. With your permission, some of our products may collect biometric information (such as a fingerprint) to perform functions on the device.
- Other Unique Identifying Information – Examples of other unique information that we collect from you include product serial numbers, information you provide when you interact in-person, online or by phone or mail with our services centres, help desks or other customer support channels, your written, voice or video responses to customer surveys or contests or additional information you have provided to us to facilitate delivery of services and to respond to your inquiries.
- Work-related information – for the purposes of registration or application related to our committees and Council operations, we will request details regarding your employer (current and/or former), past work experience and additional, related details. This will include your CV, work experience, work positions and responsibilities.
- Qualification-related details – for the purposes of your registration or application related to our committees and Council operations, we will request details of your qualifications and educational history.

The personal data we collect will be used for the following purposes:

In order for the SACPCMP to provide you with membership and related services (including the signposting of network conferences, 'member'/Registered Person and 'non-member' research, events, products and/or services), employment, involvement with the Council as a Committee/Council member or assessor/mentor/moderator, the Council needs to collect personal data for correspondence purposes and service provision.

In any event, the Council is committed to ensuring that the information it collects, and uses is appropriate for this purpose and does not constitute an invasion of your privacy.

The legal basis for the processing of your personal data:

- The SACPCMP's legitimate interests as a regulator.
- The processing is necessary to fulfil a contract/enter into negotiations for a contract of consent.

SECTION 3: PROCESSING THROUGH USE OF THE SACPCMP'S LEGITIMATE INTERESTS

Where the processing of personal data is based on the POPI Act (POPIA), the legitimate interests the SACPCMP pursues are to carry out the responsibilities of the Council as a regulatory authority, in favour of the well-being of all the Council's stakeholders, Registered Persons, applicants, employees, shareholders and for the good of the sector in which the Council operates.

The SACPCMP considers that its Registered Persons, applicants and stakeholders rely on being kept up to date about new and existing products or services related to the Council, as well as industry best practice advice in order to help them achieve their professional or organisational objectives. The SACPCMP collects and uses personal data to manage the relationship of stakeholders and better serve stakeholders. The SACPCMP uses and otherwise processes data for the following business purposes:

Customer experience: Providing stakeholders with a seamless customer experience by maintaining accurate contact and registration data, delivering comprehensive customer support, through a number of mediums including online message and chat centres, communicating with you about offering services and features that may interest you and enabling you to participate in calls and surveys, benefits, and rewards. We also use your data to deliver a tailored experience, and personalize services and communications you receive.

Transaction support: Assisting you in completing transaction/registration/ application the administering of your account, processing payments, and providing registration-related material.

Support & improvement: Communicating with you to inform you or make you aware of non-transactional product features not addressed through Customer Service or Administrative Communications.

Administrative communications: Communicating with you about Council services. Examples of administrative communications may include responses to your inquiries or requests, communications required by law or applicable updates.

Security: Maintaining the integrity and security of our websites and services, and preventing and detecting security threats, fraud or other criminal or malicious activity that

might compromise your information. We may also maintain additional security measures, such as CCTV, to safeguard our physical locations.

Business operations: Conducting ordinary business operations, verifying your identity, conducting business research, analytics, planning and strategy, corporate reporting and management, staff training and quality assurance purposes (which may include monitoring or recording calls to our customer support) and outreach.

Research & innovation: Innovating new and existing new services using research and development tools and incorporating data analysis activities.

Compliance with law: Compliance with applicable laws, regulations, court orders, government and law enforcement requests, to operate our services and to protect ourselves, our users and our Registered Persons, our applicants and other stakeholders to solve any disputes. Information collected may also be used to investigate security incidents and potential breaches of personal information, notify individuals and third parties of the breach and to prepare to defend lawsuits.

Account management: When using our services, you may create sign in credentials. When you create these credentials with your e-mail address and password, a unique identifier is created that allows you to use the same credentials for all our services. Depending on the services you are engaged with, the information associated with your credentials or account may also include delivery address, device and connection settings, device service usage data.

Marketing and advertising: Providing personalised detail through e-mail, SMS/text-messages, in application marketing and third-party platforms and other selected partner websites. Marketing is generally seen as an important tool, but the SACPCMP wants to respect the wishes of its marketing recipients. Under POPIA you have an absolute right to object to direct marketing and if you wish to do so please contact admin@sacpcmp.org.za

The SACPCMP will only process your personal data on these grounds if it is determined that the Council's services are 'professionally relevant' to you or/and your organisation. Material that the SACPCMP sends to you may be relevant based on your profile, because of the type, size or location of the field/organisation that you work in, or because you are the relevant registration/post-holder for a certain set of decisions based on factors such as your location, role, seniority, and responsibilities.

The SACPCMP believes that the recipients of its marketing have a reasonable expectation that the SACPCMP will process their Personal Data.

The data the SACPCMP holds about you may have originated from joining the SACPCMP registration community, attending a conference, webinar or event, or information you have supplied via the Council's online community.

SECTION 4: WHERE THE SACPCMP STORES INFORMATION COLLECTED ABOUT YOU

The SACPCMP may transfer your information to its data processors within and outside the South African Area but will do so with appropriate measures and controls in place to protect that information in accordance with applicable data protection laws and regulations and regulatory guidance.

In all instances, the SACPCMP will take into account the nature of the information it is transferring, and the level of protection provided by those processors.

Contractual Processing

Where the processing of personal data is based on the performance of a contract, the Registered Persons/Applicants/Members of the SACPCMP community agree that processing takes place to fulfil an ongoing membership/registration contract with its associated terms and conditions.

This means, for example, that the SACPCMP will collect, store, structure and use your personal information for the transmission of digital communications related to the administration of your membership/registration; for example, essential communications such as the SACPCMP magazine, Shape Shifter, which is closely aligned with the SACPCMP's mission statement that you have signed up to:

“Welcome to the SACPCMP Shape Shifter, a project that provides member-based organisations, applicants and Registered Persons with articles from membership and association professionals, influencers, thought-leaders and solution providers. The SACPCMP Shape Shifter is a great place to pick up handy tips to improve value, engagement and growth! Please only complete this form if you are employed by a membership organisation or association or are a current customer of the SACPCMP.”

Processing Using Consent

There are certain circumstances, particularly in regard to electronic marketing communications that fall within the Privacy and Electronic Communication Regulations, where the SACPCMP is likely to need consent from you in order to process your data.

If this is the case, the SACPCMP will ensure that the consent you provide is by a clear affirmative act establishing a freely given, specific, informed and unambiguous indication of your agreement to the processing of personal data relating to you.

You may withdraw consent at any time by either unsubscribing (via the Unsubscribe link on the footer of all emails) or requesting to unsubscribe via the following email address – admin@sacpcmp.org.za

SECTION 5: WHO YOUR INFORMATION IS SHARED WITH

The SACPCMP may share your personal data with third parties for the purposes of essential member service processing. The following third parties may receive your personal data for the following purpose(s) as part of the processing activities:

Organisation	Purpose	Country	Retrieve a copy of the safeguards in place here:
E2/My Membership	Processing, hosting of member details and email Communication Delivery	South Africa (SA)	www.mymembership.co.za
Brilliant Link	Payment services related to registration applications and annual fees	South Africa (SA)	www.brilliantlink.co.za
Sizwe IT Africa	Server management, data backups	South Africa (SA)	www.sizwegroup.co.za
E2/My Membership	SMS communication delivery	South Africa (SA)	www.mymembership.co.za
Sizwe IT Africa	ICT Services to SACPCMP	South Africa (SA)	www.sizwegroup.co.za
Limil	Call desk/PABX	South Africa (SA)	www.limil.co.za
Microsoft	Storage of emails and documentation	South Africa (SA)	www.microsoft.com

SECTION 6: DATA OBTAINED FROM E-SITES

Visitors to the website do not have to provide the SACPCMP any personal data in order to use the website. However, you may provide the SACPCMP with personal data by completing forms on its website or by contacting the Council by telephone or email. When you visit this website, the SACPCMP will automatically collect the internet protocol (IP) address of the device used by you to visit this website as well as the type of the device, browser version and time zone setting.

This will enable the SACPCMP to identify you as a unique user for analytical purposes and to optimise its website for your device. This data does not allow the SACPCMP to identify you, and the SACPCMP will not attempt to use this data to identify you. Anonymised information relating to website visits may be shared with approved stakeholders.

Cookies

The SACPCMP's website uses small text files, called cookies, which are automatically stored on a device when users access and use certain features of this website. As cookies are unique, the SACPCMP can use them to distinguish users from each other. To find out more about cookies, how to refuse them and how to change your device's cookie settings, you should visit [All About Cookies](#).

Please note that if you refuse to accept cookies or change your device's cookie settings, you may not be able to use all of the SACPCMP website's features. Data collected from the use of cookies does not allow the SACPCMP to identify you, and we will not attempt to use this data to identify you.

The categories of cookies used by the SACPCMP website are as follows:

- Strictly necessary cookies – cookies that are required for the operation of the SACPCMP website and its features, such as accessing secure areas of the website.
- Performance cookies – cookies that allow the SACPCMP to recognise new and returning users to this website and to track how they navigate around the site to help the SACPCMP improve its website.

The cookies used by the SACPCMP website are as follows:

Google Analytics

These cookies are used by the Google Analytics service to identify unique visitors to a website, where they come from, which pages they visit and how long they spend on a site. Further information can be found in the [Google Privacy Policy](#).

Source	Cookie	Description
Google Analytics	utma	This cookie creates a unique ID when a new visitor browses the website. It helps to assess the number of new visitors to the site, and also identify whether the SACPCMP is receiving repeat visitors.
	utmb	These two cookies help measure a visitor's session, giving data on what time visitors arrive and how long they spend browsing the website.
	utmc	
	utmz	This cookie provides information about how a visitor reached the site (e.g. via Google Search, referral site, social media, direct URL, etc.) and also which pages they viewed after they arrived.
	Double Click	This cookie collects anonymized Ad Views, Analytics, Browser Information, Date/Time, Demographic Data, Hardware/Software Type, Internet Service Provider, Interaction Data, Page Views, or Serving Domains.
	Audiences	This cookie collects anonymous data (Ad Views, Analytics, Browser Information, Cookie Data, Date/Time, Demographic Data, Hardware/Software Type, Internet Service Provider, Interaction Data, Page Views or Serving Domains).
	Relic	Anonymous (Analytics, Browser Information, Cookie Data, Date/Time, Demographic Data, Hardware/ Software Type, Interaction Data, Page Views, Serving Domains).

Most browsers allow you to refuse to accept cookies; for example in:

- **Internet Explorer** you can block cookies using the cookie handling override settings available by clicking "Tools", "Internet Options", "Privacy" and then "Advanced"
- **Firefox** you can block all cookies by clicking "Tools", "Options", "Privacy", selecting "Use custom settings for history" from the drop-down menu, and unchecking "Accept cookies from sites"; and

- **Chrome** you can block all cookies by accessing the "Customize and control" menu, and clicking "Settings", "Show advanced settings" and "Content settings", and then selecting "Block sites from setting any data" under the "Cookies" heading.

Blocking all cookies will have a negative impact upon the usability of many websites. If you block cookies, you will not be able to use all the features on the SACPCMP website.

SECTION 7: ACCESSING OR RESTRICTING PERSONAL DATA

At any point while the SACPCMP is in possession of/or processing your personal data, you, the data subject, have the following rights:

- **Right of access** – you have the right to request a copy of the information that the SACPCMP holds about you free of charge.
- **Right of rectification** – you have a right to correct data that the SACPCMP holds about you that is inaccurate or incomplete.
- **Right to be forgotten** – in certain circumstances you can ask for the data the SACPCMP holds about you to be erased from SACPCMP records.
- **Right to restriction of processing** – where certain conditions apply to have a right to restrict the processing.
- **Right of portability** – you have the right to have the data the SACPCMP holds about you transferred to another organisation.
- **Right to object** – you have the right to object to certain types of processing such as direct marketing.
- **Right to object to automated processing, including profiling** – you also have the right to be subject to the legal effects of automated processing or profiling.
- **Right to judicial review** – in the event that the SACPCMP refuses your request under rights of access, the SACPCMP will provide you with a reason as to why. You have the right to complain as outlined below.

All of the above requests will be forwarded on should there be a third party involved in the processing of your personal data.

SECTION 8: OTHER WEBSITES

On occasion, the SACPCMP website will contain links to other websites. This privacy policy only applies to the SACPCMP website. When you link to other websites, you should read their own privacy policies.

SECTION 9: HOW LONG CAN THE SACPCMP KEEP INFORMATION COLLECTED ON YOU?

Any information provided by you will be retained for as long as necessary in connection with the purposes for which it was provided, for example, to respond to your enquiry. In respect of any contact information stored within the SACPCMP's customer relationship management (CRM) system/databases, the SACPCMP will delete your details upon request.

Any information collected as part of an application for registration or membership will be stored for the term of an individual's term of membership and six months thereafter.

Any information collected about you or your activity through the use of cookies will be retained for the time periods necessary for the SACPCMP's marketing team to report thereon.

SECTION 11: HOW TO CONTACT THE SACPCMP REGARDING YOUR RIGHTS OR TO MAKE A COMPLAINT

In the event that you wish to make a complaint about how your personal data is being processed by the SACPCMP (or third parties above), or how your complaint has been handled, you have the right to lodge a complaint directly with the SACPCMP's data protection officer (**email**).