

FREE DEMOCRATS MEMBERSHIP PRIVACY POLICY

Effective date: [21 August 2026]

Last updated: [21 August 2026]

The **Free Democrats of South Africa** ("**Free Democrats**", "**Free Dems**", "**we**", "**us**" or "**our**") respects your privacy and is committed to protecting the personal information entrusted to us by our members, prospective members, supporters, volunteers and other individuals who interact with the Party.

This Membership Privacy Policy explains what personal information we collect, why we collect it, how we use and protect it, when we may disclose it, how long we retain it, and what rights you have in relation to your personal information.

This Policy applies specifically to information collected and processed in connection with **Free Democrats membership and participation in the activities of the Party**. It should be read together with any other privacy notices, website terms, membership terms or policies that may apply to particular Free Democrats activities.

The Free Democrats processes personal information in accordance with the **Protection of Personal Information Act 4 of 2013 ("POPIA")**, applicable regulations and other applicable South African law.

1. WHO WE ARE

The **Free Democrats of South Africa** is a political organisation established around political principles and committed to promoting its political programme, principles and objectives.

For purposes of POPIA, the Free Democrats is a **responsible party** in respect of the personal information that it determines the purposes and means of processing.

The Free Democrats may therefore collect and process personal information relating to individuals who:

- apply for membership;
- become members;
- participate in Party activities;
- volunteer for the Party;
- attend Party events;
- communicate with the Party;
- make enquiries regarding membership;
- participate in internal Party processes; or
- otherwise interact with the Party in circumstances in which personal information is processed.

2. OUR COMMITMENT TO PRIVACY

We recognise that membership of a political organisation is a personal matter and that information revealing a person's political affiliation or political persuasion deserves particular care.

We will therefore:

- collect only information that is reasonably necessary for legitimate Party purposes;
- process information lawfully and fairly;
- explain why information is being collected where required;
- use information for specified and legitimate purposes;
- take reasonable steps to ensure that information is accurate and up to date;
- protect information against loss, unauthorised access, misuse or disclosure;
- restrict access to information to persons who reasonably require it;
- retain information only for as long as reasonably necessary or legally required; and
- respect the rights granted to data subjects under POPIA.

POPIA establishes minimum requirements for lawful processing and includes conditions relating to accountability, processing limitation, purpose specification, further processing, information quality, openness, security safeguards and data-subject participation.

3. INFORMATION WE MAY COLLECT

Depending on your relationship with the Free Democrats and the activities in which you participate, we may collect some or all of the following information.

3.1 Identification information

This may include:

- full name;
- preferred name;
- date of birth;
- identity or other identification information where reasonably necessary;
- nationality or citizenship information where reasonably necessary;
- membership number or other internal identifier; and
- photograph where you voluntarily provide one or where reasonably necessary for an identified Party purpose.

We will not request identification information merely for convenience where it is not reasonably necessary.

3.2 Contact information

This may include:

- residential address;
- postal address;
- email address;
- telephone or mobile number;
- preferred method of communication; and
- communication preferences.

3.3 Membership information

We may process information necessary to administer your membership, including:

- membership application;
- membership status;
- date of joining;
- membership renewal information;
- membership category;
- membership number;
- local, provincial or other Party structure with which you are associated;
- participation in Party activities;
- volunteer activities;
- internal Party positions or responsibilities; and
- correspondence concerning your membership.

3.4 Political affiliation and political persuasion

Your application for membership necessarily indicates an association with the Free Democrats.

Information concerning a person's political persuasion is classified as **special personal information** under POPIA. POPIA generally restricts the processing of such information, but section 31 expressly provides an authorisation for processing by or for an institution founded on political principles in relation to its members where the processing is necessary to achieve the institution's aims or principles.

The Free Democrats will therefore process membership information relating to political affiliation only where necessary for legitimate Party purposes and in accordance with POPIA.

3.5 Volunteer and participation information

If you volunteer or participate in Party activities, we may process information such as:

- areas in which you wish to volunteer;
- Party events attended;
- volunteering activities undertaken;
- Party organisational responsibilities;
- local or regional participation; and
- relevant communications concerning those activities.

3.6 Communications

We may retain communications that you send to us, including:

- emails;
- membership enquiries;
- membership applications;
- requests for information;
- complaints;
- correspondence with Party officials; and
- other communications relating to your interaction with the Party.

3.7 Payment information

If membership fees, donations, merchandise purchases, event payments or other payments are processed, we may receive information necessary to record and administer the transaction.

Where payment processing is performed by a third-party payment provider, payment information may be processed directly by that provider in accordance with its own privacy terms.

The Free Democrats will seek to avoid retaining complete payment-card information where it is not necessary for our legitimate purposes.

4. INFORMATION WE GENERALLY DO NOT NEED

The Free Democrats seeks to follow the principle of data minimisation.

Unless there is a specific lawful and necessary reason, we do not intend to collect information such as:

- medical information;
- detailed health information;
- religious beliefs;
- racial or ethnic information;
- information concerning sex life;
- biometric information;
- detailed financial information; or
- information concerning alleged criminal conduct.

If a particular Party activity genuinely requires additional information, we will seek to identify the purpose for which that information is required and apply the additional protections required by POPIA.

5. WHY WE PROCESS MEMBERS' INFORMATION

We may process personal information for the following purposes:

Membership administration

To:

- receive and process membership applications;
- confirm membership;
- maintain membership records;
- communicate with members;
- administer membership renewals;
- maintain accurate membership registers;
- issue membership credentials where applicable; and
- administer the rights and responsibilities associated with membership.

Party administration

To:

- administer the organisation;
- maintain Party structures;
- communicate with Party members;
- organise meetings and events;
- coordinate volunteers;
- administer internal Party activities; and
- implement the Party's constitution, rules, policies and procedures.

Political activities

To:

- enable members to participate in Party activities;
- organise lawful political activities;
- recruit and communicate with members;
- coordinate campaigning and canvassing activities;
- communicate the Party's policies and political programme;
- organise election-related activities;
- support candidates and Party structures; and
- pursue the lawful aims and principles of the Free Democrats.

The Information Regulator has specifically recognised that political parties are responsible parties under POPIA and has issued guidance concerning the processing of personal information by political parties.

Legal and regulatory compliance

We may process information where necessary to:

- comply with applicable legislation;
- comply with a court order or lawful instruction;
- comply with electoral or other regulatory requirements;
- establish, exercise or defend legal rights; or
- respond to lawful requests from competent authorities.

Security and fraud prevention

We may process information where reasonably necessary to:

- protect Party systems;
- prevent fraudulent membership applications;
- investigate suspected misuse of Party resources;
- protect members, volunteers and Party personnel;
- maintain the security of our information systems; and
- investigate suspected unauthorised access or disclosure.

Records and accountability

We may retain information where reasonably necessary to maintain appropriate organisational, financial, legal or historical records.

6. OUR LEGAL BASIS FOR PROCESSING

Depending on the circumstances, we may process personal information on one or more of the following grounds recognised by POPIA:

- your consent;
- performance or administration of an agreement or membership relationship;
- compliance with a legal obligation;
- protection of a legitimate right or interest;
- processing necessary for legitimate Party purposes;
- processing necessary to achieve the aims or principles of a political institution, where specifically authorised by POPIA; or
- another lawful basis provided for by applicable law.

Consent, where relied upon, must be voluntary, specific and informed. POPIA defines consent in these terms.

Importantly, the processing of political-persuasion information relating to members is specifically addressed by section 31 of POPIA. The Free Democrats will not rely on

membership information for purposes unrelated to legitimate Party activities merely because an individual has become a member.

7. MEMBERSHIP AND POLITICAL PERSUASION

We want members to understand an important distinction.

When you apply to join the Free Democrats, your membership itself communicates information about your political affiliation. This means that membership information may constitute **special personal information concerning political persuasion**.

POPIA's section 31 specifically provides that the prohibition on processing political-persuasion information does not apply to processing by or for an institution founded on political principles concerning its members where that processing is necessary to achieve the institution's aims or principles.

The Free Democrats will therefore process membership information for legitimate purposes including membership administration, internal organisation, communication with members, participation in Party activities, recruitment, campaigning and other lawful activities consistent with the Party's aims and principles.

We will not sell your political affiliation or membership information.

We will not disclose your membership status to unrelated third parties for their own purposes without a lawful basis.

8. WHEN WE MAY SHARE PERSONAL INFORMATION

We may disclose personal information where reasonably necessary and lawful to:

- authorised Free Democrats officials;
- authorised Party structures;
- authorised volunteers who require the information to perform a specific Party function;
- service providers processing information on our behalf;
- technology and hosting providers;
- membership-management providers;
- email or communications providers;
- payment providers;
- professional advisers;

- auditors or accountants;
- electoral or other legally authorised authorities;
- courts, law-enforcement agencies or regulators where legally required; or
- another party where you have given the required consent.

Where a third party processes personal information on our behalf, we will take reasonable steps to ensure that appropriate confidentiality and security obligations apply.

We will not provide your membership information to another organisation for that organisation's independent marketing or commercial purposes merely because you are a Free Democrats member.

9. POLITICAL COMMUNICATIONS

Membership may involve communications concerning the Free Democrats' political activities, policies, events, campaigns and organisational matters.

By becoming a member, you acknowledge that such communications may be necessary for the administration of your membership and your participation in Party activities.

Where a communication constitutes direct marketing or is otherwise subject to specific legal requirements, we will comply with the applicable requirements of POPIA and other relevant law.

You may request that we change your communication preferences where this does not conflict with necessary membership or legal communications.

10. PUBLICLY IDENTIFIABLE MEMBERS

Membership of the Free Democrats does not automatically mean that your name, photograph, membership status or other personal information will be published publicly.

We will not assume that a person's membership authorises publication of their membership status on:

- the Party website;
- social media;
- campaign material;
- press releases;
- public membership lists;
- posters;
- videos; or

- other publicly accessible material.

Where public identification is proposed, we will seek an appropriate lawful basis and, where required, your consent.

Members may voluntarily make their own political affiliation public. Where a member deliberately makes information public, POPIA contains provisions concerning information deliberately made public by the data subject.

11. PHOTOGRAPHS, VIDEO AND EVENTS

Photographs and video recordings may be taken at Free Democrats events and activities.

Where an image or recording identifies you, it may constitute personal information.

We may use photographs or recordings for legitimate Party purposes such as:

- documenting Party activities;
- internal communications;
- reporting on events;
- Party publications;
- websites;
- social-media communications;
- campaign material; and
- historical or archival records.

Where reasonably appropriate, we will provide notice at events concerning photography or recording.

Where a particular publication or use requires consent, we will seek the appropriate consent.

If you believe a photograph or recording of you has been published inappropriately, you may contact the Party using the details in this Policy.

12. SOCIAL MEDIA

The Free Democrats may operate social-media accounts and pages.

If you interact publicly with a Free Democrats social-media account, information that you voluntarily make public may be visible to other users and may also be processed by the relevant social-media platform.

The Free Democrats does not control the privacy practices of independent social-media platforms.

You should therefore review the privacy settings and privacy policies of the relevant platform.

We will not treat a public social-media interaction as permission to publish your private membership information.

13. CHILDREN AND MINORS

The Free Democrats recognises that additional safeguards apply to the personal information of children under POPIA.

A "child" is defined by POPIA as a natural person under 18 who is not legally competent, without assistance from a competent person, to take the relevant action or decision.

The Party will take appropriate precautions when dealing with individuals under 18.

Where the law requires consent from a competent person for the processing of a child's personal information, the Party will obtain that consent before processing the information.

We will not knowingly collect unnecessary sensitive information about minors.

14. HOW WE PROTECT YOUR INFORMATION

We take reasonable technical and organisational measures to protect personal information against:

- loss;
- theft;
- unauthorised access;
- unauthorised disclosure;
- unlawful processing;
- accidental destruction;
- accidental loss;
- alteration; and
- misuse.

Depending on the information and the circumstances, safeguards may include:

- password protection;

- access controls;
- restricted administrative permissions;
- secure hosting;
- encryption where appropriate;
- secure backups;
- device security;
- confidentiality obligations;
- staff and volunteer awareness; and
- procedures for responding to suspected security incidents.

POPIA requires responsible parties to safeguard the integrity and confidentiality of personal information and to take appropriate measures against loss, damage, unauthorised access and other unlawful processing.

No electronic system can be guaranteed to be completely secure. Nevertheless, we will take reasonable measures appropriate to the nature and sensitivity of the information we hold.

15. DATA BREACHES

If the Free Democrats becomes aware of a security compromise involving personal information, we will assess the incident and take the steps required by applicable law.

Where POPIA requires notification, affected data subjects and/or the Information Regulator will be notified in accordance with the Act.

We may also take additional measures where reasonably necessary to reduce the risk of harm to affected individuals.

16. ACCURACY OF INFORMATION

We seek to maintain accurate and reasonably up-to-date membership records.

You should notify us if your personal information changes, particularly:

- your name;
- email address;
- telephone number;
- residential address; or
- other information necessary for administering your membership.

You may request correction of inaccurate or incomplete personal information in accordance with POPIA.

17. RETENTION OF PERSONAL INFORMATION

We will not retain personal information indefinitely without a legitimate reason.

Information may be retained for as long as reasonably necessary to:

- administer your membership;
- maintain organisational records;
- comply with legal obligations;
- establish or defend legal claims;
- maintain appropriate financial records;
- maintain necessary electoral or regulatory records;
- resolve disputes; or
- maintain legitimate historical or archival records.

When information is no longer reasonably required, we will take reasonable steps to securely delete, destroy or de-identify it, subject to any legal or legitimate requirement to retain it.

18. YOUR RIGHTS AS A DATA SUBJECT

Subject to the limitations and requirements of POPIA, you have rights concerning your personal information.

These include the right to:

Know what information we hold

You may request confirmation of whether we hold personal information about you and, where applicable, request access to that information.

Request correction

You may ask us to correct or update inaccurate, misleading or incomplete information.

Request deletion

You may request deletion or destruction of personal information where POPIA permits such a request.

Deletion may not always be possible where the Party is legally required or otherwise lawfully entitled to retain particular information.

Object to processing

You may object to certain processing of your personal information in circumstances provided for by POPIA.

Withdraw consent

Where processing is based on your consent, you may withdraw that consent, subject to any legal consequences or other lawful basis that may apply.

Withdrawal of consent does not necessarily make previous lawful processing unlawful.

Complain

You may raise a privacy concern or complaint directly with the Free Democrats.

You may also lodge a complaint with the **Information Regulator of South Africa** where you believe your rights under POPIA have been infringed.

The Information Regulator is responsible for administering and enforcing POPIA and provides mechanisms for dealing with complaints concerning the protection of personal information.

19. HOW TO EXERCISE YOUR RIGHTS

To exercise a right or make a privacy request, contact our Information Officer using the details below.

Information Officer

Free Democrats of South Africa

Email: [\[drjreid@telkomsa.net\]](mailto:drjreid@telkomsa.net)

Telephone: **[021 949 2067 / 083 636 0893]**

Postal address: **[16 Solway, Bellville, 7530]**

Your request should, where reasonably possible, identify:

- your name;
- your contact details;
- the nature of your request;
- sufficient information to identify the relevant personal information; and
- any information reasonably necessary to verify your identity.

We may take reasonable steps to verify your identity before providing access to personal information or making changes to an account or membership record.

20. IDENTITY VERIFICATION

Because membership information may reveal political affiliation and therefore be particularly sensitive, we may need to verify your identity before responding to certain requests.

We will seek to use proportionate verification methods.

We will not request unnecessary identification documents merely as a matter of convenience.

21. THIRD-PARTY SERVICE PROVIDERS

The Free Democrats may use third-party service providers to operate aspects of its membership and communications infrastructure.

These may include providers of:

- website hosting;
- membership-management systems;
- databases;
- cloud storage;
- email;
- communications;
- payment processing;
- event registration;
- cybersecurity;
- IT support; and
- other services necessary for Party administration.

Where such providers process personal information on behalf of the Free Democrats, the Party will take reasonable steps to ensure that appropriate contractual, technical and organisational safeguards are in place.

22. INTERNATIONAL TRANSFERS

Some technology or service providers may process or store personal information outside South Africa.

Where personal information is transferred outside the Republic, the Free Democrats will comply with the requirements applicable to cross-border transfers under POPIA.

This may include ensuring that the recipient is subject to appropriate legal protections, that appropriate safeguards are in place, or that another lawful basis for the transfer exists.

23. NO SALE OF MEMBERSHIP DATA

The Free Democrats will not sell its membership database.

We will not sell, rent or trade members' names, contact information, membership status or political affiliation to advertisers, commercial data brokers or other organisations for their own purposes.

Any disclosure of personal information will be based on a lawful purpose and handled in accordance with this Policy and applicable law.

24. CONFIDENTIALITY OF MEMBERSHIP

Membership information is treated as confidential Party information.

Access to membership records will be restricted to authorised persons who require access for legitimate Party purposes.

Party officials, employees, contractors and volunteers who have access to personal information may be required to observe confidentiality and information-security requirements.

A person's membership will not ordinarily be disclosed outside the Party merely because they have joined.

25. INTERNAL PARTY ACCESS

Membership information may need to be accessible to authorised Party structures for legitimate organisational purposes.

For example, appropriate information may be made available to authorised:

- national Party officials;
- provincial structures;
- regional structures;
- local structures;

- membership administrators;
- election or campaign organisers; and
- authorised volunteers.

Access should be limited to the information reasonably required for the person's particular function.

A volunteer assisting with an event, for example, should not automatically receive access to the Party's complete membership database.

26. DATA MINIMISATION AND ACCESS CONTROL

The Free Democrats will seek to follow a "need-to-know" approach.

Being an authorised Party official does not automatically entitle a person to unrestricted access to all membership information.

Where technically and organisationally practical, access will be restricted according to:

- role;
- function;
- geographic responsibility;
- organisational responsibility; and
- legitimate purpose.

27. COOKIES AND WEBSITE INFORMATION

When you visit a Free Democrats website, certain technical information may be collected automatically by our website or hosting providers.

This may include:

- IP address;
- browser type;
- device information;
- operating system;
- pages visited;
- approximate usage information; and
- technical logs.

Cookies and similar technologies may be used for functions such as:

- website operation;
- security;
- remembering preferences;
- analytics; and
- improving website performance.

Where required, the Party will provide additional information about cookies and obtain any consent required by applicable law.

28. LINKS TO OTHER WEBSITES

Our website or communications may contain links to external websites.

We are not responsible for the privacy practices, security or content of websites operated by third parties.

You should review the privacy policy of any external website before providing personal information to it.

29. AUTOMATED DECISION-MAKING

The Free Democrats does not intend to make decisions concerning membership solely through automated processing where doing so would produce legal consequences or similarly significant effects on an individual.

Where automated tools are used for administrative purposes, appropriate safeguards will be considered and applied where required by law.

30. CHANGES TO THIS POLICY

We may update this Privacy Policy from time to time to reflect:

- changes in legislation;
- guidance from the Information Regulator;
- changes to Party operations;
- changes to our membership systems;
- changes to technology; or
- improvements to our privacy practices.

The latest version will be made available through the Free Democrats' official communication channels.

Where a material change substantially affects the way we process existing members' personal information, we will take reasonable steps to bring the change to members' attention where appropriate.

31. COMPLAINTS AND PRIVACY CONCERNS

We encourage members to contact the Free Democrats first if they have a concern about the way their personal information is being handled.

Complaints should be directed to:

Information Officer

Free Democrats of South Africa

Email: [drjreid@telkomsa.net]

Telephone: [021 949 2067 / 083 636 0893]

We will investigate privacy complaints and take reasonable steps to resolve legitimate concerns.

You retain the right to approach the Information Regulator where permitted by law.

32. INFORMATION REGULATOR

The South African Information Regulator is the independent regulator responsible for, among other things, overseeing compliance with POPIA.

Its contact details should be obtained from its current official website before publication of this Policy, as contact information may change.

Information Regulator

South Africa

Website: [<https://inforegulator.org.za/>]

The Regulator provides guidance concerning political parties, voters, special personal information and other POPIA matters.

33. IMPORTANT NOTICE ABOUT MEMBERSHIP

By applying for membership, you acknowledge that:

1. the Free Democrats must process certain personal information in order to administer your membership;
 2. membership of a political organisation necessarily indicates an association with that organisation;
 3. information concerning political persuasion receives special protection under POPIA;
 4. POPIA specifically permits certain processing of members' political-persuasion information by political institutions where necessary to achieve their aims or principles;
 5. your membership information will be treated as confidential and will not be sold;
 6. your information may be accessed by authorised Party personnel where reasonably necessary for legitimate Party purposes;
 7. you have rights concerning your personal information under POPIA; and
 8. you may contact the Free Democrats' Information Officer regarding questions, requests or complaints concerning your personal information.
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34. PRIVACY BY DEFAULT

The Free Democrats' policy is that membership should not require unnecessary disclosure of personal information.

We will seek to collect the minimum information reasonably necessary for the particular purpose for which it is collected.

Where a Party activity can reasonably be performed without collecting additional personal information, we will seek to avoid collecting that information.

35. GOVERNING LAW

This Privacy Policy is governed by the laws of the **Republic of South Africa**.

Nothing in this Policy limits any right or protection that cannot lawfully be excluded under POPIA or any other applicable legislation.

36. CONTACT DETAILS

For membership, privacy or personal-information enquiries:

Free Democrats of South Africa

Information Officer: [Dr. Johan Reid]

Email: [drjreid@telkomsa.net]

Telephone: [021 949 2067 / 083 636 0893]

Postal address: [16 Solway, Bellville, 7530]

Website: [<https://freedemocratsza.com/>]

Effective date: [21 August 2026]

Last reviewed: [21 August 2026]

Next review: [21 August 2026]

MEMBER PRIVACY ACKNOWLEDGEMENT

When submitting a membership application, the applicant should be presented with a clear notice substantially to the following effect:

Privacy acknowledgement: I understand that the Free Democrats will process my personal information for the purposes of administering my membership and conducting its lawful organisational and political activities. I understand that information concerning my political affiliation may constitute special personal information under POPIA and that the Free Democrats may process such information where authorised by law, including section 31 of POPIA. I have read or have been given access to the Free Democrats Membership Privacy Policy and understand my rights concerning my personal information.