



WILL OF AFRICA PTY LTD

PRIVACY POLICY

Document Reference: WOA-PP-001 v1.0

Effective Date: April 2026

Classification: Public

LEGISLATIVE BASIS: This document is prepared in compliance with the Protection of Personal Information Act 4 of 2013 (POPIA) and, where applicable, the Promotion of Access to Information Act 2 of 2000 (PAIA).

PART 1: PURPOSE AND SCOPE

Section 1: Purpose

This Privacy Policy describes how Will of Africa Pty Ltd ("Will of Africa", "we", "us", "our") collects, uses, stores, and shares personal information when you register for or use our Learning Management System (LMS) at woat.africa. It is prepared in compliance with POPIA, section 18.

Section 2: Scope

This policy applies to all individuals who interact with our LMS, website, or any associated services, including:

- Individual learners registering for courses
- Corporate clients enrolling employees
- Website visitors

Section 3: Who We Are

Company	Will of Africa Pty Ltd
Website	woat.africa
Physical Address	Farm 210, Kromdraai 292-JS, eMalahleni, 1035
Information Officer	Petrus Wilhelm Jansen
Contact Email	willofafrica@gmail.com
Contact Phone	+27 82 401 0880

POPIA NOTE: The Information Officer is registered with the Information Regulator of South Africa as required by POPIA, section 55.

Section 4: Definitions

Term	Meaning
Data Subject	The natural person to whom the personal information relates.
Information Officer	The person designated and registered under POPIA to manage data compliance.
LMS	The online Learning Management System operated by Will of Africa at woat.africa.
Personal Information	Information relating to an identifiable, living natural person as defined in POPIA, section 1.
POPIA	Protection of Personal Information Act 4 of 2013.
Processing	Any operation performed on personal information, including collection, storage, use, or deletion.

PART 2: INFORMATION WE COLLECT

POPIA NOTE: We collect only the minimum personal information necessary for the purposes described below, in accordance with POPIA, section 10 (Minimality Principle).

Section 5: Categories of Personal Information Collected

5.1 Identity and Contact Information

- Full name
- Email address
- Phone number
- Physical address
- South African ID number
- Title (e.g. Mr, Ms, Dr)
- Date of birth
- Gender

5.2 Professional and Vehicle Information

- Company name and VAT number (corporate clients)
- Vehicle details: make, model, and registration number
- Driver's licence number

5.3 Emergency Contact Information

Name and contact details of your designated emergency contact person.

5.4 Training and Course Data

- Course enrolment and progress records
- Assessment and quiz results
- Course completion certificates (which contain your name and ID number)

5.5 Technical and Usage Data

- IP address and browser type (via Google Analytics)
- Pages visited and time spent on site
- Cookie identifiers — see our Cookie Policy (WOA-CP-001)

5.6 Payment Information

NOTICE: Payment transactions are processed by Paystack (Paystack South Africa (PTY) Ltd). Will of Africa does not store your full banking or card details. Paystack hosts payment data on Amazon Web Services (AWS) servers located in Ireland (European Union). This constitutes a trans-border transfer of personal information, lawful under POPIA section 72(1)(a) because Ireland is subject to the EU General Data Protection Regulation, which provides a level of data protection substantially similar to POPIA. Paystack's own privacy policy applies to all payment data.

PART 3: WHY WE COLLECT AND HOW LONG WE KEEP YOUR INFORMATION

Section 6: Purpose of Processing

We collect and process your personal information for the following lawful purposes (POPIA, section 13):

1. To register and administer your account on our LMS
2. To deliver training courses and track your learning progress
3. To issue course completion certificates
4. To process payments for course enrolments
5. To communicate course updates, administrative notices, and relevant training information
6. To comply with applicable laws and industry training requirements
7. To improve our website and course content via analytics
8. To contact your emergency contact person in the event of a training incident

Section 7: Legal Basis for Processing

Legal Basis	Application
Consent (POPIA, s11(1)(a))	You have given consent at the point of registration.
Contractual Necessity (POPIA, s11(1)(c))	Processing is required to fulfil the training services you have purchased.
Legal Obligation (POPIA, s11(1)(b))	We may be required to retain certain records under applicable law.
Legitimate Interest (POPIA, s11(1)(f))	To improve our services and maintain the security of our systems.

Section 8: Retention of Personal Information

We retain your personal information for a period of 5 (five) years after your last course interaction or the termination of your account, whichever is later. After this period, your data will be securely deleted or anonymised unless we are required by law to retain it longer.

Physical records (such as training forms) are retained for the same 5-year period and then securely destroyed.

Section 9: Third Parties With Whom We Share Your Information

We do not sell your personal information. We may share it with the following third parties, strictly for the purposes described above:

Third Party	Purpose	Notes
Paystack	Payment processing	Hosted on AWS servers in Ireland (EU). Trans-border transfer under POPIA s.72(1)(a). Subject to Paystack's own Privacy Policy.
Google Analytics	Website usage analytics	Data may be transferred outside South Africa
YouTube (Google)	Embedded training videos	Subject to Google's Privacy Policy
Uncanny Automator	LMS email communications and group enrolment	Within the LMS platform
WP Mail SMTP	Transactional email delivery	Email delivery only
WooCommerce (future)	E-commerce and course sales	When implemented
Employer (Corporate Clients)	Attendance registers, memorandums, and certificates shared with the client (employer) who enrolled the learner	Only where learner was enrolled by corporate client

Third Party	Purpose	Notes
Relevant Accreditation Body	Submission of training records and certificates for accreditation and certification purposes	Only where applicable to the specific course and certification

NOTICE: Where third parties are located outside South Africa, we take reasonable steps to ensure an adequate level of protection for your data in accordance with POPIA, section 72.

PART 4: YOUR RIGHTS AND HOW TO EXERCISE THEM

POPIA NOTE: As a data subject, you have the following rights under POPIA. These rights are subject to applicable limitations and legal retention obligations.

Section 10: Data Subject Rights

Right	Description	POPIA Reference
Right of Access	Request a copy of the personal information we hold about you.	Section 23
Right to Correction	Request that inaccurate or incomplete information be corrected.	Section 24
Right to Deletion	Request that your information be deleted, subject to legal retention obligations.	Section 24
Right to Object	Object to processing of your personal information in certain circumstances.	Section 11
Right to Complain	Lodge a complaint with the Information Regulator of South Africa.	Section 74

Section 11: How to Exercise Your Rights

To exercise any of the above rights, please contact our Information Officer:

Information Officer	Petrus Wilhelm Jansen
Email	willofafrica@gmail.com
Phone	+27 82 401 0880
Response Period	30 days from receipt of request (extendable by a further 30 days for complex requests)

Section 12: Information Regulator

If you believe your rights have been violated, you may contact the Information Regulator of South Africa:

Website	www.justice.gov.za/infoereg/
Email	infoereg@justice.gov.za
Address	JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

PART 5: SECURITY, COOKIES AND POLICY CHANGES

Section 13: Security Measures

We implement reasonable technical and organisational measures to protect your personal information against unauthorised access, loss, or destruction, including:

- Password-protected systems and access controls
- Role-based access to personal data within the LMS
- Secure physical storage for paper records
- Regular review of security practices

NOTICE: In the event of a data breach that poses a risk to data subjects, Will of Africa will notify the Information Regulator and affected data subjects in accordance with POPIA, section 22.

Section 14: Cookies

Our website uses cookies. Please refer to our Cookie Policy (Document Reference: WOA-CP-001) available at woat.africa for full details.

Section 15: Changes to This Policy

We may update this Privacy Policy from time to time. The updated version will be posted on our website with a revised effective date. Continued use of our LMS after changes constitutes acceptance of the updated policy. Material changes will be communicated to registered users via email.

Section 16: Contact Us

Company	Will of Africa Pty Ltd
Address	Farm 210, Kromdraai 292-JS, eMalahleni, 1035
Email	loekie@willofafrica.co.za
Phone	+27 83 629 9945

Approval

FOR: WILL OF AFRICA PTY LTD	
Name:	<u>Petrus Wilhelm Jansen</u>
Designation / Title:	<u>Director(CEO)</u>
Signature:	
Date:	<u>2026/04/30</u>
Place:	<u>Emalahleni</u>

Version History

Version	Date	Author	Approved By	Changes
1.0	April 2026	Egan Tarr	Will Jansen	Initial release — POPIA compliant