

PRIVACY POLICY

Version: 1.0

Swakahle Nhlaluko Skylar Magazine(Pty)Ltd (trading as “Sky Magazine” / “Sky Events”)

Effective date: 15/12/2025 Last updated: 29/7/2026

1. Introduction

Swakahle Nhlaluko Skylar Magazine (Pty) Ltd (“Sky Magazine”, “we”, “us”, “our”) respects your privacy and is committed to protecting your personal information.

This Privacy Policy explains how we collect, use, share, store and protect your personal information when you visit our website, place an order, submit photographs or content for a personalised magazine, contact us on WhatsApp, or otherwise engage with us.

We process personal information in accordance with the Protection of Personal Information Act 4 of 2013 (“POPIA”), the Electronic Communications and Transactions Act 25 of 2002 (“ECT Act”), and the Consumer Protection Act 68 of 2008 (“CPA”).

This Policy should be read together with our Terms and Conditions.

2. Responsible Party and Information Officer

Responsible Party:

Registered name	Swakahle Nhlaluko Skylar Magazine (Pty) Ltd
Registration number	2025/854960/07
Trading as	Sky Magazine / Sky Events
Registered address	149 Main Road, Rondebosch, Cape Town South Africa
Website	www.skymagazine.co.za

Name	Phakelo Brian Mabasa
Position	Director
Email	phakelomabasa@skymagazine.co.za
Telephone	+27 68 662 9703

Information Officer:

In terms of section 55 of POPIA, the Information Officer of a private body is by default the head of that body (i.e. the chief executive or equivalent).

3. What personal information we collect

We collect only the personal information reasonably necessary for the purposes set out in this Policy.

3.1 Information you give us directly

- Identity and contact details: full name, email address, mobile number
- Delivery details: physical or Paxi/courier collection address
- Order details: products ordered, order history, personalisation preferences, occasion details (e.g. birthday, wedding, memorial, corporate event)
- Content you submit for your magazine: photographs, images, captions, names, dates, dedications, messages, personal stories, and any other content you upload or send us
- Communications: messages, enquiries and correspondence via our website forms, email, WhatsApp, or social media

3.2 Information collected automatically

IP address, device type, browser type and operating system

Pages visited, time on site, referring URL

Cookie and analytics data (see section 9)

3.3 Payment information

Payments are processed by our third-party payment provider, PayFast (Pty) Ltd. We do not collect, receive or store your full card number, CVV or banking credentials. We receive only a transaction reference, payment status, amount and the billing name/email associated with the transaction.

4. Photographs and content you submit — special provisions

Personalised magazines are, by their nature, built from personal content. This section explains how we handle it.

4.1 Sensitivity

Photographs and personal narratives may reveal information about you or others that POPIA treats as special personal information under section 26 — including information that may reveal race or ethnic origin, religious or philosophical beliefs, or health. Where you submit such content, you consent to us processing it solely for the purpose of producing your magazine.

4.2 Your warranty regarding other people

Where the content you submit depicts or refers to any person other than yourself, you warrant that:

(a) you have obtained the informed consent of that person to have their image, name and details reproduced in a printed publication; and (b) where that person is a child under the age of 18, you are either their parent or legal guardian, or you have obtained the express consent of their parent or legal guardian.

We rely on this warranty. You indemnify Sky Magazine against any claim arising from a breach of it.

4.3 Children's personal information

Section 34 of POPIA prohibits the processing of a child's personal information unless a lawful ground applies — including the prior consent of a competent person (a parent or legal guardian). Because our products frequently feature children, we process a child's personal information only on the basis of the consent given by the customer in terms of clause 4.2, in their capacity as parent, guardian or as an authorised person.

If you believe we hold a child's personal information without the necessary consent, contact our Information Officer immediately and we will delete it.

4.4 We do not use your content for marketing without consent

We will not publish, display or reuse your photographs, magazine content or personal story in any marketing material, portfolio, website gallery or social media post unless you have given us separate, specific, written consent to do so. That consent is optional, is never a condition of purchase, and may be withdrawn at any time.

4.5 Deletion of submitted content

We delete original uploaded photographs and source files 6 months after your order is delivered, unless you ask us in writing to retain them for reprints. Print-ready artwork files are retained for 12 months to enable reprints and to resolve quality disputes.

5. Why we process your personal information (purpose and lawful basis)

Purpose	Lawful basis (POPIA s11)
Creating and printing your personalised magazine	Necessary to perform the contract with you
Processing payment and issuing invoices	Contract performance; legal obligation
Delivering your order (shared with couriers)	Contract performance
Customer service and order updates (incl. WhatsApp)	Contract performance; legitimate interest
Keeping accounting records and tax compliance	Legal obligation (Companies Act, Tax Administration Act, VAT Act)
Fraud prevention and site security	Legitimate interest
Direct marketing to existing customers	Legitimate interest / s69(3) — with opt-out
Direct marketing to non-customers	Consent
Website analytics and improvement	Consent (non-essential cookies)
Using your content in our marketing	Separate express consent

We do not use your personal information for automated decision-making that produces a legal effect for you.

6. Who we share your information with

We share personal information only with the following categories of recipients, and only to the extent necessary:

Operators (processors acting on our instruction):

Recipient	Purpose	Location
PayFast (Pty) Ltd	Payment processing	South Africa
HostAfrica (Pty Ltd)	Website and database hosting	RSA
Google (Google Drive / Workspace)	Storage of uploaded photographs and files	Outside SA
Swakahle Nhaluko Skylar Magazine (Pty) Ltd	Magazine design and layout	Outside SA
Meta Platforms / 360dialog	WhatsApp Business messaging	Outside SA
Make.com (Celonis)	Order workflow automation	Outside SA
Anthropic PBC	AI-assisted customer messaging ("Skye")	Outside SA
Paxi / PostNet / The Courier Guy / Any other option chosen by customer	Delivery	South Africa
Swakahle Nhaluko Skylar Magazine (Pty) Ltd	Printing and finishing	South Africa
Swakahle Nhlaluko Skylar Magazine (Pty) Ltd	Layout and artwork	South Africa

Others:

- Our accountants, auditors and legal advisers, under duty of confidentiality

- Law enforcement, regulators or courts, where we are legally obliged to disclose
- A purchaser of our business, in the event of a sale or restructure

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

All operators are required, in terms of section 21 of POPIA, to process personal information only on our instruction and to maintain appropriate security safeguards. Written operator agreements are in place or are being concluded with each of the above.

7. Cross-border transfers

Several of our service providers store or process data outside South Africa. In terms of section 72 of POPIA, we transfer personal information across borders only where:

(a) the recipient is subject to a law, binding corporate rules or a binding agreement providing an adequate level of protection substantially similar to POPIA; or (b) the transfer is necessary for the performance of our contract with you; or (c) you have consented to the transfer.

Where we rely on (a), we do so on the basis of the standard contractual terms and data protection addenda published by the relevant provider.

8. Direct marketing

Existing customers: In terms of section 69(3) of POPIA, we may send you electronic marketing about our own similar products where you are an existing customer, you gave us your details in the course of a sale, and you were given a reasonable opportunity to object at the time of collection and in every subsequent message.

Non-customers: We will only send you electronic direct marketing if you have given prior consent.

Opting out: Every marketing email contains an unsubscribe link. Every marketing WhatsApp contains a STOP instruction. You may also email [INSERT EMAIL] at any time. Opting out of marketing does not stop transactional messages about orders you have placed.

We also comply with section 45 of the ECT Act and the opt-out register contemplated in section 11 of the CPA.

9. Cookies

Our website uses cookies. Strictly necessary cookies (session, cart, security) are used without consent as the site cannot function without them. Analytics, performance and marketing cookies are set only with your consent via our cookie banner.

You can withdraw cookie consent at any time via [INSERT — cookie settings link] or by clearing cookies in your browser. Blocking necessary cookies may prevent checkout from working.

10. How long we keep your information

Category	Retention period
Uploaded photographs and source content	[6 months] after delivery
Print-ready artwork	[12 months] after delivery
Order and transaction records	5 years — Companies Act 71 of 2008 and Tax Administration Act 28 of 2011
Invoices and VAT records	5 years from date of submission of the relevant return
Marketing contact details	Until you unsubscribe, then suppression-list only
Website analytics	=< 2 years
Customer service correspondence	3 years

Where a longer period is required by law, the legal period prevails. When a retention period expires, we delete or de-identify the information.

11. How we protect your information

In terms of section 19 of POPIA we maintain appropriate, reasonable technical and organisational measures, including:

- HTTPS/TLS encryption across the website and checkout
- Multi-factor authentication on hosting, email, cloud storage and payment accounts
- Access to customer photographs restricted to staff and contractors who need it for a specific order
- Password-managed credentials; no shared logins
- Regular software, plugin and dependency updates
- Backups of the website and order database
- Confidentiality and data protection obligations in contractor agreements

No system is completely secure. We cannot guarantee absolute security, but we take our obligations seriously and review our safeguards regularly.

12. Security compromises

If we have reasonable grounds to believe that your personal information has been accessed or acquired by an unauthorised person, we will, as required by section 22 of POPIA, notify the Information Regulator and notify you as soon as reasonably possible after discovering the compromise. Our notification to you will describe the possible consequences, the measures we intend to take, what you can do to mitigate harm, and, if known, the identity of the unauthorised person.

13. Your rights

Subject to POPIA and the Promotion of Access to Information Act 2 of 2000 ("PAIA"), you have the right to:

1. Be notified that we are collecting your information, and of a security compromise
2. Request confirmation, free of charge, of whether we hold personal information about you
3. Request access to that information (a prescribed fee may apply)
4. Request correction, deletion or destruction of information that is inaccurate,

irrelevant, excessive, out of date, incomplete, misleading or unlawfully obtained

5. Object to processing on reasonable grounds
6. Withdraw consent where processing is based on consent — this does not affect processing already carried out
7. Object to direct marketing at any time
8. Complain to the Information Regulator
9. Institute civil proceedings regarding an alleged breach

How to exercise your rights: email our Information Officer at [INSERT EMAIL]. Requests for access, correction or deletion must be made on the prescribed forms:

- Form 2 (Request for correction or deletion) — Regulations under POPIA
- PAIA Form C (Request for access to a record of a private body)

We will respond within the periods prescribed by POPIA and PAIA. We may require proof of identity before acting on a request.

14. Complaints to the Information Regulator

If you are not satisfied with how we have handled your personal information or your request, you may lodge a complaint with:

The Information Regulator (South Africa) JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001 P.O. Box 31533, Braamfontein, Johannesburg, 2017 Tel: 010 023 5200
General enquiries: enquiries@inforegulator.org.za Complaints: complaints.IR@inforegulator.org.za Website: <https://inforegulator.org.za>

15. PAIA Manual

Sky Magazine maintains a PAIA Manual in terms of section 51 of PAIA, available on request from the Information Officer.

16. Changes to this Policy

We may update this Policy from time to time. The current version will always be available on our website with the effective date shown at the top. Where changes are material, we will notify you by email or a prominent notice on the site.

17. Contact us

Information Officer: Phakelo Mabasa

Email: admin@skymagazine.co.za

Telephone: +27 68 226 9703

Address: 149 Main Road, Rondebosch, Cape Town