

**SEC 5.1 OF POPI COMPLIANCE MANUAL**

**REVISION 0 1 JULY 2021**

**BEAVERCREEK FARMS (PTY) LTD  
Trading as: Rooiberg Lodge**

**Registration Number: 2004/025378/07**

**(“BEAVERCREEK”)**

**PRIVACY POLICY**

The Information Officer recommends the adoption of the policy:

DESIGNATION	APPROVAL DATE	SIGNATURE
Board of directors		
Date of next review		

**Note:**

This policy is supported or expanded on by way of other policies recorded in the Beaver creek’s POPI Compliance Manual.

**1. PRIVACY POLICY STATEMENT**

1. Beaver creek is committed, in line with the Protection of Personal Information Act, No 4 of 2013 (“POPI Act”), to protecting the privacy of all its data subjects (such as you), and which in particular include all members, customers, employees, service providers or members of the public with whom Beaver creek interacts.
2. Personal information is information that personally identifies you (e.g. telephone number, name, address, transaction history etc.) (“Personal Information”), but, depending on the purpose for which it is required, may include more sensitive information, such as biometrical information and financial information. This policy describes how and why we collect, store, use, share or otherwise process your Personal Information. It also explains your rights in relation to your Personal Information and how to contact us if you have a question or complaint.

3. Any information that is freely available or accessible in the public domain or furnished under the PAIA or any other law shall not be regarded as sensitive Personal Information.
4. This Policy is applicable to Personal Information collected by Beavercreek directly from data subjects or through the Beavercreek's website, online portals, electronic communications and information collected by Beavercreek's server from the data subject's browser.
5. This Privacy Statement only applies to Beavercreek. It does not apply to other online or offline websites, products or services. Please read the complete Privacy Policy.
6. You may be required as a pre-condition for access to the Beavercreek website or for any other type of interaction with Beavercreek, to accept the terms of this Privacy Policy or any other policy or procedure enforced to safeguard Personal Information.
7. This Privacy Policy is subject to the POPI Act and the eight conditions described therein for the protection of Personal Information.

## **2. COLLECTION OF YOUR PERSONAL INFORMATION**

- 2.1. Personal Information collected by Beavercreek may include a wide range of information, depending on the requirements of a function, service, or product provided directly, or in relation you.
- 2.2. **Depending on the circumstances**, Beavercreek may typically collect and process, but not necessarily limited to, the following Personal Information about you:
  - 2.2.1. Your name and contact information, including your email address, telephone number, physical address, postal address and other location information;
  - 2.2.2. Your date of birth, age, gender, race, nationality, title and language preferences;
  - 2.2.3. Your identity number, passport number and photograph;
  - 2.2.4. Your vehicle registration number, vehicle licence and driving licence;
  - 2.2.5. Your biometric information, including but not limited to, if applicable, that information obtained from your fingerprints, hands, facial recognition and/or retinal scanning;

2.2.6. Your banking and other financial details;

2.2.7. Your employment details;

2.2.8. Correspondence from you of a private or confidential nature;

2.2.9. such other personal information as is reasonably required by us to engage with you and/or provide services to you.

2.3. Beavercreek may collect or obtain Personal Information about you in various ways, including, but not necessarily limited to:

2.3.1. from you directly;

2.3.2. during the course of our interactions with you;

2.3.3. when you visit the Lodge;

2.3.4. when you visit and/or interact with our website or any other social media platforms or IT services;

2.3.5. from publicly available sources; and

2.3.6. from a third party who is authorised to share that information;

2.3.7. via a mobile or other software app developed for the Lodge;

2.3.8. optional information that you voluntarily provide to us.

### **3. USE OF YOUR PERSONAL INFORMATION**

3.1. Beavercreek's use of the Personal Information depends on the relationship we have with you. The POPI Act requires that Personal Information "is collected for a specific, explicitly defined and lawful purpose related to a function or activity of the responsible party."

3.2. Beavercreek uses your personal information for the following, not necessarily exhaustive list of purposes:

3.2.1. To effectively and efficiently provide, and deliver, Beavercreek products and services to you;

3.2.2. To maintain internal records as per regulatory guidelines;

3.2.3. To comply with all laws, regulations, policies and procedures applicable to Beavercreek;

- 3.2.4. For recognition of the member/customer when he/she conducts online banking;
  - 3.2.5. To understand the needs and provide relevant product and service offers;
  - 3.2.6. To ensure our website is relevant to your needs;
  - 3.2.7. To assist us to create and publish content most relevant to you;
  - 3.2.8. To alert or inform you of products, services, updated or new information with regard to Beavercreek;
  - 3.2.9. To allow you access to limited-entry areas of our website as appropriate.
- 3.3. Should Beavercreek wish to use your Personal Information for any other reason, we will provide you with an opportunity to decline this service or such use.
- 3.4. Beavercreek may merge site-visitation data with anonymous demographic information for research purposes, and we may use this information in aggregate to provide more relevant content.
- 3.5. In some limited-entry sections of Beavercreek's website, we may with your prior approval, combine site-visitation data with your Personal Information in order to provide you with personalised content. If you decline permission, Beavercreek will not provide you the personalised service and won't merge your Personal Information with site-visitation data.
- 3.6. Beavercreek may from time-to-time contract other entities to provide services or products on its behalf, and will only provide those entities the Personal Information they need to deliver the service or product. They will be prohibited from using such Personal Information for any other purpose.
- 3.7. Depending on the circumstances, Beavercreek may disclose your Personal Information to the following categories of persons:
- 3.7.1. Auditors, legal and other professional advisers and consultants of Beavercreek or other third parties and service providers who assist us to deliver products or services, including the Beavercreek's managing agents, employees, the board of directors and all of its committees;
  - 3.7.2. Information technology and other service providers who assist Beavercreek to operate the Lodge or otherwise manage or store the personal information;
  - 3.7.3. Government and law enforcement authorities;
  - 3.7.4. Financial institutions;
  - 3.7.5. Affiliated entities (such as clubs or body corporates on the Lodge);

3.7.6. Other third parties where disclosure is required by law or otherwise required for us to perform our obligations and provide our products and services; and

3.7.7. To any other person with your consent to the disclosure.

3.8. Beavercreek may disclose your Personal Information if required to do so by law or in the good-faith belief that such action is necessary to:

3.8.1. conform to the edicts of the law or comply with legal processes served on Beavercreek;

3.8.2. protect and defend the rights or property of Beavercreek and its website; or

3.8.3. act in urgent circumstances to protect the personal safety of Beavercreek's employees, members, users of our products or services or members of the public.

#### **4. CONTROL OF YOUR PERSONAL INFORMATION**

4.1. Beavercreek will take reasonable steps to protect the confidentiality and security of your Personal Information when it is disclosed to a third party and will seek to ensure that such third-party deals with your information in accordance with our instructions, applicable privacy laws, and only for the purpose for which it is disclosed.

4.2. When you book on our website, or otherwise give us Personal Information, Beavercreek will not share that Personal Information with third parties without your permission, other than for the limited exceptions already listed, and will only be used for the purposes stated above.

#### **5. SECURITY OF YOUR PERSONAL INFORMATION**

5.1. Beavercreek is committed to protecting the security of your Personal Information. We use a variety of security technologies and procedures to protect your Personal Information from unauthorised access, use, disclosure, destruction or alteration.

5.2. Beaver creek for instance stores the Personal Information you provide in computer servers with limited access that are located in controlled facilities. The transmission of sensitive information (such as a credit card number) over the internet, is protected through the use of encryption.

5.3. Data transmission across the internet is inherently insecure and therefore, although Beaver creek strive to use commercially acceptable means to protect your Personal Information, we cannot guarantee that your Personal Information will always remain private.

## **6. PROTECTION OF CHILDREN'S PERSONAL INFORMATION**

Beaver creek has a general audience website and may as a consequence collect Personal Information from children, along with other forms of interaction in the rendering of services and products. To the extent that Personal Information is collected and processed from children, such will be done in terms of the POPI Act and Beaver creek's Child Protection Policy for Personal Information.

## **7. ACCURACY**

Beaver creek will endeavour to keep Personal Information accurate, complete, and up to date as may be required for its use and Beaver creek may accordingly from time to time request you to update your Personal Information. If at any time there is a reason to believe that Personal Information residing with Beaver creek is incorrect, the data subject should inform Beaver creek in this regard. Beaver creek shall correct the erroneous information as quickly as possible.

## **8. RETENTION**

Beaver creek will only retain your Personal Information for as long as it is necessary to fulfil the purposes for which it was obtained, or to comply with applicable legal, tax or accounting requirements. Beaver creek maintains a Document Retention Policy for this purpose.

## 9. PERSONAL INFORMATION OUTSIDE SOUTH AFRICA.

- 9.1. Information that you provide may be hosted and stored in countries internationally, or Beaver Creek may in certain instances transmit or transfer Personal Information outside South Africa, and where such a foreign country's data protection laws may not be the same as those that are in force in South Africa.
- 9.2. When Beaver Creek transmits Personal Information to a foreign country, we will take appropriate safeguards to protect your Personal Information to ensure that the recipient will handle the information in a manner consistent with this policy and the level of protection provided for in the POPI Act.
- 9.3. Beaver Creek may offer goods or services to European Union residents, and in fact have members that are EU residence, and hence the European Union's General Data Protection Regulation ("GDPR") may in such instances apply in the processing of Personal Information. A comforting fact for European residence, is the deliberate synergy that already exists between the POPI Act and the GDPR, and which makes this Privacy Policy already compliant. In the application of this Privacy Policy, we will nevertheless continue to consider the implications of the GDPR in the processing of Personal Information of EU residence.

## 10. USE OF COOKIES

- 10.1. When someone visits the Beaver Creek website, a cookie may be placed on the visitor's machine (if the visitor accepts cookies) or is read if the visitor has visited the site previously. The use of cookies is to assist in the collection of the site visitation statistics described above.
- 10.2. Beaver Creek may also use cookies to collect information on which newsletter links are selected by visitors. This information is used to ensure that we are sending information which users want to read. It is collected in aggregate form and never linked with your Personal Information, unless with your prior consent.
- 10.3. Web beacons, also known as clear gif technology, or action tags, may be used to assist in delivering the cookies on our site. This technology tells us how many visitors selected key elements (such as links or graphics) on Beaver Creek's website. We do not use this technology to access your personally identifiable information on our website. It is merely a tool we use to compile aggregated statistics about Beaver Creek's website usage. We may share aggregated site statistics with partner companies, but do not allow other companies to place clear gifs on our website.

10.4.If you choose to not have your browser accept cookies from Beavercreek's website, you will be able to view the text on the screens, however you will not experience a personalised visit nor will you be able to subscribe to the service offerings on the site.

## **11. YOUR RIGHTS**

11.1.You have the right to request, from us, a description and/or record of your Personal Information that we hold. Depending on the format required, provision of this information may be subject to the payment of a reasonable administrative fee to be determined by Beavercreek and the supply of appropriate evidence of your identity.

11.2.If you wish to update your Personal Information or if you want us to delete your Personal Information entirely, please send us a written request to addressee as set out below with your full contact details. Please note that we will not delete Personal Information that we are required to retain for our business operations or for legal compliance.

11.3.If a data subject does not wish to provide consent for usage of its Personal Information or later withdraws the consent, Beavercreek shall have the right not to provide services or to withdraw the services for which the information was sought from the data subject.

11.4.Should you believe that we have not complied with the POPI Act in the processing of your Personal Information, you have the right to contact the Information Regulator in this regard. The Information Regulator can be contacted by email: [inforeg@justice.gov.za](mailto:inforeg@justice.gov.za) or by telephone: 012 406 4818.

11.5.You may at any time object to the processing of your Personal Information by submitting such objection to the Information Officer at the contact details provided below. The same applies to the exercising of any of your other rights and the submitting of any queries regarding the Personal Information that we hold about you.

## **12. THIRD PARTY WEBSITES**

Beavercreek may permit third parties to link to this website or to post a link to their website on ours. Unless expressly stated otherwise, we have no control over and accept no responsibility for the privacy practices of any third-party websites to which links may have



been provided and we recommend that you review the privacy policy of any website you visit before using that website. This privacy policy applies only to our website.

### 13. CHANGES TO THIS PRIVACY POLICY

From time to time and without notice, Beaver Creek may amend to this Privacy Policy to reflect any changes to our privacy practices. When we do, we will also reflect the revision date at the top of the Privacy Policy. For material changes to this Policy, Beaver Creek will place notifications thereon prominently on its website.

### 14. CONTACT INFORMATION

Beaver Creek welcomes your comments regarding this Privacy Statement, please contact us by e-mail or postal mail.

<b>Information Officer Name:</b>	<b>Mr. Deon Wahl</b>
<b>Information Officer E-mail:</b>	<b>deon@rooiberglodge.co.za</b>
<b>Deputy Information Officer Name:</b>	<b>Mrs Rudi Hartung</b>
<b>Deputy Information Officer E-mail:</b>	<b><a href="mailto:info@rooiberglodge.co.za">info@rooiberglodge.co.za</a></b>
<b>Physical Address:</b>	<b>Assegaay Bosch Ranch, Vanwyksdorp</b>
<b>P.O. Box:</b>	<b>P.O. Box 1, Vanwyksdorp, 6690</b>
<b>Telephone:</b>	<b>+27 87 802 3578</b>
<b>Website:</b>	<b><a href="http://www.rooiberglodge.co.za">www.rooiberglodge.co.za</a></b>