

# PRIVACY POLICY of Turtle Creek Golf Estate (Pty) Ltd, T/A Goose Valley Golf Club

## Application

The Privacy Policy applies to personal information collected by the club, as the club is an applicable organisation under the Protection of Personal Information Act No. 4 of 2013 (POPI), which governs the way private sector organisations collect, use, keep secure and disclose personal information.

Turtle Creek Golf Estate (Pty) Ltd shares your concern about the protection of your information and is committed to safeguarding your privacy. This is our policy regarding the privacy of information we collect. We will not trade, sell or lease the personal information you entrust to us. Please read this carefully to understand how your personal information will be treated.

## The Privacy Policy outlines:

### 1. Personal information

#### 1.1. What is Personal Information?

- a. Personal information is defined as an identifiable living **natural person**; and where **applicable** an identifiable **juristic person**
- b. Some examples of personal information are your name, residential address, email address, bank details, photos and opinions on your likes and dislikes that can identify you (see paragraph 3.2 below).

### 2. Special Personal/Sensitive Information

#### 2.1 What is Special Personal/Sensitive Information?

- a. Sensitive information is a subset of personal information.
- b. It means information or opinion about an individual's racial or ethnic origin, political opinions, membership of a political organisation, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, criminal record, health information about an individual, genetic information, biometric information that is to be used for the purpose of automated biometric verification or biometric identification or biometric templates.

#### 2.2.1 Collection of Sensitive Information

In general, we attempt to limit the collection of sensitive information we may collect from you, but depending on the uses you make of our facilities or the functions that you perform for us, this may not always be possible and we may collect sensitive information from you in order to carry out the services provided to/from you.

The type of sensitive information we may collect from you or record about you is dependent on the services provided to you by the club and will be limited to the purpose(s) for which it is collected. For example – application for limited membership may require health information.

We will not collect sensitive information from you without your consent.

#### 2.3 Consent to collection of certain types of sensitive information

We may collect certain types of sensitive information where you have consented and agreed to the collection of such information. We will obtain your consent at (or around) the point in time in which we collect the information.

The main type of sensitive information that we may collect (if any) will usually relate to your:

- a. criminal record (if any – if you are nominating for a Board position);
- b. special food or dietary requirements due to medical, cultural or religious reasons;
- c. health or medical information,
- d. financial standing (to qualify for certain membership categories)

but only if the sensitive information is necessary for, or incidental to, the purposes of running our business.

### 3. Collection of your personal information

3.1 We will only collect personal information that is necessary for us to provide our products and services to you. This depends ultimately upon the purpose of collection and we have set out the general purposes of collection below.

3.2 The type of information includes (but is not limited to) the following:

- a. your contact information such as full name (first and last), e-mail address, current postal address, delivery address (if different to postal address) and phone numbers;
- b. details relating to your employment (if applicable) or your previous employment,
- c. your date of birth;
- d. proof of your identity (including, but not limited to, driver's licence, passport, ID Document, birth certificate);
- e. any sensitive personal information listed in paragraph 2.3;
- f. if applicable, emergency contact details;
- g. details required as part of your club membership or handicap status,
- h. whether you participated in any activity or event organised by the club;
- i. photographs or video footage taken at our premises, which may include you;
- j. your opinions, statements and endorsements collected personally or via surveys and questionnaires, including but not limited to your views on the products and services offered by the club; and
- k. if you are requesting products or services from us or we are purchasing goods or services from you, then any relevant payment or billing information (including but not limited to bank account details, direct debit, credit card details, billing address, repayment information and invoice details).

3.3 As far as possible or unless provided otherwise under this privacy policy, we will collect your personal information directly from you. If we collect details about you from someone else, we will, whenever reasonably possible, make you aware that we have done this and the reason for it.

3.4 When you engage in certain activities, such as entering a tournament or promotion, filling out a survey or sending us feedback, we may ask you to provide certain information, which you may withhold or provide at your own discretion. It is optional for you to engage in these activities.

3.5 Depending upon the reason for requiring the information, some of the information we ask you to provide may be identified as mandatory or voluntary. If you do not provide the mandatory data or any other information we require in order for us to provide our services to you, we may be unable to provide or effectively provide our services to you.

3.6 If you use our website, we may utilise "cookies" which enable us to monitor traffic patterns and to serve you more efficiently if you revisit our website. A cookie does not identify you personally but may identify your internet service provider or computer. You can set your browser to notify you when you receive a cookie and this will provide you with an opportunity to either accept or reject it in each instance.

#### 4. Use and disclosure of your personal information

4.1 We will only use or disclose your personal information for the primary purposes for which it was collected or as consented to and/or as set out below.

4.2 You consent to us using and disclosing your personal information to facilitate a purpose in connection with:

- a. if required, the verification of your identity, including the verification of your date of birth, if applicable;
- b. facilitating membership or visitation requirements
- c. provision of our products and services to you, which shall include but is not limited to:
  - i). the administration and management of our products and services, including charging, billing, credit card authorisation and verification, checks for financial standing, credit-worthiness (including but not limited to undertaking an assessment for credit loss and obtaining credit references, if applicable), fraud and collecting debts; and
  - ii). to offer you updates, or other content or products and services that may be of interest to you;
- d. to facilitate the administration, management and improvement of the club, including but not limited to:
  - i). the use of your personal information collected in accordance with paragraph 3.1 in the administration and management of the club;
  - ii). communications between other clubs including but not limited to reciprocal arrangements and sharing of industry news;
  - iii). the management, governance and administration of the club, including but not limited to any management and governance meetings of the club;

- iv). Where email is used by staff or volunteers holding positions of trust to communicate information in order to discharge their duties in that role, they are required to ensure that individual names of recipients are not shown publicly.
  - v). Where possible, email addresses to be under the 'bcc' address section of outgoing emails.
  - vi). Members must not use member email addresses obtained accidentally to communicate with other members unless they have the express permission of that member to receive emails.
- e. if applicable, any requirement to include you in various registers maintained by the club including, but not limited to, the register of excluded persons;
  - f. facilitating medical assistance in the event of a medical emergency, or to provide you with medical treatment as requested by you;
  - g. your participation in any activity or event organised by the club or a third party organisation;
  - h. your ability to attend other Clubs;
  - i. co-ordinating, managing and maintaining good order and security of the club and our premises, which shall include but is not limited to protecting the rights and safety of other parties on our premises;
  - j. investigating and reporting information to third parties regarding any accidents or incidents that may have occurred on our premises;
  - k. the improvement of our services (including to contact you about those improvements and asking you to participate in surveys about our products and services);
  - l. the maintenance and development of our products and services, systems and infrastructure;
  - m. marketing and promotional activities by us and our related bodies (including by direct mail, telemarketing, email, WhatsApp, SMS and MMS messages) such as our newsletters;
  - n. to provide customer service functions, including handling customer enquiries and complaints;
  - o. to offer you updates, or other content or products and services that may be of interest to you;
  - p. our compliance with applicable laws;
  - q. the transfer, and matters in connection with a potential transfer, of the club to another entity; and
  - r. any other matters reasonably necessary to continue to provide our products and services to you.

4.3 We may also use or disclose your personal information and in doing so we are not required to seek your additional consent:

- a. when it is disclosed or used for a purpose related to the primary purposes of collection detailed above and you would reasonably expect your personal information to be used or disclosed for such a purpose (secondary use);
- b. if we reasonably believe that the use or disclosure is necessary to lessen or prevent a serious or imminent threat to an individual's life, health or safety or to lessen or prevent a threat to public health or safety;
- c. if we have reason to suspect that unlawful activity has been, or is being, engaged in; or
- d. if it is required or authorised by law or formally requested by a statutory or regulatory authority.

4.4 In the event we propose to use or disclose such personal information other than for reasons in 4.1, 4.2, and 4.3 above, we will first seek your consent prior to such disclosure or use.

4.5 If you have received communications from us and you no longer wish to receive those sorts of communications, you should contact us via the details set out at the end of this document and we will ensure the relevant communication ceases. Any other use or disclosure we make of your personal information will only be as required by law or by this privacy policy or otherwise with your consent.

## 5. The types of organisations to which we may disclose your personal information

5.1 We may disclose your personal information to other organisations. Examples of organisations and/or parties that your personal information may be provided include:

- a. other Member Clubs;

- b. South African Golf Association (SAGA) and its related bodies;
  - c. Southern Cape Golf Union (SCGU);
  - d. Handicaps Networks Africa (HNA);
  - e. related entities and subsidiaries of the club;
  - f. third parties, such as trade suppliers and club sponsors and
  - g. our contractors and agents, including but not limited to our professional advisors such as accountants, solicitors and auditors or other companies who assist us in providing our products and services to you.
- 5.2 Your personal information is disclosed to these organisations and/or parties only in relation to the goods or services we provide to you or for a purpose permitted by this privacy policy.
- 5.3 We take such steps as are reasonable to ensure that these organisations and/or parties are aware of the provisions of this privacy policy in relation to your personal information.

## 6. Photographs and Closed Circuit Television

- 6.1 We use closed circuit televisions (CCTV) at certain locations throughout our premises (e.g. entry and exit) and surrounding areas. The CCTV is integral to our security system and CCTV images are stored for a minimum “retention period” (unless an incident is identified, in which case the images are archived and retained..
- 6.2 As indicated in paragraph 3.2(i), we may take photographs of you attending our premises, and we may wish to use them for marketing and advertising purposes. Unless you advise us otherwise, you expressly agree and consent to the use of any photographs, which may include you, for the aforementioned purposes, without compensation.

## 7. Direct Marketing

- 7.1 You expressly consent to us using your personal information, including any email address you give to us, to provide you with information and to tell you about our products, services or events or any other direct marketing activity (including third party products, services, and events) which we consider may be of interest to you.
- 7.2 Without limitation clause 7.1, if it is within your reasonable expectations that we send you Direct Marketing Communications given the transaction or communication you have had with us, then we may also use your personal information for the purpose of sending you Direct Marketing Communications which we consider may be of interest to you.
- 7.3 You expressly consent to us disclosing your personal information to other organisations (including but not limited to organisations such as those listed in paragraph 5.1) that may also use your personal information for sending you Direct Marketing Communications.
- 7.4 If at any time, you do not wish to receive any further Direct Marketing Communications from us, or others under paragraph 7.3, you may ask us not to send you any further information about products and services and not to disclose your information to other organisations for that purpose. You may do this at any time by using the “unsubscribe” facility included in the email or by contacting us via the details set out at the end of this document.

## 8. Cross Border Disclosure

- 8.1 Any personal information that you provide to us may be transferred to, and stored at, a destination outside South Africa, where we may utilise overseas data and website hosting facilities or have entered into contractual arrangements with third party service providers to assist us with providing our goods and services to you. Personal information may also be processed by staff or by other third parties operating outside South Africa who work for us or for one of our suppliers, agents, partners or related companies.
- 8.2 By submitting your personal information to us, you expressly agree and consent to the disclosure, transfer, storing or processing of your personal information outside of SA. In providing this consent, you understand and acknowledge that countries outside SA do not always have the same privacy protection obligations as SA in relation to personal information. However, we will take steps to ensure that your information is used by third parties securely and in accordance with the terms of this privacy policy.
- 8.3 If you do not agree to the transfer of your personal information outside SA, please contact us by via the details set out at the end of this document.

## 9. Data quality and security

- 9.1 We have taken steps to help ensure your personal information is safe. You will appreciate, however, that we cannot guarantee the security of all transmissions or personal information, especially where the Internet is involved.

9.2 Notwithstanding the above, we will take reasonable steps to:

- a. make sure that the personal information we collect, use or disclose is accurate, complete and up to date;
- b. protect your personal information from misuse, loss, unauthorised access, modification or disclosure both physically and through computer security methods; and
- c. destroy or permanently de-identify personal information if it is no longer needed for its purpose of collection.

9.3 However, the accuracy of this information depends largely on the information you provide to us, so we recommend that you:

- a. let us know if there are any errors in your personal information; and
- b. keep us up-to-date with changes to your personal information (such as your name or address).

## 10. Access to and correction of your personal information

10.1 You are entitled to have access to any personal information relating to you which we possess, except in some exceptional circumstances provided by law.

10.2 If you would like access to or correct any records of personal information we have about you, you are able to access and update that information (subject to the above) by contacting us via the details set out at the end of this document.

## 11. Consent

11.1 You are agreeing to the terms of this privacy principle if you visit the club, use our website or by accepting the terms of one of our terms and conditions (relating to a product or service offer) which refer to this privacy policy.

11.2 We reserve the right to modify the privacy policy as our business needs require. We will notify you of such changes (whether by direct communication or by posting a notice on our website), after which, your continued use of our products, services or website or your continued dealings with us shall be deemed to be your agreement to the modified terms. If you do not agree to our continued use of your personal information due to the changes in our privacy policy, please contact us via the details set out at the end of this document.

## 12. Resolving Privacy Complaints

12.1 We have put in place an effective mechanism and procedure to resolve privacy complaints. We will ensure that all complaints are dealt with in a reasonably appropriate timeframe so that any decision (if any decision is required to be made) is made expeditiously and in a manner that does not compromise the integrity or quality of any such decision.

12.2 If you have any concerns or complaints about the manner in which we have collected, used or disclosed and stored your personal information, you can tell us by contacting us.

- Telephone: +27 (44) 533 2391
- Email: [manager@goosevalleygolfclub.com](mailto:manager@goosevalleygolfclub.com)
- Post: PO Box 1320, Plettenberg Bay, 6600

Please mark your correspondence to the attention of the club manager.

12.3 You have a right to lodge a complaint with the Information Regulator for any contravention of POPIA.

- Email: [inforeg@justice.gov.za](mailto:inforeg@justice.gov.za)

### **In order to resolve a complaint, we:**

- a. will liaise with you to identify and define the nature and cause of the complaint;
- b. may request that you provide the details of the complaint in writing;
- c. will keep you informed of the likely time within which we will respond to your complaint; and
- d. will inform you of the legislative basis (if any) of our decision in resolving such complaint

12.4 We will keep a record of the complaint and any action taken in a privacy register.