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PRETORIA COUNTRY CLUB

Standard Website Privacy & Cookies Policy

Where we refer to “process”, it means how we collect, use, store, make available, destroy, update, disclose, or otherwise deal with your personal information. As a general rule, we will only process your personal information if this is required to deliver or offer a service, provide a product, or carry out a transaction.

We may combine your personal information and use the combined personal information for any of the purposes stated in this Privacy Policy.

In this document any reference to “we” or “us” or “our” includes Pretoria Country Club (PCC or the Club).

If you use our services, goods, products, and service channels, you agree that we may process your personal information as explained in this Privacy Policy. Sometimes you may provide us with consent to process your personal information. Read the Privacy Policy carefully because it may limit your rights.

As a Club, this Privacy Policy will apply to the processing of personal information by any member of our club. If we process personal information for another party under a contract or a mandate, the other party’s privacy policy will apply to the processing.

We can change this Privacy Policy from time to time if the law or its business practices requires it.

The version of the Privacy Policy displayed on our website will apply to your interactions with us.

What is personal information?

Personal information refers to any information that identifies you or specifically relates to you. Personal information includes, but is not limited to, the following information about you:

- your marital status (such as married, single, divorced).
- your national origin.
- your age.
- your language, birth, education.

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- your identifying number (such as an employee number, identity number or passport number).
- your email address, physical address (such as residential address, work address or your physical location), telephone number.
- your gender.
- special personal information as explained below.

When will we process your personal information?

We will only process your personal information for lawful purposes relating to the Club if the following applies:

- if you have consented thereto.
- if a person legally authorised by you, the law, or a court has consented thereto.
- if it is necessary to conclude or perform under a contract we have with you.
- if the law requires or permits it.
- if it is required to protect or pursue your, our or a third party's legitimate interest.

What is special personal information?

Special personal information is personal information about the following:

- your race (such as when the Club submits reports to the Department of Labour in which statistical information must be recorded).
- your ethnic origin.

When will we process your special personal information?

We may process your special personal information in the following circumstances:

- if you have consented to the processing.
- if the processing is needed to create, use, or protect a right or obligation in law.
- if the processing is for statistical or research purposes and all legal conditions are met.

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- if the special personal information was made public by you.
- if the processing is required by law.

When and from where do we obtain personal information about you?

- We collect personal information from third parties that are directly integrated with our software platform.
- We collect information about you based on your use of our products, services, or service channels.
- We collect information about you based on how you engage or interact with us, such as via our support desk, emails, letters, telephone calls and surveys.

If the law requires us to do so, we will ask for your consent before collecting personal information about you from third parties.

The third parties from whom we may collect your personal information include, but are not limited to, the following:

- partners of our club for any of the purposes identified in this Privacy Policy.
- your spouse, dependents, partners, employer, and other similar sources.
- people you have authorised to share your personal information, such as a person that makes a travel booking on your behalf or a medical practitioner for insurance purposes.
- attorneys, tracing agents, debt collectors and other persons that assist with the enforcement of agreements.
- payment processing services providers, merchants, banks, and other persons that assist with the processing of your payment instructions, such as EFT transaction partners.
- law enforcement and fraud prevention agencies and other persons tasked with the prevention and prosecution of crime.
- regulatory authorities, industry ombudsman, governmental departments, and local and international tax authorities.
- trustees, executors or curators appointed by a court of law.

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- our service providers, agents and sub-contractors, such as couriers and other persons we use to offer and provide products and services to you.
- courts of law or tribunals.
- participating partners, whether retail or online, in our customer loyalty reward programmes.

What are the reasons for which we need to process your personal information?

We will process your personal information for the following reasons:

- to provide you with products, goods, and services.
- to market our products, goods, and services to you.
- to respond to your enquiries and complaints.
- to comply with legislative, regulatory, risk and compliance requirements (including directives, sanctions, and rules), with voluntary and involuntary codes of conduct and industry agreements or to fulfil reporting requirements and information requests.
- to conduct market and behavioural research, including scoring and analysis to determine if you qualify for products and services or to determine your credit or insurance risk.
- to develop, test and improve products and services for you.
- for historical, statistical and research purposes, such as market segmentation.
- to process payment instruments.
- to create, manufacture and print payment issues (such as a payslip).
- to enable us to deliver goods, documents, or notices to you.
- for security, identity verification and to check the accuracy of your personal information.
- to communicate with you and carry out your instructions and requests.
- for customer satisfaction surveys and promotional offerings.

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- to enable you to take part in customer loyalty reward programmes; to determine your qualification for participation, earning of reward points, and your rewards level; to monitor your buying behaviour with our rewards partners to allocate the correct points or inform you of appropriate products, goods, and services in which you may be interested; or to inform our reward partners about your purchasing behaviour.
- to enable you to take part in and make use of value-added products and services.
- for any other related purposes.

How do we use your personal information for marketing?

- We will do this in person, by post, telephone, or electronic channels, such as SMS, email, and fax.
- In all cases, you can request us to stop sending marketing communications to you at any time.

When how and with whom do we share your personal information?

In general, we will only share your personal information if any one or more of the following apply:

- if you have consented to this.
- if it is necessary to conclude or perform under a contract we have with you.
- if the law requires it.
- if it is necessary to protect or pursue your, our, or a third party's legitimate interest.

What are your duties and rights regarding the personal information we have about you?

You must provide proof of identity when enforcing the rights below.

You must inform us when your personal information changes.

Please refer to our Promotion of Access to Information Act 2 of 2000 Manual (PAIA Manual) for further information on how you can give effect to the rights listed below. Download the PAIA Manual.

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You have the right to request access to the personal information we have about you by contacting us. This includes requesting:

- confirmation that we hold your personal information.
- a copy or description of the record containing your personal information.
- the identity or categories of third parties who have had access to your personal information.

We will attend to requests for access to personal information within a reasonable time. You may be required to pay a reasonable fee to receive copies or descriptions of records or information about third parties.

You have the right to request us to correct or delete the personal information we have about you if it is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, obtained unlawfully, or we are no longer authorised to keep it. You must inform us of your request in writing. Please refer to our PAIA Manual for further information in this regard, such as the process you should follow to give effect to this right. It may take up to 15 business days for the change to reflect on our systems. We may request documents from you to verify the change in personal information.

A specific agreement that you have entered into with us may determine how you must change your personal information provided at the time when you entered into the specific agreement. Please adhere to these requirements. If the law requires us to keep the personal information, it will not be deleted upon your request. The deletion of certain personal information may lead to the termination of your business relationship with us.

You may object on reasonable grounds to the processing of your personal information.

We will not be able to give effect to your objection if the processing of your personal information was and is permitted by law, you have provided consent to the processing, our processing is/was done according to your consent, or the processing is necessary to conclude or perform under a contract with you.

Where you have provided your consent for the processing of your personal information, you may withdraw your consent. If you withdraw your consent, we will explain the consequences to you. We may proceed to process your personal information even if you have withdrawn your consent if the law permits or requires it. It may take up to 15 business days for the change to reflect on our systems, during this time we may still process your personal information. You

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must inform us of any objection in writing. Please refer to our PAIA Manual for further information in this regard, such as the process you should follow to give effect to this right.

You have a right to file a complaint with us or any Regulator with jurisdiction about an alleged contravention of the protection of your personal information by us. We will address your complaint as far as possible.

How do we secure your personal information?

We will take appropriate and reasonable technical and organisational steps to protect your personal information according to industry best practices. Our security measures (including physical, technological, and procedural safeguards) will be appropriate and reasonable. This includes the following:

- keeping our systems secure (such as monitoring access and usage).
- storing our records securely.
- controlling access to our buildings, systems and/or records.
- safely destroying or deleting records.
- ensuring compliance with international ISO security standards.

You can also protect your personal information. Please visit the website of the relevant business you have established a business relationship with for more information.

How long do we keep your personal information?

We will keep your personal information for as long as:

- the law requires us to keep it.
- a contract between you and us requires us to keep it.
- you have consented to us keeping it.
- we are required to keep it to achieve the purposes listed in this Privacy Policy.
- we require it for statistical or research purposes.
- a code of conduct requires us to keep it.

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- we require it for our lawful business purposes.

Take note: We may keep your personal information even if you no longer have a relationship with us for the historical data that may be required by your employer or employee.

What is our cookie policy?

A cookie is a small piece of data sent from our websites or applications to your computer or device hard drive or Internet browser where it is saved. The cookie contains information to personalise your experience on our websites or applications and may improve your experience on the websites or applications. The cookie will also identify your device, such as your computer or smart phone.

By using our websites or applications you agree that cookies may be forwarded from the relevant website or application to your computer or device. The cookie will enable us to know that you have visited the website or application before and will identify you. We may also use the cookie for analytics and to prevent fraud.