



Ceres Golf Club
PRIVACY POLICY

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DEFINITIONS

Some of the key terms that we use in this policy are defined below:

“Club” means Ceres Golf Club;

“personal information” means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to:

- information relating to the race, gender, sex, pregnancy, marital status, national, ethnic, or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;
- information relating to the education or the medical, financial, criminal or employment history of the person;
- any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier, or other particular assignment to the person;
- the biometric information of the person;
- the personal opinions, views or preferences of the person;
- correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
- the views or opinions of another individual about the person; and
- the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person;

“POPIA” means the Protection of Personal Information Act 4 of 2013, as amended from time to time;

“processing” means any operation or activity or any set of operations, whether or not by automatic means, concerning personal information, including:

- the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;
- dissemination by means of transmission, distribution or making available in any other form; or
- merging, linking, as well as restriction, degradation, erasure, or destruction of information.

PURPOSE OF THIS POLICY

2.1 Ceres Golf Estate is committed to complying with the Protection of Personal Information Act 4 of 2013 in relation to the processing of personal information.

2.2 The purpose of this policy is to describe how and why the club collect, store, use, share or otherwise process personal information. It also explains the rights in relation to personal information and how to contact the Information Officer for enquiries or complaints.

THE PERSONAL INFORMATION COLLECTED

3.1 The club collects, but is not limited to, and process the following personal information from a data subject:

- a) Name and contact information, including email address, telephone number, physical address and postal address.
- b) Date of birth, age, gender, race, nationality, title and language;
- c) Identity number, passport number;
- d) Vehicle license plate number;
- e) Banking details (if applicable);
- f) Employment details;
- g) Any correspondence in a private or confidential nature;



- h) such other personal information as is reasonably required by to engage with you and/or provide services to you.

SOURCES OF PERSONAL INFORMATION

4.1 The club gathers Personal Information from several sources, which include directly from data subjects, publicly available sources such as websites, social media, referrals, prospects, conferences and the like. Given that Personal Information can be extracted and/ or obtained from several sources and consolidated into one CRM or other similar systems of record, it may be difficult or impossible to identify the exact source of one particular piece of information e.g.:

- (a) directly from you;
- (b) during the course of our interactions with you;
- (c) when you visit the club;
- (d) when you visit and/or interact with our website or any other social media platforms or IT services;
- (e) from publicly available sources; and
- (f) from a third party who is authorised to share that information;
- (g) via a mobile or other software app developed for the club.

HOW AND WHY PERSONAL INFORMATION IS PROCESSED

5.1 POPIA requires that personal information “is collected for a specific, explicitly defined and lawful purpose related to a function or activity of the responsible party.”

5.2 Further, POPIA provides that personal information may only be processed if:

- a) the data subject or a competent person where the data subject is a child consents to the processing;
- b) processing is necessary to carry out actions for the conclusion or performance of a contract to which the data subject is party;
- c) processing complies with an obligation imposed by law on the responsible party;
- d) processing protects a legitimate interest of the data subject;
- e) processing is necessary for the proper performance of a public law duty by a public body; or
- f) processing is necessary for pursuing the legitimate interests of the responsible party or of a third party to whom the information is supplied.

5.3 Why we collect and use personal information:

- a) Facilitating transactions with data subjects
- b) Fulfilling its contractual obligations to its clients/members and other stakeholders
- c) Complying with the provisions of statute and regulations
- d) Attending to the legitimate interests of data subjects
- e) Identifying prospects for enhanced service delivery and business sustainability
- f) Confirm and verify data subject identity or to verify that they are authorised users for security purposes;
- g) Conduct market or customer satisfaction research
- h) Audit and record keeping purposes
- i) In connection with legal proceedings.

5.4 Other personal information may be collected from time to time, as the club deems necessary for business requirements, or in order to comply with applicable laws.

WHO PERSONAL INFORMATION IS SHARED WITH

6.1 Depending on the circumstances, we may disclose your personal information to the following categories of persons:

- a. Auditors, legal and other professional advisers and consultants of the club or other third parties who help us deliver our services,



- b. Information Technology and other service providers who help us run the club or otherwise manage or store the personal information;
- c. Government and law enforcement authorities;
- d. Financial institutions;
- e. Other third parties where disclosure is required by law or otherwise required for us to perform our obligations and provide our services; and
- f. To any other person with your consent to the disclosure.

6.2 Reasonable steps are taken to protect the confidentiality and security of personal information when it is disclosed to a third party and seek to ensure the third-party deals with personal information in accordance with POPI and only for the purpose for which it is disclosed.

DATA SECURITY

7.1 Personal information is stored in electronic or in hard copy form. We may keep this information at our own premises, or at sites managed by our services providers.

7.2 The club is legally obliged to provide adequate systems, technical and operational protection for the Personal Information that it holds and to prevent unauthorized access to as well as prohibited use of Personal Information. The club will therefore on a regular basis review its security controls and related processes to ensure that the Personal Information of data subjects remains secure.

7.3 The club has conducted an impact assessment across all of its functions and used the findings thereof to manage risk optimally as well as to provide iterative improvements on an ongoing basis. The clubs' policies and procedures cover the following aspects -

- Physical security;
- Computer and network security;
- Access to personal information;
- Secure communications;
- Security in contracting out activities or functions;
- Retention and disposal of information;
- Acceptable usage of personal information;
- Governance and regulatory issues;
- Monitoring access and usage of private information;
- Investigating and reacting to security incidents.

7.4 The club implement appropriate security measures to protect personal information that is in our possession against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, unauthorised access, in accordance with applicable law.

7.5 Where there are reasonable grounds to believe that personal information that is in our possession has been accessed or acquired by any unauthorised person, we will notify the relevant regulator and you, unless a public body responsible for detection, prevention or investigation of offences or the relevant regulator informs us that notifying you will impede a criminal investigation.

PERIOD OF HOLDING PERSONAL INFORMAITON

8.1 The club endeavors to provide the most accurate information possible to stakeholders, including data subjects.

8.2 The club seeks to verify the accuracy of its information as frequently as possible and to remove information that it learns to be inaccurate. Thus, the club intends to process the information it has about data subjects for so long as it is accurate or until the data subject instructs Ceres Golf Club to refrain from processing it – **in order to instruct the club to refrain from collecting and/ or processing Personal Information, it must engage with its Information Officer (IO) in respect of removal.**

8.3 Personal Information shall only be retained and stored for the period for which the information is required to serve the purpose for its collection, or for such period as may be required in terms of statutes such as the Companies Act and various labour laws.



INTERNATIONAL TRANSFER OF PERSONAL INFORMATION

9.1 In some cases, the third parties to whom we may disclose your personal information may be located outside your country of residence (for example, in a cloud service, system or server), and may be subject to different privacy regimes.

9.2 When we disclose personal information overseas, 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 POPIA.

DATA SUBJECT RIGHTS

10.1 Data subjects have the right to request that the club provide them with access to their Personal Information, to rectify or correct their personal information, erase Personal Information or restrict the processing of Personal Information, including refraining from sharing it or otherwise providing it to any third parties. Data subjects also have the right to raise complaints with the Information Regulator. The afore-going rights may be subject to certain limitations pursuant to applicable law. **In order to access any of these rights, engage with its Information Officer.**

10.2 To protect the integrity and security of the information kept, the club may ask that a defined access procedure, which may include steps to verify identity is followed.

10.3 If personal information must be deleted, the club may need to terminate the client/member agreement. The club can refuse to delete personal information if law require that this is retained as per 8.3 or if the clubs rights needs to be protected.

CONTACT US

11.1 If you have a question, concern, or complaint regarding the way in which we handle your personal information, or if you believe that we have failed to comply with this policy or breached any applicable laws in relation to the management of Personal Information, you can make a complaint.

Our Head Office physical address is -

Ceres Golf Club, Mountainview Street, Ceres, 6835, Western Cape, South Africa

Information Officer	Heidi Gough	
Deputy Information Officer		Vickus Filmalter
Email	ceresgolf@polka.co.za	ceresgolf@polka.co.za
Landline	(023)31-23068	(023)31-23068
Mobile	071 283 4234	082 303 1643

CHANGES TO THIS PRIVACY POLICY

12.1 This privacy policy may be changed/updated from time to time if necessary.

SIGN OFF

The signatories hereof, confirm their acceptance of the contents and recommend the adoption of this policy thereof.

Name & Surname	Signature	Date of Approval
President		
Captain		
Vice-Captain		

