



PRIVACY POLICY STATEMENT

Hermanusdoorns Shareblock Ltd

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The law that sparked it all

The Protection of Personal Information Act 4 of 2013 (POPIA) was signed into law by the President on 19 November 2013. It gives effect to the constitutional right to data privacy in terms of Section 14 of the Bill of Rights of the Constitution, as well as potentially exposing all parties who process personal information of data subjects to potential liability.

What this law states

In terms of POPIA everyone has the right to privacy, including the right to the lawful collection, retention, dissemination and use of one's Personal Information. Personal Information is defined as "information which relates to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person". This includes, but is not limited to, names, sex, gender, address, contact details, identity number and medical or health information.

How this law affects us

In order to carry out its aims and objectives as a private game farm and provider accommodation of accommodation in the leisure industry, Hermanusdoorns Shareblock Ltd, and will on an on-going basis receive, provide and process Personal Information.

We are therefore under an obligation to provide any person whose Personal Information is processed by it, (known as a "Data Subject") with a number of details pertaining to the use of and subsequent processing of their Personal Information, before it uses or processes this Personal Information

What this is about

This Privacy Notice describes how Hermanusdoorns Shareblock Ltd collects, uses, discloses, retains and protects your personal information, in accordance with POPIA and other relevant laws

It sets out the responsibilities and obligations of all persons who make use of, or access or receive Information and Communications from and of Hermanusdoorns via its communication facilities and resources including its:

- website,
- email, and
- social media platforms

It also seeks to call attention to how all users of these facilities and resources are to ensure that when using these resources that they respect and process another's Personal Information lawfully and in accordance with the provisions of POPIA and its 8 Conditions of Lawful Processing.

Who we are

We are officially registered as Hermanusdoorns Shareblock Ltd and are essentially a private game farm in the Waterberg, situated approximately 40 km from Vaalwater on the R517 towards Thabazimbi. The farm is operated as a Share Block within the Waterberg Biosphere Reserve and provides a welcome getaway to the bushveld for shareholders.

What we are all about

Hermanusdoorns has always been committed to the compliance with industry standards and applicable laws. This is the reason why the responsible use of its website and all related resources in respect of data privacy is important to its Directors and Management team.

Whilst we are committed to protecting all persons' rights to privacy and who in consequence will ensure that all persons' Personal Information is used

- appropriately,
- transparently, and
- according to applicable law,

its Directors and Management team have to ensure that these rights to privacy are balanced with other rights such as the right to use and have access to the Information and Services of Hermanusdoorns, including its online and social media platforms and applications.

How we operate

Shareholders are required to sign a "User Agreement" and a "Main Agreement" with Hermanusdoorns in accordance with the provisions of the Share Blocks Control Act No. 59 of 1980. These agreements provide the rights and obligations for the exclusive use and occupation of a residential building (unit) which is / will be constructed on the property for and at the costs of the shareholder.

This is done together with the use of the communal property with other shareholders in respect of that portion of the property which is not reserved for the exclusive use through other owners. Share certificates are issued to all shareholders and registered as required by the Share Blocks Control Act.

Hermanusdoorns also provides shareholders with a number of services which includes the provision of electricity, laundry, cleaning services, maintenance and alarm monitoring. Services are generally charged to shareholders on a usage basis and collected via a monthly invoicing process. In addition, annual levies are collected and special levies are raised as when required.

How it is collected

We collect personal information about you and any other person whose details you provide to us in accordance with the relevant laws, either:

- **Directly** from you when you complete a product or service application form, electronically, telephonically or by way of a hard copy;
- **Indirectly** from you when you interact with us electronically by way of our website, apps, or social media channels

We will also collect your information where you have only partially completed and/or abandoned any information which you began to apply to our website and/or other online forms. Given that we already consider you a customer at this stage, we may use this information to contact you in order to remind you to complete outstanding information.

How long it is retained

The Leadership team of Hermanusdoorns will only retain your Personal Information for the period of time necessary to fulfil the purposes detailed by this Policy.

This period of time is dependent on the length of the relationship that you have with us and our current legal position at the time of the prevailing law. We will retain your information as is necessary to comply with **legal, regulatory, fraud prevention, accounting** or legitimate business requirements.

Your relationship with Hermanusdoorns determines the exact nature of the Personal Information we process, and the purpose for which this personal information is collected and used.

Hermanusdoorns will not collect and/or process any of your personal information that you do not want to be collected or processed.

The information that we may collect through our online services and your visits and contacts with us will include, but is not limited, to the following:

Contact information

- Full Name - First name, Second name (if applicable), Surname, Title
- Address(es) - Home, Postal, Work
- Telephone number(s) - Home, Work, Mobile
- e-Mail address(es) - Primary, Secondary
- Employment details - Occupation

Identity data

- Identity document
- Passport
- Visa,
- other related identification data

Demographics

- Ethnic group
- Nationality
- Language preference

Clickstream Data

(when using our website, apps and/or social media channels)

- Cookies
- IP address
- Hardware and software,
- Search terms used,
- Internet browser type,
- Domain names,
- Access dates and times
- Referring website (if any) through which you clicked through to our website

(This traffic data is aggregated and not personally identifiable. Our website analysis will also respect any 'do not track' setting you might have on your web browser.)

Granting consent

In certain instances, we may need consent to process your personal information. If you give us your consent for a specific context, you are free to withdraw this consent at any time. The website of Hermanusdoorns will explicitly ask when we need your personal information or when we request to contact you.

Withdrawing consent

Please note that where you have withdrawn your consent, this will not affect the processing that took place prior to such withdrawal and it will not affect the processing of your personal information where consent is not required.

Where you have unsubscribed from certain direct marketing communications, we will keep a record of your information and request to ensure that we do not send such direct marketing to you again.

Refusal to grant consent

Should we intend to use your personal information for secondary use, we will allow you to decline this service.

Where we require personal information in order to provide you with access to our properties and services, your failure or refusal to provide us with the necessary information, may result in Hermanusdoorns being unable to provide you with such access or services.

Option to opt-out

In the event that you have subscribed to any of our communiqués, we will send you regular correspondence regarding matters pertaining to Hermanusdoorns that may be of interest to you.

You may unsubscribe from communiqués by selecting the option to unsubscribe at the bottom page of our correspondence or by emailing us your request to sydneygericke10@gmail.com. Sydney Gericke, one of the Hermanusdoorns Board members was assigned the responsibility of POPIA Officer as required by the Act.

Where you choose to exercise your right to opt out of direct marketing, please allow up to 21 days for Hermanusdoorns to effect that change.

FIVE: How we use your personal information

Hermanusdoorns will process your information lawfully and in a reasonable manner that does not infringe upon the privacy of the data subject. To the extent permissible under the applicable laws, Hermanusdoorns may use your information as follows:

General Administration

- To provide you with our financial products and services, and maintain our relationship with you;
- To assess, check, and process conclude and administer your application
- To execute a transaction in accordance with your request
- To meet our contractual obligations with you or take steps necessary for the conclusion of a contract with you;
- To execute the Hermanusdoorns' strategic initiatives

Regulatory

- To comply with legislative and regulatory requirements, including codes of conduct and requirements of our regulators
- For purposes of proof and legal proceedings;
- For audit and record-keeping purposes;

Customer Service

- To enhance your experience when interacting with the Hermanusdoorns
- To help its Leadership team improve its service levels to you;

Marketing & Research

- To process your marketing preferences
- To provide you with information about our offerings from time to time via your preferred medium
- To conduct market research
- For statistical analysis and research purposes;

Preventative measures

- To maintain the security of our digital channels and systems;
- To prevent or control the spread of any disease; and

You have the right to request that your personal information not be used for any other use except for the intended purpose of its collection.

We will not

The Directors and Management Team of Hermanusdoorns will not sell, rent, or trade your personal information to any third party.

Your personal information will only be shared with third parties if there is a **legitimate** reason to do so.

Hermanusdoorns will not disclose your personal information to third parties unless there is valid processing ground as set out in Section 11 of POPIA.

We may

The Directors and Management Team of Hermanusdoorns may disclose the personal information you provided to the following entities:

- Third parties in relation to
 - the purposes set out in the section above (How we use your information)
 - when needing to fulfil our contractual obligations to you.
- Public bodies and/or law enforcement (either directly or through shared databases) for fraud detection and prevention

The Leadership Team of Hermanusdoorns may also share aggregated information with stakeholders and business partners (for example, demographic data) in a manner that does not identify the persons to whom the information applies.

We will

The Directors and Management Team of Hermanusdoorns will disclose personal information when lawfully required to do so or where we believe in good faith that such action is necessary:

- In order to comply with any
 - relevant legislation
 - legal process
- To protect and defend the rights or property of Hermanusdoorns or its website
- To act under circumstances where it is necessary to protect the personal safety of users of offerings provided by Hermanusdoorns, our website or the public
- By any regulatory authority

SEVEN: Security & storage of personal information

Security Measures

Hermanusdoorns intends to protect the integrity and confidentiality of your personal information. The organisation has implemented appropriate and reasonable technical and organisational information security measures to keep your information secure, accurate, current, and complete.

Access

We take the necessary steps in order to ensure that your personal information is secure from unauthorised use, access or disclosure.

Third Parties

Where third parties are required to process your personal information in relation to the purposes set out in this policy and for other lawful requirements, we ensure that they are contractually bound to apply the appropriate security practices.

EIGHT: Your rights and responsibilities

Lawfulness

You agree to provide **correct and current** information to us and not to misrepresent or imitate any person or entity or falsely state or misrepresent your affiliation with anyone or anything.

Correction of information

The responsibility remains with you to inform Hermanusdoorns in the event that your Personal Information changes.

Hermanusdoorns will furnish you with the means to ensure that your personal information is correct and up to date. Alternatively, you may request for your personal information to be update by us. In that case, we will take all reasonable steps to confirm your identity before making changes to your personal information that we may have in our possession.

Marketing

The responsibility remains with you to inform Hermanusdoorns in the event that your Personal Information changes.

Hermanusdoorns will furnish you with the means to ensure that your personal information is correct and up to date. Alternatively, you may request for your personal information to be update by us. In that case, we will take all reasonable steps to confirm your identity before making changes to your personal information that we may have in our possession.

Requesting copies

You have the right to request a copy of the Personal Information that we have in our possession furnished to us by you. Please contact us on the e-mail addresses and/or telephone numbers provided below and detail the information that you require from us.

Confirmation of identity

We will take all reasonable steps to confirm your identity before furnishing you with any of your personal information that we may have in our possession.

TEN: Contact information

Hermanusdoorns

Should you have any queries regarding this Policy, please contact the Chairman of Hermanusdoorns or the POPIA Officer for Hermanusdoorns on these details:

- Mr. Malcolm Perrie: Malcolm.Perrie@Motusparts.co.za
- Mr. Sydney Gericke: sydneygericke10@gmail.com

Please ensure that you do not include sensitive information in your e-mails to us.

The Information Regulator

You may lodge a complaint to the Information Regulator if you believe that we have not complied with this Policy. The Information Regulator can be contacted on

- The Information Regulator P.O. Box 31533, Braamfontein, Johannesburg, 2017
- InfoReg@Justice.gov.za