

# GREENWAYS

GOLF ESTATE

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## THE PROTECTION OF PERSONAL INFORMATION ACT POLICY / NOTICE

### INDEX

1.	Executive Summary .....	2
2.	About us .....	2
3.	The information that we collect .....	2
4.	How we use your information .....	2
5.	Disclosure of information .....	3
6.	Information security .....	3
7.	Records .....	4
8.	Your rights .....	4
9.	Correction of your information .....	5
10.	Definition of personal information .....	5
11.	How to contact us .....	5
12.	Details of our Information Officer .....	6

## 1. Executive Summary

This Policy explains how we obtain, use and disclose personal information, in accordance with the requirements of the Protection of Personal Information Act (“POPIA”).

**Greenways Country Estate Home Owners' Association** (“we/us/our”) is committed to protecting your privacy and to ensure that your personal information is collected and used properly, lawfully and transparently.

This Policy will be reviewed annually to ensure that it remains up-to-date and in compliance with any changes in legislation.

## 2. About us

We are a legal entity established in terms of statute and managed by Trustees and an Estate Manager. Our members comprise of all owners of residential units in Greenways Country Estate, situated at Beach Road, Strand, Western Cape (“**the Estate**”).

## 3. The information that we collect

We collect, store and process personal information of owners, tenants, visitors, contractors, service providers, golfers, employees and others who live or work within the Estate, or who otherwise enter the Estate or access our website, for the primary purpose of monitoring and regulating entry to and exit from the Estate and communicating with such persons. For this purpose, we collect different information from different categories of persons. These details may include full names, identification numbers, biometric images, residential addresses, contact numbers, email addresses and similar information.

We collect information directly from you where you provide us with your personal details. Where possible, we will inform you what information you are required to provide to us and what information is optional. During electronic interactions - information may be collected.

## 4. How we use your information

# GREENWAYS

GOLF ESTATE

We use your personal information only for the purposes for which it was collected and agreed by you. In addition, where necessary your information may be retained for legal or research purposes.

For example, we may use personal information:

- To gather contact information;
- To confirm and verify your identity and your right to access the Estate -
  - to communicate with you about matters that relate to the Estate;
  - for the detection and prevention of fraud, crime, money laundering or other malpractice;
- To conduct market or customer satisfaction research or for statistical analysis;
- For billing, finance, audit and record keeping purposes;
- In connection with legal proceedings.

## 5. **Disclosure of information**

We may disclose your personal information to our service providers who are involved in the delivery of products or services, including those who provide security, access control and managing agent services to us. We have agreements in place to ensure that they comply with the privacy requirements as required by the POPIA.

We may also disclose your information:

- To our trustees/employees when needed to comply with their duties;
- Where we have a right/duty to disclose in terms of law or industry codes; and
- Where we believe it is necessary to protect our rights.

## 6. **Information security**

We are legally obliged to provide adequate protection for the personal information we hold and to prevent unauthorized access and use of personal information. We will, on an on-going basis, continue to review our security controls and related processes to ensure that your personal information remains secure.

Our security policies and procedures cover:

- Physical security;
- Computer and network security;

# GREENWAYS

GOLF ESTATE

- 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.

When we contract with third parties, we impose appropriate security, privacy and confidentiality obligations on them to ensure that personal information that we remain responsible for, is kept secure.

We will ensure that anyone to whom we pass your personal information agrees to treat your information with the same level of protection as we are obliged to exercise.

In the event that we become aware of a security breach that has/may have exposed your personal information that is held by us, we will take all reasonable steps available to us to notify you of the nature and extent of the breach and prevent any similar recurrence.

## **7. Records**

We retain your personal information for so long as is necessary to achieve the purpose for which it is obtained. As a general rule, we normally destroy, delete or de-identify information of persons who have not entered the Estate for a period in excess of 2 years. We do not retain your information for any longer than is necessary for achieving the purpose for which it was collected unless -

- further retention is required for record purposes, or by law;
- we reasonably require to keep it;
- retention is required or permitted by a contract between us; or
- you consent to the further retention.

Destruction, deletion and/or de-identification is done in a manner that prevents its reconstruction in an intelligible form.

## **8. Your rights: Access to information**

You have the right to request a copy of the personal information we hold about you. To do this, simply contact the Information Officer at the numbers/addresses as provided on our website and specify what information you require. We will need a copy of your ID document to confirm your identity before providing details of your

# GREENWAYS

GOLF ESTATE

personal information. Please note that any such access request may be subject to a payment of a legally allowable fee.

## 9. **Correction of your information**

You have the right to ask us and any service providers to update or correct your personal information. We will require a copy of your ID document to confirm your identity before making changes to personal information we may hold about you. We would appreciate it if you would keep your personal information accurate.

## 10. **Definition of personal information**

According to POPIA “**personal information**” means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person. POPIA lists the following as examples of what could constitute personal information –

- information relating to 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;
- information relating to education or medical, financial, criminal or employment history;
- any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier etc.;
- biometric information;
- personal opinions, views or preferences;
- correspondence sent by a 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 one individual about another person; and
- the name of a 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.

For our purposes, it also specifically includes, but is not limited to, information we collect as per clause 3 above.

## 11. **How to contact us**

If you have any queries about this notice, or you need further information about our privacy practices or our information register, or you wish to withdraw consent, or you wish to exercise preferences or access or correct your personal information, please

# GREENWAYS

GOLF ESTATE

contact our Information Officer, or contact us at the numbers/addresses listed on our website, being [www.greenwaysestate.co.za](http://www.greenwaysestate.co.za) .

**12. Details of our Information Officer are as follows:**

NAME: The Estate Manager

TELEPHONE NUMBER: 021 853 3889

EMAIL ADDRESS: [admin@greenwaysestate.co.za](mailto:admin@greenwaysestate.co.za) (*attention Estate Manager*)

PHYSICAL ADDRESS: Greenways Country Estate, Beach Road, Strand 7140.