

PRIVACY POLICY

This Privacy Policy is effective as of February 2021.

PLEASE READ THIS PRIVACY NOTICE CAREFULLY. IT EXPLAINS HOW YOUR PERSONAL INFORMATION IS COLLECTED AND USED.

Grootbos Foundation (referred to as the "Foundation", "we", "us" or "our") and its affiliates including Grootbos Accommodation Enterprises are committed to protecting your privacy as a stakeholder (referred to as "stakeholder", "you" or "your"), and we take our responsibility regarding the security of your Personal Information (which has the meaning given in the Data Privacy Law applicable to you,) very seriously.

This privacy notice (the "Privacy Policy") describes –

- the types of Personal Information we collect during your recruitment and throughout the period of your service;
- how we hold and use the information;
- with whom we may share your Personal Information;
- the measures we take to protect the security of the information; and how you can contact us about our privacy practices.

When you or log on to, opt into a programme, continue to engage with the Operations you accept and consent to this Privacy Policy and to the handling, use and disclosure of your Personal Information in the manner described herein.

1. WHO IS RESPONSIBLE FOR PROCESSING YOUR PERSONAL DATA?

Grootbos Foundation is the "responsible party" (i.e. the organisation responsible) for all Personal Information of all stakeholders for the purposes of data privacy laws, principles and regulations which may apply to you (including the Protection of Personal Information Act ("POPI") and General Data Protection Regulation ("GDPR")) (collectively, "Data Privacy Law").

2. DATA COLLECTION: WHAT PERSONAL INFORMATION DO WE COLLECT AND FROM WHERE?

To the extent permissible under applicable Data Privacy Law, we collect information about you and any other party whose details you provide us when you

2.1 Engage with the Operations. This includes the following mandatory information: Your name, email address, phone number, ID number, next of kin, police clearance status, CV, Driver's License, Banking Details, Performance records, Disciplinary records and training.

3. SPECIAL PERSONAL INFORMATION

3.1 Under Data Privacy Law, certain categories of personal information are recognised as sensitive, including information about your religious beliefs, philosophical beliefs, political opinions, race and ethnic origin, trade union membership, health information, information about your sex life, biometric information or information about your criminal behavior ("Sensitive Personal Information").

3.2 In certain cases, we may collect Sensitive Personal Information about you. We would only collect Sensitive Personal Information if there is a clear reason for doing so and with your explicit consent.

4 PURPOSE AND LAWFUL BASIS: WHY AND HOW DO WE USE YOUR PERSONAL INFORMATION?

4.1 Your personal information may be used for the following purposes –

4.1.1 Administrative or legal purposes: We use your personal information to operate our business, including for statistical and marketing analysis, systems testing and to diagnose technical and service problems, maintenance and development of our operations, or in order to deal with a dispute or claim. We may also perform data analysis based on the data we collect from you for statistical and marketing analysis purposes.

4.1.2 Security, health, administrative, crime prevention/detection and legal purposes: We may use your personal information to verify your information and identity, and to protect against, identify and prevent fraud and other unlawful activities. We may also share your personal information with government authorities or enforcement bodies for compliance with legal requirements, or as otherwise required or permitted by applicable Data Privacy Law.

4.1.3. Other purposes: We may also use your personal information in other ways, and where we do so, we will provide specific notice at the time of collection and obtain your consent unless otherwise permitted by applicable Data Privacy Law.

4.2 We will only process your personal information where we have a legal basis to do so, which will depend on the reasons for which we have collected and need to use your personal information. In most cases we will need to process your personal information so that we can enter into contracts or agreements with you. Our processing of your personal information for the above purposes is done pursuant to the following legal basis –

4 to carry out our obligations under the agreement or contract we have with you;

4.2. to comply with a legal obligation;

4.2.3 if it is in our legitimate interests to do so as an organisation (e.g. for administrative purposes and to improve the functionality of our operations); and

4.2.4 where you have consented to our using your personal information (e.g. to process your special personal information and for direct marketing related uses).

5 WHO DO WE SHARE YOUR PERSONAL INFORMATION WITH?

5.1 We may share your personal information with the following people for the purposes described in this Privacy Policy –

5.1.1 government authorities, law enforcement bodies and regulators for compliance with legal requirements, or where otherwise required by applicable Data Privacy Law; and

5.1.2 our legal and other professional advisers in order to enforce our legal rights in relation to our contract with you.

6 AGGREGATED INFORMATION

6.1 We aggregate your personal information, including your special personal information, with that of other stakeholders for statistical purposes and share this aggregated statistical data with our donors and partners for reporting purposes.

7.2 We ensure that such aggregated statistical data cannot be linked to any specific person, including you, by any third party. Our donors and partners can in no way identify you individually from the statistical data and therefore is not personal information for the purpose of Data Privacy Laws and under this Privacy Policy.

8 YOUR RIGHTS

8.1 Under certain circumstances, by applicable Data Privacy Law you have the right to –

8.1.1 Request information. You may request information about whether we hold personal information about you, where we got your personal information from, what personal information is held or being used; why we are holding/using it i.e. the purpose; and whether or not the supply of such information is voluntary or mandatory (as well as the consequences if you fail to provide personal information);

8.1.2 Request access to your personal information. This allows you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it;

8.1.3 Right to rectify the personal information that we hold about you. If you believe that the personal information we have is inaccurate or incorrect, you have the right to ask us to correct that personal information.

8.1.4 Request erasure of your personal information. You have the right to ask us to delete or remove your personal information from our records where there is no good reason for us continuing to process it.

8.1.5 Right to object to processing of your personal information. Where we are relying on a legitimate interest (or those of a third party) and there is something about your particular

situation which makes you want to object to processing on this ground, you have the right to object to the processing of your personal information for that purpose;

8.1.6 Right to portability. You have the right to receive your personal information in a portable format.

8.1.7 Withdraw consent. In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes to which you originally agreed, unless we have another proper and legitimate basis for doing so;

8.1.8 You have the right to only be approached once for your consent to the processing of your personal information for the purposes of direct marketing of electronic communications;

8.1.9 To be notified should an unauthorised person gain access to your personal information;

8.1.10 Right to complain: You have the right to complain and lodge a complaint with the –

8.1.10.1 If you are a South African, South African Information Regulator whose details are –

8.1.10.1.1 Website: <http://justice.gov.za/inforeg/>

8.1.10.1.2 Tel: 012 406 4818

8.1.10.1.3 Fax: 086 500 3351

8.1.10.1.4 Email: inforeg@justice.gov.za

8.2 If you wish to exercise your rights related to your personal information (including the rights set out above), please contact us using the details set out in paragraph 12 below.

9 TRANSFER OF YOUR PERSONAL INFORMATION OUTSIDE SOUTH AFRICA AND SECURITY MEASURES

9.1 International transfers of your personal information

9.1.1 We do not transfer your personal information outside the Republic of South Africa.

9.2 Data security

9.2.1 We follow strict security procedures in the storage and disclosure of your personal information, which are designed to protect it against misuse, unauthorised access, modification or disclosure and accidental loss, destruction or damage.

9.3 Retention of your Personal Information

9.3.1 We will not retain your personal information for longer than is necessary to fulfil the purposes for which it is being processed.

9.3.2 When we no longer need your personal information, we will securely delete or destroy it. We will also consider if and how we can minimise the personal information that we use, and if we can de-identify your personal information so that it can no longer be associated with you or identify you, in which case we may use that information without further notice to you.

10 UPDATES TO THIS PRIVACY POLICY

Grootbos Foundation may revise and update this Privacy Policy at any time in its sole discretion by posting an updated Privacy Policy at its main office on Grootbos Private Nature Reserve. All such changes to the Privacy Policy are effective immediately when posted to the Platform and apply to all access to and use of the Platform thereafter.

11 HOW TO CONTACT US?

11.1 If you would like to access, correct, amend, or delete any Personal Information we have about you, register a complaint, or simply want more information, contact us on info@grootbosfoundation.org or +27 28 384 8044