



De Zalze Golf Club (“the Company”): Data and Information Protection Framework

Statement

The purpose of this framework is to ensure that:

- The De Zalze Golf Club complies with legislation which regulates the protection of personal data and information, in particular the Protection of Personal Information Act (POPIA) (2013) and the Promotion of Access to Information Act (PAIA) (2000).
- The De Zalze Golf Club understands its obligations under the abovementioned legislation and acknowledges the need to manage data and information in accordance therewith.

Scope & Principles covered by the Framework

2.1 This framework applies to:

- All directors, employees, and service providers contracted or appointed by the De Zalze Golf Club, and who process personal information.
- All personal information processed by the De Zalze Golf Club

2.2 The following principles are applied through the implementation of the framework:

- The De Zalze Golf Club ensures that the conditions and all the measures set out in the Act that give effect to such conditions are complied with at the time of determining the purpose and means of the processing.
- Personal information may only be processed in a fair and lawful manner.
- Personal information may only be processed for specific, explicitly defined, and legitimate reasons.
- Personal information may not be processed for a secondary purpose unless that processing is compatible with the original purpose.
- The responsible party must take reasonable steps to ensure that the personal information collected is complete, accurate, not misleading, and updated where necessary.
- The data subject whose information we are collecting must be aware that we are collecting such personal information and for what purpose the information will be used.
- Personal information must be kept secure against the risk of loss, unlawful access, interference, modification, unauthorized destruction, and disclosure.
- Data subjects may request whether their personal information is held, as well as access thereto and/or the correction and/or deletion of any personal information held about them.

Application

3.1 Personal information will only be processed if a data subject has given consent to the Company and the processing is not prohibited by law. (Definition of data subject in Appendix A)

3.2 Consent is implied where data processing is necessary in terms of:

- A contract entered or to be entered between the Company and the data subject.
- Requirements by law
- The protection of property or significant interests in case where it cannot be reasonably expected from the Company to obtain such consent.

3.3 It is the responsibility of all persons falling under the scope to take reasonable steps to ensure personal information they process is kept accurate and up to date as possible.

3.4 The De Zalze Golf Club will ensure that personal information is adequate, relevant, and may only be processed for a specific purpose and duration. Personal information must be retained and disposed of in accordance with the De Zalze Golf Club's Data Retention Policy.

3.5 The processing of special personal information will only be carried out in accordance with the Act. Special personal information is defined in Appendix A to this framework.

3.6 Any requests by data subjects for information must be done in writing and accordance with the De Zalze Golf Club's section 51 PAIA Manual available on the website (www.dezalzegolf.co.za).

3.7 It is essential, as part of the De Zalze Golf Club's operations, to use security systems to maintain adequate levels of security. This includes the use of a biometric access control system, as well as closed-circuit television (CCTV).

3.7.1 All information collected through these systems are kept and stored securely and may only be accessed by authorized persons for specific security purposes (i.e., used as evidence in security incidents, prevention of crime, etc.).

3.7.2 The number and type of equipment used to collect such information were specifically planned and installed for its intended purpose.

3.7.3 The information is only stored for as long as required (usually 30 days), whereafter it is disposed of in a way that protects the rights and privacy of data subjects.

3.8 Proper notices are displayed informing data subjects that personal information is collected, which includes that certain areas are covered by CCTV.

Data Security

4.1 Anyone who falls under the scope of this framework is required to take reasonable steps in keeping personal information under their control securely and may only disclose it if required in terms of this framework.

4.2 The parties in 4.1 must consider keeping personal information in the following manner:

- a. In a lockable room with controlled access.
- b. In a locked drawer or filing cabinet.
- c. Electronic data should be stored on the De Zalze Golf Club's network server (with appropriate security access levels) and not on local workstations or removable storage devices.
- d. If electronic data is stored on local devices (including desktops, PC's, laptops, mobile phones, tablets) or removable storage devices or media due to a specific requirement, it must be protected by encryption and password-protected access.
- e. Desktops, PC's, laptops, mobile phones, tablets should not be left unattended without password-protected screen lock.
- f. Personal information in hard copy should not be left unattended or where it can be accessed by unauthorized parties.
- g. Anyone who processes personal information at home or other locations must take specific care to protect the information.
- h. Personal information contained in electronic mails (e-mails) may not be distributed to any other person other than the recipient(s) without the consent of the original sender, whether it be explicit or implicit.

Responsibility for Compliance

It is the individual responsibility of each director, head of department, and employee to ensure that they:

- Comply with the specific responsibilities for safeguarding the personal and sensitive information held on data subjects.
- Comply with the provisions of this framework and related legislation.

Non-Compliance

Any non-compliance with this framework and associated procedures must be reported to the CEO. Any deliberate or intentional non-compliance may lead to disciplinary procedures and dismissal.

Revision

This framework will be reviewed at least annually.

APPENDIX A – DEFINITIONS

Data subject – the person to whom personal information relates.

Person – a natural person or a juristic person.

Personal information – information relating to an identifiable, living natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to:

- a) Information relating to the race, gender, sex, pregnancy, marital status, national, ethnic, or social origin, color, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language, and birth of that person.
- b) Information relating to the education or the medical, financial, criminal or employment history of the person.
- c) Any identifying number, symbol, email address, physical address, telephone number, location information, or.
- d) Biometric information.
- e) Personal opinions, views, or preferences of the person.
- f) 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.
- g) The views or opinions of another individual about the person.
- h) 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.

Processing – operation or activity or any set of operations, whether by automatic means, concerning personal information, including:

- a) The collection, receipt, recording, organization, collation, storage, updating or modification, retrieval, alteration, consultation, or use.
- b) Dissemination by means of transmission, distribution or making available in any other form or.
- c) Merging, linking, as well as restriction, degradation, erasure, or destruction of information.

Special personal information – personal information concerning the religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life or biometric information of a data subject; or criminal records or allegations of criminal conduct.

The Company – De Zalze Golf Club