

THE PROTECTION OF PERSONAL INFORMATION ACT (POPIA) POLICY

Date of last change: 2021-06-29

Date approved by SP Board: 2021-07-16

Effective Date: 2021-07-16

This Privacy Policy describes our policies and procedures that have been put in place with respect to the collection, processing, distribution, and disclosure of your personal information when making use of our services.

Settlers Park has committed to comply with the legal requirements of POPIA and its regulations as well as the principles of good practice and treating customers fairly. We also recognise the importance of POPIA in protecting individuals and their privacy, and will undertake to retain relevant, quality information from you and ensure that such information is always kept safe. It is important for you to note that your personal data is used to provide and improve the services offered to you. Therefore, by entering a business relationship or single transaction with Settlers Park, you agree to the collection and use of information within the framework of this Privacy Policy. All staff at Settlers Park that have access to your information have and will continue to receive ongoing training and support to ensure that they act in accordance with our processes and policies and remain compliant.

DEFINITIONS

For the purposes of this Privacy Policy: -

- 'Client' means the individual accessing or using the Service, or the company, or other legal entity on behalf of which such individual is accessing or using the Service, as applicable.
- 'Company' refers to Settlers Park Association, trading as Settlers Park Retirement Village
- 'Cookies' are small files that are placed on your computer, mobile device or any other device by a website, containing the details of your browsing history on that website among its many uses.
- 'Country' refers to the Republic of South Africa.
- 'Device' means any device that can access the Service such as a computer, a cell phone or a digital tablet.
- 'Personal Data' is any information that relates to an identified or identifiable individual.
- 'Service' refers to the list of services listed in Principle 3 of the Policy.
- 'Service Provider' means any natural or legal person who processes the data on behalf of the Company. It refers to third-party companies or individuals employed by the Company to facilitate the Service, to provide the Service on behalf of the Company, to perform services related to the Service or to assist the Company in analysing how the Service is used.
- 'Settlers Park' or 'the Park' refers to Settlers Park Association, trading as Settlers Park Retirement Village
- 'Usage Data' refers to data collected automatically, either generated using the Service or from the Service infrastructure itself (for example, the duration of a page visit).

- 'Website' refers to Settlers Park websites accessible from www.settlerspark.co.za or www.sprv.co.za.

TYPES OF DATA COLLECTED

PERSONAL DATA

To make use of our services and for Settlers Park and its staff to render services accurately, our clients will be required to provide us with certain personally identifiable information for us to make contact or identify and verify our clients. Personally identifiable information may include, but is not limited to: -

- Email addresses
- Full first and last name, and preferred, or given name
- Phone numbers
- Address, Postal code, City, Province
- ID number and details
- Driver's licence number and details
- Dates of birth, marriage, and death
- Contact details of your family members, medical doctors, and other professionals
- Medical history
- History of interactions with staff

COLLECTING AND USING PERSONAL DATA

USE OF YOUR PERSONAL DATA

The Company may use Personal Data of clients or potential clients for the following purposes:-

- For the performance of a contract: the development, compliance and undertaking of the contract for the products, items or services purchased by the client or of any other contract with Settlers Park.
- To contact the client by email, telephone calls, SMS, or other equivalent forms of electronic communication, regarding updates or informative communications related to the products and services, when necessary or reasonable for their implementation.
- To provide the client with news, special offers and general information about other goods, services and events offered by Settlers Park which are like those that have already been purchased or enquired about unless the client has opted not to receive such information.
- To attend and manage the clients' requests and instructions.
- Settlers Park may use client information for other purposes, such as data analysis, identifying trends, determining the effectiveness of promotional campaigns and to evaluate and improve our services, products, marketing, and client experience.

TRANSFER OF PERSONAL DATA

Client information, including Personal Data, is processed at Settlers Park's offices and it is in that office where the processing of such client's information will take place. It may mean that information may be transferred to — and maintained on — computers located outside of South Africa or other governmental jurisdiction where the data protection laws may differ than those from South Africa. The clients consent to this Privacy Policy followed by submission

of such information represents an agreement to that transfer. Settlers Park will take all steps reasonably necessary to ensure that data is treated securely and in accordance with this Privacy Policy and no transfer of Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of such data and other personal information.

DISCLOSURE OF PERSONAL DATA

LEGAL REQUIREMENTS

Settlers Park may disclose Personal Data if such action is necessary to comply with a legal obligation such as: -

- Required by the Financial Intelligence Centre.
- Required by the Financial Services Conduct Authority.
- Required by SAPS.
- Required by the South African Reserve Bank.
- Required by South African Revenue Services.
- Required by a Court of Law.

SECURITY OF PERSONAL DATA

Settlers Park will take every reasonable measure to keep data protected however, no method of transmission over the Internet, or method of electronic storage is 100% secure. While Settlers Park strives to use commercially acceptable means to protect Personal Data, absolute security cannot be guaranteed.

CHILDREN'S PRIVACY

Settlers Park does not undertake any business which addresses any person under the age of 16 unless prior consent is obtained from that child's legal guardians.

POLICY CONDITIONS

Condition 1: Accountability

- Settlers Park is accountable for the personal information that is processed or that is held in our possession and therefore reasonable steps must be taken to ensure that personal information obtained from clients is stored safely and securely.
- This includes contact details, financial information, any information required under the FIC regulations and any other personal information that may be obtained for the purpose of providing our services to the client.

Condition 2: Processing limitation

- Settlers Park will collect personal information directly from clients.
- Settlers Park will only process or release client information with their consent, except where it is required to do so by law, necessary to carry out actions for the conclusion of performance of a contract, protects a legitimate interest and necessary for proper performance.
- Personal information will be processed in a lawful and reasonable manner that does not infringe the privacy of our clients.

Condition 3: Specific purpose

Settlers Park collects personal information from clients for the purpose of rendering our services to our clients, such services include:

- Provision of accommodation
- Limited medical support, including contact tracing
- Security services
- Services rendered in terms of the Older Persons Act
- Social and entertainment services
- Provision of food and restaurant services
- Providing an internal telephone list.

Condition 4: Limitation on further processing

- Personal information may not be processed further in a way that is incompatible with the purpose for which the information was collected initially.
- Settlers Park collects personal information for the purpose of rendering services as listed above, and it will only be used for that purpose.

Condition 5: Information quality

- Settlers Park is responsible for ensuring that client information is complete, up to date and accurate before it is used. This means that it may be necessary to request clients, from time to time, to update their information and confirm that it is still relevant.
- If Settlers Park is unable to reach a client for this purpose their information will be deleted from our records FIVE years after the termination of the business relationship.

Condition 6: Openness

In the instance where personal information is collected from a source other than directly from the client (E.g.: credit checks, AML checks, Astute checks, other portals), Clients will be made aware that their information is being collected by us and of the specific reason we are collecting their information.

Condition 7: Security safeguards

- Settlers Park will ensure technical and organisational measures are put in place to secure the integrity of personal information, and safeguard it against the risk of loss, damage, or destruction.
- Personal information must also be protected against any unauthorised or unlawful access or processing. Settlers Park is committed to ensuring that information is only used for legitimate purposes with our clients consent and only by authorised employees and third parties which have been disclosed.

Condition 8: Participation of individuals

- Clients are entitled to know particulars of their personal information held by Settlers Park as well as the identity of any authorised employees that had access thereto.
- Clients are also entitled to correct any information held by Settlers Park.

OUR COMMITMENT TO COMPLY WITH RELEVANT DATA PROTECTION LAWS

Settlers Park endeavours to take all reasonable steps in ensuring compliance with all relevant data protection laws, which includes but is not limited to: -

- Reviewing and updating our Privacy Policy.
- Updating our data security on our equipment, infrastructure, and systems.
- Ongoing training for all staff that have access to your personal data.
- Access to personal data is limited to only those who require it.

CHANGES TO THIS POLICY

Settlers Park may update its Privacy Policy from time to time.

Clients are advised to review this Privacy Policy periodically for any changes.