

Privacy Policy

This notice describes the Indaba Hotel & Conference Centre privacy policy. By visiting this website, you are accepting the practices described in this Privacy and Security statement.

The information provided by you helps us personalise and continually improve your online experience at Indaba Hotel & Conference Centre and its subsidiaries (including but not limited to Mowana Spa, Chiefs Boma Restaurant, Indaba Tasting Room and the Gin School). Here are the types of information we gather.

- **Information You Give Us:** We receive and store information you enter on the Indaba Hotel & Conference Centre website or that you may provide to Indaba Hotel & Conference Centre in any other manner. Certain of the information provided on registration is mandatory to assist us in ensuring that the communications and transactions entered into with you may be completed effectively and lawfully.
- **Automatic Information:** Indaba Hotel & Conference Centre receives and stores certain types of information whenever you interact on the Indaba Hotel & Conference Centre website or communicate with Indaba Hotel & Conference Centre by email. For example, like many websites, we use "cookies," and we obtain certain types of information when your web browser accesses Indaba Hotel & Conference Centre.
- **Email Communications:** To help us make emails more useful, we may receive a confirmation when you open email from the Indaba Hotel & Conference Centre website, if your computer supports such capabilities.

By providing the information to Indaba Hotel & Conference Centre you consent to Indaba Hotel & Conference Centre collecting, maintaining, storing and processing the information, provided that, Indaba Hotel & Conference Centre shall:

- Not disclose your personal information to a third party other than to affect the transactions agreed to in using the Indaba Hotel & Conference Centre website, without obtaining your express consent to do so.
- Only disclose your personal information, without your consent, if legally required to do so.
- Be entitled to use the information provided by you to compile statistical or aggregated information in such a way that you may not be identified.

Indaba Hotel & Conference Centre shall own and retain all rights to non-personal statistical information compiled by it. While Indaba Hotel & Conference Centre and its affiliates shall take commercially reasonable care to safeguard the information provided by you to Indaba Hotel & Conference Centre from unauthorised access or disclosure, Indaba Hotel & Conference Centre does not represent or guarantee that the safeguards will provide absolute protection. Indaba Hotel & Conference Centre shall not be obliged to encrypt any information sent to you, received from you or stored on your behalf or for the purposes agreed in this agreement, unless agreed with you to the contrary, in writing. Should the personal information and records held by us no longer be required by Indaba Hotel & Conference Centre, we undertake to take reasonable steps to destroy or de-identify this information after a reasonable period of time has elapsed. If you provide Indaba Hotel & Conference Centre with personal data, you shall have the right, on reasonable prior written notice, to request inspection, change, amendment, or deletion of such personal data.

Please see the next page for the hotel's policy on Protection of Personal Information

STANDARD OPERATING PRACTICE

Protection of Personal Information Policy

SUBJECT	Protection of Personal Information
PURPOSE	Our Hotel Protection of Personal Information Policy addresses the requirements of the Protection of Personal Information Act, 2013.
APPLICABLE TO	This policy refers to all parties (employees, guests, suppliers, job candidates, etc.) who provide any amount of information to the Hotel.
EFFECTIVE DATE	1 July 2021
DATE ISSUED	1 June 2021

STATEMENT OF PURPOSE

With this policy, we ensure that we gather, store and handle data fairly, lawfully, transparently and with respect towards individual rights.

LIMIT OF AUTHORITY

Employees (Operators) who handle (collect, input, file, etc.) personal information must strictly follow all principles described in this policy. A breach of data protection guidelines will invoke disciplinary and possibly legal action.

1. DEFINITIONS

- a. *Data subject*: The person to whom personal information relates, for example: guests, employees, suppliers, outside contractors.
- b. *Information Regulator*: A juristic person with jurisdiction throughout the Republic who must exercise its powers and perform its functions in accordance with POPIA.
- c. *Operator*: Means a person who processes personal information for a responsible party in terms of a contract or mandate, without coming under the direct authority of that party. For example, reservationist who inputs a guest's information on Opera.
- d. *Personal Information*: It is information relating to an identifiable person (living natural person or existing juristic person as far as is applicable, for example: race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, wellbeing, disability, religion, conscience, belief, culture and birth, education or medical, financial, criminal or employment history, any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assigned to the person, biometric information, personal opinions, views

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or preferences, the views or opinions of another individual about the person, correspondence sent by the person that is implicitly or explicitly of a private/confidential nature, 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.

- e. *POPIA*: Acronym for Protection of Personal Information Act, 2013.
- f. *Responsible Party*: Means a public or private body or any other person which, alone or in conjunction with others, determines the purpose of and means for processing personal information. In our case, it means the Hotel.

2. MINIMUM CONDITIONS TO BE FOLLOWED FOR THE PROCESSING OF PERSONAL INFORMATION OF A DATA SUBJECT

- a. Ensure that it is processed lawfully, fairly and transparently. This includes the provision of appropriate information to Data Subjects when their data is collected by the Hotel, in the form of privacy or data collection notices. The Hotel must also have a legal basis (for example, consent) to process Personal Information;
- b. Ensure it is processed only for the purposes for which it was collected;
- c. Ensure it will not be processed for a secondary purpose unless that processing is compatible with the original purpose.
- d. Ensure it is adequate, relevant and not excessive for the purposes for which it was collected;
- e. Ensure it is accurate and kept up to date;
- f. Ensure it will not be kept for longer than necessary;
- g. Ensure it is processed in accordance with integrity and confidentiality principles; this includes physical and organisational measures to ensure that Personal Information, in both physical and electronic form, are subject to an appropriate level of security when stored, used and communicated by the Hotel, in order to protect against access and acquisition by unauthorised persons and accidental loss, destruction or damage;
- h. Ensure it is processed in accordance with the rights of Data Subjects, where applicable. Data Subjects have the right to:
 - i. be notified that their Personal Information is being collected by the Hotel. The Data Subject also has the right to be notified in the event of a data breach;
 - ii. know whether the Hotel holds Personal Information about them, and to access that information.

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- iii. request the correction or deletion of inaccurate, irrelevant, excessive, out of date, incomplete, misleading or unlawfully obtained personal information;
- iv. object to the Hotel's use of their Personal Information and request the deletion of such Personal Information (deletion would be subject to the Hotel's record keeping requirements);
- v. object to the processing of Personal Information for purposes of direct marketing by means of unsolicited electronic communications; and
- vi. complain to the Information Regulator regarding an alleged infringement of any of the rights protected under POPIA and to institute civil proceedings regarding the alleged non-compliance with the protection of his, her or its personal information.

3. CONSENT AND USE OF PERSONAL INFORMATION

- a. When an employee (operator) obtains guest (data subject) personal information for legal and operational purposes, it is the Department Head's responsibility to ensure that the guest is notified of the purpose for which the information is obtained.
- b. When an employee (operator) obtains guest (data subject) personal information for marketing purposes, it is the Department Head's responsibility to ensure that the guest's (data subject's) consent is obtained.
- c. It is the Department Head's responsibility to ensure that the personal information is adequate, relevant and not excessive for the purposes for which it was collected;
- d. It is the Department Head's responsibility to ensure that the personal information is processed only for the purposes for which it was collected;
- e. It is the Department Head's responsibility to ensure that the personal information collected will not be processed for a secondary purpose unless that processing is compatible with the original purpose

4. SAFEGUARDING PERSONAL INFORMATION

- a. It is the Department Head's responsibility to ensure personal information is filed, used and communicated (physical and electronic) securely. In other words, in such a way to prevent damage, destruction, unauthorized access, and accidental loss.
- b. It is the Department Head's responsibility to ensure personal information is not kept for longer than is necessary

5. ACCURACY OF PERSONAL INFORMATION

- a. It is the Department Head's responsibility to ensure personal information is accurate and kept up to date. This applies to stored (or filed) personal information and when it is being used or communicated.