

THE CLARENS

GOLF & LEISURE ESTATE

Data Retention & Destruction Policy

The Clarens Golf & Leisure Estate HOA (NPC)

Policy Title: Data Protection Policy

Effective Date: 29 June 2025

Information Officer: Bernie Platte (General Manager)

Deputy Information Officer: Heindrich Dyer (Golf Director)

Last Reviewed: 29 June 2025

Next Review Due: 29 June 2026

1. Purpose

This policy outlines how The Clarens Golf & Leisure Estate HOA (NPC) retains, archives, and destroys personal and organisational data in compliance with the Protection of Personal Information Act (POPIA) and other applicable legislation. It ensures data is retained only for as long as legally or operationally necessary.

2. Scope

This policy applies to:

- All data held in physical or electronic form
- All departments and personnel
- All contractors, third parties, and service providers who manage data on behalf of the HOA

3. Principles

- Data will not be kept longer than necessary.
- Data retention periods will be based on legal, contractual, and operational requirements.
- Data will be securely destroyed or anonymised when no longer needed.
- The HOA will maintain clear documentation and audit trails of all retention decisions and disposal actions.

4. Retention Schedule

Data Type	Retention Period	Legal/Operational Basis
Homeowner/member records	5 years after termination	POPIA; PAIA; operational need
Contact details for newsletters/events	Until consent withdrawn	POPIA (Consent-Based)
Financial records (invoices, receipts)	5 years	SARS Act; Companies Act
Employee records (HR files)	5 years after termination	Basic Conditions of Employment Act
Payroll & tax submissions	5 years minimum	SARS; Labour legislation
CCTV footage	7 days (rolling)	Operational security standard
Visitor and contractor logs	1 year	Site safety and security compliance
Lucky draw/raffle entry records	1 year after prize awarded	Consent and transparency principle

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<u>Data Type</u>	<u>Retention Period</u>	<u>Legal/Operational Basis</u>
Emails (business-critical)	10+ years	POPIA; internal governance
General correspondence	10+ years	Operational reference
Website user form submissions	12 months	Website operations
Complaint and disciplinary records	5 years after resolution	Internal governance
Board and committee minutes	Permanent	Corporate memory & accountability

5. Destruction & Deletion Process

- **Physical Records:** Shredded or incinerated under supervision.
- **Digital Records:** Securely deleted using IT sanitisation tools; backups purged.
- **CCTV Footage:** Automatically overwritten every 7 days unless flagged for investigation. Records flagged for deletion will be reviewed quarterly. Any deletion must be authorised by the General Manager or a designated Data Compliance Officer.

6. Roles & Responsibilities

- **General Manager:** Oversees policy implementation and compliance.
- **Department Heads:** Ensure correct application within departments.
- **IT Staff/Contractors:** Manage digital deletions and system backups.
- **All Employees:** Follow guidance on data classification, retention, and disposal.

7. Exceptions

Any deviation must be authorised in writing and be justified (e.g., litigation hold, ongoing investigation).

8. Review & Updates


This policy will be reviewed annually or earlier if:

- New legal obligations arise
- Operational changes occur
- A data breach or audit prompts revision

9. Reporting Concerns

Concerns about data retention or destruction should be reported to:

 info@thecclarens.co.za

 058 256 1270