

# THE CLARENS

## GOLF & LEISURE ESTATE

### Privacy 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

This Privacy Policy explains how The Clarens Golf & Leisure Estate HOA (NPC) ("we", "us", "our") collects, uses, discloses, and protects personal information in accordance with the Protection of Personal Information Act (POPIA), Act 4 of 2013. We are committed to respecting the privacy of residents, visitors, clients, employees, and all stakeholders who interact with our Estate and services.

## 1. Information We Collect

We collect personal information through various interactions including:

- Estate access applications and resident registrations
- Employment and contractor onboarding
- Event and facility bookings
- Participation in competitions, raffles, or lucky draws
- Security access systems including visitor logs and CCTV footage
- Emergency contact databases
- Email, phone, and website enquiries

Examples of some information we collect may include:

- Names and contact details
- ID numbers or passport numbers
- Property ownership or rental information
- Vehicle registration details
- Emergency contact details
- Email and social media interactions

## 2. Purpose of Collecting Personal Information

We collect personal information for purposes that include:

- Managing estate access and security
- Administering membership and homeowner records
- Booking and coordinating use of facilities
- Communication and community engagement
- Managing events and competitions
- Compliance with legal and governance obligations
- Ensuring health, safety, and emergency response readiness

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### 3. How We Store and Secure Data

We implement reasonable and appropriate safeguards to protect personal information. These include:

- Encrypted digital storage and secure servers
- Physical access controls for paper records
- Password-protected systems and anti-virus software
- CCTV systems with 7-day footage retention
- Role-based access to sensitive data

We retain information only for as long as necessary to fulfil the purpose for which it was collected or as required by law.

### 4. Information Sharing

We do not sell or rent personal information. We may share data:

- With authorised estate employees and management
- With contractors and service providers operating under confidentiality agreements
- With emergency services and law enforcement when necessary
- With legal or regulatory bodies when required

All third-party operators are contractually bound to handle information in line with POPIA requirements.

### 5. Your Rights

You have the right to:

- Access your personal information held by us
- Request correction or deletion of inaccurate or outdated data
- Object to processing under certain circumstances
- Lodge a complaint with the Information Regulator of South Africa

To exercise these rights, contact our Information Officer in writing.

### 6. Information Officer Contact Details

**Information Officer:** Bernie Platte (General Manager)

**Deputy Information Officer:** Heindrich Dyer (Golf Director)

**Email:** [info@theclarens.co.za](mailto:info@theclarens.co.za)

**Phone:** 058 256 1270

**Physical Address:** The Clubhouse Admin Offices, Clarens Golf & Leisure Estate

**Website:** <https://www.theclarens.co.za>

### 7. Staff Training and Awareness

Staff are trained during onboarding and continuously through operational meetings to handle personal data responsibly and securely.

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### **8. Updates to This Policy**

This Privacy Policy may be updated from time to time to reflect changes in legal requirements or operational practices. Updated versions will be posted on our website and made available at the Clubhouse Admin Offices.

For any questions or concerns regarding this policy or your personal data, please contact the Information Officer.