

# THE CLARENS

## GOLF & LEISURE ESTATE

### Website 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

## 1. Introduction

The Clarens Golf & Leisure Estate HOA (NPC) ("we", "our", or "us") is committed to protecting your privacy. This Website Privacy Policy explains how we collect, use, disclose, and protect your personal information when you visit or interact with our website: [www.theclarens.co.za](http://www.theclarens.co.za)

We process personal information in compliance with the Protection of Personal Information Act, 4 of 2013 (POPIA).

## 2. What Information We Collect

We may collect the following personal information from users of our website:

- Name and surname
- Email address
- Contact number
- Physical address (if entered via forms)
- IP address and browsing data
- Preferences or information voluntarily provided in contact forms or surveys
- Any further information required deemed necessary by us
- Information submitted through competitions, raffles, or lucky draws

## 3. How We Collect Information

- Directly from you via contact forms, newsletter sign-ups, bookings, and event registrations
- Automatically through browser cookies and analytics tools
- From referrals or third-party integrations (e.g. event partners or contractors)

## 4. Why We Collect Your Information

We collect and use personal information for the following purposes:

- To respond to enquiries submitted via the website
- To communicate estate updates, events, and promotional material (with consent)
- To administer bookings, raffles, and competitions
- To improve our website performance and user experience

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- For statistical and security purposes
- To comply with legal and regulatory requirements

### **5. Cookies and Tracking**

We use cookies to enhance your experience on our website. These may include:

- Session cookies (to maintain site functionality)
- Analytics cookies (to understand site usage)
- Preference cookies (to remember your choices)

You may adjust your browser settings to refuse cookies; however, this may affect website functionality.

### **6. Sharing of Information**

We do not sell personal information. We may share your data with:

- Our authorised employees, contractors, and IT service providers
- Legal authorities where disclosure is required by law
- Marketing providers for communication purposes (only with consent)
- Event and raffle partners where relevant

All third parties are bound by confidentiality and data protection agreements.

### **7. Data Security**

We implement appropriate physical, technical, and administrative safeguards to protect personal data against loss, misuse, unauthorised access, disclosure, alteration, or destruction. These include:

- SSL encryption
- Firewalls and access controls
- Secure data storage systems
- Staff training in POPIA compliance

### **8. Retention of Information**

- CCTV footage: retained for 7 days
- Other personal information: retained for as long as necessary to fulfil the purpose it was collected for, or as required by law

### **9. Your Rights**

Under POPIA, you have the right to:

- Request access to personal information we hold about you
- Request correction or deletion of your data
- Withdraw consent (where applicable)
- Lodge a complaint with the Information Regulator

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### 10. Contact Us

If you have any queries about this policy or the way your information is handled, contact us via:

- **Email:** [info@theclarens.co.za](mailto:info@theclarens.co.za)
- **Telephone:** 058 256 1270
- **Website:** [www.theclarens.co.za](http://www.theclarens.co.za) (via the POPIA & PAIA portal)
- **In person:** Visit the Clubhouse admin offices

### 11. Policy Updates

This policy may be updated periodically to reflect legal or operational changes. Updated versions will be posted on this page with the revision date.

**The Clarens Golf & Leisure Estate HOA (NPC)** remains committed to responsible and lawful data handling.