

# CUSTOMER PRIVACY NOTICE

This Notice explains how we obtain, use and disclose your personal information, as is required by the Protection of Personal Information Act (“PPI”).

At Caribbean Beach Club Home Owners Association we are committed to protecting your privacy and to ensure that your personal information is collected and used properly, lawfully and transparently.

This Notice sets out:

- Who we are
- What information we collect
- Our aim to provide on-going management and security services
- To whom we disclose your information
- How we safeguard your information
- Your rights to access and correction of information
- Changes to this Notice
- How to contact us

## WHO WE ARE

In this Notice, “CBC” (Caribbean Beach Club Golf Estate), “CBCHOA” (Caribbean Beach Club Home Owners Association), “St James Sports Club”, “Sandy Lane Golf Club” or “we” refers to one or more of the entities in the Caribbean Beach Club Home Owners Association that operate in Kosmos, North West Province.

## THE INFORMATION WE COLLECT

We collect and process your personal information mainly to provide you with access to our services, to help us improve our offerings to you and for certain other purposes explained below.

The type of information we collect will depend on the purpose for which it is collected and used. We will only collect information that we need for that purpose.

We collect information directly from you where you provide us with your personal details, for example when you purchase a home and become a member of the Association or services from us such as registering on the security access system or when you submit enquiries to us or contact us. Where possible, we will inform you what information you are required to provide to us and what information is optional.

We also collect information about you from other sources as explained below. We also collect information from your employees (domestic workers, gardeners, etc.) contractors and visitors all for the purpose stated below.

With your consent, we may also supplement the information that you provide to us with information we receive from other companies in order to offer you a more consistent and personalised experience in your interactions with CBC and its various service providers.

Website usage information is collected using “cookies” which allows us to collect standard internet visitor usage information.

## HOW WE USE YOUR INFORMATION

We will use your personal information only for the purposes for which it was collected or agreed with you, for example:

- To provide our services to you, to carry out the transaction demanded by our Memorandum of Incorporation and other Governance Documents requested by you at AGM's and EGM's and to maintain our relationship;
- For security purposes;
- To conduct credit reference searches or verification as required by our Governance Documents;
- To confirm and verify your identity or to verify that you are an authorised user for security purposes;
- For operational purposes, and where applicable, for credit management;
- For the detection and prevention of fraud, crime, money laundering or other malpractice;
- For debt tracing or debt recovery;
- To conduct market or customer satisfaction research or for statistical analysis;
- For audit and record keeping purposes;
- In connection with legal proceedings.

We will also use your personal information to comply with legal and regulatory requirements or industry codes to which we subscribe or which apply to us, or when it is otherwise allowed by law (for example to protect CBC's interests).

## ONGOING MANAGEMENT SERVICES

Given our aim to provide you with on-going management and security services, we would like to use your information to keep you informed about other services which may be of particular interest to you.

Please email [admin@caribbeanbeach.co.za](mailto:admin@caribbeanbeach.co.za) if you do not want to receive information from our stakeholders and business partners. You may opt out at any time if you don't want to receive any further communications of this nature.

You may also give and withdraw consent and tell us what your communication preferences are by clicking here <https://cms.gloportal.co.za/restricted/Logon.do?action=login> to log into My Profile on the GloVent site or by contacting us at the numbers/addresses provided below.

## DISCLOSURE OF INFORMATION

We may disclose your personal information to our service providers who are involved in the delivery of products or services to you. We have agreements in place to ensure that they comply with these privacy terms.

We may share your personal information with, and obtain information about you from:

- Third parties for the purposes listed above, for example credit reference and fraud prevention agencies, law enforcement agencies;
- Stakeholders directly linked to CBC such as the restaurant when we believe it will enhance the services we can offer to you, but only where you have agreed to such sharing;
- Other third parties from whom you have chosen to receive marketing information.

We may also disclose your information:

- Where we have a duty or a right to disclose in terms of law or industry codes;
- Where we believe it is necessary to protect our rights.

## INFORMATION SECURITY

We are legally obliged to provide adequate protection for the personal information we hold and to stop unauthorised access and use of personal information. We will, on an on-going basis, continue to review our security controls and related processes to ensure that your personal information is secure.

Our security policies and procedures cover:

- Physical security;
- Computer and network security;
- Access to personal information;
- Secure communications;
- Security in contracting out activities or functions;
- Retention and disposal of information;
- Acceptable usage of personal information;
- Governance and regulatory issues;
- Monitoring access and usage of private information;
- Investigating and reacting to security incidents.

When we contract with third parties, we impose appropriate security, privacy and confidentiality obligations on them to ensure that personal information that we remain responsible for, is kept secure.

We may need to transfer your personal information to another country for processing or storage. We will ensure that anyone to whom we pass your personal information agrees to treat your information with the same level of protection as we are obliged to.

## YOUR RIGHTS: ACCESS TO INFORMATION

You have the right to request a copy of the personal information we hold about you. To do this, simply click here <https://cms.gloportal.co.za/restricted/Logon.do?action=login> to log into My Profile to review your personal information or contact us at the numbers/addresses listed below and specify what information you would like. We will take all reasonable steps to confirm your identity before providing details of your personal information.

Please note that any such access request may be subject to a payment of a legally allowable fee.

## CORRECTION OF YOUR INFORMATION

As a member or a resident, you have the right as well as an obligation in terms of our Governance documentation to ask us to update or correct your personal information or, in the case of a person not a member of the Association or resident on the estate, delete your personal information. You may do this by clicking here <https://cms.gloportal.co.za/restricted/Logon.do?action=logon> to log into My Profile to

review and change your personal information or by contacting us at the numbers/addresses provided below.

We will take all reasonable steps to confirm your identity before making changes to personal information we may hold about you.

We would appreciate it if you would keep your personal information accurate. Please update your information by logging onto My Profile whenever your details change.

## CHANGES TO THIS NOTICE

Please note that we may amend this Notice from time to time. Please check this website periodically to inform yourself of any changes.

## HOW TO CONTACT US

If you have questions about this Notice or believe we have not adhered to it, or need further information about our privacy practices or wish to give or withdraw consent, exercise preferences or access or correct your personal information, please contact us at the following numbers/addresses:

- CBCHOA Administration: 012 244 3000 or by fax: 012 244 3001
- [Admin@caribbeanbeach.co.za](mailto:Admin@caribbeanbeach.co.za)
- My Profile

**Oct 2021**