

## Privacy Notice & Consent to Use of Personal Information

This Club Kempton Park Golf Club (“**the Club**”), is firmly committed to protecting the privacy of our Members and associates. The Club is the sole owner of the information collected on this website. We will not share, sell, or otherwise distribute the financial or personal information of our Members, or those who otherwise provide personal information to us, to any other persons or organisations in any way other than what is disclosed in this Notice.

This Club is aware of its personal data obligations towards its Members, GolfRSA and all affiliates and associates of GolfRSA and hence this Notice and the Club’s personal data protection policy and practical implementation will always be compliant with South African law and international best practice.

We respect the privacy of everyone who visits this website. As a result, we would like to inform you regarding the way we would use your Personal Information. We recommend you read this [Privacy Notice & Consent to Use of Personal Information \(“Notice”\)](#) so that you understand our approach towards the use of your Personal Information. By submitting your Personal Information to this Club, you will be treated as having given your permission – where necessary and appropriate – for disclosures referred to in this Notice.

By using this website, you acknowledge that you have reviewed the terms of this Notice and agree that we may collect, use and transfer your Personal Information in accordance therewith. If you do not agree with these terms, you may choose not to use our website and please do not provide any Personal Information through this website. This Notice forms part of our Website Terms and Conditions of Use (where relevant or standalone if not displayed) and such shall be governed by and construed in accordance with the laws of South Africa. This Notice explains how we obtain, use and disclose your personal information, as is required by the **Protection of Personal Information Act, No 4. Of 2013 (“POPIA”)**. This Club is committed to protecting your privacy and to ensure that your Personal Information is collected and used properly, lawfully and safely.

We collect and process your Personal Information mainly to provide you with access to our services and to interface with other Clubs, GolfRSA and the handicaps network provider. 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 join this Club, or enter a competition associated with this Club. This Club collects Personal Information from when you register with us as a Member or to enter a competition played on our course. We will only use this information to carry out the processes for the purpose for which you registered with us. We will protect your Personal Information in accordance with this Notice and POPIA. If you agree, we will use your information to send marketing information to you (it will always have an “opt-out” element). This Club will not share your Personal Information with external third parties, save for the GolfRSA appointed handicaps network operator.

The Club will only collect Personal Information from you when the purpose for collection has been explicitly defined and agreed. We undertake to ensure that as the data subject, you are aware of the purpose for collecting your Personal Information. Where reasons for processing for further purposes arise, these will be explicitly defined and agreed. The Club will take reasonable steps to ensure that information is complete, accurate, not misleading and where necessary, updated. The Club will ensure that appropriate information security measures are established to ensure that Personal Information is protected in line with industry practices and standards. If the data has not been collected directly from the data subject, the source of collection will be provided together with name and address of the party.

1. According to POPIA “Personal Information” means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person. The POPIA, which has more specific examples if you need them, can be found at the following link: <https://popia.co.za/section-1-definitions/>. Examples of information we collect from you are (“**Personal Information**”):

- name
- residential address
- email address
- telephone/cell number
- gender
- age
- possibly details of prior club
- banking details (where debit orders are implemented)

We also collect information about you from other sources as explained below. With your consent, we may also supplement the information that you provide to us with information we receive from other associates under the auspices of GolfRSA, in order to offer you a more consistent and personalised experience in your interactions with Club.

We may automatically collect non-personal information about you, such as the type of internet browsers you use, or the website from which you linked to our website. We may also aggregate details which you have submitted to the website (for example, the products or services you are interested in). You cannot be identified from this information and it is only used to assist us in providing an effective service on this website. We may from time-to-time supply third parties with this non-personal or aggregated data for uses in connection with this website.

Cookies Policy: We use the term “cookies” to refer to cookies and other similar technologies covered by POPIA on privacy in electronic communications. What is a cookie? Cookies are small data files that your browser places on your computer or device. Cookies help your browser navigate a website and the cookies themselves cannot collect any information stored on your computer or your files. When a server uses a web browser to read cookies, they can help a website deliver a more user-friendly service. To protect your privacy, your browser only gives a website access to the cookies it has already sent to you. We use cookies to learn more about the way you interact with our content and help us to improve your experience when visiting our website. Cookies remember the type of browser you use and which additional browser software you have installed. They also remember your preferences,

such as language and region, which remain as your default settings when you revisit the website. Cookies also allow you to rate pages and fill in comment forms. Some of the cookies we use are session cookies and only last until you close your browser, others are persistent cookies which are stored on your computer for longer. For some of the functions within our websites we use third party suppliers, for example, when you visit a page with videos embedded from or links to *YouTube*. These videos or links (and any other content from third party suppliers) may contain third party cookies and you may wish to consult the policies of these third-party websites for information regarding their use of cookies. We will not use cookies to collect personally identifiable information about you. However, should you wish to do so, you can choose to reject or block the cookies set by the websites of any third-party suppliers by changing your browser settings – see the *Help* function within your browser for further details. Please note that most browsers automatically accept cookies, so if you do not wish cookies to be used you may need to actively delete or block the cookies. You can also visit [www.allaboutcookies.org](http://www.allaboutcookies.org) for details on how to delete or reject cookies and for further information on cookies generally. For information on the use of cookies in mobile phone browsers and for details on how to reject or delete such cookies, please refer to your handset manual. Note, however, that if you reject the use of cookies, you will still be able to visit our website but some of the functions may not work correctly.

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

- Analyse the effectiveness of our advertisements, competitions and promotions
- Collect information about the device you are using to view the website, such as your IP address or the type of Internet browser or operating system you are using and link this to your Personal Information so as to ensure that the website presents the best web experience for you
- Evaluate the use of the website, products and services
- For audit and record keeping purposes
- For market research purposes
- For monitoring and auditing website usage

- Help speed up your future activities and experience on the website. For example, a website can recognise that you have provided your Personal Information and will not request the same information a second time.
- In connection with legal proceedings
- Make the website easier to use and to better tailor the website and our products to your interests and needs
- Offer you the opportunity to take part in competitions or promotions
- Personalise your website experience, as well as to evaluate (anonymously and in the aggregate) statistics on website activity, such as what time you website it, whether you have website it before and what website referred you to it
- To assist with business development
- To carry out our obligations arising from any contracts entered into between you and us
- To conduct market or Member satisfaction research or for statistical analysis
- To confirm and verify your identity or to verify that you are an authorised Member for security purposes
- To contact you regarding products and services which may be of interest to you (including the Club's newsletter), provided you have given us consent to do so or you have previously requested a product or service from us and the communication is relevant or related to that prior request and made within any timeframes established by applicable laws.
- To notify you about changes to our service
- To respond to your queries or comments
- 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
- Where we collect Personal Information for a specific purpose, we will not keep it for longer than is necessary to fulfil that purpose, unless we have to keep it for legitimate business or legal reasons. In order to protect information from accidental or malicious destruction, when we delete information from our services, we may not immediately delete residual copies from our servers or remove information from our backup systems

- You can opt out of receiving communications from us at any time. Any direct marketing communications that we send to you will provide you with the information and means necessary to opt out.

We may disclose your Personal Information to our business partners who are involved in the delivery of GolfRSA's handicap system. We may thus share your Personal Information with and obtain information about you from:

- Third parties for the purposes listed above
- 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.

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 renew security controls and related processes to ensure that your Personal Information is secure. Our security policies and procedures cover:

- Acceptable usage of personal information
- Access to personal information
- Computer and network security
- Governance and regulatory issues
- Investigating and reacting to security incidents
- Monitoring access and usage of personal information
- Physical security
- Retention and disposal of information
- Secure communications
- Security in contracting out activities or functions (these details are in the Club's PAIA & POPI Policy and as a Member of this Club you may request a copy thereof).

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 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.

In terms of the **Promotion of Access to Information Act, No. 2 of 2000 (“PAIA Act”)** you have the right to request a copy of the Personal Information we hold about you. To do this, simply contact us at the numbers/addresses listed on our home page 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, as laid down in our PAIA & POPIA Policy.

You have the right to ask us to update, correct or delete your Personal Information. 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 take the necessary steps to keep your Personal Information accurate and up-to-date by notifying us of any changes we need to be aware of.

Should you have any concerns with the way in which we are processing your Personal Information, please contact your Club’s Information Officer, the details of whom are held at the Pro Shop, alternatively you are entitled to lodge a complaint with the Information Regulator, whose contact details are:

33 Hoofd Street

Forum III, 3rd Floor Braampark

P.O Box 31533

Braamfontein, Johannesburg, 2017

Complaints email: [complaints.IR@justice.gov.za](mailto:complaints.IR@justice.gov.za)

General enquiries email: [infoereg@justice.gov.za](mailto:infoereg@justice.gov.za).

We pledge that our processing of your Personal Information will be handled in a way that complies with all the relevant laws and that your rights to privacy will be protected as required by law.

Please note that we may amend this Notice from time to time. Please check our website periodically to inform yourself of any changes. If you have any queries 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 numbers/addresses listed on our website.

