



## **TSWALU KALAHARI RESERVE PROPRIETARY LIMITED**

### **PRIVACY POLICY**

#### **1 INTRODUCTION**

1.1 We understand that your privacy and the security of your personal information is extremely important. This policy sets out what we do with your personal information, what we do to keep it secure, from where and how we collect it, as well as your rights in relation to the personal information we hold about you.

1.2 This policy applies if you interact with us, including through our reservations department via phone or email, through our agents, through an online contact form, booking via Nightsbridge or by social media platforms.

1.3 If you don't want to read all the detail, here are the things we think you'd really want to know:

1.3.1 We share your personal information with third parties where it is necessary to provide services to you or to perform our functions.

1.3.2 We use a number of third parties to process your personal information on our behalf linked to the purpose(s) for which we collected your personal information.

1.3.3 You have a number of rights over your personal information and the different ways in which you can exercise those rights is set out in this notice under paragraph 9.

1.3.4 We do send relevant direct marketing communications, if permitted (based on our online compliancy authorisation). We do this to encourage either you or your clients to stay at Tswalu by sending you updates and news that we feel will be of benefit to either you or your client. If you want us to stop you can request us to stop and opt-out of receiving our marketing communication.

#### **2 WHO ARE WE?**

When we say “**we**” or “**us**” in this policy, we are referring to Tswalu Kalahari Reserve Proprietary Limited.

#### **3 WHAT SORTS OF PERSONAL INFORMATION DO WE HOLD?**

In order to offer you services and products we will collect, hold and use the following personal information –



- 3.1 information that you provide to us such as your name, address, identification number, telephone number, email address, and any feedback you give to us relating to personal preferences for your stay, including by phone, email, or when you communicate with us via social media or our website;
- 3.2 information about the services that we provide to you or the functions we perform (including for example, the things we have provided to you, when and where, the way you use our services, and so on);
- 3.3 information about whether or not you want to receive marketing communications from us; and
- 3.4 your contact details and details of the emails and other electronic communications you receive from us, and how you interact with them. For example whether the communication has been opened, if you have clicked on any links within that communication and the device you used. We do this because we want to make sure that our communications are useful to you, so if you don't open them or don't click on any links in them, we know we need to improve our services.

#### 4 **OUR LEGAL BASIS FOR PROCESSING YOUR PERSONAL INFORMATION**

Whenever we process your personal information we have to have something called a "legal basis" for what we do. The different legal bases we rely on are –

- 4.1 **Consent** - You have told us you are happy for us to process your personal information for a specific purpose(s).
- 4.2 **Legitimate interests** - The processing is necessary for us to conduct our business, but not where our interests are overridden by your interests or rights.
- 4.3 **Performance of a contract** - We must process your personal information in order to be able to provide you with one of our products or services.
- 4.4 **Legal obligation** - We are required to process your personal information by law.

#### 5 **HOW DO WE USE YOUR PERSONAL INFORMATION?**

We may use your information in the following ways –

- 5.1 **To provide our services or to perform our functions** - we need to use your personal information to make our products and services available to you. After that, we need to provide them to you, process your payment and sometimes award with promotions. We need to use your details to do all this.



- 5.2 **To improve interactive experience with us** - we try to understand the community we serve so we can provide you with great personalised offers and ensure that we meet all requirements to ensure a tailored guest experience, including dietary and medical conditions, if applicable.
- 5.3 **Analytics and profiling** - we use your personal information for statistical analysis and to help us understand you more. This helps us to serve you better and to find ways to improve our offering to you.
- 5.4 **Contacting you** - we use your personal information to contact you. This may be in relation to a service update, an issue you have raised with us, to conduct market research or to ask for your feedback.
- 5.5 **Marketing and advertising** - we use your personal information to provide relevant marketing communications (including by email or online advertising), relating to our services/functions, and those of our third party partners or affiliates. As part of this, online advertising may be displayed on our website.

## 6 PERSONAL INFORMATION SHARING

We may share information about you with –

- 6.1 companies or third parties affiliated to us;
- 6.2 partners or agents involved in delivering the services offered by us;
- 6.3 partners or agents that conduct satisfaction surveys and any other surveys related to our functions;
- 6.4 companies who are engaged to perform services for or on our behalf;
- 6.5 law enforcement agencies, regulatory organisations, courts or other public entities if we are required by law to do so;
- 6.6 emergency services; and
- 6.7 with any entity or forum wherein we may protect ourselves against fraud or exercise our rights.

## 7 COOKIES AND SIMILAR TECHNOLOGIES

We use cookies to help give you the best experience on our website. Our cookies policy is available [here](#).



## 8 KEEPING YOU INFORMED ABOUT OUR OFFERING/SERVICES

- 8.1 We would like to tell you about the great offers, ideas, news and services we offer from time to time that we think you might be interested in. Where we have consent or it is in our legitimate interests to do so, we may do this by direct mailer, email, text message, WhatsApp, phone, through online advertising or by any other electronic means.
- 8.2 We won't send you marketing messages if you tell us not to, but if you are a customer we will send you occasional messages and may send you surveys (you can always opt out of these via the survey email itself). If you wish to amend your marketing preferences, you can do so by clicking the unsubscribe link in any email notification, replying "Stop" to any SMS, or by emailing [info@tswalukalahari.com](mailto:info@tswalukalahari.com).
- 8.3 Please note that it can take a little while for all marketing to stop once you either withdraw your consent or tell us you'd like to opt out of marketing. This is because some marketing may have been identified as relevant to your interests and may already be in transit, meaning it cannot be immediately stopped.

## 9 YOUR RIGHTS

- 9.1 You have a number of rights under data protection legislation which, in certain circumstances, you may be able to exercise in relation to the personal information we process about you.
- 9.2 These include –
- 9.2.1 the right to access a copy of the personal information we hold about you;
  - 9.2.2 the right to correction of inaccurate personal information we hold about you;
  - 9.2.3 the right to restrict our use of your personal information;
  - 9.2.4 the right to be forgotten; and
  - 9.2.5 the right to object to our use of your personal information.
- 9.3 Where we rely on consent as the legal basis on which we process your personal information, you may also withdraw that consent at any time.



If you are seeking to exercise any of these rights, please contact us at [POPIA@tswalukalahari.com](mailto:POPIA@tswalukalahari.com). Please note that we will need to verify your identity before we can fulfil any of your rights under data protection law. This helps us to protect the personal information belonging to our customer against fraudulent requests. You may also refer to our PAIA and POPIA Manual for details.

## 10 AUTOMATED DECISION MAKING AND PROFILING

We do not use any purely automated processing processes to bring about a decision – including profiling – on the establishment, implementation or termination of an employment relationship.

## 11 HOW LONG WILL WE KEEP YOUR PERSONAL INFORMATION FOR?

We will keep your personal information for the purposes set out in this privacy policy and in accordance with the law and relevant regulations. We will never retain your personal information for longer than is necessary.

## 12 SECURITY

We take protecting your personal information seriously and are continuously developing our security systems and processes. Some of the controls we have in place are –

- 12.1 we limit physical access to our buildings and user access to our systems to only those that we believe are entitled to be there;
- 12.2 we use technology controls for our information systems, such as firewalls, user verification, strong data encryption, and separation of roles, systems and data;
- 12.3 systems are proactively monitored through a “detect and respond” information security function;
- 12.4 we utilise industry standards to support the maintenance of a robust information security management system; and
- 12.5 we enforce a “need to know” policy, for access to any data or systems.

## 13 CONTACT US

If you would like to exercise one of your rights as set out in the “Your Rights” section above, or you have a question or a complaint about this policy, or the way your personal information is processed, please contact us by email on [POPIA@tswalukalahari.com](mailto:POPIA@tswalukalahari.com).



## 14 INFORMATION REGULATOR (SOUTH AFRICA)

The Information Regulator (South Africa) is an independent body established in terms of section 39 of POPIA. The Information Regulator is empowered to monitor and enforce compliance by public and private bodies with the provisions of the POPIA Act. They may be accessed at –

14.1 JD House  
27 Stiemens Street  
Braamfontein  
Johannesburg, 2001

14.2 **Contact:** [infoereg@justice.gov.za](mailto:infoereg@justice.gov.za) or  
**Complaints:** [complaints.IR@justice.gov.za](mailto:complaints.IR@justice.gov.za)

## 15 POLICY REVISION

This privacy policy is subject to review and amendment without prior notice. However, we undertake to ensure that any amendments hereto are communicated on our publicly available platforms such as our website, for the benefit of the general public, our customers, and any other persons whom may be affected by this policy.

## 16 VERSION CONTROL

Last updated June 2021.