

Contents

Privacy policy	2
Collection of data	2
Employees	2
Customers	2
Suppliers	4
Individuals screened for COVID 19	5
Consent	5
Sharing information	5
Retention	5
Your legal rights	6
Changes to this policy	6
Information Technology Policy	7
Email Usage	7
Disclaimer	7
Computer Usage	7
Security	7
Virus Protection	8

Privacy policy

Effective date: 21 June 2021

Polkadraai Trust is committed to protecting the privacy of personal information of our data subjects. The information you share with us as a data subject allows us to provide you with the best experience with our products and services, or as a stakeholder of Polkadraai Trust.

It is important that you take all necessary and appropriate steps to protect your data yourself (for example, by ensuring that all passwords and access codes are kept secure).

Polkadraai Trust has dedicated policies and procedures in place to protect all personal information collected and processed by us. Please read below for more information on how we collect, process, use and disclose personal information. carelvd@carelsburgh.co.za

Registered address: Carelsburgh Plaas, Vlottenburg, Stellenbosch, 7604

Information officer contact details: carelvd@carelsburgh.co.za

Collection of data

Personal data will be collected directly from you, as data subject.

Where information is not collected directly from you as a data subject, we will take reasonable steps to inform you of the fact that the information was collected and will be processed.

You must not send us personal information about someone else without first getting his or her consent for it to be used and disclosed in the ways set out in this terms and conditions. This is because we will assume he or she has consented although we may still ask for confirmation from them. Where you do give us information about someone else, or someone else discloses a connection with you, that information may be taken into account with your other personal information.

Employees

Polkadraai Trust must process personal information of their employees for various legal and employment purposes. The information that will be processed is as follows:

Personal information	Purpose for processing	Legal basis for processing
Name and Surname	The data processing activity is necessary to enter into or perform a contract with the data subject.	The data subject has given permission for the organisation to process their personal data for one or more processing activities.
Gender	The data processing activity is necessary to enter into or perform a contract with the data subject.	The data subject has given permission for the organisation to process their personal data for one or more processing activities.

Marital status	The data processing activity is necessary to enter into or perform a contract with the data subject.	The data subject has given permission for the organisation to process their personal data for one or more processing activities.
Age	The data processing activity is necessary to enter into or perform a contract with the data subject.	The data subject has given permission for the organisation to process their personal data for one or more processing activities.
Language and birth of the person	The data processing activity is necessary to enter into or perform a contract with the data subject.	The data subject has given permission for the organisation to process their personal data for one or more processing activities.
ID number	The data processing activity is necessary to enter into or perform a contract with the data subject.	The data subject has given permission for the organisation to process their personal data for one or more processing activities.
Telephone number, e-mail address	The data processing activity is necessary to enter into or perform a contract with the data subject.	The data subject has given permission for the organisation to process their personal data for one or more processing activities.
Physical address	The data processing activity is necessary to enter into or perform a contract with the data subject.	The data subject has given permission for the organisation to process their personal data for one or more processing activities.
Account Details	The data processing activity is necessary to enter into or perform a contract with the data subject.	The data subject has given permission for the organisation to process their personal data for one or more processing activities.

Customers

In order for us to provide you with the best service, we need to collect and process personal information from you as a customer. This information will consist of the following:

Personal information	Purpose for processing	Legal basis for processing
Name, surname, telephone number and address of next of kin	To ensure accurate on the system (to identify customer)	The data processing activity is necessary to enter into or perform a contract with the data subject.
Language and birth of the person	To determine the preferred language of communication	The data processing activity is necessary to enter into or perform a contract with the data subject.

Education history	To determine the compatibility of students sharing accommodation	The data processing activity is necessary to enter into or perform a contract with the data subject.
Financial history	Used to identify the customer's specific risks and services to be rendered.	The data processing activity is necessary to enter into or perform a contract with the data subject.
ID number	To confirm the customer is a real person or that the customer is who he or she claims to be.	The data processing activity is necessary to enter into or perform a contract with the data subject.
E-mail address, telephone number and physical address	Needed in order to communicate with the customer	The data processing activity is necessary to enter into or perform a contract with the data subject.
Student number	To save as proof that the occupant is a registered student	The data processing activity is necessary to enter into or perform a contract with the data subject.
Vehicle registration number	To identify which vehicle belongs on the property and which not (security reasons)	The data processing activity is necessary to enter into or perform a contract with the data subject.

Suppliers

In order for us to communicate with you regarding services you provide/ payment purposes, we need to collect and process personal information from you as a customer. This information will consist of the following:

Personal information	Purpose for processing	Legal basis for processing
Name and Surname	In order to communicate with suppliers and to identify supplier	The data subject has given permission for the organisation to process their personal data for one or more processing activities.
Email address and telephone number	In order to communicate with suppliers.	The data subject has given permission for the organisation to process their personal data for one or more processing activities.
Physical address	In order to communicate with suppliers.	The data subject has given permission for the organisation to process their personal data for one or more processing activities.

Polkadraai Trust will keep your personal information confidential at all times, however, you agree and consent that Polkadraai Trust may:

- a) Communicate with you electronically in relation with the service or product being provided (email, fax, telephone or through any other relevant or secured electronic platform)
- b) Obtain any relevant personal information, from any person or institution, necessary to comply with the agreement between you and Polkadraai Trust.

- c) Obtain credit information from any person or institution where necessary
- d) Verify the information provided herein and to contact other third party for purposes of the same
- e) Disclose personal information to regulatory or government agencies in accordance with the relevant legislation or directive
- f) Use personal information to market new or other products of the company which may be suitable or relevant to you

Individuals screened for COVID 19

The following needs to be explained verbally to anyone who needs to complete documentation with personal information for COVID 19 Screening. It may also be documented on the document to be completed:

The personal information collected is necessary to comply with the COVID 19 screening as required by the Disaster management Act and supplementary regulations and directives. This information will be kept confidential unless disclosure is required by law. E.g. should a positive case be identified. This information will be stored for a period of [Enter time period] and thereafter be destroyed. If you do not provide the information as required, we can limit or refuse you access to the premises.

Consent

Where the legal basis for us processing your personal information is consent as above, it will be included in the contract or agreement concluded with you. This consent may be withdrawn at any time, however this withdrawal of consent will not make processing we undertook before your withdrawal unlawful. You will not suffer any detriment for withdrawing your consent.

You may withdraw your consent by contacting our information officer, whose details are provided at the beginning of the privacy policy.

Where the legal basis for processing is for the proper performance of the contract, and you fail to provide us with the information or request us to stop processing this information, it may create limitations on our performance of the contract or agreement.

Sharing information

In processing your personal information, we may share it with third party processors under an operator's agreement. These include but are not limited to:

- a) Company registration documents
- b) Compiling of financial statements
- c) Sharing of employee information for payroll purposes

As an operator, these service providers will not be able to process or use your data for any reason other than to provide the service as required by us. They also need to implement proper safeguards to ensure the personal information is secured at all times.

Retention

Polkadraai Trust is required to comply with various different legislative retention periods, which leads to different retention requirements. As such we have opted for the longest retention period required from us for legal purposes and apply this to all our data. Your personal information will be only be kept on record while you are an occupant. Once your final deposit has been paid, all personal information in our possession will be deleted/ destroyed.

Your legal rights

You have the following rights under the Protection of Personal Information Act:

- a) Request access to your personal information
- b) Request a correction or deletion of personal information
- c) Object to the processing of personal information
- d) Lodge a complaint to the Information Regulator

If you want to exercise any of the rights described above, or are dissatisfied with the way we have used your personal information, please contact the information officer.

Changes to this policy

This policy may change from time to time. The latest effective date will be highlighted at the start of the privacy policy.

Information Technology Policy

Email Usage

- 1.1 The email facility must be used for business purposes only.
- 1.2 The email of Polkadraai Trust may not be used as a facility to.
- 1.3 Initiate or forward any chain message or other message which asks the recipient to forward the message to multiple other users, unless such message is required for purposes of the employer's business.
- 1.4 Send, download, display or store prohibited material.
- 1.5 When receiving emails from customers, personal information contained in these emails must be kept confidential.
- 1.6 Where possible, emails must be acted upon and deleted as soon as possible,
- 1.7 Emails will not be forwarded outside Polkadraai Trust unless the customer requested this.

Disclaimer

- 2.1 The employees will ensure that every email message sent contains the disclaimer at the end of such message.
- 2.2 No employee is permitted to alter the content of the disclaimer.
- 2.3 No employee is permitted to change the set-up of the email or the signatory clause at the end of the email message.

Computer Usage

- 3.1 No unlicensed software will be used on the computer system.

Security

- 5.1 Computer users of Polkadraai Trust must ensure that their computers are adequately protected against theft and damage.
- 5.2 All users are responsible for ensuring the security, integrity and confidentiality of all data stored on the local memory of their computer, in particular any customer data. In this regard, any flash disk used to store data must be securely kept at all times.
- 5.3 If any device is stolen, the user should report it immediately and steps should be taken to change all access passwords.
- 5.4 Users should under no circumstances store any information on memory sticks, unless such memory sticks are password protected.

Virus Protection

6.1 The users must ensure that the latest anti-virus protection software.

6.2 If a virus is detected, the relevant people must be notified.

6.3 Passwords should not be printed or stored in any manner or form.

DISCLAIMER: PLEASE NOTE THAT THE PROPOSED WORDING IN THIS DOCUMENT DOES NOT CONSTITUTE LEGAL ADVICE, AND ANY LEGAL DOCUMENTS AND AGREEMENTS SHOULD STILL BE REVIEWED AND APPROVED BY A LEGAL PRACTITIONER IF NECESSARY.