

**PRIVACY POLICY | CRAYFISH LODGE SEA AND
COUNTRY GUESTHOUSE (PTY) LTD
VERSION 1**

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Privacy policy

Effective date: 01 July 2021

Crayfish Lodge Sea And Country Guesthouse (Pty) Ltd 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 Crayfish Lodge Sea And Country Guesthouse (Pty) Ltd.

By submitting any information to Crayfish Lodge Sea And Country Guesthouse (Pty) Ltd, you provide consent to the processing of your personal information as set out in this policy.

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).

Crayfish Lodge Sea And Country Guesthouse (Pty) Ltd 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.

Registered address: Killaney Street 2 & 4, De Kelders, Gansbaai, 720

Information officer contact details: rk@crayfishlodge.com

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.

Prospective employees

In applying for this position you may provide us with personal information as part of the application process. We may also obtain personal information while performing the required background check, reference check and credit check if relevant.

The personal information that may be obtained during this process is as follows:

| Personal information | Purpose for processing | Legal basis for processing |
|---|--|--|
| Identity Name and surname, ID number | To verify your identity and be able to properly address you. | The data processing activity is necessary to enter into or perform a contract with the data subject. |

| | | |
|---|---|---|
| Background information (ID number, Employment history, Language skills, views of other people about the person.) | To verify your identity and Information is necessary to determine whether Crayfish Lodge Sea And Country Guesthouse (Pty) Ltd can enter into a contract with you. | The data processing activity is necessary to enter into or perform a contract with the data subject. |
| Contact information (Telephone number, email address, physical address) | For communication purposes. | 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. |

Employees

Crayfish Lodge Sea And Country Guesthouse (Pty) Ltd 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 |
|--|---|---|
| Identity Name and Surname, ID number | To verify your identity. | The data processing activity is necessary to perform a contract with the data subject. |
| Contact information (Telephone number, email address, physical address) | For communication purposes. | 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. |
| Background information (Employment history, Language skills, views of other people about the person.) | To keep your personnel file up to date. | The data processing activity is necessary to perform a contract with the data subject. |
| Other information Marital status, Name and surname, PAYE number, Account information | Processed for payroll purposes. | The data processing activity is necessary to perform a contract with the data subject. |

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, ID number, vehicle registration number, telephone number and Email address | To identify you on the database and provide you with information on promotions and discounts | The data subject has given permission for the organisation to process their personal data for one or more processing activities. |
| Language | To identify you on the database and provide you with information on promotions and discounts | The data subject has given permission for the organisation to process their personal data for one or more processing activities. |

Suppliers

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, Email address, physical address and telephone number. | To communicate with suppliers, order from suppliers, pay suppliers and receive goods/ services from suppliers. | The data subject has given permission for the organisation to process their personal data for one or more processing activities. |
| Other Information: Account information | For payment purposes | The data subject has given permission for the organisation to process their personal data for one or more processing activities. |

Crayfish Lodge Sea And Country Guesthouse (Pty) Ltd will keep your personal information confidential at all times, however, you agree and consent that Crayfish Lodge Sea And Country Guesthouse (Pty) Ltd 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 Crayfish Lodge Sea And Country Guesthouse (Pty) Ltd
- 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 three months 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.

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

Crayfish Lodge Sea And Country Guesthouse (Pty) Ltd 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 kept for a period of 5 years in order for us to comply with all legal requirements.

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.