HEAD OFFICE
012 809 0142
27 Muirfield Boulevard, Silver Lakes, 0081

CLUBHOUSE
012 809 0281
La Quinta Street, Silver Lakes, 0081

PRO SHOP
012 809 0430
La Quinta Street, Silver Lakes, 0081

SLHOA PRIVACY NOTICE

1. Introduction

Silver Lakes Homeowners Association NPC, known as "SLHOA", is a registered Non-Profit Company. We strive to ensure that our use of Personal Information of data subjects is lawful, reasonable, and relevant to our business activities, with the ultimate goal of improving our offerings and your experience. SLHOA privacy and is committed to protecting the privacy of visitors to this site. SLHOA seeks to employ best practices when it comes to the collection and processing of personal information in accordance with data protection or privacy legislation.

This Online Privacy Notice sets out what we will do with any Personal Information we collect from or about you, or that you provide to us, when you use our services, including our websites or app or when you contact us or are contacted by SLHOA. Please read this Privacy Notice carefully to understand our views and practices regarding your Personal Information and how we will treat it.

If you do not agree with these terms, you may choose not to use our site, and please do not provide any Personal Information through this site. This Privacy Notice forms part of our Site Terms and Conditions of Use and 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, 2013 (POPI Act).

2. The Personal Information we collect about you

We collect and process your Personal Information mainly to establish contact and communicate with Homeowners and tenants. 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.

SLHOA may collect, receive, record, organise, collate, store, update, change, retrieve, read, process, analyse, use and share your Personal Information in a way set out in this Privacy Notice. When we do one or more of these actions with your Personal Information, we are "Processing" your personal information. "Personal Information" refers to private information about an identifiable person (which includes natural persons as well as juristic persons, such as companies or trusts).

Personal information does not include information that does not identify a person (including in instances where that information has been de-identified). We may process different kinds of personal data about you, which we have grouped together as follows:

- Identity Data, which includes information concerning your name, username or similar identifier, marital status, title, date of birth, gender, and legal status.
- Contact Data, which includes billing addresses, delivery addresses, email addresses and telephone numbers.
- Transaction Data from our client, the credit provider, which includes details about payments from you.

3. How we collect your Personal Information

We collect your personal information in three ways, namely:

- through direct or active interactions with you, and
- from third parties
- Direct or active collection from you

We may require you to submit certain information in order for you to access certain portions of the Website and to enable us to provide certain services to you (e.g. providing further requested information, applying for a vacancy, etc.) or to conclude an agreement with us, or to fulfil our statutory obligations. We also collect information directly from you when you communicate directly with us, for example, via e-mail and telephone calls. If you contact us, we will update our system and keep a record of that correspondence. The information we may actively collect from you may include any of the information listed in section 2 of this Privacy Notice.

Information collected from third parties

SLHOA may receive personal information about you from various third parties and public sources, and will treat that information with due care

4. How the Information Collected is used

Personal information provided to SLHOA by you will only be used for the purposes stated when the personal information is requested. We may use your personal information:

- to collection of debts;
- to comply with our statutory obligations, as well as interacting with regulatory authorities;
- to conduct business case analysis;
- to conduct SLHOA recruitment exercises, including referrals, and hiring processes, including the capturing of a job applicant's details and the providing of status updates to such a job applicant. In this context, SLHOA will conduct criminal record and credit checks;

- to retain and make information available to you on the Website;
- maintain and update our customer databases;
- to establish and verify your identity on the Website;
- diagnose and deal with technical issues, customer support queries and other user queries;
- operate, administer, maintain, secure and develop the Website and the performance and functionality of the Website;
- to protect our rights in any litigation;
- detect, prevent or deal with actual or alleged fraud, security or abuse, misuse or unauthorised use of the Website and/or contravention of this Privacy Notice or any of the terms and conditions that apply to the use of the Website;
- communicate with you and keep a record of our communications with you and your communications with us;
- inform you about any changes to the Website, the Privacy Notice or other changes which are relevant; and
- for any other purposes relevant to our business activities, provided they are lawful.

Demographical and statistical information about user behaviour may be collected and used to analyse the popularity and effectiveness of the SLHOA website. Any disclosure of this information will be in an aggregated and anonymised form and will not identify individual users.

SLHOA will restrict its processing of your Personal Information to the original purposes for which it was collected, unless SLHOA reasonably considers that it is required to be processed for another purpose and that purpose is compatible with the original purpose. If you would like us to explain how the further processing for the new purpose is compatible with the original purpose, please contact us.

5. Sharing of your Personal Information

We will not intentionally disclose, for commercial gain or otherwise, your Personal Information other than as set out in this Privacy Notice or without your permission.

SLHOA may share your Personal Information under the following circumstances:

- to our agents, advisers, service providers and suppliers who have agreed to be bound by this Privacy Notice or on terms which offer the same level of protection as this Privacy Notice;
- to our employees, service providers and agents if and to the extent that they need to know the information to provide the services for or to us for which they have been appointed. We will authorise any information processing done by a third party on our behalf, amongst other things, by entering into written agreements with those third parties governing our relationship with them and containing confidentiality and non-disclosure provisions;

- We use the term "cookies" to refer to cookies and other similar technologies covered by the POPI Act on privacy in electronic communications.

6. How long do we store Personal Information

Personal information is held only as long as is necessary to provide the services to you or our client or as may be required in terms of legislation (including prescription periods), business requirements and whichever period is the longest. The details of this are available on request to the SLHOA Information Officer in accordance with the applicable laws and regulations of the Republic of South Africa.

Personal information that you provide to us will be stored electronically on our servers, as well as in hard copy format (at times), with reasonable organisation and technical safeguards in place to protect this personal information.

We may keep and process some or all of your personal information if and for as long as:

- we are required or permitted by law or a contract with you to keep it;
- we reasonably need it for lawful purposes related to our functions and activities;
- we reasonably need it for evidentiary purposes; or
- you agree to us keeping it for a specified further period.

To determine the appropriate retention period for personal information, SLHOA will consider, among other things, the quantity, nature and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means.

7. Personal 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 ongoing basis, continue to review our security controls and related processes to ensure that your Personal Information is secure.

Our security 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 personal information;
- Acceptable usage of personal information;
- Governance and regulatory issues;
- 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 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.

8. Access to your Personal Information

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 POPI Act Policy.

9. Correction of your Personal Information

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 the 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.

10. Definition of Personal Information

According to the POPI Act ''Personal Information'' means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person. The POPI Act, which has more specific examples if you need them, can be found at the following link:

Protection of Personal Information Act 4 of 2013 | South African Government

11. Right to object

In terms of the POPI Act (POPIA) section 18. (h) (iv) you have the right to object to the processing of personal information as referred to in section 11(3) of the POPIA.

12. Right to lodge a complaint

In terms of the POPI Act (POPIA) section 18. (h) (v) you have the right to lodge a complaint to the Information Regulator (South Africa) (IRSA). The IRSA contact details are:

Website
https://www.inforegulator.org.za

Physical Address

JD House
27 Stiemens Street
Braamfontein
Johannesburg
2001

Postal Address

PO Box 3153
Braamfontein
Johannesburg
2017

Telephone +27 (0) 10 023 5200
Email enquiries@inforegulator.org.za

13. Changes to this notice

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

14. How to contact us

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 012 809 0142.