## **MyWebChannel PRIVACY NOTICE**

My Web Channel (Pty) Ltd, registration number: 2013/021584/07 (hereinafter referred to as "MyWebChannel") is committed to ensuring the privacy of all visitors ("Visitors") to the website, **MyWebChannel**, known as webchannel.design, all users of our gate access software, known as **Pre-Authify** as well as all users of the **More Community Trust** portal.

Part of this commitment is compliance with privacy legislation and guidelines as set out in the Promotion of Access to Information Act (PAIA), the Protection of Personal Information Act (POPI) and the Electronic Communications and Transactions Act (ECTA).

This privacy notice sets out the basis on which any personal information MyWebChannel collects from you, or that you provide to MyWebChannel, will be processed by MyWebChannel. Please read the following carefully to understand our practices regarding your personal information and how we will treat it.

#### INFORMATION THAT WE COLLECT

MyWebChannel, the More Community Trust Portal and Pre-Authify collect the following information:

This is information that MyWebChannel collects and processes about you for the purposes set out in this notice, which information may include name, contact details, information contained in your passport or ID document and sometimes your geographical location. As well as this, Pre-Authify may retain data that is requested of you when entering a particular entrance to one of the game lodges or game parks, this data could include: drivers licence information and information contained on your motor vehicle registration disc

In some instances, MyWebChannel may receive your personal information from third-parties. Furthermore, MyWebChannel may collect your information from publicly available sources such as websites.

The MyWebChannel website collects your personal information for the following purposes:

- To facilitate and respond to enquiries made on the website
- Web site and system administration.
- for analysis, evaluation and research

The More Community Trust Portal collects your personal information for the following purposes:

- To facilitate and respond to enquiries made on the website
- To facilitate donations made through the portal
- for analysis, evaluation and research

Pre-Authify collects your personal information for the following purposes:

1



- To facilitate and create access codes for entrance through certain gates using the software
- To create a record of individuals that are under suspicion of acting criminally
- for analysis, evaluation and research
- to provide you with the information and services that you request from Pre-Authify and for Pre-Authify to request information it may require from you;
- to inform you about Pre-Authify events or initiatives.

### WHAT IF YOU DON'T PROVIDE THE INFORMATION?

Where possible, MyWebChannel limits, to the best of its ability, the amount of personal information collected from you. However, please note that in order for a you to interact with us, certain information is required and accordingly this interaction is dependent on MyWebChannel being able to collect and process that information.

#### WHO DO WE SHARE YOUR INFORMATION WITH?

MyWebChannel may disclose your personal information to third parties, if it is under a duty to disclose or share your personal information in order to comply with any legal obligation; or in order to enforce any contractual terms and conditions and other agreements; or to protect the rights, property, or safety of MyWebChannel.

Such third-parties include service providers including IT suppliers, consultants and professional advisers.

All service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third party service providers to use your personal information for their own purposes. We only permit them to process your personal information for specified purposes and in accordance with our instructions.

## SECURITY MEASURES IN PLACE TO PROTECT YOUR INFORMATION

MyWebChannel has put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. These measures include, but are not limited to, policies and procedures to protect your information and IT security.

We have put in place procedures to deal with any suspected data security breach and will notify you and the Information Regulator of a suspected breach where we are legally required to do so.

MyWebChannel may store your data in databases that are located in the USA. In terms of POPI this is allowed provided that the USA is subject to data protection rules similar to South Africa and provided that the data subject is aware of the transfer. (Section 72) The USA is considered as having this protection in place and if this should change, MyWebChannel will

immediately cease this cross boarder transfer of information and make suitable other arrangements to retrieve and store such data.

#### **HOW LONG DO WE RETAIN YOUR INFORMATION?**

MyWebChannel will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal information, we consider the amount, 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, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once the information is no longer required for the purposes for which we collected it we will retain and securely destroy your personal information in accordance with our Document Retention & Destruction policy or applicable laws and regulations.

Should you be suspected of criminal activity at one of the game parks to which access is governed by the Pre-Authify software, your data may be retained for a period of 10 years.

## RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION

Under certain circumstances, you have the right to:

- 1. **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- 1. **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- 1. **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- 1. **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- 1. **Withdraw consent** to us processing your personal information. In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal information, or withdraw consent to us processing your information, please contact the Information Officer stipulated at the end of this notice in writing.

You will not be subject to decisions that will have a significant impact on you based solely on automated decision making, unless we have a lawful basis for doing so and we have notified you. MyWebChannel does not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

#### CHANGES TO THIS PRIVACY NOTICE OR YOUR INFORMATION

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

Should your personal information change, please inform MyWebChannel and provide MyWebChannel with your corrected personal information as soon as reasonably possible to enable MyWebChannel to update your personal information on its systems.

# WHO CAN YOU CONTACT REGARDING YOUR PERSONAL INFORMATION AND THIS NOTICE?

Should you have any queries regarding this privacy notice or would like to enforce any rights you may have under POPI, please contact us at:

Information Officer: Grant Harding Email: <a href="mailto:grant@MyWebChannel.za.com">grant@MyWebChannel.za.com</a>

If you wish to lay a complaint against us regarding the way we have processed your personal information you can do so at South African Information Regulator: <a href="http://www.justice.gov.za/inforeg/">http://www.justice.gov.za/inforeg/</a>

30 July 2021, Version 1