

APPENDIX C: PART 1 -

PROCESSING OF PERSONAL INFORMATION IN ACCORDANCE WITH POPIA

For clients (including guests of any Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries)

- a) Making hotel reservations for clients.
- b) Report to Immigration Services in accordance with Immigration Act.
- c) Performing duties in terms of any agreement with clients.
- d) Make, or assist in making, credit decisions about clients.
- e) Operate and manage clients' accounts and manage any application, agreement or correspondence clients may have with Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries.
- f) Communicating (including direct marketing) with clients by email, SMS, letter, telephone or in any other way about Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries products and services, promotions and competitions, unless clients indicate otherwise.
- g) To form a view of clients as individuals and to identify, develop or improve products that may be of interest to clients.
- h) Carrying out market research, business and statistical analysis.
- i) Performing other administrative and operational purposes including the testing of systems.
- j) Recovering any debt clients may owe to Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries.
- k) Complying with Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries regulatory and other obligations inclusive of the Immigration Act, The Consumer Protection Act and the National Credit Act.
- l) Any other reasonably required purpose relating to the Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries business.

For prospective clients (including prospective guests of any Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries)

- a) Making hotel reservations.
- b) Verifying and updating information.
- c) Pre-credit scoring.
- d) Direct marketing.
- e) Communicating (including direct marketing) with clients by email, SMS, letter, telephone or in any other way about Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries products and services, promotions and competitions, unless clients indicate otherwise.
- f) Any other reasonably required purpose relating to the processing of a prospect's personal information reasonably related to the Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries business.

For employees

- a) The same purposes as for clients (above).
- b) Verification of applicant employees' information during recruitment process.
- c) General matters relating to employees:
 - i) Pension
 - ii) Medical aid
 - iii) Payroll
 - iv) Disciplinary action
 - v) Training
- d) Any other reasonably required purpose relating to the employment or possible employment relationship.

For vendors /suppliers /other businesses

- a) Verifying information and performing checks.
- b) Purposes relating to the agreement or business relationship or potential agreement or business relationships between the Parties.
- c) Payment of invoices
- d) Complying with Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries regulatory and other obligations; and
- e) Any other reasonably required purpose relating to the Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries business.

In relation to the aforementioned any legitimate interest of Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries as is detailed in Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries Privacy Policy published on its websites: www.goodersonleisure.co.za or the Gooderson Leisure Corporation Proprietary Limited.

APPENDIX C PART 2 -

CATEGORIES OF DATA SUBJECTS AND CATEGORIES OF PERSONAL INFORMATION RELATING THERETO

Employees

- a) Name and contact details.
- b) Identity number and identity documents including passports.
- c) Employment history and references.
- d) Banking and financial details.
- e) Details of payments to third parties (deductions from salary).
- f) Employment contracts.
- g) Employment equity plans.
- h) Medical aid records.
- i) Pension Fund records.
- j) Remuneration/salary records.
- k) Performance appraisals.
- l) Disciplinary records.
- m) Leave records.
- n) Training records.

Clients and prospective clients / guests (which may include employees and prospective employees)

- a) Postal and/or street address.
- b) Title and name.
- c) Contact numbers and/or e-mail address.
- d) Nationality.
- e) Identity document, birth certificate or passport
- f) Financial information.
- g) Browsing habits and click patterns on Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries websites as per the Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries Privacy and Cookie Policy
- h) Responses to Surveys and Competitions and Promotions
- i) Customer comments and service reviews

Vendors /suppliers / other businesses

- a) Name, address and contact details
- b) Identity and legal entity details and applicable statutory information.
- c) Banking and financial information.
- d) Information about products or services.
- e) Browsing habits and click patterns on Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries websites as per the Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries Privacy and Cookie Policy.
- f) Other information not specified, reasonably required to be processed for business operations.

APPENDIX C: PART 3 - RECIPIENTS OF PERSONAL INFORMATION

- a) Any firm, organisation or person that Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries uses to collect payments and recover debts or to provide a service on its behalf;
- b) Any firm, organisation or person that/who provides Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries with products or services;
- c) Any payment system Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries uses;
- d) Regulatory and governmental authorities or ombudsmen, or other authorities, including immigration and tax authorities, where Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries has a duty to share information;
- e) Third parties to whom payments are made on behalf of employees;
- f) Financial institutions from whom payments are received on behalf of data subjects;
- g) Any other Operator not specified;
- h) Employees, contractors and temporary staff; and
- i) Agents.

APPENDIX C: PART 4 – CROSS BORDER TRANSFERS OF PERSONAL INFORMATION

Personal Information may be transmitted trans-border to Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries service providers in other countries, and Personal Information may be stored in data servers hosted outside South Africa, which may not have adequate data protection laws. Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries will endeavour to ensure that its service providers will make all reasonable efforts to secure the data and Personal Information.

Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries will transfer Personal Information outside South Africa in the following circumstances:

- a) a client reservation is with a Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries located internationally;
- b) where Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries is required to make contact on behalf of client outside South Africa;
- c) where electronic services and resources are based outside South Africa for example banking and credit card payment services;
- d) where there is an international element to a reservation.

Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries will take steps to ensure that, wherever possible, the transfer complies with POPIA and endeavour to ensure that our host providers are subject to laws, or policies, which uphold principles for the reasonable processing of information substantially similar to the POPIA to ensure adequate protection of Personal Information.

For further information please contact the Information Officer.

APPENDIX C: PART 5 – DESCRIPTION OF INFORMATION SECURITY MEASURES

Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries undertakes to institute and maintain the data protection measures to accomplish the following objectives outlined below. The details given are to be interpreted as examples of how to achieve an adequate data protection level for each objective. Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries may use alternative measures and adapt to technological security development, as needed, provided that the objectives are achieved.

1) Access Control of Persons

Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries shall implement suitable measures in order to prevent unauthorized persons from gaining access to the data processing equipment where the data are processed.

2) Data Media Control

Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries undertakes to implement suitable measures to prevent the unauthorized manipulation of media, including reading, copying, alteration or removal of the data media used by Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries and containing personal data of Customers.

3) Access Control to Data

Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries represents that the persons entitled to use Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries data processing system are only able to access the data within the scope and to the extent covered by their respective access permissions (authorisation).

4) Transmission Control

Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries shall be obliged to enable the verification and tracing of the locations/destinations to which the personal information is transferred by utilization of Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries data communication equipment/devices.

5) Transport Control

Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries shall implement suitable measures to prevent Personal Information from being read, copied, altered or deleted by unauthorized persons during the transmission thereof or during the transport of the data media.

6) Organisation Control

Gooderson Leisure Corporation Proprietary Limited and its Subsidiaries shall maintain its internal organisation in a manner that meets the requirements of this Manual.