



SunEden Share Block (Pty) Ltd

SunEden Share Block (Pty) Ltd - General Privacy Policy

SunEden Share Block (Pty) Ltd is a registered Naturist Resort, situated in South Africa, available to be visited by guests from all over the world.

This Privacy Policy describes how SunEden Share Block (Pty) Ltd collects and processes personal information about its clients, guests, shareholders and tenants; how they use and protect this information and rights in relation to this information.

POLICY DETAIL - By Order – The Board of Directors

This privacy policy applies to all personal information we collect or process about any person related to us in any form. Personal information is information, or a combination of pieces of information that could reasonably allow you to be identified.

Our Primary address is Plot 38, Kloppersbos, Pretoria, South Africa.

Our contact details are found on our website at www.suneden.com

Any queries or questions may be directed to The Chairman at chairman@suneden.com or the Marketing Director at marketing@suneden.com.

Registered Dealer's Policy

Please note that SunEden Share Block (Pty) Ltd operates globally either directly or through their registered marketing agents.

SunEden Share Block (Pty) Ltd marketing persons or agents are not necessarily subsidiaries of the mother company and may also be individually owned. These entities will have their own privacy policy and where they collect and process personal information, their own respective privacy policies will apply.

1. PERSONAL INFORMATION USE

SunEden Share Block (Pty) Ltd will collect personal information about clients or guests from a variety of sources, including information they collect from individuals directly, e.g.:

- if they are day guests, locally or abroad;
- if they are regular guests that make use of our Sleep-over facilities;
- if they are tenants who own or rent any facility on the SunEden Share Block (Pty) Ltd premises;
- if they are shareholders of SunEden Share Block (Pty) Ltd and/or permanent residents of the premises
- if they are any person who contact us and/or provide services to us, and information we collect about them from other sources, including commercially available sources, such as public databases (where permitted by law).

We may be required by law to collect certain personal information about you or as a consequence of any contractual relationship we have with you. Failure to provide this information may prevent or delay the fulfilment of these obligations.

1.1 Information we collect directly from you

The categories of information that we may collect directly from you include the following:

- personal details (e.g. name, date of birth, job title);
- contact details (e.g. phone number, email address, postal address or mobile number);
- payment details and transactions;
- if you are a customer or dealer of SunEden Share Block (Pty) Ltd (they will identify you once you have registered on our website or any other website related to our business);
- IP addresses and MAC identifiers (while you access our websites and other online services).

1.2 Information we collect from other sources:

The following are examples of the categories of information we may collect from other sources:

- personal details (e.g. name, date of birth, job title, credit information);
- contact details (e.g. phone number, email address, postal address or mobile number);

1.3 Other information we use about you

Include generated information such as profiles, history of our relationship with you, etc.

2. HOW PERSONAL INFORMATION IS USED AND THE BASIS ON WHICH IT IS DONE

If you are a customer or guest, we use your personal information to:

- ensure that our records are kept accurate and up to date;
- comply with legal obligations to which we are subject;
- check and maintain marketing quality control;
- carry out analysis of our services and facilities to you and ensure correct functioning of our operation;
- provide you with customer service, any relevant support and promotional material;
- handle complaints of relevant matters

If you are in a similar market and industry, we use your personal information to:

- carry out background checks prior to engaging you as a business associate;
 - contact you with questions and other information regarding the market of industry you represent;
 - pay invoices;
 - comply with legal obligations to which we are subject to.
- We must have a legal basis to process your personal information. In most cases the legal basis will be one of the following:
- to fulfil our contractual obligations to you. If you are a customer or guest, our contractual obligations to you include providing accommodation, hospitality services, providing customer service, promotional material and marketing platforms.
 - If you are a supplier of service provider, our contractual obligations to you include paying invoices correctly and ensuring you are able to access our premises when required;
 - to meet our legitimate interests. If you are a customer or guest, our legitimate interests, for example, are maintaining quality control of our facilities and services, carrying out analysis for service development and market research and ensuring that our records are kept up to date and accurate.
 - If you are in the business of having our legitimate interest, for example, are ensuring that the services you provide are appropriate for our needs, that your services function correctly with our systems, that any complaints or concerns can be promptly relayed to you, and our records are kept up to date and accurate.

3. YOUR RIGHTS OVER YOUR PERSONAL INFORMATION

You have certain rights regarding your personal information, subject to local law. These include the following rights to:

- access your personal information;
- rectify the information we hold about you;
- erase your personal information;
- restrict our use of your personal information;
- object to our use of your personal information;
- receive your personal information in a usable electronic format and transmit it to a third party (right to data portability); and
- lodge a complaint with our head office.

We encourage you to contact us to update or correct your information if it changes or if the personal information, we hold about you, is inaccurate.

Please note that we will likely require additional information from you in order to honour your requests.

If you would like to discuss or exercise such rights, please contact us at the details provided on our website. www.suneden.com

4. AUTOMATED DECISIONS ABOUT YOU

We may also make automated decisions about you, based on your personal information in the following circumstances:

- If you are a customer or guest to select personalized offers, discounts or recommendations to send you based on your shopping history, browsing history and/or usage of SunEden services;
- Subject to local legal requirements and limitations, you can contact us to object to our use of automated decision-making.

When we adopt automated decision-making involving profiling based on your personal information in providing our service, we will separately provide you with information about the logic involved and any effects of the automated decisions and seek your consent.

5. INFORMATION SHARING

We may share your personal information with third parties under the following circumstances:

- Law enforcement agencies, courts, regulators, government authorities. We may share your personal information with these parties where we believe this is necessary to comply with a legal or regulatory obligation, or otherwise to protect our rights or the rights of any third party.
- Asset purchasers. We may share your personal information with any third party that purchases, or to which we transfer, all or substantially all of our assets and business related matters. Should such a sale or transfer occur, we will use reasonable efforts to try to ensure that the entity to which we transfer your personal information uses it in a manner that is consistent with this Privacy Policy.

6. INFORMATION SECURITY AND STORAGE

We implement technical and organizational measures to ensure a level of security appropriate to the risk to the personal information we process. These measures are aimed at ensuring the on-going integrity and confidentiality of personal information. We evaluate these measures on a regular basis to ensure the security of the processing.

We will keep your personal information for as long as we have a relationship with you. When deciding how long to keep your personal information after our relationship with you has ended, we take into account our legal obligations and regulators' expectations. We may also retain records to investigate or defend potential legal claims.

We will retain your personal information in accordance with our data retention policy which sets out data retention periods required or permitted by applicable law.

7. INTERNATIONAL DATA TRANSFERS

SunEden Share Block (Pty) Ltd has guests and shareholders from the USA, Europe, Australia, Africa and the rest of the world and thus your personal information could be submitted to, stored, and processed in any of these countries which might or might not be regarded as ensuring an adequate level of protection for personal information under European Union data protection law or that of the United States of America. Furthermore, we may work with third party service providers while storing or processing your personal information, for example, your personal information may be stored in the cloud by our cloud service providers and they may keep your personal information in locations outside the Economic Area of both the USA or Europe, which do not provide an adequate level of protection. We have put in place appropriate safeguards (such as contractual commitments) in accordance with applicable legal requirements to ensure that your data is adequately protected. For more information on the appropriate safeguards in place, please contact us at the details below.

8. CONTACT US

SunEden Share Block (Pty) Ltd is the controller responsible for the personal information we collect and process. If you have any questions or concerns regarding the way in which your personal information has been used, please contact us at the email address provided below. Please note that, depending on the nature of your request or inquiry, we may need to confirm your identity before we process it. marketing@suneden.com

9. CHANGES TO THE POLICY

You may request a digital copy of this privacy policy from us using the contact details set out above. We may modify or update this privacy policy from time to time. You will be able to see when we last updated the privacy policy because we will include a revision date. Changes and additions to this privacy policy are effective from the date on which they are posted. Please review this privacy policy from time to time to check whether we have made any changes to the way in which we use your personal information.