

POPI Policy

PROTECTION OF PERSONAL INFORMATION (POPI) POLICY



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GENERAL

Scope of this Protection of Personal Information Policy (POPI)

More Collection ("MORE Collection" or "we") regards as of paramount importance the protection and security of individuals' data. We encourage you to read this policy carefully. More Collection is a private body and the services we offer are in the Tourism Industry.

The POPI Act applies to any person's personal information irrespective if they are a guest, a staff member or a supplier. The purpose of this information notice (the "POPI Policy") is to inform you ("you", "your", or "Customer") about how we and the data processors acting on our behalf, may collect and process personal data and other information concerning you and your use of our Services, as well as security measures we implement to ensure the confidentiality and integrity of your personal data and the rights you have to control them throughout your use of our websites, www.more.co.za, www.morecommunitytrust.co.za and www.njmorefieldguidecollege.co.za in accordance with the Applicable Laws.

This POPI Policy does not apply to the data, stored, hosted, or otherwise processed by our Customers (agents, guests, tour operators) using MORE Collection services.

We may provide additional information about data processing practices for specific Services that is not included in this policy. These notices may supplement or clarify this POPI Policy, sometimes providing you with additional choices about how we process your data. If you do not agree with or are not comfortable with any aspect of this POPI Policy, you should immediately discontinue access or use of our Services.

You acknowledge that this POPI Policy applies only to the Services and to the use of our websites and does not cover any information collected and/or processed by third parties on external websites or sources, of which the links may appear on our websites. As a result, MORE Collection is not responsible for these websites or external sources' activities in the collection and processing of personal data, which shall, where appropriate, be governed by the POPI notices of each of these external websites or sources.

The above-mentioned services offered by MORE Collection includes but are not limited to:

- Accommodation reservations at a MORE Collection property
- Accommodation reservation booked through MORE Concierge at third party properties
- Transport, flights, activities reservations
- Employment at MORE Collection
- MORE Community Trust bookings or events

Applicable Laws

Our Services and the processing of your personal data and other information are performed in accordance with South Africa (The Protection of Personal Information Act 4 of 2013)

DEFINITIONS

Below definitions refers to the Protection of Personal Information Act Chapters and Sections.

1. **"MC Journeys Travel Planner"** refers to MORE Collection Journey Agents
2. **"Biometrics"** means a technique of personal identification that is based on physical, physiological or behavioural characterisation including blood typing, fingerprinting, DNA analysis, retinal scanning and voice recognition.
3. **"Child"** means a natural person under the age of 18 years who is not legally competent, without the assistance of a competent person, to take any action or decision in respect of any matter concerning him or herself
4. **"Code of conduct"** means a code of conduct issued in terms of Chapter 7
5. **"Competent person"** means any person who is legally competent to consent to any action or decision being taken in respect of any matter concerning a child
6. **"Consent"** means any voluntary, specific and informed expression of will in terms of which permission is given for the processing of personal information

7. **“Constitution”** means the Constitution of the Republic of South Africa, 1996
8. **“Data subject”** means the person to whom personal information relates. This can be referring to an Employee, a Guest, or a Supplier
9. **“De-identify”**, in relation to personal information of a data subject, means to delete any information that—
- a) identifies the data subject
 - b) can be used or manipulated by a reasonably foreseeable method to identify the data subject
 - c) can be linked by a reasonably foreseeable method to other information that identifies the data subject,
10. **“De-identified”** has a corresponding meaning
11. **“Direct marketing”** means to approach a data subject, either in person or by mail or electronic communication, for the direct or indirect purpose of:
- a) promoting or offering to supply, in the ordinary course of business, any goods or services to the data subject; or
 - b) requesting the data subject to make a donation of any kind for any reason;
12. **“Electronic communication”** means any text, voice, sound or image message sent over an electronic communications network which is stored in the network or in the recipient’s terminal equipment until it is collected by the recipient
13. **“Filing system”** means any structured set of personal information, whether centralised, decentralised or dispersed on a functional or geographical basis, which is accessible according to specific criteria
14. **“Operator”** means a person who processes personal information for a responsible party in terms of a contract or mandate, without coming under the direct authority of that party
15. **“Person”** means a natural person or a juristic person
16. **“Personal information”** means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to:
- a) information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person
 - b) information relating to the education or the medical, financial, criminal or employment history of the person
 - c) any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier, or other particular assignment to the person
 - d) the biometric information of the person
 - e) the personal opinions, views or preferences of the person
 - f) correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence
 - g) the views or opinions of another individual about the person; and
 - h) the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person
17. **“Private body”** means:
- a) a natural person who carries or has carried on any trade, business, or profession, but only in such capacity.
 - b) a partnership which carries or has carried on any trade, business, or profession; or
 - c) any former or existing juristic person, but excludes a public body
18. **“Processing”** means any operation or activity or any set of operations, whether by automatic means, concerning personal information, including:
- a) the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use
 - b) dissemination by means of transmission, distribution or making available in any other form; or
 - c) merging, linking, as well as restriction, degradation, erasure, or destruction of information
19. **“Promotion of Access to Information Act or POPIA”** means the Promotion of Access to Information Act, 2000 (Act No. 2 of 2000)
20. **“Public body”** means:
- a) any department of state or administration in the national or provincial sphere of government or any municipality in the local sphere of government; or
 - b) any other functionary or institution when:
 - i. exercising a power or performing a duty in terms of the Constitution or a provincial constitution; or
 - ii. exercising a public power or performing a public function in terms of any legislation.

21. **"Public record"** means a record that is accessible in the public domain and which is in the possession of or under the control of a public body, whether or not it was created by that public body
22. **"Record"** means any recorded information - regardless of form or medium, including any of the following:
- a) Writing on any material.
 - b) information produced, recorded, or stored by means of any tape recorder, computer equipment, whether hardware or software or both, or other device, and any material subsequently derived from information so produced, recorded or stored.
 - c) label, marking or other writing that identifies or describes anything of which it forms part, or to which it is attached by any means.
 - d) book, map, plan, graph, or drawing.
 - e) photograph, film, negative, tape or other device in which one or more visual images are embodied so as to be capable, with or without the aid of some other equipment, of being reproduced.
 - i. in the possession or under the control of a responsible party
 - ii. whether or not it was created by a responsible party; and
 - iii. regardless of when it came into existence
23. **"Regulator"** means the Information Regulator established in terms of section 39
24. **"Re-identify"**, in relation to personal information of a data subject, means to resurrect any information that has been de-identified, that:
- a) identifies the data subject.
 - b) can be used or manipulated by a reasonably foreseeable method to identify the data subject; or
 - c) can be linked by a reasonably foreseeable method to other information that identifies the data subject and
25. **"Re-identified"** has a corresponding meaning
26. **"Republic"** means the Republic of South Africa
27. **"Responsible party"** means a public or private body or any other person which, alone or in conjunction with others, determines the purpose of and means for processing personal information
28. **"Restriction"** means to withhold from circulation, use or publication any personal information that forms part of a filing system, but not to delete or destroy such information
29. **"Special personal information"** means personal information as referred to in section 26
30. **"This Act"** includes any regulation or code of conduct made under this Protection of Personal Information Act
31. **"Unique identifier"** means any identifier that is assigned to a data subject and is used by a responsible party for the purposes of the operations of that responsible party and that uniquely identifies that data subject in relation to that responsible party.

WHAT INFORMATION DO WE COLLECT?

Information we process may include personal data. Personal data means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

More Collection properties have an indemnity form that all guests receive and complete upon check-in. This document will include personal information for the purpose of providing a service to a guest, send service surveys, feedback campaigns and activities.

Other documentation that MORE Collection requires and collects which contain personal information are the following but not limited to:

- Employee contracts and records
- Human resources documentation related to UIF, Payroll, Training records etc
- Supplier contracts
- Travel Agent contracts
- Tour Operator Contracts
- Database for marketing communication

WEBSITES

When you use our website, you may provide information such as your name (first name, last name), your e-mail address, your phone number (also identified as your **"Contact Details"**).

You may also provide our Payment Service Providers ("PSP") (e.g., enter PayPal, Master Card, Visa details etc), with your credit card number and relevant payment information (your "Payment Details"), when you purchase any of our products / services. Your Contact and/or Payment Details are processed so we can ensure the smooth running of our contractual relationship: handling your booking and delivering our services, processing invoices and payments, preventing fraud, managing claims and sending you important notifications.

When you sign up to our newsletters or ask to be contacted, you express your consent to the use of your email address or other contact details by **MORE Collection** to keep you up to date with our latest news, promotions.

When contacting our MC Journeys Travel Planner team for assistance, we may ask for your email or some other contact details and we will record the content of our correspondence with you. We may also request that you send formal identification information. This data allows us to answer any queries, monitor service quality and compliance, check accuracy of the information you provide us, prevent fraud and or provide training for our staff as well as customer service representatives.

We record data about visitors who use our websites which may contain information about you including the following: IP address, type of operating system, browsing software and device you use, date and time you visited the website, information about your visit including the URL clickstream to, through and from our website, products / services you viewed or searched for, download errors, length of visits to certain pages, page interaction ("Browsing Data"). With that Browsing Data, we troubleshoot problems, prevent fraud and abuse, we customize your browsing and booking experience and we analyse trends and demographics to improve our services and marketing activities. We may collect some of this Browsing Data for purposes described in this POPI Policy with the use of various technologies including cookies or other device identification technologies.

HOW WE USE PERSONAL DATA

We strongly adhere to the data minimization principle set forth under Applicable Laws and endeavour to only process personal data that is strictly necessary for the delivering of our services. These services include:

- Fix bugs and improving the functionality of **MORE Collection** products and services
- Facilitate your support requests
- Facilitate your booking request
- Investigate and prevent potential security issues, abuse, fraud, and breaches
- Understand and evaluate the need for additional services and features
- Optimize marketing operations (e.g., highlight and educate customers)
- Convey important information to customers (e.g., firmware updates, security warnings, legal notices, crucial information pertaining to our properties)
- Honour our contractual commitments to selected partners and providers
- Meet applicable legal obligations and regulatory requirements
- Internal Human Resources purposes for our employees including Payroll, Personal Tax, COID etc

We exclusively process, de-identified, aggregate, pseudonymized and anonymized data to support your journey with **MORE Collection**:

- Usage and bug reporting information such as the version, language, and region registered for your operating system.
- Data related to your activity on website such as type of currency, timestamps, transaction amounts and status, page views.

Some services accessible through **MORE Collection** are partly or fully provided by third parties who may process your information as set forth in their own POPI policies, contractual commitments we have with them or applicable laws.

MORE Collection may use third party suppliers to book the below services but are not limited to:

- Tours booked through MORE Collection
- Transfers booked through MORE Collection
- Other Activities booked through MORE Collection which includes
 - Shark Cage Diving
 - Paragliding
 - Helicopter Trips
 - Guided Hikes
 - Boat Cruises
 - Flights
 - Accommodation with hotels that is not part of the MORE Collection group
 - Horse Riding
 - Restaurants

SENSITIVE AND CONFIDENTIAL DATA

We will not intentionally collect or maintain, nor do we want you to provide, and will never ask you for any information regarding race or ethnic origin, political opinions, religious or philosophical beliefs nor any other confidential information unless required by law. Please prevent from disclosing to us or to any third party any sensitive personal data relating to you or any other person.

Note: Only after confirmation of your booking, will we request you to provide us with any relevant medical or health conditions (i.e., dietary requirement, allergies etc.) this information is collected for your own safety and to enhance your experience with MORE Collection.

HOW LONG DO WE KEEP YOUR INFORMATION?

In accordance with the storage limitation principle set forth under Applicable Laws, we endeavour retaining data for no longer than the time required to achieve and comply with such legitimate and legal purposes, including satisfying any legal, accounting, tax or other compliance reporting requirements.

We may archive some of your personal data, with restricted access, for an additional period of time when it is strictly necessary for us to comply with our legal and/or regulatory archiving obligations and for the applicable statute of limitation periods. At the end of this additional period, your remaining personal data will be permanently erased or anonymized from our systems.

To determine the retention period of your data, we consider the legitimate purpose for which your data has been collected and may be further processed, among those listed in this POPI Policy. In particular,

- Where cookies or other technical tracking technologies are placed on your computer or when we process your Browsing Data, we keep them for as long as necessary to achieve their purposes (e.g., for the duration of a session for session ID cookies) and for a maximum period defined in accordance with Applicable Laws.
- If you contact us as part of an enquiry, we keep your personal data, notably your contact details, for as long as necessary to process your enquiry.
- If you purchased a product or a service from us, we may retain some transactional data attached to your contact details to comply with our legal, tax or accounting obligations.
- For marketing purposes your contact details will be kept on our system until you have unsubscribed or requested us to remove you from our system and database.

WHO MAY WE SHARE YOUR INFORMATION WITH

MORE Collection, its employees and contractors may use some of your personal data strictly as part of their duties and in accordance with this POPI Policy.

We may also transmit some of your data to third parties such as payment services, infrastructure, logistics, and other services providers.

We endeavour to enter contractual arrangements with these third parties to ensure that personal data they could have to process for the provision of their tasks is adequately secured and that your personal information is protected. These providers have POPI policies which you may refer to for information about how they process your information and how to exercise your data subjects' rights as provided under Applicable Laws. All personal data processed by these third parties shall solely be used to perform the services they provide to us and for the purposes set out in this POPI Policy.

Companies outside of South Africa are not required by their law to be POPI compliant however with any services or suppliers we partner with in other African countries, we endeavour to have contractual agreements to keep any information we send them secure and not share with any unauthorised parties.

In certain circumstances and only where required by Applicable Laws, we may disclose some of your data to competent administrative or judicial authorities or any other authorized third party.

WHAT ARE YOUR RIGHTS REGARDING YOUR PERSONAL DATA

You can withdraw your consent at any time to receiving our marketing emails by clicking on the "Unsubscribe" link at the bottom of the emails we sent you.

You have the right to request access to the personal data we retain about you, their rectification or erasure, as well as the right to request the restriction of the processing or to object to the processing of your personal data.

You also have the right to request a copy, in an interoperable format (right to your data "portability"), of the personal data that you have provided to us for the performance of a contract / service with us or under your sole consent.

If you object to the processing or ask for the erasure of your personal data by **MORE Collection**, we shall acknowledge the receipt of your request and, within a maximum one-month period, we shall stop processing your personal data or erase it from our IT systems, except where **MORE Collection** has legitimate and compelling grounds for processing, or for the purpose of ascertaining, exercising or defending its legal rights in accordance with the Applicable Laws. If necessary, **MORE Collection** shall inform you of the legal grounds and reasons why your request could not be satisfied in whole or in part.

To exercise any of the abovementioned rights, please send us a request using the below Contact Information. We will take steps to verify your identity, to ensure, with a reasonable degree of certainty, that you are at the origin of the data subjects' right request. When feasible, we will match personal data provided by you in submitting a request to exercise your rights, with other information already maintained by **MORE Collection**, this could include matching two or more data points you provide us. In some instances, when the matching cannot establish your identity, we can request you to provide a copy of a formal identification document.

CONTACT INFORMATION

If you wish to access, correct, modify or delete the personal information we have about you, object to their processing, exercise your right to portability, file a complaint, exercise any of the above-mentioned rights or simply obtain more information about the use of your personal data, **please contact MORE Collection, POPI information Officer:** privacy@more.co.za

MORE Collection will endeavour to find a satisfactory solution to ensure compliance with the Applicable Laws. In the absence of a response from **MORE Collection** or if you are not satisfied by **MORE Collection** response or proposal or at any moment, you have the ability to lodge a complaint before the Information Regulator. The grievance will be dealt with by an adjudicator. If you are not happy with the determination of the adjudicator, you can still approach the Information Regulator for another ruling.

HOW DO WE SECURE PERSONAL DATA

To ensure the integrity and confidentiality of your personal data, we implement appropriate physical, electronic, and organizational procedures to safeguard and secure personal data throughout our Services.

In particular, MORE Collection implements necessary technical and organizational measures, in order to ensure the security and confidentiality of your personal data collected and processed, and particularly, to prevent your personal data from being distorted, damaged or communicated to unauthorized third parties, by ensuring an appropriate level of security with regards to the risks associated with the processing and the nature of the personal data to be protected.

We notably implement the following security measures, among others:

- **Payment Data security:**
 - i. We use a secure virtual payment portal for you to make payment and MORE Collection does not have access to view the credit card details you used.
 - ii. Should you require us to take a manual credit card payment, we would send you a Credit Card authorisation form to complete and we ask you to return it to us as a password protected document. Once the document has served its purpose it is destroyed.
- Awareness program and employee training:
 - All new employees starting at the company receives training on the policy and procedures
 - Annual refresher training
 - Existing employees have all been trained on the policy and procedures
- Data encryption in transit and at rest
- Data redundancy for resilience in case of disasters
- Role-based authentication
- Two-factor authentication of our authorized employees
- Continuous system monitoring
- Industry-standard security evaluations
- Independent third-party security reviews and penetration tests

While we endeavour to provide best-in-class protection for your personal data when you use our services, please keep in mind that the transmission of information on the Internet is not fully secure.

HOW DO WE TRANSFER YOUR PERSONAL DATA OUTSIDE SOUTH AFRICA

Personal data that we collect from you may be stored and processed in, and transferred to, countries outside South Africa. For example, this could happen if one of our service providers is located in a country outside SA. These countries may not have data protection laws equivalent to those in force in SA.

Note: Our Stanley and Livingstone Boutique Hotel and Ursula's Homestead situated in Zimbabwe forms part of **MORE Collection** is also accountable to all aspects of this POPI policy and all its procedures.

If we transfer personal data outside SA, we will take the necessary steps to ensure that your personal data continues to be protected in compliance with the Applicable Laws, notably by only transferring your personal data to businesses established in countries and may be recognized by the Information Regulator of South Africa as providing an adequate level of protection for your personal data or to organizations with whom we have entered into contractual arrangements to ensure an appropriate protection of your personal data or that commit themselves to applying a code of conduct or may have a certification mechanism validated by the Information Regulator of South Africa.

Note: All pertinent personal information will be shared across border where applicable which is necessary for your booking and safety.

We are confident that **MORE Collection's** long-standing security and privacy culture will enable us to identify and apply appropriate solutions to continue serving our clients globally and on both sides of the Atlantic with trust and security and without interruption.

DATA BREACH PROCEDURE

POPI provides that a responsible party (MORE Collection), which is defined as a person or business which processes personal information, will be obliged in the event of a data breach to notify the Information Regulator as well as affected parties within a reasonable time after the discovery of the compromise.

Where there are reasonable grounds to believe that the personal information of a data subject has been accessed or acquired by any unauthorised person, the POPI Information Officer and Company Management will follow the protocol in place and should it be deemed necessary, notify the data subject as set out by this protocol and the POPI Act.

If you would like more detail on this protocol, **please e-mail privacy@more.co.za**

RAISING A COMPLAINT

MORE Collection is committed to providing a quality service and working in an open and accountable way that builds trust and respect with its customers and employees. We will treat any Personal Information shared with us as confidential and keep it secure.

The purpose of this procedure is to have a platform where you as a customer or employee can raise any concerns regarding the way we process and store your Personal Information.

Should you have a complaint regarding our approach in processing your Personal Information or how your Personal Information was handled, **please send an e-mail to privacy@more.co.za or call us on +2711 880 9992**. We will respond to you via e-mail within 3 business days. We aim to handle all complaints fairly, consistently and to follow an impartial avenue to resolve any complaint.

Should you have not received a response within the 3 business days or you are not satisfied with the outcome, **please contact the General Manager of Operations on privacyGM@more.co.za**.

MISCELLANEOUS

If a court or competent authority considers that any provision of this POPI Policy (or any part thereof) is invalid, illegal or unenforceable, that provision or relevant part of the provision will, to the extent required, be deemed to be deleted. The validity and enforceability of the other provisions of this POPI Policy will not be affected.

Unless otherwise agreed, no delay, act or omission by a party in exercising a right or remedy will be deemed a waiver of such right, or of another right or remedy.

This POPI Policy is governed by and interpreted according to South African law. Any dispute arising out of this POPI Policy will be subject to the exclusive jurisdiction of the South African courts.

CHANGES TO OUR POPI POLICY

We reserve the right to make changes to this POPI Policy as we deem necessary from time to time or as may be required by law. Any changes will be immediately notified via our newsletter and you are deemed to have accepted the new terms of the POPI Policy when you first use the services after such changes. Where appropriate, we will notify you of these changes in due time.

This policy will be reviewed annually and updated where necessary or when the regulations of the POPI Act are amended by the South African Government.

In the event **MORE Collection** is the subject of a corporate transaction such as an acquisition or merger with another company, your information may be transferred to the new owners so that we can continue to provide our Services to you. We will, in any case, take steps to protect your privacy.

CONTACT DETAILS

MORE Collection 199 (Pty) Ltd
15, 3rd Avenue
Parktown North
Johannesburg
South Africa

Tel: +27 11 880 9992

MORE Collection comprises the following companies and business units:

Companies (legal entities)

Lion Sands Private Game Reserve (Pty) Ltd

Tinga Private Game Lodge (Pty) Ltd

MORE Concession I (Pty) Ltd

Huntrex 101 (Pty) Ltd

More Community Trust

Business Units:

Lion Sands Game Reserve

Marataba South Africa

Cape Cadogan Boutique Hotel

MORE Collection

More Community Trust

NJ MORE Field Guide College