

# **THE BUSH HOUSE – MADIKWE**

## **Privacy Policy**

### **1. Who are we**

Mawuya Bushlodge CC, is a close corporation duly registered under number 2006/162909/23 trading under the name and style of The Bush House. ('we', 'our' and 'Bush House').

Our postal address is: P.O.Box746 Lichtenburg 2740 and we operate the following domains [www.bushhouse.co.za](http://www.bushhouse.co.za), [www.thebushhouse.co.za](http://www.thebushhouse.co.za).

This Privacy Policy sets out how we use and protect any information that you give us when you use this website or by any other means.

We are committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified when using this website, or by any other means, then you can be assured that it will only be used in accordance with this Privacy Policy.

We may change this Privacy Policy at any time by updating it on the website. You should check the website occasionally to ensure that you are aware of and agree with any changes. Where there are substantial changes that will affect your rights, they will be accommodated for you as far as is reasonably practicable.

### **2. What is this Privacy Policy for?**

- 2.1. This Policy is intended to provide information about how we will use (or "process") personal data about individuals including our visitors, contractors, and guests.
- 2.2. This information is provided in accordance with the rights of individuals under the Protection of Personal Information Act, Act no. 4 of 2013, ("POPI") and all applicable data protection legislation, to understand how their data is used. Everyone is encouraged to read this Privacy Policy and understand the Bush House's obligations to our community.

- 2.3. This Privacy Policy applies alongside any other information we may provide about a particular use of personal data, for example; when collecting data via an online or paper form.
- 2.4. This Privacy Policy also applies in addition to the Bush House's other relevant terms and conditions and policies, including:
- (a) any reservation for accommodation;
  - (b) any service or employment or consulting, permanent or temporary, contract between the Bush House and its staff or third parties.
- 2.5 Anyone who works for, or acts on behalf of, the Bush House (including staff and volunteers) should also be aware of and comply with this Privacy Policy, which also provides further information about how personal data about those individuals will be used.

### **3. Responsibility for Data Protection**

- 3.1. We have notified the Information Commissioners Office in accordance with the terms of POPI that we may obtain information about visitors to our website. For the purposes of POPI the data controller is the Bush House and we have appointed a nominated representative as our Privacy Officer. Our Privacy Officer will deal with all your requests and enquiries concerning the use of your personal data (see section on Your Rights below) and shall endeavour to ensure that all personal data is processed in compliance with this Privacy Policy and all applicable data protection legislation.
- 3.2. The Privacy Officer is Sue Morrison.

### **4. Why we need to process Personal Data**

- 4.1. In order to carry out its ordinary duties to visitors, guests, staff, third parties and members of and the North West Parks Board we may process a wide range of personal data about individuals as part of its daily operation.
- 4.2. Some of this activity we need to carry out in order to fulfil our legal rights, duties or obligations in terms of a reservation for accommodation or a staff contract or where you have given permission for us to use your personal data.

- 4.3. Other uses of personal data will be made in in the good faith belief that such disclosure is necessary, to comply with a legal obligation, to protect and defend the right or property, to prevent or investigate possible wrongdoing in connection with or involving the Bush house, to protect the personal safety of other visitors, guests, employees and contractors or the public at large and to protect against legal liability.
- 4.4. We expect that the data collected may be used for any of the following:
- a) to enable us to offer the accommodation and the “Big 5” experience at the Bush House;
  - b) To keep you informed and notify you about changes to our hospitality offering;
  - c) To enable you to participate interactively when you choose to do so;
  - d) To provide the appropriate care and support for our visitors and guests;
  - e) For the purposes of management planning, research and statistical analysis in an effort to improve our hospitality offering;
  - f) To enable relevant authorities to monitor the Bush House’s performance and to intervene or assist with incidents as appropriate;
  - g) To make use of photographic images of guests in Bush House publications, on the Bush House’s website and (where appropriate) on any of our social media channels;
  - l) For security purposes, including CCTV in accordance with the Bush House’s security requirements;
  - m) To carry out or cooperate with any Bush House or external complaints, disciplinary or investigation process; and
  - n) Where otherwise reasonably necessary for our purposes, including to obtain appropriate professional advice and insurance for the Bush House.

## **5. Types of Personal Data processed**

This will include by way of example:

- 5.1. Names, addresses, telephone numbers, email addresses and other contact details;
- 5.2. Car details (about those who use our facilities);
- 5.3. Bank details and other financial information in respect of the payment of fees to the Bush House;
- 5.4. Where appropriate, information about individuals' health, and contact details for their next of kin and dietary requirements; and
- 5.5. Images of visitors or guests engaging in Bush House activities, and images captured by our CCTV system.
- 5.6. Information that your browser sends whenever you visit our website, when you access it through a mobile device known as usage data.

## **6. How we collect Data**

- 6.1. Generally, we receive personal data from the individual directly. This may be via a form, or simply in the ordinary course of interaction or communication (such as email or written communications).
- 6.2. We may also collect information about your usage of our website(s) to improve our services available to you. This may include technical information including the IP (Internet Protocol) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform and if you access our site by your mobile device, we may collect your unique phone identifier.
- 6.3. We also may collect data through our website. You may give us information about you by filling in forms or completing editable fields on our website. This includes information you submit on our website should you create a user profile, subscribe to our services and/or newsletters, participate in discussion boards or other forums, enter a competition, promotion or survey, and/or when you report a problem with our website. The information you give us may include your name, address, e-mail address, phone number, photograph, and/or such other information as you may give us from time to time.

- 6.4. However, in some cases personal data may be supplied by third parties (for example travel and marketing agents, another lodge in Madikwe Game Reserve, or other professionals or authorities working with that individual); or collected from a third party or publicly available resources (for example, if you post something on a Facebook page or Twitter page, or if we find out about one of your interaction with us through a story in the local newspaper, or if someone else tells us).

## **7. Who has access to Personal Data and with whom it may be shared**

- 7.1. Occasionally, we may need to share personal information relating to you with third parties, such as:
- (a) professional advisers (lawyers and accountants) or relevant authorities (North West Parks Board).
  - (b) government authorities (conservation, health, police or the local authority); and
  - (c) appropriate regulatory bodies (POPI regulators and occupational health and safety inspectors).
- 7.2. We share certain data with other destination marketing organisations. The other organisations use this data for the purposes of ensuring that the hospitality offering we offer remains competitive, relevant and marketable. The data will be shared by the other organisation in a secure manner which only select members will be able to access. The other organisation agrees not to share the information with parties outside of its agreement with us, unless it is necessary for the purposes of complying with the other organisation's legal duties or is otherwise required by law, and agreed in writing in advance by us.
- 7.3. We share data with our bank, and other banks as necessary, for the purposes of hospitality fee payment arrangements.
- 7.4. Finally, in accordance with POPI, some of our processing activity is carried out on our behalf by third parties, such as IT systems, web developers or cloud storage providers. This is always subject to contractual assurances that personal data will be kept securely and only in accordance with our specific directions, and we take all appropriate measures to prevent unauthorised or unlawful access to it. As many of these processors operate globally, it may be necessary to transfer your information internationally. Use of

personal data by such third parties is safeguarded by both international procedures and legal agreements to comply with the requirements of POPI.

- 7.5. We may also use third party service providers to monitor and analyse the use of our website.

## **8. How long we keep Personal Data**

- 8.1. We will retain personal data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason. Typically, the legal recommendation for how long to keep staff and Bush House records is up to 7 years. However, incident reports and safeguarding files will need to be kept much longer, in accordance with specific legal requirements.

## **9. Your Rights**

- 9.1. Rights of access, etc.
- a) Individuals have various rights under POPI to access and understand personal data about them held by us, and in some cases ask for it to be erased or amended or for Bush House to stop processing it, but subject to certain exemptions and limitations.
  - b) Any individual wishing to access or amend their personal data, or wishing it to be transferred to another person or organisation, should put their request in writing to the Privacy Officer.

## **10. Whose Rights?**

- 10.1. The rights under POPI belong to the individual to whom the data relates. However, we will often rely on parental consent to process personal data relating to persons under the age of eighteen years old (“child”) (if consent is required) unless, given the nature of the processing in question, and the child’s age and understanding, it is more appropriate to rely on the child’s consent.
- 10.2. Parents should be aware that in such situations they may not be consulted, depending on the interests of the child, the parents' rights at law or under their reservation contract, and all the circumstances but generally we shall not collect such information without the express consent of the parent or guardian.

- 10.3. Where you, as the parent or guardian, are aware that your child has provided us with personal data without your express consent directly or indirectly which allows them to share your child's information with us, please contact us. Should we become aware that we have collected information without consent we will either obtain consent where such is necessary or we will remove the information.

## **11. Data Accuracy and Security**

- 11.1. We will endeavour to ensure that all personal data held in relation to an individual is as current and accurate as possible.
- 11.2. An individual has the right to request that any inaccurate or out-of-date information about them is erased or corrected (subject to certain exemptions and limitations under POPI): please see above for details of why we may need to process your data and who you may contact if you disagree.

## **12. Cookies**

- 12.1. A cookie is a string of information that is sent by a website and stored on your hard drive or temporarily in your computer's memory. We may employ cookie technology to help you move faster through our Site and to assist with the online application process. We may employ cookie technology to estimate our total audience size and traffic and to help us improve our Site's experience by measuring which site areas are of greatest interest to users.
- 12.2. You can turn off the ability to receive any of these cookies by adjusting the browser in your computer, but you should note that if you do so, this may materially affect the functionality of the Site and the information you can access through it.

## **13. This Privacy Policy**

- 13.1. We will update this Privacy Policy from time to time. Any substantial changes that affect your rights will be provided to you directly as far as is reasonably practicable.

## **14. Queries and Complaints**

- 14.1. Any comments or queries on this notice should be directed to the Privacy Officer.

- 14.2. If an individual believes that we have not complied with this notice or acted otherwise than in accordance with POPI, they should notify the Privacy Officer. You can also make a referral to, or lodge a complaint with, the Information Commissioner's Office (ICO), although the ICO recommends that steps are taken to resolve the matter with us before involving the regulator.

Adopted by Bush House and effective from 30 June 2021.