



JUST AFRICA HOLIDAY (PTY) LTD

PRIVACY POLICY

OVERVIEW

Here at Just Africa Holiday (Pty) Ltd we understand the importance of your Privacy and we therefore take the protection of Personal Information seriously.

The purpose of this Privacy Policy is to describe how we collect, use, store and disclose the Personal Information that is provided to us, what we learn about you from your visit to our website as well as explain the choices and rights that you have as a data subject regarding your personal information.

Throughout this Privacy Policy, all references to "our", "us", "we" or "Just Africa Holiday" refer to Just Africa Holiday (Pty) Ltd.

WHO DOES THIS PRIVACY POLICY COVER?

This Privacy Policy explains how we will treat your Personal Information whether provided by you to us or collected by us through other means in your ordinary use of our services, and our website. The Privacy Policy describes our approach and practices in respect of your Personal Information and our treatment thereof.

This policy applies to all external parties with whom we interact, including but not limited to:

- Applicants, individual customers, potential customers, and recipients of our services (including individuals who book or enquire about our services with or through us or who are the recipients of any services booked through us);
- Representatives of customer organisations;
- Individuals whose personal information is collected from any of our affiliated companies (such as where you have consented to your Personal Information being disclosed to other group companies for marketing purposes);
- Our suppliers and service providers;
- Visitors to our offices; and,
- Other users of our services.

This Privacy Policy must be read together with our website terms and conditions and any other documents, agreements or Privacy Policies that describe how we, in specific circumstances, collect or process Personal Information about you. This will enable you to understand how Just Africa Holiday will process your information

The Privacy Policy supplements such other documents and agreements, but shall not supersede them and in an event of conflict, the terms of the particular documents or agreements will prevail.

DATA COVERED BY THIS PRIVACY POLICY

This Privacy Policy describes the privacy practices of Just Africa Holiday for data that we collect:



- Through websites operated by us from which you are accessing this privacy policy, including Just Africa Holiday and other websites owned or controlled by Just Africa Holiday (collectively, the Websites)
- Through software applications made available by us for use on or through computers and mobile devices (the Apps)
- Through our social media pages that we control from which you are accessing this privacy policy (collectively, our social media Pages)
- Through email messages that we send you that link to this privacy policy, and through your communications with us online or in person,
- From third party other sources such as public databases, marketing partners, and other third parties; and
- Or through other offline interactions (collectively, property visits and offline interactions).

Collectively, we refer to the websites, the apps, and our social media pages as the “online services” and, together with the property visits and offline interactions, the “services”

THE DATA WE COLLECT

At points throughout your journey with us, we collect personal data in accordance with the law, and to provide you with exemplary services. Personal data is information that may identify you as an individual or relate to you as an identifiable individual. We collect and process the following types of personal data about you:

- Name
- Gender
- Postal address
- Telephone number
- Email address
- Financial information (such as credit and debit card number or other payment data)
- Language preference
- Date and place of birth
- Nationality, passport, visa, or other government-issues identification data
- Important dates: birthdays, anniversaries and special occasions
- Employer details (for business related-bookings)
- Travel lientery, tour group, or activity data
- Prior guest stays or interactions, goods and services purchased, special services and amenity requests
- Social media account ID, profile picture and other data publicly available, or data made available by linking your social media (if applicable)

In more limited circumstances, we may also collect:

- Data about family members and companions, names, and ages of children
- Biometric data
- Images, video, and audio data via security cameras located in public areas in our properties

We may also collect information about your “stay preferences” that we use to make your current and future stays and experience more enjoyable, including information about your interests and other relevant information that we learn about you. This may also include any



likes or dislikes about our services that you tell us about so we can improve our services, and specific dietary, health restrictions or personal needs to ensure your wellbeing. We may also collect your “personal preferences”, that may include details of your special anniversaries (such as birthdays and wedding anniversary), which type of activities you prefer to take part in, and your hobbies. Personal preferences may also include details about who you usually travel with, their relationship to you, and your marital status.

If you submit any personal data about other people to us or our service providers (e.g., if you make a reservation for another individual), you represent that you have the authority to do so and you permit us to use the data in accordance with this privacy policy.

THE ONLINE AND MOBILE DATA WE COLLECT

Typically, we do not collect Personal data through your use of the online services. However, we may collect “other data” that does not directly identify you. To the extent other data reveals your specific identity or relates to an individual, we will treat other data as Personal Data.

“Other data” includes:

- **System data:** when you use both desktop and mobile devices to access the Online Services, we collect certain data through your browser or automatically through your device, such as your computer type, screen resolution, operation system name and version, device manufacturer and model, language, internet browser type and version and the name of the version of the Online Services you are using.
- **IP Address:** we also collect your IP address, a number that is automatically assigned to the device that you are using by your internet service provider (ISP). An IP address is identified and logged automatically in our service log files when a user accesses the online services, along with the time of the visit and the pages that were visited. We use IP addresses to calculate usage levels, diagnose server problem and administer the online services. We may also derive your approximate location from your IP address.
- **Precise location-based services:** with your consent, we may collect the precise physical location of your device by using satellite, cell phone tower, WIFI signals, or other technologies. We will collect this data if you opt-in to improve special offers and to enable location-driven capabilities on your device. If you have opted-in to share your location, the program will continue to collect location data based on how you chose to share the data.
 - **Precise location Opt-out:** you can specify via your devices operating system to always share location data, only when in use, or never. If you choose only when app is in use, we will have access to the data until you log off or close the application or until you use your devices settings to disable location capabilities.

COOKIES AND SIMILAR TECHNOLOGIES ON OUR WEBSITES

When you visit our websites from either a desktop or mobile device, we may collect and use cookies or other identifiers to serve you with personal advertisements for Just Africa Holiday and other third-party products, either via email, on our website, or on other websites on the internet; to measure how you interact with our websites; and to maintain your preferences. We do this primarily through cookies, which are pieces of data stored directly on the computer or mobile device that you are using.



In general, we use three different types of cookies:

- **Necessary cookies:** These cookies help make this website usable by enabling basic functions like page navigation and access to secure areas of the website. This website cannot function properly without these cookies.
- **Statistic cookies:** These cookies help the website owners to understand how visitors interact with websites by collecting and reporting information anonymously.
- **Marketing cookies:** These cookies are used to track visitors across websites. The intention is to display ads that are relevant and engaging for the individual user and thereby more valuable for publishers and third-party advertisers.

You can learn more about our cookies in our [Cookie Declaration](#).

OPTING OUT OF COOKIES

There are several ways to opt-out of cookies. If, however, you do not accept any cookies, you may experience some inconveniences in your use of the Online services. For example, we will not be able to recognise your computer, and you will need to log in every time you visit. You also will not receive advertising or other offers from us that are relevant to your interests.

HOW AND WHERE WE COLLECT YOUR DATA

This privacy policy describes the privacy practices of Just Africa Holiday for Personal and Other data that we collect through the following:

- **Just Africa Holiday:** we collect personal data and other data from other companies for the purposes described in this privacy policy, such as providing and personalizing the services, communicating with you, facilitating the programs and to accomplish our business purposes.
- **Promotional activity:** we collect personal data and other data from third parties who may provide promotions to you, or other offers.
- **Other sources & service providers:** We collect personal data and other data from various third parties, such as public database, joint marketing partners, and online travel agencies (OTA's)
- **Online services:** We collect personal or other data when you interact with our online services, by performing such actions as, but not limited to, browsing, making a reservation, communicating with us, or otherwise connecting with us or posting to social media pages, or signing up for a newsletter or participating in a survey, contest or promotional offer.
- **Customer Care Centres:** We collect personal data when you make a reservation over the phone, communicate with us by email, fax, or other customer services. These communications may be recorded for purposed of quality assurance and training.
- **Internet-connected devices:** we collect personal data and other data from internet-connected devices available in our properties. For example, when you connect a device to one of the properties internets.



HOW AND WHEN WE SHARE YOUR DATA

Our goal is to provide you with the highest level of hospitality and services, and to do so, we may share personal data and other data with the following:

- **Just Africa Holiday:** We disclose personal data and other data to other companies for the purposes described in this privacy policy, such as providing and personalizing the services, communicating with you, facilitating membership services and to accomplish our business purposes. We share your personal data and other data used for making reservations with the applicable property to fulfil and complete your reservation. This may include the sharing of your personal data and other data to entities that are located outside South Africa.
- **On-property and/or travel providers:** We may share your information with on-property facilities such as spa, restaurants, concierge, and other companies that may provide you with a service at one of our properties.
- **Off-property and/or travel providers:** At your request, we may share your information with companies outside our properties such as tour operators, outside activities, outside restaurants, and other companies that may provide you with a service. It is important to note that this is only done at the request from you and we are not responsible for the external parties' privacy policy.
- **Service Providers:** We disclose personal data and other data to third party service providers including, for example, companies that provide website hosting, payment processing, customer service, marketing, auditing and other services

OTHER USES AND DISCLOSURES:

We will use and disclose personal data as we believe to be necessary or appropriate:

- a) To comply with applicable law, including laws outside your country or residence
- b) To comply with legal process
- c) To respond to requests from public and government authorities, including authorities outside your country of residence and to meet national security or law enforcement requirements
- d) To enforce our terms and conditions and indemnity agreements
- e) To protect the rights, privacy, safety or property of Just Africa Holiday, you or others
- f) To allow us to pursue available remedies or limit the damages that we may sustain.

We may use and disclose other data for any purpose, except where are not allowed to under applicable law.

YOUR DATA, YOUR CHOICES: YOUR PRIVACY PREFERENCES & RIGHTS

At Just Africa Holiday, we believe that you should have choices with respect to your data. We provide you with the options, information and choices below to express your preferences: what and how much you share with us and when and how you hear from us.

Communication preferences

- To change how we communicate with you, you can use the unsubscribe link at the bottom of any of our communications



- If you no longer want to receive marketing-related emails, you may opt out by following the instructions in any such email you receive from us.
- NOTE: Even if you choose to opt out of marketing-related emails, we will continue to send you transactional messages, such as information about your reservations, including confirmation and pre-arrival emails.

Your rights

You have the right and responsibility to ensure that the Personal Information we hold about you is accurate. In the absence of evidence to the contrary, we will assume that the information you provided to us is accurate. At your request, where the law requires us to do so, you can exercise your data subject rights as per the following, subject to verification and validation of your identity:

- Request access to your Personal Information that we hold about you;
- Request rectification of your Personal Information that we hold about you;
- Request erasure, as permitted by law, of your Personal Information that we hold about you;
- Request restriction of processing of your Personal Information; and,
- Object to processing of Personal Information as permitted by law.

Your rights are subject to processing, set out in Just Africa Holidays' PAIA manual, which is also available on our website.

How you can request to access, change, delete, restrict or confirm the use or object to the processing of your personal data

If you would like to request to access, change, delete, restrict or confirm the use or object to the processing of your personal data that you have previously provided to us, or you would like to receive an electronic copy of your personal data for purposes for transmitting it to another company, or appeal our decision regarding your privacy request, please see our PAIA manual. If you have any questions, please feel free to contact the information officer at info.officer@tintswalo.com.

OTHER IMPORTANT PROVISIONS

Non-Just Africa Holiday Entities

This privacy statement does not address, and we are not responsible for the privacy, data, or other practices of any entities outside of Just Africa Holiday including any third party operating any site or service to which the services link, payment service, or any other site. We have no control over, and are not responsible for, any third party's collection, use and disclosure of your personal data.

In addition, we are not responsible for the data collection, use, disclosure or security policies and practices of other organisations, such as Facebook, Google, Microsoft or any other app developer, app provider, social media platform provider, operating system provider, including with respect to any personal data you disclose to other organisations through social media pages and apps.



SECURITY

We seek to use reasonable organisational, technical and administrative measures to protect personal data. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interactions with us are no longer secure, please immediately notify us on info.officer@tintswalo.com.

RETENTION

We will retain your personal data for the period necessary to fulfil the purposes outlined in this privacy statement unless a longer retention period is required or permitted by law.

The criteria used to determine our retention period include:

- The length of time we have an ongoing relationship with you and provide the services to you
- Whether there is a legal obligation to which we are subject (for example, certain laws require us to keep records of your transactions for a certain period of time before we can delete them)
- Whether retention is advisable considering our legal position (such as, for statutes of limitations, litigation, or regulatory investigations)

Just Africa Holiday undertakes, where possible, to anonymise or delete your Personal Information as soon as the purpose and/or duration of their established retention expire.

However, personal Information may be archived beyond the applicable periods for the purpose of researching, investigating and prosecuting criminal offenses with the sole purpose of allowing, as needed, the provision of such Personal Information to the judicial authorities, or for other retention obligations, in particular for accounting or fiscal purposes. Archiving implies that this Personal Information will be subject to access restrictions and will no longer be available online but will be retrieved and kept on a secure and independent device.

USE OF SERVICES BY MINORS

The services are not directed to individuals under the age of eighteen (18). We will not intentionally or knowingly collect Personal Information directly from minors (anyone under the age of 18). The Personal Information of minors will be collected through their legal guardian or parent only where products or services are required for the minors.

DATA TRANSFERS OUT OF SOUTH AFRICA

It is important to note that by making a reservation with us, you understand that in order to provide our service to you we may be required to transfer your personal data out of South Africa.

In certain circumstances, courts, law enforcement agencies, regulatory agencies or security authorities in other countries may be entitled to access your personal Data.

Should we wish to store your information with a third party, who is located outside of South Africa and they receive your personal information, they will need to comply to either the Protection of Personal Information Act, or binding agreement which states that they will



provide an adequate level of protection to your Personal Information. This means that they have to agree to lawfully process your Personal Information and protect your Personal Information in the same manner as we do.

INDEMNITY

You accept that Just Africa Holiday takes reasonable and practical steps to safeguard Protected Personal Information in its possession. To the fullest extent permissible by law, you hereby indemnify and hold harmless Just Africa Holiday its employees and affiliates against any liability, damages and/or legal action whatsoever and howsoever arising, including negligence on the part of Just Africa Holiday, its employees or agents and Just Africa Holiday shall not accept liability for any damages or any type of loss suffered by you when utilizing the services of the Sites and Third-Party Sites and Service Providers.

CONTACT US

Our appointed Information Officer is responsible for overseeing questions concerning our Privacy Policy. You may contact our Information Officer on +27 11 300 8794 or at info.officer@tintswalo.com to discuss this Privacy Policy, your rights under data protection laws applicable to you and to raise any complaints with us. Further contact information and contact forms are available in our PAIA Manual.

You may also direct your complaint directly to:

Just Africa Holiday

5 Lynx Road,
Treesbank
Midrand
Gauteng
1685
(PO Box 70406, Bryanston, 2021)

In the absence of a response from Just Africa Holiday or if the disputes persist, you have the possibility to lodge a complaint with the South African Information Regulator (please refer to our PAIA manual for further details)

UPDATES TO THIS PRIVACY POLICY

This Privacy Policy was last updated in *July 2023* and is referred to as *version 2*. We may at any time change this Privacy Policy and any changes will be communicated on our website. The latest version will replace all earlier versions, unless it says differently