

# SAGA DATA PROTECTION POLICY

## THE PROTECTION OF PERSONAL INFORMATION ACT 4 OF 2013

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## 1. DEFINITIONS

In this Policy (as defined below): -

1.1. The following words and expressions used in this policy shall bear the meanings assigned to them and cognate words and expressions shall bear corresponding meanings hereunder unless the context shall clearly otherwise indicate: -

1.1.1. **“child”** –

1.1.1.1. Where the child is in the Republic of South Africa, means any natural person under the age of 18 (eighteen) years; and

1.1.1.2. Where the child is in the European Union, any natural person under the age of 16 (sixteen) years;

1.1.2. **“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;

1.1.3. **“consent”** means any voluntary, specific, and informed expression of will in terms of which permission is given for the processing of personal information;

1.1.4. **“data breach”** means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, Personal Information under the control of or in the possession of SAGA;

1.1.5. **“data subject”** means the person to whom personal information relates;

1.1.6. **“direct marketing”** means to approach the data subject, either in person or by mail or electronic communication, for the direct or indirect purpose of –

- 1.1.6.1. promoting or offering to supply, in the ordinary course of business, any goods or services to the data subject; or
- 1.1.6.2. requesting the data subject to make donation of any kind for any reason;
- 1.1.7. “**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;
- 1.1.8. “**employees**” means any employee of SAGA;
- 1.1.9. “**SAGA**” means South African Gunowners’ Association, a voluntary association of individuals and businesses who support the right to legally own and use firearms for self-defence, sport, hunting, and collecting purposes. The terms “we”, “us”, and “our” shall have a corresponding meaning;
- 1.1.10. “**GDPR**” means Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation);
- 1.1.11. “**information officer**” of, or in relation to, a –
  - 1.1.11.1. Public body means an information officer or deputy information officer as contemplated in section 1 or 17 of the Act; or
  - 1.1.11.2. Private body means the head of a private body as contemplated by section 1, of the Promotion of Access to Information Act;
- 1.1.12. “**operator**” means a person or entity who processes personal information for a responsible party in terms of a contract or mandate, without coming under the direct authority of that responsible party;

- 1.1.13. **“person”** means a natural person or juristic person;
- 1.1.14. **“personal information”** means information relating to an identifiable, living, natural person, (for purposes of the GDPR, this is specifically limited to natural persons only), and where it is applicable, an identifiable, existing juristic person, including, but not limited to –
- 1.1.14.1. 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;
  - 1.1.14.2. information relating to the education or the medical, financial, criminal or employment history of the person;
  - 1.1.14.3. any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier, or other particular assignment to the person;
  - 1.1.14.4. the biometric information of the person;
  - 1.1.14.5. the personal opinions, views, or preferences of the person;
  - 1.1.14.6. 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;
  - 1.1.14.7. the views or opinions of another individual about the person; and
  - 1.1.14.8. 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;
  - 1.1.14.9. Corporate structure, composition, and business operations (in circumstances where the data subject is a juristic person) irrespective of whether such information is in the public domain or not;

1.1.15. “**private body**” means –

1.1.15.1. A natural person who carries or has carried on any trade, business, or profession, but only in such capacity;

1.1.15.2. A partnership which carries or has carried on any trade, business, or professions; or

1.1.15.3. Any former or existing juristic person, but excludes a public body;

1.1.16. “**Policy**” means this Privacy Policy;

1.1.17. “**POPI**” means the Protection of Personal Information Act 4 of 2013;

1.1.18. “**processing**” means any operation or activity or any set of operations, whether or not by automatic means, concerning personal information, including –

1.1.18.1. The collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation, or use;

1.1.18.2. Dissemination by means of transmission, distribution, or making available in any other form; or

1.1.18.3. Merging, linking, as well as restriction, degradation, erasure, or destruction of information;

1.1.19. “**Promotion of Access to Information Act**” means the Promotion of Access to Information Act 2 of 2000;

1.1.20. “**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;

1.1.21. “**record**” means any recorded information –

1.1.21.1. regardless of form or medium, including any of the following:

1.1.21.1.1. writing on any material;

- 1.1.21.1.2. 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;
- 1.1.21.1.3. label, marking or other writing that identifies or describes anything of which it forms part, or to which it is attached by any means;
- 1.1.21.1.4. book, map, plan, graph, or drawing;
- 1.1.21.1.5. 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;
- 1.1.21.2. in the possession or under the control of the responsible party;
- 1.1.21.3. whether or not it was created by the responsible party; and
- 1.1.21.4. regardless of when it came into existence;
- 1.1.22. “**regulator**” means either (i) the South African Information Regulator established in terms of POPIA; or (ii) the relevant supervisory authority under the GDPR;
- 1.1.23. “**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;
- 1.1.24. “**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;
- 1.1.25. “**special personal information**” means personal information concerning a data subject’s religious or philosophical beliefs, race or ethnic origin, trade union membership, political opinions, health, sexual life, sexual orientation, genetic information, biometric information, or criminal behaviour;

1.1.26. **“third party”** means any independent contractor, agent, consultant, sub-contractor, or other representative of SAGA;

1.1.27. **“this Act”** includes any regulation or code of conduct made under this Act;

1.1.28. **“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 the responsible party; and

1.1.29. **“website”** means SAGA’s website currently located at <https://www.saga.org.za/>

## **2. PURPOSE OF THIS POLICY**

The purpose of this policy is to inform data subjects about how we process their personal information.

## **3. APPLICATION**

3.1. SAGA, in its capacity as Responsible party and/or Operator, shall strive to observe, and comply with its obligations under POPI and, where relevant, the GDPR, as well as accepted information protection principles, practices and guidelines when it processes personal information from or in respect of a data subject.

3.2. This policy applies to personal information collected by SAGA in connection with the services which we offer and provide. This includes information collected directly from you as a data subject, as well as

information we collect indirectly through our direct marketing campaigns and online through our website, branded pages on third party platforms, and applications accessed or used through such websites or third party platforms which are operated by or on behalf of SAGA.

- 3.3. This privacy policy does not apply to information practices of third party companies who we may engage with in relation to our business operations (including, without limitation, their websites, platforms and/or applications) which we do not own or control; or individuals that SAGA does not manage or employ. These third party sites may have their own privacy policies and terms and conditions and we encourage you to read them before using them.

#### **4. GENERAL PROVISIONS**

- 4.1. This policy applies to all personal information processed by the responsible party.
- 4.2. The responsible party is responsible for its ongoing compliance with this policy.
- 4.3. This policy shall be reviewed at least annually.
- 4.4. SAG has registered with the Information Regulator as a responsible party that processes personal information.

#### **5. PROCESS OF COLLECTING PERSONAL INFORMATION**

- 5.1. SAGA collects personal information directly from data subjects, unless an exception is applicable (such as, for example, where the data subject has made the personal information public, or the personal information is contained in or derived from a public record).



- 5.2. Where the data subject voluntarily provides us with their personal information, where possible, we will inform the data subject what information it is required to provide to us and what information is optional.
- 5.3. We often collect personal information directly from the data subject and/or in some cases from third parties.
- 5.4. Where we obtain personal information from third parties, we will ensure that it obtains the consent of the data subject to do so or will only process the personal information without the data subject's consent where we are permitted to do so in terms of clause 5.1 above.
- 5.5. An example of such third parties include: (i) our members when we handle personal information on their behalf; (ii) credit reference agencies; (iii) other companies providing services to SAGA; (iv) where we make use of publicly available sources of information.
- 5.6. Data subjects have a right to access their personal information and any such requests shall be dealt with in a timely manner.
- 5.7. Personal information shall be: -
  - 5.7.1. processed lawfully, fairly, reasonable, and in a transparent manner to ensure that it protects the data subject's privacy and will process the personal information in a manner that does not adversely affect the data subject in question;
  - 5.7.2. collected for a specified, explicit, and legitimate purpose and further not processed in a manner that is incompatible with those purposes;
  - 5.7.3. adequate and where necessary, kept up to date; every reasonable step will be taken to ensure that personal information that is

inaccurate, having regard to the purposes for which they are processed, are erased, or rectified without delay;

5.7.4. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal information is processed;

5.7.5. processed in a manner that ensures appropriate security of the personal information including protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical or organisational measures.

5.8. The responsible party is committed to applying the principles of POPI to its day-to-day operations, including: -

5.8.1. Give effect to the Constitutional right to privacy, by safeguarding personal information when processed, subject to justifiable limitations that are aimed at –

5.8.1.1. Balancing the right to privacy against other rights, particularly the right of access to information; and

5.8.1.2. Protecting important interests, including the free flow of information within the Republic and access international borders;

5.8.2. Regulate the manner in which personal information may be processed, by establishing conditions, in harmony with international standards, that prescribe the minimum threshold requirements for the lawful processing of personal information;

5.8.3. Provide persons with rights and remedies to protect their personal information from processing that is not in accordance with POPI.

## **6. SPECIAL PERSONAL INFORMATION AND PERSONAL INFORMATION OF CHILDREN**

6.1. Special personal information is sensitive personal information of a data subject and SAGA acknowledges that it will generally not process special personal information unless (i) processing is carried out in accordance with the data subject's explicit consent; or (ii) information has been deliberately made public by the data subject; or (iii) processing is necessary for the establishment, exercise, or defence of a right or legal claim or obligation in law); or (iv) processing is for historical, statistical or research purposes, subject to stipulated safeguards; or –

for purposes of POPI –

6.1.1. specific authorisation has been obtained in terms of POPIA; and

for purposes of the GDPR –

6.1.2. processing is necessary for the purposes of carrying out the obligations and exercising specific rights of SAGA or of the data subject in the field of employment and social security and social protection law;

6.1.3. Processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent;

6.1.4. Processing is necessary for the establishment, exercise, or defence of legal claims or whenever courts are acting in their judicial capacity;

6.1.5. Processing is necessary for reasons of substantial public interest;

6.1.6. Processing is necessary for the purposes of preventative or occupational medicine; or

6.1.7. Processing is necessary for reasons of public interest in the area of public health.

6.2. SAGA acknowledges that it may not process any personal information concerning a child and will only do so where it has obtained the consent of the parent or guardian of that child or where it is permitted to do so in accordance with applicable laws.

## **7. LAWFUL PURPOSES**

7.1. Where SAGA is the responsible party, we will only process a data subject's personal information (other than for special personal information) where –

7.1.1. consent of the data subject (or competent person where the data subject is a child) is obtained;

7.1.2. processing is necessary to carry out the actions for conclusion of a contract/mandate to which a data subject is party;

7.1.3. processing complies with an obligation imposed by law on SAGA;

7.1.4. processing protects a legitimate interest of the data subject;

7.1.5. processing is necessary for pursuing the legitimate interests of SAGA or of a third party to whom the information is supplied; and/or

7.1.6. processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in SAGA.

7.2. We will only process personal information where one of the legal bases referred to in paragraph 7.1 above are present. Further, we will ensure

that processing will relate only to the purpose for and of which the data subject has been made aware (and where relevant, consented to) and will not process any personal information for any other purpose(s).

- 7.3. SAGA understands its obligation to make data subjects aware of the fact that it is processing their personal information and inform them of the purpose for which we process such personal information.
- 7.4. We will only process a data subject's personal information for a specific, lawful, and clear purpose (or for specific, lawful, and clear purposes) and will ensure that we make the data subject aware of such purpose(s) as far as possible.
- 7.5. We will generally use personal information for purposes required to operate and manage our normal business operations and these purposes include one or more of the following non-exhaustive purposes –
  - 7.5.1. For the purpose of providing services to the data subjects from time to time;
  - 7.5.2. Personal information is processed as part of the "Know Your Customer" process as per the requirements of the Financial Intelligence Centre Act 38 of 2001;
  - 7.5.3. Personal information is processed in order to conduct due diligence processes on our members;
  - 7.5.4. Personal information is processed for the purposes of performing general information technology-related functions for all functions within SAGA;
  - 7.5.5. For purposes of interacting with you on our website and generally monitoring your use on our website, including for purposes of improving same;

- 7.5.6. Personal information is processed in connection with internal audit purposes (i.e., ensuring that the appropriate internal controls are in place in order to mitigate the relevant risks, as well as to carry out any investigations where this is required);
  - 7.5.7. Personal information is processed for employment-related purposes such as administering payroll, and assessing credit and criminal history;
  - 7.5.8. To respond to any correspondence that the data subject may send to SAGA, including via email, our website, or by telephone;
  - 7.5.9. In connection with the execution of payment processing functions, including payment of our supplier invoices;
  - 7.5.10. To contact the data subject for direct marketing purposes subject to the provisions of clause 10 below;
  - 7.5.11. For such other purposes to which the data subject may consent from time to time; and
  - 7.5.12. For such other purposes as authorised in terms of applicable law.
- 7.6. Where we rely on a data subject's consent as the legal basis for processing personal information, the data subject may withdraw his/her/its consent or may object to SAGA's processing of the personal information at any time. However, this will not affect the lawfulness of any processing carried out prior to the withdrawal of consent.
- 7.7. If the consent is withdrawn or if there is otherwise a justified objection against the use or the processing of such personal information, SAGA will ensure that the personal information is no longer processed.

## **8. STORAGE AND PROCESSING OF PERSONAL INFORMATION BY SAGA AND THIRD PARTY SERVICE PROVIDERS**

- 8.1. We may store your personal information in hardcopy format and/or in electronic format using our own secure on-site servers or other internally hosted technology. Your personal information may also be stored by third parties, via cloud services or other technology, with whom we have contracted with, to support our business operations.
- 8.2. Our third party service providers, including data storage and processing providers, may from time to time also have access to a data subject's personal information in connection with purposes for which the personal information was initially collected to be processed.
- 8.3. We may disclose personal information to third parties with whom we contract. When doing so we impose appropriate security, privacy, and confidentiality obligations on such third parties to ensure that the personal information, that we remain responsible for, is kept secure.
- 8.4. We may also disclose personal information, where we: -
  - 8.4.1. have a duty or a right to disclose in terms of law or industry codes;
  - 8.4.2. believe it is necessary to protect our rights.
- 8.5. We will ensure that anyone to whom we pass personal information agrees to treat the personal information in accordance with the provisions of this policy, all other relevant internal policies, and procedures, POPI and, where relevant, the GDPR.
- 8.6. These third party do not use or have access to your personal information other than for purposes specified by us, and we require such parties to

employ at least the same level of security that we use to protect your personal data.

- 8.7. Your personal information may be processed in South Africa or another country where SAGA, its affiliates, and their Third Party service providers maintain servers and facilities and standards of protection required under applicable law.

## **9. DATA SUBJECT RIGHTS**

### **9.1. ACCESS TO INFORMATION**

9.1.1. The data subject has the right to request a copy of the personal information we hold about them.

9.1.2. To do this, the data subject may contact us at the numbers/addresses as provided on our website and specify what information the data subject requires.

9.1.3. We will need a copy of the data subject's identity document to confirm their identity before providing details of personal information.

### **9.2. CORRECTION OF PERSONAL INFORMATION**

9.2.1. The data subject has the right to ask us to update, correct or delete its personal information.

9.2.2. We will require a copy of the data subject's identity document to confirm its identity before making changes to personal information we may hold about it.

9.2.3. We require our members and employees to keep their personal information accurate and up to date.



## 10. PERSONAL INFORMATION FOR DIRECT MARKETING PURPOSES

- 10.1. To the extent that we act in our capacity as a direct marketer, we shall strive to observe, and comply with our obligations under POPI and, where relevant, the GDPR when implementing principles and practices in relation to direct marketing.
- 10.2. We acknowledge that we may only use personal information to contact the data subject for purposes of direct marketing from time to time where it is permissible to do so.
- 10.3. We may use personal Information to contact any data subject and/or market our services directly to the data subject(s) if the data subject is one of our existing clients, the data subject has requested to receive marketing material from us, or we have the data subject's consent to market our services directly to the data subject.
- 10.4. If the data subject is an existing member, we will only use his/her/its personal information if we have obtained the personal information through the provision of a service to the data subject and only in relation to similar services to the ones we previously provided to the data subject.
- 10.5. We will ensure that a reasonable opportunity is given to the data subject to object to the use of their personal information for our marketing purposes when collecting the personal information and on the occasion of each communication to the data subject for purposes of direct marketing.
- 10.6. We will not use your personal information to send you marketing materials if you have requested not to receive them. If you request that we stop processing your personal information for marketing purposes, we shall do so. We encourage that such requests to opt-out of marketing be made via forms and links provided for that purpose in the marketing materials sent to you.

## **11. ACCURACY**

- 11.1. We shall take reasonable steps to ensure that all personal information is kept as accurate, complete, and up to date as reasonably possible depending on the purpose for which personal information is collected or further processed.
- 11.2. We may not always expressly request the data subject to verify and update his/her/its personal information unless this process is specifically necessary.
- 11.3. We, however, expect that the data subject will notify us from time to time in writing of any updates required in respect of his/her/its personal information.
- 11.4. Where necessary for the lawful basis on which personal information is processed, steps are in place to ensure that personal information is kept up to date.

## **12. RETENTION, ARCHIVING AND REMOVAL**

- 12.1. We may keep records of the personal information we have collected, correspondence, or comments in an electronic or hardcopy file format.
- 12.2. We will not retain personal information for a period longer than is necessary to achieve the purpose for which it was collected or processed, and we are required to delete, destroy (in such a way that it cannot be reconstructed) or de-identify the information as soon as is reasonably practicable once the purpose has been achieved. This prohibition will not apply in the following circumstances –
  - 12.2.1. where the retention of the record is required or authorised by law;

- 12.2.2. we require the record to fulfil its lawful functions or activities;
  - 12.2.3. retention of the record is required by a contract between the parties thereto;
  - 12.2.4. the data subject (or competent person, where the data subject is a child) has consented to such longer retention; or
  - 12.2.5. the record is retained for historical, research or statistical purposes provided safeguards are put in place to prevent use for any other purpose.
- 12.3. Accordingly, we will, subject to the exceptions noted herein, retain personal information for as long as necessary to fulfil the purposes for which that personal information was collected and/or as permitted or required by applicable law.
- 12.4. Where we retain personal information for longer periods for statistical, historical or research purposes, we will ensure that appropriate safeguards have been put in place to ensure that all recorded personal information will continue to be processed in accordance with this policy and the applicable laws.
- 12.5. Once the purpose for which the personal information was initially collected and processed no longer applies or becomes obsolete, we will ensure that the personal information is deleted, destroyed or de-identified sufficiently so that a person cannot re-identify such personal information.
- 12.6. In instances where we de-identify your personal information, we may use such de-identified information indefinitely.

## **13. FAILURE TO PROVIDE PERSONAL INFORMATION**

- 13.1. Should SAGA need to collect personal information by law or under the terms of a contract that we may have with you, and you fail to provide the personal information when requested, we may be unable to perform the contract we have or are attempting to enter into with you.
- 13.2. In such a case, we may have to decline to provide or receive the relevant services, and you will be notified where this is the case.

## **14. INFORMATION SECURITY**

- 14.1. We are legally obliged to provide adequate protection for the personal information we hold and to its alteration, loss and damage, or access by non-authorised third parties. We will, on an on-going basis, continue to review our security controls and related processes to ensure that personal information remains secure.
- 14.2. We will ensure the security and integrity of personal information in its possession or under its control with appropriate, reasonable technical and organisational measures to prevent loss, unlawful access, and unauthorised destruction of personal information.
- 14.3. Taking into account the costs of implementation and the nature, scope, context, and purposes of processing as well as the risk of varying likelihood and severity for the rights and freedoms of data subjects, we implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk of processing, including measures protecting any personal information from loss, theft, unauthorised access, disclosure, copying, use or modification.
- 14.4. Further, SAGA maintains regularly verifies that the security measures are effective and regularly updates same in response to new risks.

- 14.5. Access to personal information is limited to personnel who need access and appropriate security is in place to avoid unauthorised sharing of personal information.
- 14.6. When personal information is deleted, it is done safely and in a manner that the data is irrecoverable.
- 14.7. Appropriate back-up and disaster recovery solutions are in place.

## **15. BREACH**

- 15.1. A data breach refers to any incident in terms of which reasonable grounds exist to believe that the personal information of a data subject has been accessed or acquired by any unauthorised person.
- 15.2. A data breach can happen for many reasons, which include: (a) loss or theft of data or equipment on which personal information is stored; (b) inappropriate access controls allowing unauthorised use; (c) equipment failure; (d) human error; (e) unforeseen circumstances, such as a fire or flood; (f) deliberate attacks on systems, such as hacking, viruses or phishing scams; and/or (g) alteration of personal information without permission and loss of availability of personal information.
- 15.3. In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclose of, or access to, personal information we shall promptly assess the risk of the data subjects' rights and freedoms and if appropriate report the breach to the Information Regulator as soon as possible.
- 15.4. SAGA will address any data breach in accordance with the terms of POPI and, where relevant, the GDPR.

- 15.5. SAGA will notify the affected data subject (unless the applicable law requires that we delay notification to the data subject) in writing in the event of a data breach (or a reasonable belief of a data breach) in respect of that data subject's personal information.
- 15.6. SAGA will provide such notification as soon as reasonably possible and, where feasible, not later than 72 (seventy-two) hours after having become aware of any data breach in respect of such data subject's personal information.
- 15.7. Where SAGA acts as an 'operator' and should any data breach affect the data of data subjects whose information SAGA processes as an operator, SAGA shall (in terms of POPI and, where applicable, the GDPR) notify the relevant responsible party immediately where there are reasonable grounds to believe that the personal information of relevant data subjects has been accessed or acquired by any unauthorised person.

## **16. TIME PERIODS**

- 16.1. SAGA will respond to each written request of a data subject not later than 30 (thirty) days after receipt of such requests. Under certain circumstances, SAGA may, however, extend the original period of 30 (thirty) days once for a further period of not more than 30 (thirty) days.
- 16.2. A data subject has the right to make a complaint to SAGA in respect of this time limit by contacting SAGA using the contact details provided below.

## **17. COSTS TO ACCESS TO PERSONAL INFORMATION**

17.1. The prescribed fees to be paid for copies of the data subject's personal information are listed in the PAIA manual.

## **18. USE OF WEBSITE COOKIES**

18.1. Our website uses cookies, which are small text files sent by a web server to store on a web browser. They are used to ensure websites function properly, store user preferences when needed and collect anonymous statistics on website usage.

18.2. You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting, you may be unable to access certain parts of our website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to the website. If you accept a "cookie" or fail to deny the use of "cookies", you agree that we may use your personal information collected using "cookies" (subject to the provisions of this Policy). Where you either reject or decline cookies, you are informed that you may not be able to fully experience the interactive features of our website.

## **19. CHANGES TO THIS POLICY**

19.1. SAGA reserves the right to make amendments to this policy from time to time and will use reasonable efforts to notify data subjects of such amendments.

19.2. The current version of this policy will govern the respective rights and obligations between you and SAGA each time that you access and use our website.

## **20. CONTACT DETAILS**

NAME OF BODY: THE SAGA TRUST

### **PHYSICAL AND POSTAL ADDRESSES**

Tandjo Centre, 4 Joseph Avenue, Glen Anil 4051

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### **INFORMATION OFFICER:**

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- 20.1. If a Data Subject is unsatisfied with the manner in which SAGA addresses any complaint with regard to its processing of personal information, the data subject can contact the office of the relevant Regulator.