



THE PROTECTION OF PERSONAL INFORMATION ACT 4 OF 2013

CUSTOMER PRIVACY STATEMENT

This Statement is being issued to explain how Msinsi Holdings SOC Ltd obtain, use and disclose customer personal information, in accordance with the requirements of the Protection of Personal Information Act ("POPIA"), Act No. 4 of 2013.

Msinsi Holdings SOC, Ltd is committed to protecting customer privacy and to ensure that your personal information is collected and used properly, lawfully and transparently.

About the Company: Msinsi Holdings SOC Ltd trading as Msinsi Resorts & Game Reserves

Msinsi Holdings SOC Ltd is the state owned company wholly owned by Umgeni Water. The mandate of Msinsi Holdings SOC Ltd is primarily to manage the water resources on behalf of Umgeni Water and secondarily to manage ecotourism services rendered at its operational sites.

Definitions

- **'consent'** means any voluntary, specific and informed expression of will in terms of which permission is given for the processing of personal information;
- **'data subject'** means the person to whom personal information relates;
- **'direct marketing'** means to approach a data subject, either in person or by mail or electronic communication, for the direct or indirect purpose of promoting or offering to supply, in the ordinary course of business, any goods or services to the data subject; or requesting the data subject to make a donation of any kind for any reason;
- **'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;
- **'personal information'** means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person.
- **'processing'** means any operation or activity or any set of operations, whether or not by automatic means, concerning personal information, including:
 - the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;
 - dissemination by means of transmission, distribution or making



available in any other form; or merging, linking, as well as restriction, degradation, erasure or destruction of information;

- **PAIA 'Promotion of Access to Information Act'** means the Promotion of Access to Information Act, 2000 (Act 2 of 2000);
- **POPIA 'Protection of Personal Information Act'** means the Protection of information Act, 2013 (Act 4 of 2013)
- **'record'** means any recorded information regardless of form or medium, including any of : Writing on any material; 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; label, marking or other writing that identifies or describes anything of which it forms part, or to which it is attached by any means; book, map, plan, graph or drawing; 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; in the possession or under the control of a responsible party; whether or not it was created by a responsible party; and Regardless of when it came into existence.
- **'regulator'** means the Information Regulator established in terms of section 39;

The information that Msinsi Holdings SOC Ltd collects

Msinsi Holdings (SOC) Ltd collects and processes personal information of its stakeholders ranging from its employees, customers, suppliers, consultants pertaining to the relationship that Msinsi has with such relevant stakeholder.

- The type of information shall depend on the need for which it is collected and shall be processed for that purpose only. Whenever possible, Msinsi Holdings (SOC) Ltd shall inform the relevant stakeholder as to the information required and the information deemed optional. Examples of personal information that Msinsi Holdings (SOC) Ltd collects include, but is not limited to:
- The stakeholder's Identification documents, names, surname, physical and postal addresses, postal code, marital status, number of dependents, next of kin information, cell phone numbers, telephone number, fax numbers, and emails.
- Description of stakeholder's residence, location, business, assets, financial information, human capital, banking details, correspondences, opinions and reports etc.
- Any other information required by Msinsi Holdings (SOC) Ltd and its stakeholder's in order to effectively and efficiently provide services and product of quality standard and to comply with all legislative obligations of Msinsi Holdings.



Disclosure of Information

Msinsi Holdings SOC Ltd may disclose personal information of those customers who participate in the Wild Card Loyalty Programme to SANParks as the facilitator of the loyalty programme in accordance with the Protection of Personal Information Act No.4 of 2013.

Msinsi Holdings SOC Ltd may also disclose customer information if it is necessary:

- to avoid prejudice to the maintenance of the law by any public body including the prevention, detection, investigation, prosecution and punishment of offences;
- to comply with an obligation imposed by law or to enforce legislation concerning the collection of revenue as defined in Section 1 of the South African Revenue Service Act, 1997 (Act34 of 1997);
- for the conduct of proceedings in any court or tribunal that have commenced or are reasonably contemplated;
- in the interests of national security; where we believe it is necessary to protect our rights.

Information Security

Msinsi Holdings SOC Ltd is legally obliged to provide adequate protection for the personal information it holds and to stop unauthorized access and use of personal information. Security controls and related processes shall be reviewed on an on-going basis to ensure that customer personal information remains secure.

Security controls include inter alia:

- Computer and network security;
- Secure communications;
- Acceptable usage of personal information;
- Governance and regulatory issues;
- Monitoring access and usage of private information;
- Investigating and reacting to security incidents.

In the unlikely event of security breach, Msinsi Holdings SOC Ltd will report such incident to the Information Regulator and to individuals and companies involved or affected.

Access to Information

- **Requests for records/information held Msinsi Holdings SOC Ltd**



Requests for records shall be dealt with in terms of PAIA, which gives effect to the constitutional right of access to information held by the public bodies. Such access request may be subject to a payment of a legally allowable fee. Such requests must be made in writing on the prescribed form to the Information Officer in terms of PAIA

All personal information, held by Msinsi Holdings SOC Ltd in its archives, storage and electronically stored, shall be dealt with in the strictest confidence and may only be disclosed, where such processing is in compliance with the POPI Act and this policy.

Rights of Data Subjects Regarding Direct Electronic Marketing

- **Unsolicited electronic communication**

Msinsi Holdings SOC Ltd may not engage in direct marketing by means of any form of electronic communication, including automatic calling machines, facsimile machines, SMS or email unless the data subject:

- I. has given his, her or its consent to the processing; or
- II. is a customer of Msinsi Holdings SOC Ltd and;
- III. if Msinsi Holdings SOC Ltd has obtained the contact details of the data subject in the context of the sale of a product or service;
- IV. for the purpose of direct marketing similar products or services; and
- V. if the data subject has been given a reasonable opportunity to object, free of charge and in a manner free of unnecessary formality, to such use of his, her or its electronic details at the time when the information was collected
- VI. if the data subject on the occasion of each communication with the data subject for the purpose of marketing the data subject has not initially refused such use.

- **Directories**

In the event that Msinsi Holdings SOC Ltd runs a printed or electronic directory to which data subjects are subscribers to a directory available to the public or obtainable through directory enquiry services, in which his, her or its personal information is included, the data subject/s must be informed, free of charge and before the information is included in the directory about the purpose of the directory; and about any further uses to which the directory may possibly be put, based on search functions embedded in electronic versions of the directory.



Correction of information

Customers have the right to ask Msinsi Holdings SOC Ltd to update, correct or delete their personal information. Msinsi Holdings SOC Ltd will require a copy customer's ID document to confirm identity before making changes to personal information.

How to contact Msinsi Holdings SOC Ltd

Please contact Msinsi Holdings SOC Ltd at the numbers/addresses listed herein below and on our website.

Physical Address:

Msinsi Holdings SOC Ltd
Blocks A & C,
18 Old Main Road,
Hillcrest,
3650

Postal Address:

Private Bag X 1020,
Hillcrest,
3650

Telephone number: +27 (31) 765 7724

Fax number: +27 (31) 765 7704

Email: info@msinsi.co.za

Website: www.msinsi.co.za