



MAITOCEAN 04 PTY LTD TRADING AS DULINI PRIVATE GAME RESERVE

REGISTRATION NO: 2012/192868/07

## PRIVACY POLICY

### 1. DEFINITIONS

In this Privacy Policy, the following words shall, unless otherwise stated or inconsistent with the context in which they appear, bear the following meanings, and other words derived from the same origins as such words (that is, cognate words) shall bear corresponding meanings:-

- 1.1 "Data" means all data provided by you to us, including your Personal Information;
- 1.2 "Dulini Private Game Reserve" means the private game viewing and eco-tourism reserve known as Dulini Private Game Reserve operated by Maitocean 04 Pty Ltd in the Sabi Sand Game Reserve;
- 1.3 "ECTA" means Electronic Communications and Transactions Act 25 of 2002 and includes the regulations published under that Act, and any amendments to that Act and/or the regulations from time to time (if any);
- 1.4 "Personal Information" has the meaning assigned to that term in the POPI Act;
- 1.5 "Platforms" means the <https://www.dulini.com> website, and the "Self-Service Portal";
- 1.6 "POPI Act" means Protection of Personal Information Act No. 4 of 2013 and includes the regulations published under that Act, and any amendments to that Act and/or the regulations from time to time (if any);
- 1.7 "Privacy Policy" means this privacy policy adopted by Maitocean 04 Pty Ltd, registration number 2012/ 192868/ 07 trading as Dulini Private Game Reserve, as amended and / or substituted from time to time;
- 1.8 "Processing" has the meaning assigned to that term in the POPI Act;

### 1. INTERPRETATION

- 1.1 In this Privacy Policy, any reference to "we" or "us" or "our" refers to Maitocean 04 Pty Ltd trading as Dulini Private Game Reserve registration number 2012/ 192868/ 07, a company registered in South Africa as well as all affiliates, employees, members, agents, shareholders, officials, concessionaries and representatives of any form of Maitocean 04 Pty Ltd trading as Dulini Private Game Reserve;



- 1.2 Any reference to “you”, “your” or “user” refers to the data subject.
- 1.3 This Privacy Policy outlines how we process the personal information you provide to us or that we collect through other means when we provide our services or when you access our website and social media platforms.
- 1.4 This Privacy Policy must be read together with our website terms and conditions of use and any other contractual agreement you may have with us.
- 1.5 A notice will be posted on our website home page whenever the Privacy Policy amended.
- 1.6 Please check the website regularly to ensure that you are aware of the latest version of this Privacy Policy.

## 2. WHAT PERSONAL INFORMATION DO WE COLLECT?

- 2.1 The service we provide to you determines the exact nature of the personal information we process, and the purpose that your personal information is collected and used for. As a private game viewing and eco-tourism reserve, the personal information we process includes the following:
  - 2.1.1 information about you / Company, your name, identity number / company name.
  - 2.1.2 contact information - your email, address, phone number and physical address.
  - 2.1.3 online information - cookies and IP address (your computer’s internet address), if you use our websites and/or social media channels.
  - 2.1.4 financial information - we may process information related to your business, banking details, credit card detail.
  - 2.1.5 contractual information - details about contracts involving clients’ dietary requirements, nationality, allergies, health concerns, weight, gender, age, passport numbers and expiry dates, last point of contact prior to arrival at any facility, contact and emergency details and details of travel to and from the responsible parties premises or customers premises.

## 3. WHY IS YOUR PERSONAL INFORMATION COLLECTED AND HOW IS IT USED?

We use your personal information to provide business process outsourcing services to you which may include:

- 3.1 providing you with our services, and maintain our relationship with you;



- 3.2 meeting our contractual obligations with you;
- 3.3 to detect or prevent unlawful activity, fraud, money-laundering and loss;
- 3.4 for risk analysis or risk management;
- 3.5 recording, monitor and/or access your telephone calls (i.e. voice recordings), correspondence and electronic communications to/with us (or any of our employees, agents or contractors) in order to accurately carry out your instructions and requests, to use as evidence and in the interests of crime prevention;
- 3.6 statistical analysis and research purposes;
- 3.7 audit and record-keeping purposes;
- 3.8 purposes of proof and legal proceedings;
- 3.9 enhancing your experience with us and to help us improve our Service to you;
- 3.10 marketing our services, provided that you have not objected to receiving such marketing;
- 3.11 safety and security purposes;
- 3.12 debt recovery or debt tracing purposes;
- 3.13 to execute a transaction in accordance with your request;
- 3.14 complying with our regulatory reporting obligations;
- 3.15 complying with our legal obligations, including screening of clients and visitors' health when accessing our premises to comply with COVID-19 regulations and protocols;
- 3.16 to conduct recruitment and hiring processes, which includes but is not limited to conducting criminal record and credit checks (where appropriate), the capturing of applicants details and providing status updates to job applicants';
- 3.17 create supplier profiles on our systems, to pay suppliers, for general supplier administration and supplier database maintenance;
- 3.18 responding to your query when you contact our call centre;
- 3.19 create client profiles on our systems, to invoice clients, for general client administration and client database maintenance;
- 3.20 to carry out any other reasonable business operation considering our business and the relationship between the parties; and



3.21 any purpose related to and compatible with the above.

#### 4. HOW IS YOUR PERSONAL INFORMATION COLLECTED?

4.1 We are committed to respecting your privacy and to processing your personal information lawfully, transparently and securely in accordance with the POPI Act.

4.2 We may collect your personal information in the following ways:

4.2.1 directly from you when you provide information electronically, telephonically or in hard copy.

4.2.2 indirectly from you when you interact with our website, social media, through and agent or email addresses, which may include the collection of metadata (data about data).

4.2.3 from employers who are authorised to provide us with your personal information.

4.3 We will also collect the personal information of any other person whose details you provide to us in accordance with POPI Act.

#### 5. IS YOUR PERSONAL INFORMATION COLLECTED BY THIRD PARTIES?

5.1 Third-party information system administrators that have access to our client database, may collect personal information about you to provide us with information system or other software services.

5.2 We may use a third-party payment processor to process payments made to us or third parties. In connection with the processing of such payments, we do not retain any personally identifiable information or any financial information such as credit-card numbers. Rather, all such information is provided directly to our third-party processor and the use of your Personal Information is governed by their Privacy Policy.

5.2 Your personal information will never be provided to third parties without your consent. We do not control the collection or use of your personal information by third parties and this Privacy Policy does not apply to third parties. We do not accept any responsibility or liability for third-party policies or your use of a third-party app, platform, or service.

#### 6. IS YOUR PERSONAL INFORMATION SHARED BY US?

6.1 Your personal information will only be shared with third parties or representatives if there is a legitimate reason to do so.



- 6.2 Your personal information may also be shared with third-party consultants to fulfil our contractual obligations to you.
- 6.3 We will not sell, rent, or trade your personal information to any third party.
- 6.4 We will disclose information when legally required to do so to comply with any relevant legislative and regulatory requirements.
- 6.5 Notwithstanding the above, we shall share your Data to the relevant third parties concerned should one of the following occasions transpire:
- 6.5.1 if it is legally obligated in terms of statute to disseminate your Data;
  - 6.5.2 if we reasonably believe in good faith that the sharing of the Data is necessary to protect the property and/or rights of Dulini Private Game Reserve, third parties and/or the public at large;
  - 6.5.3 if you furnish us with express consent to disseminate your Data to an identifiable and authorised entity and/or person;
  - 6.5.4 we acknowledge and accept that in terms of section 21(1) of the POPI Act, we must conclude a written contract with the entity and/or person processing the Personal Information on our behalf (the “operator”). Such written contract shall ensure that the operator that processes the Personal Information shall establish and maintain the security measures referred to in section 19 of the POPI Act; and
  - 6.5.5 you hereby acknowledge that if you send us a request (for example via a support e-mail or via our feedback mechanisms), we reserve the right to publish it on our Platforms, which shall enable us to convey our response and/or clarify an issue to you, clients and potential clients.
7. IS YOUR PERSONAL INFORMATION TRANSFERRED INTERNATIONALLY?
- 7.1 We may need to send your personal information to another country for storage or processing on our behalf by an international service provider.
  - 7.2 We will only send your personal information to service providers in a country that does not have information protection laws similar to that of the Republic of South Africa if the recipient agrees to adhere to the principles of POPIA.
8. CCTV MONITORING



8.1. Our facilities and premises are monitored by CCTV cameras for crime prevention, quality control and general public safety.

9. IS YOUR PERSONAL INFORMATION STORED SECURELY?

9.1 We strive to protect your privacy and the confidentiality of your personal information.

9.2 Appropriate information security measures have been implemented to keep your information secure, accurate and updated.

9.3 We cannot guarantee the security of any information you transmit to us online and you do so at your own risk.

9.4 Your personal information will be held and used for as long as permitted for legal, regulatory, fraud prevention and legitimate business purposes.

9.5 We assure you that reasonable steps are taken to ensure the reliability and integrity of our employees who have access to your personal information for a specific purpose.

10. YOUR RIGHT TO ACCESS AND CORRECT YOUR PERSONAL INFORMATION

10.1 You have the right to access your personal information held by a public or private body in terms of the Promotion of Access to Information Act ("PAIA").

10.2 Access your personal information can be exercised by contacting our Information officer.

10.3 Correct any of your personal information held by us.

10.4 Your right to correct your personal information can be exercised by contacting our information officer.

10.5 Exercise the rights conferred to you under PAIA by sending a request to our Compliance Officer.

11. USE OF YOUR PERSONAL INFORMATION FOR MARKETING PURPOSES

11.1 We may send you direct marketing communications and information about our services and/or properties similar in nature to those in which you initially displayed an interest.



11.2 These communications may be sent in various forms, including e-mail, SMS and phone calls. If you indicate a preference of communication, we will endeavour to use that method whenever practical to do so.

11.3 If you do not wish to receive our direct marketing, you may simply opt out by sending an e-mail of your intention to opt-out to [drafting note: details required] and we shall remove and delete your Personal Information from our mailing list, please allow up to 15 days for us to effect that change.

## 12. OUR PRIVACY POLICY TOWARDS CHILDREN

12.1 The services are not directed to individuals under 16. We do not knowingly collect personal information from children under 16. If we become aware that a child under 16 has provided us with personal information, we will take steps to delete such information. If you become aware that a child has provided us with any personal information, please contact our support services.

## 13. AMENDMENTS TO THIS PRIVACY POLICY

13.1 We reserve the right to change and/or amend this Privacy Policy in any manner at any time without prior notice.

13.2 In the event that we make material changes and/or amendments to this Privacy Policy, we will place a prominent notice on its Platform to advise you to inspect and inform yourself of the updated Privacy Policy.

13.3 The most recent version of this Privacy Policy will govern the respective rights and obligations between you and us regarding its subject matter.

## 14. QUERIES/COMPLAINTS

14.1 Questions, comments, concerns, and requests regarding this statement may be directed to our information officer,

14.2 If you have a complaint or concern regarding the processing of your personal information, please submit your complaint to our information officer

14.3 The contact details for our appointed Information Officer/Data Protection Officer can be found hereunder:

Name : MAITOCHEAN O4 PTY LTD TRADING AS DULINI PRIVATE  
GAME RESERVE



Contact Number : +27 (0) 11 792 4927  
Email : sales@dulini.com

### 13. DATA BREACH RESPONSE

13.1 We have appointed an incident response team within our Compliance Department to manage any data breach.

13.2 If your personal information is compromised because of a cyber-attack or some form of data incident, we will notify you of this as soon as is reasonably possible.

### 14. CONTACTING THE INFORMATION REGULATOR

14.1 Please allow us the opportunity to address any complaints regarding our processing of your personal information however you have the right to complain to the Information Regulator, whose contact details are:

The Information Regulator (South Africa):

Physical address: JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001  
Postal address: P.O. Box 31533, Braamfontein, Johannesburg, 2017  
Complaints: [complaints.IR@justice.gov.za](mailto:complaints.IR@justice.gov.za)  
General enquiries: [infoereg@justice.gov.za](mailto:infoereg@justice.gov.za)