

## Website Privacy Policy for [www.pga.co.za](http://www.pga.co.za)

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This privacy policy located at ([www.pga.co.za/policies](http://www.pga.co.za/policies)) (“the Policy”) explains how the Professional Golfers Association of South Africa located at the Royal Johannesburg and Kensington Golf Club, 1 Fairway Avenue, Linksfield, 2192 (“We”/“Us”/“Our”) collects and uses Personal Information and explains your rights in respect of your Personal Information.

### General Information Regarding This Policy:

Where We collect Personal Information from you, We do so as a Responsible Party or Operator, as dictated by the factual context, in terms of the Protection of Personal Information Act No. 4 of 2013 (“POPIA”).

### What is Personal Information?

Personal Information is information relating to an identifiable, living, natural person or, where applicable an identifiable, existing juristic person. This will include:

- 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;
- information relating to the education or the medical, financial, criminal or employment history of the person;
- any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
- the biometric information of the person;
- the personal opinions, views or preferences of the person;
- 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;
- the views or opinions of another individual about the person; and
- 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.

### What Personal Information Do We Collect?

If you are not a member of the PGA we do not collect Personal Information, other than what you provide us on our Website.

As a member of the PGA we only collect the Personal Information required for you to receive the services in accordance with your membership.

We do not process any Special Personal Information on our website but may process Special Personal Information of our members, during the course of their membership, this will always be done with their consent.

Where free text fields are provided on our Website they are not intended for Special Personal Information and We ask that you do not insert Special Personal Information.

Should you provide us with Special Personal Information in these free text fields, you do so at your own risk. In the event We determine Special Personal Information is provided in the free text fields, We reserve the right to delete all submitted information or just the Special Personal Information.

## Our Purposes of Collecting Your Personal Information:

We collect Personal Information you provide voluntarily:

- in your communications with us;
- in furtherance of your PGA membership, Membership Regulations and/or Tournament Regulations;
- by you submitting your Personal Information to us via the Website;
- subscribing to newsletters or marketing communications from us;
- using Our online tools (whether you are logged-in or not);
- participating in surveys;
- registering for events and/or training.

Purpose: the above Personal Information is provided with your explicit consent and/or, should you be a PGA member, is required for us to comply with our contractual obligations we may have to you. This gives us the right and ability to communicate with you for the purposes which you provided your Personal Information.

We collect information automatically, some of which may be Personal Information, by:

- accessing Our Website We collect certain Personal Information from your device automatically, such as your IP address, device identification number, device model, device operating system, browser being used, and general geographic location;
- monitoring how you interact with Our Website.

Purpose: this gives us a better understanding of Our Website's users, what they use to access Our Website and how they interact with Our Website. Overall, enabling us to improve Our website. This is in Our legitimate interest in developing and improving Our Website and the experience for its visitors.

## Will My Personal Information be Disclosed to Third Parties?

We use third party service providers for the technical elements of managing your Personal Information. They cannot access your Personal Information without our written consent, which We will not provide without your written consent.

We do not sell your Personal Information and protect it at the same standards as Our own Personal Information, which is no less stringent than is required by law. In the event personally identifiable information is available to third party it will be done in accordance with the POPIA.

In the event that We sell or buy any business or assets, or We are acquired by a third party We may disclose your Personal Information to such third party in Our legitimate business interests.

We will disclose your Personal Information where We are under a duty to disclose it in order to comply with any legal obligation.

Should We need to disclose your Personal Information to a third party to protect your, or Our, legitimate interests We reserve the right to do so.

## Who Can I Contact Regarding My Personal Information?

We have appointed Ivano Ficalbi as Our Information Officer, who may be contacted on [ivano@pga.co.za](mailto:ivano@pga.co.za) or on (+27) 11 485-1370.

## Where Do You Store My Personal Information?

The Personal Information We possess about you will generally be stored and processed within the borders of the Republic of South Africa ("RSA").

Personal Information may also be processed in a third country outside the RSA by Us or one of Our suppliers. This will be for the provision of support services, fulfilling an obligation We have to you, technical requirements of Our systems, or other legitimate reasons.

Where We transfer your Personal Information to such a third country it shall be to a party who is subject to a law, binding corporate rules or binding agreement which provides an adequate level of protection to the same level as this Policy.

## How Long Do You Keep My Personal Information?

As a past or current PGA member, we keep your Personal Information indefinitely, or until you request, we delete your Personal Information (and we are able to comply with such request).

Should you not be a PGA member, we will only retain your Personal Information for as long as it is required for the purpose collected.

Purpose: In order to ensure continuity of membership and that of your membership, education, employment and golfing statistics, we retain your personal information indefinitely. This is in your legitimate interests as it prevents you from losing your statistics and gives you greater membership flexibility.

## How Secure Is My Personal Information?

The transmission of information via the internet is not completely secure. Although We will do Our best to protect your Personal Information, We cannot guarantee the security of your Personal Information transmitted to Our site; any transmission is at your own risk.

Once We have received your information, We will use strict procedures and security features to try to prevent unauthorised access.

## In Addition to The Above, What Other Rights Do I Have in Respect of My Personal Information?

At any time, you have the rights to:

1. Opt-out of receiving marketing communications;
2. Access your Personal Information held by us;
3. Update or modify your Personal Information held by us;
4. Withdraw your consent for us to process your Personal Information;
5. Complain to us or the Information Regulator about Our processing of your Personal Information.

In certain circumstances and subject to the relevant legislation, you have the rights to:

1. Request We restrict or entirely stop processing your Personal Information;
2. Request We delete all your Personal Information we process on you;
3. Request a copy of the Personal Information provided to us.

## What are the rules regarding the sharing of PGA member's details?

If you are a PGA member and you know a member personally: You may share these details with other members, however, you must confirm with the member whose details you are sharing that they consent to you sharing their Personal Information.

If you do not know the member, but will be playing at their club: You may contact the PGA who will provide these details to you (in accordance with our Membership Regulations) and you may only use these details in accordance with the Membership Regulations.