

PRIVACY AND DATA PROTECTION POLICY

General Principles

Stormhaven Park will in all respects comply with the Protection of Privacy Information Act (POPI), 2013. Specifically, we will obtain permission to collect and store information relating to Members, Residents, Staff and Service Providers so that the operational and reporting functions comply with the applicable Acts, Regulations, Management Rules and Conduct Rules. The information collected will be stored securely, appropriate to the media in which it is held. The information gathered will be used only to facilitate the operational and desirable services which will make life in the Stormhaven Park community stable, secure and pleasant. In addition to South Africa's Protection of Privacy Act, Stormhaven Park's Management is aware of the EU's General Data Protection Regulations (GDPR). They are more advanced and complex than would appear to be the case for South African's POPI Act when detailed regulations for that ACT are published.

Personal Information held and recorded

In handling personal information of Members, Residents and Staff, Stormhaven Park adheres to the requirements of both the POPI Act and GDPR. However, as Stormhaven Park does not engage in cross-border data transfers, those aspects of GDPR do not apply.

The key personal data held by Stormhaven Park is:

Classification	Personal	Legal	Financial	Healthcare	EU Citizen
Member	Full names, Date of Birth, Identity Documents and/or Passports, Addresses, Contact Details	Property: - Membership Records - Insurance Values Tax Reference Numbers*	Accounting records as required by the Sectional Title Acts, Member contributions, Participation Quotas, Catering and Water Consumption, Bank details*	Emergency Information, Personal Health records*, Medication*, Next of Kin with contact details, Motor Vehicle Registration*	Yes / No? Country? Visa?
Resident	Full names, Date of Birth, Identity Documents and/or Passports, Addresses, Contact Details		Accounting records as required by the Sectional Title Acts, Member contributions, Participation Quotas, Catering and Water Consumption	Emergency Information, Personal Health records*, Medication*, Next of Kin with contact details, Motor Vehicle Registration*	Yes / No? Country? Visa?
Employee	Full names, Date of Birth,	Contract of Employment	Bank details Benefits records	Emergency Information,	

	Identity Documents and/or Passports, Addresses, Contact Details	Tax Reference Numbers		Personal Health records*, Medication*, Next of Kin with contact details, Motor Vehicle Registration*	
Retention period	Per legal requirements	Per legal requirements	Accounting records: legally required; Other 3 months after leaving	3 months after leaving	3 months after leaving subject to legal requirements
Items marked with * may not be applicable to all persons					

Access by Trustees, staff and delegated persons

Access by these individuals will be limited to those who need it to fulfil their roles or complete a specific task in Stormhaven Park. In certain circumstances, it may be necessary for Trustees to be briefed on elements of information regarding a person. With respect to Staff salaries, these and the annual review of salaries will be limited to a Staff Committee consisting of the Chairman of Trustees, the vice-Chairman and the Manager.

Access by Members

Members may, as described in the Sectional Title Acts have access to the minutes of Trustee Meetings and financial records of the Body Corporate consonant with the provisions of the POPI Act. As this entitlement is designed that Members might be reassured as to the fidelity and effectiveness of the Trustees and Management, it follows that details of Levy Payments and Staff employment records (private contact details, salaries and leave records, etc.) may not be released. Those financial records in aggregate detail will suffice to fulfil the requirements of the Sectional Title Acts.

Access by Residents

Residents who are not Members of property at Stormhaven Park will have access to all general information about life and services of the community, but not the level of access to financial and other information enjoyed by Members.

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Service Providers

Stormhaven Park will maintain suitably limited information about the service providers with whom it has a commercial relationship. That information may, with the permission of the service provider concerned, be shared with Members, Residents or staff who enquire about a particular service.

Data Storage

Paper-based data records will be kept in locked cabinets. The keys will be held by the relevant staff member, back-up keys will be held securely. These cabinets will be locked during periods when the staff member concerned does not require access to them. There are electronic records of information, the volume of this increasing as paper records are converted to electronic format. Electronic records will be held on computers with encrypted files further secured by user logons. Backup copies of the records on Network Attached Storage will similarly be encrypted.

Retention of Data

Data records subject to regulation by any Act of Parliament or Regulation by Government Departments will be retained for the periods specified in such instruments. Information not so regulated will be held for the longest period specified by Regulation for any such information kept for the same data subject.

Data Distribution

Stormhaven Park's records will be used only for the purposes described above. No information will be shared, sold or exchanged to or with any third party. Unusually, there may be an exception in an emergency when of relevant healthcare information should be shared with attending medical staff, or with others upon the consent of the individual. Sectional Title Acts: Any reference made to Sectional Title Acts include the Sectional Title Act, Sectional Title Scheme Management Act, Community Schemes Ombud Services Act, each with its regulations, management rules and conduct rules (where applicable).(Formally adopted at the Trustees Meeting dated 16 August 2018)