

PRIVACY POLICY FOR RIVER CLUB HOA

Introduction

River Club Homeowners Association is committed to protecting the privacy of our residents, tenants, visitors, employees, and service providers. This Privacy Policy explains how we collect, use, disclose, and safeguard your Personal Information in accordance with the **Protection of Personal Information Act, No. 4 of 2013 (POPIA)**.

2. The Information Officer

The Estate has appointed an **Information Officer** who is registered with the [South African Information Regulator](#). All queries regarding this policy or the processing of your data should be directed to:

- **Information Officer:** Shane Pollock
- **Email Address:** riverclubsupervisor@gmail.com
- **Phone Number:** 072 105 9737
- **Physical Address:** 4297 Limpopo Crescent, River Club Estate, Piesang Valley Road, Plettenberg bay, Western cape, South Africa

3. Personal Information We Collect

We only collect Personal Information that is necessary to manage estate operations, security, and administration. This includes:

- **Contact Information:** Names, identity/passport numbers, email addresses, phone numbers, and physical/postal addresses.
- **Property Details:** Erf/stand numbers, ownership details, and tenant lease agreements.
- **Financial Information:** Banking details for levy debit orders, billing statements, and payment histories.
- **Security & Access Control Data:** Vehicle registration numbers, driver's licence scans, visitor logbooks, and biometric access templates (e.g., fingerprints/facial recognition).
- **Surveillance Data:** Closed-Circuit Television (CCTV) footage captured in common areas and at entrance/exit gates.
- **Employment Data:** Information relating to estate staff and contracted service providers.

4. Purpose of Processing Personal Information

We process your Personal Information strictly for the following lawful purposes:

- **Security Management:** Monitoring estate access, verifying visitors, and maintaining CCTV surveillance to ensure community safety.
- **Estate Administration:** Managing levy accounts, issuing statements, enforcing estate rules, and hosting Annual General Meetings (AGMs).

- **Communication:** Sending urgent operational notices, newsletters, and safety alerts to residents.
- **Legal Compliance:** Fulfilling statutory obligations under the Sectional Titles Schemes Management Act, Companies Act, or local municipal bylaws.

5. Disclosure of Personal Information

We do not sell your personal data. We only share your information with third-party **Operators** who are contractually bound to safeguard your privacy under Section 21 of POPIA. These may include:

- Appointed **Managing Agents** handling financial and administrative services.
- Contracted **Security Companies** managing physical access control at the gates.
- Access to data for any specific unit is accessible only to the registered owners or members of that unit, to monitor and ensure security, safety and rule compliance at the premises they are legally responsible for.
- **IT and Software Providers** hosting the estate's communication portals or visitor management apps.
- **Legal Advisors** or debt collectors in the event of rule breaches or levy defaults.
- **Law Enforcement** or regulatory bodies when required by a valid subpoena or court order.

6. Security Safeguards

We implement robust technical and organizational measures to secure your Personal Information against unauthorized access, loss, or destruction.

7. Policy Changes

We may update this privacy policy from time to time. The latest version will always be available on the estate website or at the management office.

8. Data Retention

We retain Personal Information only for as long as necessary to fulfil the operational purpose for which it was collected, or as mandated by South African statutory legal retention periods (e.g., financial records must be kept for 7 years). CCTV footage is automatically overwritten on a rolling cycle (typically 14 to 30 days) unless required for an ongoing incident investigation.

9. Your Data Rights under POPIA

As a data subject, you have the following rights under POPIA:

- **Right of Access:** You may request confirmation of whether we hold your Personal Information and request a copy of that record.
- **Right to Correction:** You may request that we update or correct inaccurate, outdated, or incomplete data.

- **Right to Objection:** You may object to the processing of your data on reasonable grounds, unless processing is required by law.
- **Right to Complain:** If you believe we have misused your data, you have the right to lodge a complaint directly with the **Information Regulator** via email at `complaints.IR@inforegulator.org.za`.