SEBATA 4×4 CC

PRIVACY POLICY

Protection of Personal Information Act (POPIA)

Act 4 of 2013 – Republic of South Africa

Company: Sebata 4×4 CC
Registration Number: 2011/084097/23
Website: www.sebata4x4.com
Email: safaris@sebata4x4.co.za
Telephone: 078 931 7101
Physical Address: 205 Visvanger Road, Montana Park, Pretoria, 0182, South Africa

Policy Version: 1.0
Effective Date: [Insert date]
Last Updated: [Insert date]

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1. INTRODUCTION

1.1 Sebata 4×4 CC ("Sebata", "the Company", "we", "us" or "our") recognises the importance of protecting personal information and respecting the privacy of its Clients, Participants, website visitors, employees, suppliers and business partners.

1.2 This Privacy Policy explains how Sebata collects, processes, stores, uses, protects and shares personal information in accordance with the Protection of Personal Information Act 4 of 2013 (POPIA) and applicable South African legislation.

1.3 Sebata is committed to ensuring that personal information is processed lawfully, reasonably, securely and transparently.

1.4 This policy applies to all personal information processed by Sebata in connection with:

- 4×4 adventures and expeditions.

- Guided tours and safaris.
- Adventure activities and events.
- Booking enquiries and reservations.
- Website visits and contact forms.
- Marketing and promotional activities.
- Customer communications.
- Supplier and business relationships.

1.5 By providing personal information to Sebata, Clients acknowledge that their information may be processed for the purposes explained in this policy, subject to the lawful grounds and requirements of POPIA.

1.6 Where consent is legally required, Sebata will obtain that consent separately and will not treat acceptance of this policy as blanket consent for every type of processing.

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2. RESPONSIBLE PARTY

2.1 For purposes of POPIA, Sebata 4×4 CC acts as the responsible party in respect of personal information collected and processed for its business activities.

2.2 The Company determines the purposes and means for which personal information is processed, subject to applicable legislation.

2.3 The Company will take reasonable steps to ensure that employees, representatives, contractors and authorised service providers who handle personal information understand their responsibilities.

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3. PERSONAL INFORMATION WE COLLECT

3.1 Depending on the nature of the services requested or provided, Sebata may collect the following categories of personal information.

3.1.1 Personal identification information

- Full names and surnames.
- Identity numbers.
- Passport numbers.
- Date of birth.
- Nationality.
- Residential and postal addresses.

3.1.2 Contact information

- Telephone and mobile numbers.
- Email addresses.
- Emergency contact details.
- Other communication details supplied by the Client.

3.1.3 Booking and travel information

- Tour selections and booking history.
- Travel dates and itineraries.
- Accommodation requirements.
- Border crossing information.
- Travel permits and supporting documentation.
- Information required for travel arrangements.

3.1.4 Medical and health information

Where reasonably necessary for participant safety and emergency management, Sebata may collect:

- Pre-existing medical conditions.
- Allergies.
- Relevant medication information.

- Mobility or physical limitations.
- Medical aid information.
- Emergency medical information.

Medical information constitutes special personal information under POPIA and will receive additional protection.

3.1.5 Vehicle and insurance information

- Vehicle make and model.
- Vehicle registration numbers.
- Vehicle specifications.
- Relevant vehicle insurance information.
- Recovery and equipment requirements.
- Information relating to vehicle suitability for a particular expedition.

3.1.6 Financial and payment information

- Payment confirmations.
- Transaction references.
- Invoices and receipts.
- Billing details.
- Information necessary to administer bookings and payments.

Sebata does not intend to collect or retain banking passwords, PINs or unnecessary payment-card security information.

3.1.7 Photographs and video recordings

Sebata may collect photographs and video recordings during tours and events for operational, documentary, safety and promotional purposes, subject to the applicable consent requirements.

3.1.8 Website information

When visitors access the Company's website, certain technical information may be collected, including:

- IP addresses.
- Browser type.
- Device information.
- Website usage information.
- Cookie information.
- Website interaction and analytical information.

3.2 Sebata will endeavour to collect only information that is reasonably necessary for the relevant purpose.

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4. PURPOSES FOR WHICH PERSONAL INFORMATION IS PROCESSED

4.1 Sebata processes personal information for legitimate business, contractual, operational and legal purposes.

4.2 These purposes include:

- Responding to enquiries.
- Preparing quotations.
- Processing and confirming bookings.
- Administering payments and invoices.
- Preparing Tour Programmes and itineraries.
- Arranging accommodation and activities.
- Coordinating border crossings and travel documentation.
- Confirming participant eligibility and vehicle suitability.
- Managing participant safety.
- Identifying relevant medical or emergency requirements.

- Contacting emergency contacts where necessary.
- Arranging emergency medical assistance.
- Complying with legal and regulatory obligations.
- Managing complaints and disputes.
- Maintaining appropriate business records.
- Protecting the Company's legitimate legal interests.
- Improving the Company's services and website.
- Sending marketing communications where legally permitted.

4.3 Personal information will not be processed for purposes unrelated to the original purpose of collection unless a lawful basis for further processing exists.

4.4 Sebata will not knowingly use personal information in a manner that is incompatible with the purpose for which it was collected.

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5. LAWFUL PROCESSING OF PERSONAL INFORMATION

5.1 Sebata will process personal information only where a lawful basis exists under POPIA.

5.2 Depending on the circumstances, lawful processing may be based on:

- The consent of the data subject.
- The necessity of processing to perform a contract with the Client.
- Compliance with a legal obligation.
- The protection of the legitimate interests of the data subject.
- The legitimate interests of Sebata or another relevant party, where permitted by law.

5.3 Sebata will ensure that personal information is processed in a fair and lawful manner.

5.4 Where consent is relied upon, the consent must be voluntary, specific and informed.

5.5 A Client may withdraw consent where processing is based on consent. Such withdrawal will not affect the lawfulness of processing that took place before withdrawal.

5.6 Withdrawal of consent may affect Sebata's ability to provide certain services where the information is necessary for the safe or lawful provision of those services.

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6. MEDICAL AND SPECIAL PERSONAL INFORMATION

6.1 Sebata recognises that medical and health information is classified as special personal information under POPIA.

6.2 Such information may be collected where necessary for:

- Assessing participant safety.
- Identifying relevant medical risks.
- Preparing for emergencies.
- Coordinating medical assistance.
- Arranging emergency evacuation.
- Protecting the vital interests of a participant where legally permitted.
- Meeting other lawful obligations.

6.3 Sebata will only process medical information where an applicable authorisation under POPIA exists.

6.4 Where consent is required, the relevant participant will be asked to provide specific consent.

6.5 Medical information will be treated as confidential and access will be restricted to authorised individuals who require the information for legitimate operational, safety or emergency purposes.

6.6 Medical information will not be used for unrelated marketing or promotional purposes.

6.7 Where a medical emergency occurs, Sebata may disclose relevant information to medical practitioners, emergency personnel or other appropriate parties where legally permitted and reasonably necessary to protect the participant's health or vital interests.

6.8 Sebata will take reasonable measures to ensure that medical information is not unnecessarily disclosed to other participants or unrelated third parties.

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7. INFORMATION RELATING TO CHILDREN

7.1 Sebata may collect personal information relating to children who participate in tours or activities.

7.2 The Company recognises that POPIA provides additional protection for the personal information of children.

7.3 Where required by law, Sebata will obtain consent from a competent person, such as a parent or legal guardian, before processing a child's personal information.

7.4 Information relating to children may include:

- Full names and dates of birth.
- Relevant medical information.
- Emergency contact details.
- Travel documentation.
- Information necessary for booking and safety arrangements.

7.5 Such information will only be processed for lawful purposes associated with the child's participation, safety and administration of the Tour.

7.6 Sebata will take reasonable steps to prevent unnecessary disclosure of children's personal information.

7.7 Photographs and videos of identifiable children will only be used for marketing purposes where the necessary consent has been obtained from the appropriate person.

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8. SHARING OF PERSONAL INFORMATION WITH THIRD PARTIES

8.1 Sebata does not sell Clients' personal information.

8.2 Personal information may be shared with selected third parties where reasonably necessary for providing services, fulfilling contractual obligations, protecting participants or complying with legal requirements.

8.3 Such third parties may include:

- Accommodation establishments.
- Tour and activity operators.
- Travel and transport providers.
- Park authorities and conservation organisations.
- Border and immigration authorities.
- Medical practitioners and emergency services.
- Insurance providers.
- Vehicle recovery operators.
- Payment and accounting service providers.
- Website hosting and information technology providers.
- Professional legal and accounting advisers.
- Government and regulatory authorities where legally required.

8.4 Only information reasonably necessary for the relevant purpose should be disclosed.

8.5 Where a third party processes personal information on behalf of Sebata, the Company will take reasonable steps to ensure that an appropriate written

agreement or other lawful arrangement is in place requiring the third party to protect the information.

8.6 Third parties receiving personal information for their own independent purposes may be subject to their own privacy policies and legal obligations.

8.7 Sebata will not knowingly permit third parties to use Client information for unrelated purposes without an appropriate lawful basis.

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9. CROSS-BORDER TRANSFER OF PERSONAL INFORMATION

9.1 Certain Sebata Tours may involve travel outside the Republic of South Africa.

9.2 In connection with international tours, it may be necessary to transfer relevant personal information to accommodation providers, tour operators, authorities, medical providers or other service providers located outside South Africa.

9.3 Such information may include:

- Names and passport details.
- Travel documentation.
- Contact information.
- Emergency contact details.
- Relevant medical information.
- Booking and accommodation details.

9.4 Sebata will only transfer personal information outside South Africa where the requirements of section 72 of POPIA are met.

9.5 Appropriate safeguards will be considered, including whether the receiving country or recipient provides an adequate level of protection, whether an appropriate agreement exists, or whether another lawful basis for the transfer applies.

9.6 Clients acknowledge that international travel arrangements may require the disclosure of relevant information to foreign authorities and independent service providers.

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10. DIRECT MARKETING AND PROMOTIONAL COMMUNICATIONS

10.1 Sebata may communicate with existing Clients regarding bookings, tour arrangements, invoices, operational updates and other service-related matters.

10.2 Sebata may also wish to send information about:

- Upcoming expeditions.
- New tours and destinations.
- Special offers.
- Events.
- Company news.
- Promotional activities.

10.3 Direct marketing through electronic communication, including email and SMS, will be conducted in accordance with section 69 of POPIA.

10.4 Where prior consent is required, Sebata will obtain such consent before sending electronic direct marketing communications.

10.5 Where the existing customer exception under POPIA applies, Sebata will only use it within the limits and conditions prescribed by the Act.

10.6 Clients will be given a reasonable opportunity to opt out of marketing communications.

10.7 Marketing consent is voluntary and is not a condition of purchasing a Tour.

10.8 Clients may withdraw marketing consent at any time by contacting:

Email: safaris@sebata4x4.co.za

10.9 Sebata will not knowingly send unsolicited electronic marketing communications in contravention of POPIA.

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11. PHOTOGRAPHS, VIDEOS AND SOCIAL MEDIA

11.1 Sebata may photograph or record activities during Tours for operational, documentary and safety purposes.

11.2 The use of identifiable photographs or videos for advertising, social media, website content or promotional material will be subject to the appropriate consent.

11.3 Participants will be provided with an opportunity to indicate whether they consent to the use of their identifiable images for marketing purposes.

11.4 A participant who declines marketing consent will not be required to grant such consent as a condition of participating in a Tour.

11.5 Sebata will take reasonable steps to respect requests not to use identifiable photographs for promotional purposes.

11.6 Where consent is withdrawn, Sebata will address future use in accordance with applicable law and the practical circumstances of material already published.

11.7 Sebata will not knowingly use photographs in a manner that is defamatory, misleading or inappropriate.

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12. COOKIES AND WEBSITE TRACKING

12.1 Sebata's website may use cookies and similar technologies to improve website functionality and user experience.

12.2 Cookies may be used for:

- Website functionality.
- Remembering user preferences.

- Understanding website traffic.
- Improving website performance.
- Website analytics.
- Security and fraud prevention.

12.3 Where non-essential cookies or tracking technologies require consent, Sebata will provide an appropriate mechanism for obtaining that consent.

12.4 Website visitors may be able to manage cookie preferences through their browser settings or the Company's cookie preference mechanism.

12.5 Disabling certain cookies may affect website functionality.

12.6 Third-party website services may also use their own cookies and tracking technologies, subject to their respective privacy policies.

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13. SECURITY AND PROTECTION OF PERSONAL INFORMATION

13.1 Sebata recognises its responsibility to protect personal information against loss, unauthorised access, unlawful processing, disclosure, alteration or destruction.

13.2 The Company will implement reasonable technical and organisational security measures appropriate to the nature of the information processed.

13.3 Such measures may include:

- Restricting access to authorised personnel.
- Password protection and appropriate access controls.
- Secure storage of electronic records.
- Appropriate protection of physical documents.
- Limiting the distribution of medical and identity information.
- Staff confidentiality requirements.
- Appropriate security measures for computers and electronic devices.

- Reviewing the security arrangements of relevant service providers.
- Secure disposal of information when no longer required.

13.4 Employees and representatives who have access to personal information must treat such information as confidential.

13.5 Personal information must not be unnecessarily copied, distributed, stored on unsecured devices or disclosed to unauthorised individuals.

13.6 Sebata will periodically review its security arrangements and take reasonable steps to address identified weaknesses.

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14. SECURITY COMPROMISES AND DATA BREACHES

14.1 If Sebata becomes aware of a security compromise involving personal information, the Company will take reasonable steps to investigate and contain the incident.

14.2 Where a security compromise falls within section 22 of POPIA, Sebata will notify the Information Regulator and affected data subjects as soon as reasonably possible, in accordance with the Act.

14.3 Notification may be provided through an appropriate communication method, including email or written notice.

14.4 Where appropriate, affected individuals will be informed of:

- The nature of the security compromise.
- The type of personal information potentially affected.
- The possible consequences.
- Measures taken or planned to address the incident.
- Recommended steps to reduce potential harm.

14.5 Sebata will take reasonable steps to prevent further unauthorised access and strengthen its security arrangements following an incident.

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15. RETENTION AND DESTRUCTION OF PERSONAL INFORMATION

15.1 Sebata will not retain personal information for longer than is necessary to achieve the purpose for which it was collected, unless retention is required or authorised by law.

15.2 Personal information may be retained for purposes including:

- Booking administration.
- Contractual records.
- Accounting and tax requirements.
- Insurance matters.
- Legal claims and disputes.
- Emergency and incident records.
- Regulatory compliance.
- Historical business records where lawful.

15.3 Financial and accounting records will be retained for the applicable statutory retention periods.

15.4 Passport, identity and medical information will not automatically be retained indefinitely merely because a Client has participated in a Tour.

15.5 When personal information is no longer required and no lawful reason for continued retention exists, it will be securely destroyed, deleted or de-identified.

15.6 Physical documents containing personal information will be securely disposed of.

15.7 Electronic information will be deleted or rendered inaccessible through appropriate procedures, subject to legitimate backup and legal retention requirements.

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16. RIGHTS OF DATA SUBJECTS

16.1 In accordance with POPIA, individuals whose personal information is processed by Sebata have certain rights.

16.2 These rights may include:

- The right to know whether personal information is held by Sebata.
- The right to request access to personal information.
- The right to request correction of inaccurate information.
- The right to request deletion or destruction where legally justified.
- The right to object to certain forms of processing.
- The right to withdraw consent where consent is the basis of processing.
- The right to object to direct marketing.
- The right to lodge a complaint with the Information Regulator.
- The right to institute appropriate legal proceedings where permitted by law.

16.3 Requests must be submitted in writing to:

Email: safaris@sebata4x4.co.za
Subject: POPIA – Personal Information Request

16.4 Sebata may request reasonable proof of identity before processing a request to protect against unauthorised disclosure.

16.5 Requests will be considered and handled in accordance with POPIA and applicable regulations.

16.6 Sebata may lawfully refuse or limit a request where a statutory ground for refusal or restriction applies.

16.7 Where a request is refused, Sebata will provide the relevant reasons where required by law.

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17. INFORMATION OFFICER

17.1 Sebata will appoint and register an Information Officer in accordance with POPIA.

17.2 The Information Officer is responsible for overseeing the Company's compliance with POPIA, including:

- Promoting compliance with lawful processing requirements.
- Developing and maintaining appropriate privacy procedures.
- Addressing personal information enquiries and complaints.
- Coordinating data-subject requests.
- Assisting with security incident management.
- Liaising with the Information Regulator where necessary.

17.3 Information Officer contact details:

Information Officer: [Insert full name]
Email: [Insert dedicated privacy email or safaris@sebata4x4.co.za]
Telephone: 078 931 7101
Postal/Physical Address: 205 Visvanger Road, Montana Park, Pretoria, 0182.

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18. COMPLAINTS AND CONTACT DETAILS

18.1 Clients who have concerns about the processing of their personal information should first contact Sebata's Information Officer.

18.2 Sebata will make reasonable efforts to investigate and respond to privacy complaints.

18.3 If a Client is dissatisfied with the response, they may lodge a complaint with the Information Regulator.

Information Regulator of South Africa

Website: www.inforegulator.org.za

Telephone: 010 023 5200

Email: enquiries@inforegulator.org.za

18.4 The Information Regulator's contact details and procedures should be checked against its current official website when a complaint is submitted.

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19. THIRD-PARTY WEBSITES

19.1 Sebata's website may contain links to independent third-party websites, accommodation providers, activity operators or other service providers.

19.2 Sebata is not responsible for the privacy practices, security arrangements or content of independent third-party websites.

19.3 Clients are encouraged to review the privacy policies of third-party websites before providing their personal information.

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20. AMENDMENTS TO THIS PRIVACY POLICY

20.1 Sebata reserves the right to update this Privacy Policy where necessary to reflect changes in legislation, business operations, technology or information-processing practices.

20.2 Updated versions will be published on the Company's website.

20.3 The latest version will identify its effective date and date of revision.

20.4 Material changes affecting the processing of personal information will be communicated to affected individuals where required by law.

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21. ACCEPTANCE AND ACKNOWLEDGEMENT

21.1 This Privacy Policy is intended to explain how Sebata processes personal information and the rights of individuals under POPIA.

21.2 Clients acknowledge that they have been provided with access to this policy when supplying personal information to Sebata.

21.3 Acceptance of this policy does not constitute blanket consent for the processing of special personal information, direct marketing, photographs or other processing activities for which specific consent or another lawful basis is required.

21.4 Where separate consent is required, Sebata will obtain that consent through an appropriate consent mechanism.

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End of Privacy Policy