

THE BAILEY ON BREE (PTY) LTD

PRIVACY POLICY

The following Privacy Policy discloses the Privacy practices for The Bailey on Bree (Pty) Ltd on how we treat the Personal Information we collect through your use of our services, products and website.

OVERVIEW

Here at The Bailey on Bree, we understand the importance of your Privacy and we therefore take the protection of Personal Information seriously.

The purpose of this Privacy Policy is to describe how we collect, use, store and disclose the Personal Information that is provided to us, what we learn about you from your visit to our website as well as explain the choices and rights that you have as a data subject regarding your personal information.

Throughout this Privacy Policy, all references to “our”, “us”, “we” or “The Bailey” refer to The Bailey on Bree (Pty) Ltd.

WHO DOES THIS PRIVACY POLICY COVER?

- This Privacy Policy explains how we will treat your Personal Information whether provided by you to us or collected by us through other means in your ordinary use of our services, and our website. The Privacy Policy describes our approach and practices in respect of your Personal Information and our treatment thereof.
- This policy applies to all external parties with whom we interact, including but not limited to:
 - Recipients of our services (including individuals who enquire about our services with or through us);
 - Representatives of customer organisations;
 - Individuals whose personal information is collected by us or is provided to us;
 - Our suppliers and service providers;
 - Past, current and potential employees;
 - Visitors to our premises; and,
 - Other users of our services.
- This Privacy Policy must be read together with our terms and conditions, our PAIA manual and any other documents, agreements or Privacy Policies that describe how we, in specific circumstances, collect or process Personal Information about you. This will enable you to understand how The Bailey on Bree will process your information.
- The Privacy Policy supplements such other documents and agreements, but shall not supersede them and in an event of conflict, the terms of the particular documents or agreements will prevail.

HOW WE COLLECT INFORMATION

We may collect your Personal Information during any of the following:

- Personal Information may be provided to us by you or is collected by us when engaging with data subjects on the uses of The Bailey's services.
- The type of personal information The Bailey collects depends on the purpose for which it is collected and used. This specific purpose will be apparent from the context in which the information is requested and includes, but is not limited to, the following:
 - You submit an enquiry to us or contact us and you may be required to provide your name, surname, contact numbers or email address.
 - You make a booking at The Bailey where you are required to provide your name, surname, email address, contact number and optionally special requests, occasions or dietary requirements.
 - You interact with us on social media.
 - You apply for employment opportunities at The Bailey and you may be required to provide your name, surname, identity number, qualifications history and record of criminal behaviour.
- Where possible, we will inform you what information is voluntary or mandatory for you to provide to us and what the consequences for failing to provide the requested information.
- The Bailey will only collect and retain your personal information for as long as necessary for the fulfilment of those purposes as have been identified by us and/or as required by law and/or as agreed with you.

THE NATURE AND CATEGORIES OF PERSONAL INFORMATION THAT WE COLLECT

In order for us to provide you with our services, we require up-to-date and correct Personal Information. Personal Information includes the prescribed information falling within the definitions of Personal or Special Personal Information as set out in the Protection of Personal Information Act, 2013 ("Protected Personal Information").

The Bailey collects, with your consent, personally identifiable information such as, but not limited to, your e-mail address, name, home or work address, telephone number, Identification number, medical details, financial details and emergency contacts. The Bailey also collects anonymous demographic information, which is not unique to you, such as your postal or ZIP code, age, gender, preferences and interests.

We will not intentionally or knowingly collect Personal Information directly from minors (anyone under the age of 18). The Personal Information of minors will be collected through their legal guardian or parent only where products or services are required for the minors.

WE MAY USE YOUR INFORMATION

- Personal information will only be processed for the purposes for which it was collected and/or to comply with legal and regulatory obligations and/or as authorised by law by your consent.
- The purposes for which we process personal information include, but are not limited to:
 - Responding to your enquiry.
 - Providing our services to you.
 - Sending service emails (booking confirmation and post-dining feedback)
 - Marketing or promoting our services and products for improvement.
 - Managing your account or relationship and complying with your instructions or requests.
 - Assessing and dealing with complaints.
 - Where you have unsubscribed from certain direct marketing communications, ensuring that we do not send such direct marketing to you again.
 - Safety and security reasons.
 - Compiling non-personal statistical information to measure our performance.
 - Complying with legal requirements and/or industry codes.

DISCLOSURE OF INFORMATION AND THIRD-PARTY SERVICE PROVIDERS

The Bailey may disclose your personal information to third parties in certain circumstances where required by law, where it is necessary to give effect to a contract with you, or where we have a legitimate interest in doing so, which include, but are not limited to:

- Where we have your consent
- Where we are required to do so by law
- To our service providers who are involved in the delivery of our services to you, where we have agreements in place to ensure that our service providers comply with POPIA.
- Third parties to which we disclose personal information include, but are not limited to:
 - Service providers of The Bailey
 - Government Agencies
 - Professional bodies
 - Regulators, courts, tribunals and law enforcement agencies.

The Bailey only conducts business with third-parties that agree to our Privacy Policy. Which includes the restriction to sell, share, or rent this information to others in ways different from what is disclosed in this notice or elsewhere contrary to the manner described in this notice.

We will not share your Personal Information to external organisations that are not our service providers, unless business operations require the processing of your Personal Information in other countries, either to carry out processing based on your instructions or for ordinary business purposes.

Should we wish to store your information with a third party, who is located outside of South Africa and they receive your personal information, they will need to comply to either the Protection of Personal Information Act, or binding agreement which states that they will provide an adequate level of protection to your Personal Information. This means that they have to agree to lawfully process your Personal Information and protect your Personal Information in the same manner as we do.

The Bailey encourages you to review the Privacy Policy of third-party websites, service providers and applications (“Third Party Sites”) you choose to link to from The Bailey so that you understand how those third-party sites and service providers collect, use and share your information. The Bailey will not be held responsible for the Privacy Policies or other content of Third-Party Sites and Service Providers outside of The Bailey.

RETENTION OF PERSONAL INFORMATION

The Bailey will not keep your Personal Information beyond the period strictly necessary for the purposes for which it was collected, and in accordance with the Applicable Legislation.

The Bailey undertakes, where possible, to anonymise or delete your Personal Information as soon as the purpose and/or duration of their established retention expire.

Nevertheless, Personal Information may be archived beyond the applicable periods for the purpose of researching, investigating and prosecuting criminal offenses with the sole purpose of allowing, as needed, the provision of such Personal Information to the judicial authorities, or for other retention obligations, in particular for accounting or fiscal purposes. Archiving implies that this Personal Information will be subject to access restrictions and will no longer be available online but will be retrieved and kept on a secure and independent device.

SECURITY

We take the Protection of your Personal Information seriously and we take precautions to keep your Personal Information secure. Therefore, with due regard to generally accepted information security and handling procedures we seek to secure the integrity and confidentiality of Personal Information in our possession by taking appropriate, reasonable technical and organisational measures to prevent loss of, damage to, or unauthorised destruction of Personal Information; and unlawful access to or processing of personal information. However, as the website is accessible via the internet, and the internet is inherently insecure, we cannot guarantee the security of information you send to us online (including that it will not be intercepted). You send information to us online at your own risk.

YOUR RIGHTS

You have the right and responsibility to ensure that the Personal Information we hold about you is accurate. In the absence of evidence to the contrary, we will assume that the information you provided to us is accurate. At your request, where the law requires us to do

so, you can exercise your data subject rights as per the following, subject to verification and validation of your identity:

- Request access to your Personal Information that The Bailey holds about you;
- Request rectification of your Personal Information that The Bailey holds about you;
- Request erasure, as permitted by law, of your Personal Information that The Bailey holds about you;
- Request restriction of processing of your Personal Information; and,
- Object to processing of Personal Information as permitted by law.

Your rights are subject to processing, set out in The Bailey's PAIA manual, which is also available at the-bailey.co.za.

USE OF COOKIES

It is a common practice of almost all professional websites to use cookies. Cookies are tiny files that are downloaded to your computer that are used to improve your experience.

When you access our website, we may send one or more cookies (small text files containing a string of alphanumeric characters) to your computer to collect certain usage information. We use "session cookies" (which disappear after you close your browser) and "persistent cookies" which remain after you close your browser and which can be removed manually) which may be used by your browser on subsequent visits to our website.

We use information gathered by cookies to improve the website. *Please note that some of our business partners (e.g., advertisers) use their own cookies or widgets on our website. We have no access to or control over them. Information collected by any such cookie or widget is governed by the privacy policy of the company that created it, and not by us.* Cookies cannot contain malicious code such as viruses. All information is anonymous and we do not use the collected information to create visitor profiles.

The Bailey uses Google Analytics and Cookies to target our advertising on third party sites. For example, it may be ads on Facebook, LinkedIn, Google AdWords or other websites.

Google Analytics is a web analysis service that analyses how users interact with the site. On behalf of Personal Achievement Centre and based on your consent, Google will use this information to assess your use of the website, to compile reports on website activity and to provide the website operator with other services related to website and internet use.

We use the IP anonymization tool offered by Google Analytics in order to ensure anonymous collection of IP addresses (so-called IP Masing). The IP address transmitted by your browser in the context of google Analytics is not merged with other Google Data.

You can prevent the setting of cookies by adjusting the settings on your browser (see your browser Help for how to do this). Refusing a Cookie may, in some cases, preclude you from using, or negatively impact, the display or function of our websites or certain areas or features of our websites. Therefore, it is recommended that you do not disable cookies.

INDEMNITY

You accept that The Bailey takes reasonable and practical steps to safeguard Protected Personal Information in its possession. To the fullest extent permissible by law, you hereby indemnify and hold harmless The Bailey and its employees against any liability, damages and/or legal action whatsoever and howsoever arising, including negligence on the part of The Bailey, its employees or agents and The Bailey shall not accept liability for any damages or any type of loss suffered by you when utilizing the services of the Sites and Third-Party Sites and Service Providers.

CONTACT US

Our appointed Information Officer is responsible for overseeing questions concerning our Privacy Policy. You may contact our Information Officer on 011 300 8794 or at info.officer@tintswalo.com to discuss this Privacy Policy, your rights under data protection laws applicable to you and to raise any complaints with us. Further contact information and contact forms are available in our PAIA Manual.

You may also direct your complaint directly to:

The Bailey On Bree (Pty) Ltd

5 Lynx Road,

Treesbank

Midrand

Gauteng

1685

(PO Box 70406, Bryanston, 2021)

In the absence of a response from The Bailey or if the disputes persist, you have the possibility to lodge a complaint with the South African Information Regulator (please refer to our PAIA manual for further details)

This Privacy Policy was last updated in August 2022 and is referred to as version 1. We may at any time change this Privacy Policy and any changes will be communicated on our website. The latest version will replace all earlier versions, unless stated differently.