

# Privacy Policy

## 1. INTRODUCTION

Club Twenty Three (Pty) Ltd (Club 23) recognizes the importance of privacy and the protection of personal information provided to it and is committed to the safeguarding of such information.

This privacy policy explains how Club 23 collects and uses personal information. It contains information regarding the rights of natural and juristic persons to whom personal information relates (data subjects).

Club 23 reserves the right to amend this Privacy Policy or add provisions to it at any time by publishing an updated version on its website.

## 2. COLLECTION OF INFORMATION

Club 23 collects personal information in various instances, including when:

- data subjects contact Club 23 or request information or services;
- Club 23 provides services to data subjects;
- persons apply for employment at Club 23;
- when persons use Club 23's websites or engage with Club 23 through social media.

The interaction with Club 23 on Club 23's website will result in the collection of information regarding the person's activities on the website. Similarly, when anyone engages with Club 23 via any one of Club 23's social media platforms. This information includes, but is not limited to, the person's name, contact details and information regarding the matter with which they need assistance.

In the course of engaging with clients on matters, Club 23 will naturally be exposed to and collect personal information which includes the data subject's name and contact details as well as information regarding the matters that we need to assist them with.

As part of its recruitment processes, Club 23 collects information from graduates and employment applicants. This information includes educational information as well as employment history. By enquiring regarding employment opportunities at Club 23 or applying for employment, applicants are deemed to provide their consent to Club 23's processing of their personal information for recruitment purposes, which may include screening as well as background and reference checks.

## 3. BASIS AND PURPOSE FOR PROCESSING PERSONAL INFORMATION

Club 23 may process personal information:

- to provide services to clients;
- to comply with legal or regulatory obligations;
- if a data subject has provided their consent; or
- if the processing is allowed by law.

The purposes for which Club 23 processes personal information include, but are not limited to:

- marketing and promotion of Club 23's services;
- providing and improving services to clients;

- improving users' experience when using Club 23's websites;
- communicating with persons for Club 23's internal purposes;
- enabling Club 23's internal operations;
- exercising and defending legal rights.

#### **4. DISCLOSURE OF PERSONAL INFORMATION**

Club 23 may release personal information or disclose it to third parties in certain circumstances.

These include, but are not limited to:

- if Club 23 is required or authorised to do so by law or a court order;
- in order for Club 23 to enforce its rights;
- in order for Club 23 to provide services to its clients.

The third parties to whom we disclose personal information include, but are not limited to:

- advocates and other parties involved in legal services;
- third party service providers to Club 23 or its clients;
- third parties who provide research services to Club 23 or its clients;
- government authorities and registries, organs of state, regulators, courts, tribunals and law enforcement agencies.

#### **5. TRANSFER OF PERSONAL INFORMATION**

Personal information collected by Club 23 may be transferred to persons in other countries. Those countries' laws might not protect personal information in the same way or on the same level as the law in the data subject's country. However, Club 23 will take reasonable steps to ensure that recipients in other countries have appropriate privacy measures in place.

#### **6. RETENTION OF PERSONAL INFORMATION**

Club 23 retains personal information for as long as may be reasonably necessary in accordance with applicable law.

#### **7. COOKIES**

Club 23 websites makes use of cookies. Cookies store information regarding website visitors. Cookies have various purposes, such as improving the visitor's experience on the website and facilitating their use of the website.

#### **8. DIRECT MARKETING**

Club 23 may send marketing and promotional communications and material to persons. Recipients may opt out from receiving such communications by contacting Club 23 at the details provided below or by clicking on the opt-out link that will be contained in the relevant electronic communication.

#### **9. SECURITY**

Club 23 takes all reasonable steps to protect and avoid unauthorised access to personal information. It has implemented various policies, procedures, and software to safeguard personal

information and routinely reviews its operations in order to ensure that personal information is adequately protected.

## **10.DATA SUBJECT RIGHTS**

The law might provide data subjects with rights to access, amend or delete personal information that is in the possession of Club 23. However, Club 23 may, in certain instances, legally refuse or decline such requests. If applicable, a data subject may also have the right to object to Club 23's processing of their personal information or to file a complaint with a regulator. If a data subject wishes to exercise their rights, they can contact Club 23 at the details provided below. Club 23 may charge data subjects a fee for accessing, amending or deleting their personal information.

Data subjects are encouraged to contact Club 23 in order to update their personal information as and when necessary.

## **11.CONTACT DETAILS**

In order to contact Club 23 for purposes relating to this privacy policy, please contact us using these contact details:

The Compliance Officer  
Club 23  
306 Domkrag Street,  
Waltloo,  
Pretoria,  
0184

Telephone: +27 78 099 9658

E-mail: [info@c23.co.za](mailto:info@c23.co.za)

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