

PRIVACY POLICY

Under the Western Province Hockey Union (WPHU) and Central Hockey Club (CHC) Constitution and Bye Laws, the WPHU has full jurisdiction and authority over everything concerning hockey and playing of hockey effectively, therefore, any person(s) affiliated to the Affiliate Members (Clubs) and Associate Members involved in any hockey activity agree to comply with the Constitution, Bye Laws, League Rules, Rules of Hockey and rules and directives of the present Code of Conduct.

These Regulations, inter alia, stipulate that an accredited club must maintain a register of its members, which register must contain the full names, ID number and residential address of the member.

As CHC strictly functions in the electronic domain and paper organization, it follows that CHC shall maintain an Electronic Members Database where it must securely capture and store the minimum of required Personal Information of its members in order for it to comply with the requirements of the WPHU as stated above. And to further also conduct its stated business in an effective and efficient manner, in order to render the high level of service delivery it stands for and as is contracted with members when they enroll for membership with CHC.

For purposes of transparency, responsibility and accountability, the Privacy Policy following below, therefore, describes CHC policies on the Collection, Use, and Disclosure of Personal Information, which information is stored and maintained on the CHC Electronic Membership Database, which in turn allows members access to the use of the CHC interactive websites and mobile applications (the "Services" or "Web Services").

In this context CHC is bound by and adheres to the stipulations and to the prescripts of Section 51 of the Protection of Personal Information Act, 2013 (Act 4 of 2013) (the PoPI Act), for as far as CHC may use or make available the Personal Information it collects from its members.

It is, therefore, a precondition that before being accepted as member of CHC, membership applicants will at enrolment, explicitly consent to the collection, use, and possible disclosure of their Personal Information as described in this Privacy Policy.

The terms "we", "us", and "CHC" refer to the internet domain registered as ***centralhockey.co.za***.

- **Secure Electronic Storage of Personal Information**

- In adherence to the stipulations of Section 19 of the PoPI Act (2013), the electronic membership database of the CHC is as secure as it can be humanly possibly be. No CHC data is secure stored on its website or any public domain.
- CHC follows generally accepted industry standards to protect the Personal Information submitted and in its possession and especially those sections of Personal Information described as a "Unique Identifier" in the PoPI Act (2013), both during transmission and once CHC has received it.
- Although CHC always makes good faith efforts to store Personal Information in a secure operating environment that is not open to the public, members should understand that there is no such thing as complete internet security, and CHC cannot guarantee that there will be no unintended disclosures of a member's Personal Information. If CHC becomes aware that a member's

Personal Information has been disclosed in a manner not in accordance with this Privacy Policy, we will use reasonable efforts to notify the respective member or members of the nature and extent of the disclosure (to the extent we know that information) as soon as reasonably possible and as permitted by law.

- In email communications from members to CHC, additional Personal Information not originally collected, is frequently communicated inadvertently. This kind of information will receive the same kind of security and level of protection by CHC as are afforded all Personal Information collected and kept by CHC.
- **MEMBERS ARE, HOWEVER, REMINDED THAT DESPITE THE CHC'S COMPLIANCE WITH THE PRESCRIPT RE: PROTECTION OF PERSONAL INFORMATION CONTAINED IN THE PoPI ACT, CHC CANNOT PROTECT A MEMBER'S PERSONAL INFORMATION IF THE MEMBER DOES NOT PERSONALLY TAKE CARE TO PROTECT SUCH PERSONAL INFORMATION FROM MISUSE DUE TO THE MEMBER'S USE OF OTHER WEB-BASED APPLICATIONS AND SERVICES OR DISCUSSION GROUPS HE OR SHE MAY BE PART OF, OR PARTAKE IN, WHERE SUCH PERSONAL INFORMATION MAY OR COULD ALSO BECOME ACCESSIBLE.**

- **Personal Information Collected**

- By joining CHC and remaining a member, a member consents to the collection of the following Personal Information, which constitutes the only Personal Information CHC will collect in respect of its members and kept stored on its electronic members database.
- **Initials, First name & Surname:** CHC needs to know to whom membership is awarded, and the Initials and Surname of a member has to reflect on all official CHC documents which are needed for all.
- **RSA ID Number:**
 - (a) it becomes the primary search "term" to access members' data on the CHC electronic members database, and
 - (b) it will be linked to the Members' unique Member Number which is automatically assigned upon registration.
- **Gender:** in order :
 - (a) for CHC to keep statistics on membership and possible extension of needs per gender group, and
 - (b) to be classified for the correct competition category.
- **Language:** the member's preferred language for communication.
- **Date of Birth:** in order for CHC to determine membership categories and for financial and other administrative purposes.
- **Email address:** in order for CHC to be able to directly communicate with members (CHC only communicates with members via email).
- **Postal address & Street address:** To keep a geographic demarcation of members' residential locations.
- **Telephone numbers:** Specifically, mobile phone numbers, in order to :
 - (a) be able to urgently contact a member if need be
 - (b) communicate with a member via SMS message.
- The Personal Information collected and stored by CHC thus complies with the stipulations of Sections 10 and 13 of the PoPI Act (2013). Only the minimum of a member's personal detail are retained on our system when a member resigns from the Club to enable us to provide clearances to WPHU regarding such a member.
- The above stated Personal Information of members, which is collected and stored by CHC, is also in many instances, clearly not new information pertaining to an individual who has been using web-based services for a while, as such member's Personal Information could already have been captured in

one or other manner by a number of other Service Providers with which the specific member interacts with on the internet.

- No Banking and/or other member specific financial information required for online payments are collected CHC.

- **Personal Information Submitted by a Member**

- CHC may store the information a member submits in order for him/her to be able to use and partake in the Club activities.
- Account registration: a member must provide a valid email address and mobile number at enrolment in order to sign up for membership through the Services (such an account is automatically created for a member at enrolment).
- A CHC member cannot opt out of electronically receiving required CHC administrative or legal notices via his/her provided email address. If a member should feel that an unauthorized account has been created depicting his or her likeness, s/he can request its removal by sending email to info@centralhockey.co.za.
- Public Content: Any information a member may reveal in a rating or review posting or other online discussion or forum is intentionally open to the public and is not in any way private. A member should think carefully before disclosing any Personal Information in any public forum. Members do not have permission to disclose any Individually Identifiable Information re: the CHC in any public forum. What a member has written may be seen and/or collected by third parties and may be used by others in ways CHC are unable to control or predict.
- Contacts & messaging: A member may invite friends, colleagues, businesses, and others whom he or she knows (collectively, "Associates") to join the Club by providing the CHC contact information or the website address.
- Members are advised that when they send an invitation to connect to an Associate or another member, that Associate or member will have access to the member's email address because it is displayed in the invitation. The invitation may also contain other Services Content about the member, such as name and photograph, to help the User or Associate identify who is sending the invitation. A member's CHC connections will also have access to the member's email address. Members may thus not invite anyone he or she does not know and trust, to connect with him/her.
- All Personal Information electronically stored by CHC is strictly in the format provided and entered by members themselves and that data will not be changed by CHC without express request by a member in person (no such request through a third party will be given any attention or regulate any action by CHC).
- CHC explicitly states that it at all times remains the responsibility of a member to ascertain that his/her contact details are up to date on the CHC members' database. CHC will not be held responsible should any contact details of a member change and the member has not made provable effort to either personally change such detail on his/her profile page on his/her Online Member web page, or by sending an email to request updating of personal contact details to info@centralhockey.co.za.

- **Information Provided on Behalf of Minors**

- In terms of the stipulations Sections 34 and 35 of the PoPI Act (2013), CHC does not collect Personal Information of minors other than such information being submitted by the minor's parent or legal guardian.
- CHC does allow membership of minors under the age of 13 years. A written application and a communications procedure will be entered into with the

parent or guardian of such a minor when application is made for such a minor to join CHC through his/her parent or guardian.

- If the member is a parent or legal guardian of a minor between the ages of 13 and 18 years and needs to communicate with CHC on that minor's behalf, members may, in compliance with the User Terms and Conditions, use the Services on behalf of such minor child. Any Personal Information a member provides while using the Services on behalf of his/her minor will be treated as Personal Information as otherwise provided herein.
- If a user is under the age of 18, they should not use the Online Membership Pages. Enabling access to email and Internet Services for minors remain the responsibility of parents or legal guardians of minors.

- **Electronic Activity & Use (Analytical Services)**
 - CHC does not collect or store information related to a member's use of the electronic Services it renders, such as browser type, IP address, unique device identifier, requested URL, referring URL, browser language, the pages members view, and the date and time of members' visits.

- **Third Parties**
 - CHC does not rent, share, sell or trade Personal Information or members' Demographic Data with third parties for marketing purposes.
 - Service Providers: CHC, however, has to share Personal Information with WPHU for registration of members. Those business partners shall be, and are, bound to uphold the same standards of security and confidentiality that CHC has promised to members in this Privacy Policy, and they will only use specific Contact Data and other Personal Information to carry out their specific business obligations to CHC and to provide members' requested services.
 - Business Transfers: CHC may from time to time have to share information of or about members with subsidiaries, joint ventures, or other companies under common control, in which case CHC will require them to honour this Privacy Policy.
 - Links: The Services may contain links to unaffiliated third party websites. Except as set forth herein, CHC does not share members' Personal Information with them, and are not responsible for their privacy practices. CHC suggests that members read the privacy policies on all such third party websites.

- **Use and Disclosure of Members' Personal Information**
 - Customization and Contact: The objective of collecting Personal Information from members is to provide an efficient, meaningful and customized experience. For example, CHC can use Personal Information to:
 - (a) help make the Services easier for members to use by not having to enter information more than once;
 - (b) help members to quickly find information and services;
 - (c) help CHC to create content that is most relevant to members; and
 - (d) alert members to new information and Services offered by CHC.
 - CHC may use members' contact data to send members information about CHC or CHC products or Services to contact members when necessary.
 - Due to the nature of the administrative procedures employed by CHC, all CHC personnel have access to members' Personal Information on the CHC electronic members' database. CHC personnel all subscribe to high ethical standards in respect of the content of this policy document, and are bound by a non-disclosure clause in their employment contracts re: the possible disclosure of any CHC electronic information to third parties and are liable in instances of transgression of that clause.

- **Duration of Retention of Personal Information**
 - Once a person has been accepted as a member of CHC, his or her Personal Information collected at enrolment as identified under paragraph 2 above, will be stored in the format provided by the member for as long as the person remains a paid-up member, unless the member changes the contact details when issuing requests CHC to do so on his/her behalf. This in order for the CHC to be able to continuously render the contracted services to the member which s/he had joined and paid the Club for.
 - The full Paragraph 2 disclosed Personal Information of members provided at enrolment will be stored for a maximum of five years after the last date on which the member had to update his/her membership, should the member default on payment of membership fees. After five years of not updating membership with the Club, a member's Surname, Initials and ID number will permanently remain on the CHC database for future reference should that person one day again apply for membership. All other Personal Information the CHC has in possession re: that member will be permanently deleted from the CHC electronic members' database (see below).
 - The Surname, Initials and ID number of a member who's membership of CHC terminates for whatever reason, will permanently remain on the CHC database for future reference should that person one day again apply for membership (or for administrative purposes should such a member pass away). All other Personal Information the CHC has in possession re: that member will be permanently deleted from the CHC electronic members' database (see below).
 - The CHC electronic membership database, however, retains the references of all official CHC documents issued and linked to any member at any time in the past for possible management of liability issues, and to protect CHC against fraudulent transactions entered into by non-active former members on strength of CHC documentation issued at the time the member was on the electronic members database marked as an active member of the Club.

- **Complaints Process**
 - If members have any comments, concerns or questions about this Privacy Policy, please send an email with full details to *info@centralhockey.co.za*.
 - If members would want to lodge complaints against the manner in which the CHC manages and secures its electronic membership database, based on reasonable and factual grounds, they must contact the independent Information Regulator, appointed in terms of Section 39 of the PoPI Act (2013).
 - Members may also send complaints via an email with full details to *info@centralhockey.co.za* so that the complaint can be investigated, and immediate mitigations set into motion to rectify the problem should the complaint be proven to be true.

- **Updates and Changes to Privacy Policy**
 - CHC may revise this Privacy Policy from time to time. The most current version of the Privacy Policy will govern the CHC use of its members' Personal Information and other information, which policy will be located at <https://www.centralhockey.co.za/PrivacyPolicy.php>
 - If CHC makes any changes to this Privacy Policy, members will be notified by email or by posting a notice on or through the Services. By continuing to access or use the Services after those changes become effective, members by default agree to be bound by the revised CHC Privacy Policy unless they explicitly state that they do not consent to it, by sending an email directed at to *info@centralhockey.co.za* with reasons why they cannot agree with the changes.