

SOMERSET WEST COUNTRY CLUB

(NPC) Reg: 1998/013790/08

NPO Reg: 094-210-NPO

NLC Society Reg. No: 00566 | Scheme Reg. No: 00566/01



PRIVACY POLICY

Prepared in terms of the Protection of Personal Information Act 4 of 2013 ("POPIA")

Effective date: August 2026

1. INTRODUCTION

- 1.1. Somerset West Country Club (NPO Registration Number 094-210-NPO), of Rue De Jacqueline, Somerset West Country Club, Cape Town, 7130 ("the Club", "we", "us" or "our"), respects your privacy and is committed to protecting your personal information in accordance with the Protection of Personal Information Act 4 of 2013 ("POPIA").
- 1.2. This Privacy Policy explains what personal information we collect, why we collect it, how we use, share, store and protect it, what use we may make of it for direct marketing, and what rights you have. It applies to Club members, lottery ticket purchasers and participants, prize winners, website and online portal users, and other individuals whose personal information we process, including in connection with the Club's registered society lottery, the 2027 Ryder Cup Grand Prize Draw (NLC Society Reg. No. 00566, Scheme Reg. No. 00566/01).
- 1.3. This policy should be read together with the Club's PAIA Manual and the official rules and terms and conditions of any Club lottery.

2. RESPONSIBLE PARTY AND INFORMATION OFFICER

Responsible party	Somerset West Country Club
Physical / postal address	Rue De Jacqueline, Somerset West Country Club, Cape Town, 7130
Telephone	021 852 2925
Email	chairperson@swcountryclub.co.za
Information Officer	Sonja Koehler, Chairperson
Deputy Information Officer	Neil Stokes, Treasurer

3. PERSONAL INFORMATION WE COLLECT

3.1. Depending on your relationship with the Club, we may collect the following categories of personal information:

- 3.1.1. identifying information: full name, date of birth, South African identity number or passport number, nationality, and a photograph (for example, of a lottery winner, with consent);
- 3.1.2. contact information: postal and physical address, telephone number and email address;
- 3.1.3. financial information: proof of payment, banking details and payment card information (processed by our payment service providers), for ticket purchases and, where applicable, prize delivery;
- 3.1.4. lottery participation information: ticket numbers purchased, date and channel of purchase, draw results, and prize-winner declarations;
- 3.1.5. travel information: passport details, visa application information and travel preferences of a prize winner and their nominated companion, to

the extent necessary to arrange and facilitate the prize trip and related visa applications;

3.1.6. membership information: membership category, subscription and facility-use records (for Club members); and

3.1.7. electronic and website information: information submitted via the Club's online ticketing portal or website, and standard technical/usage data (such as IP address and browser type) where our website uses cookies or similar technology.

3.2. We do not intentionally collect personal information from, or sell tickets to, persons under the age of 18.

4. WHY WE PROCESS YOUR PERSONAL INFORMATION

4.1. We process personal information for the following purposes:

4.1.1. to sell and administer lottery tickets, including verifying eligibility (including age) to participate;

4.1.2. to conduct and independently monitor the lottery draw;

4.1.3. to identify, verify, notify and publicise the winner of the lottery, and to arrange delivery of the prize, including booking flights, accommodation and event tickets, and facilitating the visa applications required for the winner and their companion to travel to Ireland;

4.1.4. to administer Club membership and provide Club services and facilities;

4.1.5. to comply with our legal and regulatory obligations, including our obligations to the National Lotteries Commission (such as lottery returns, beneficiary receipts and prize-winner declarations), the South African Revenue Service, and any applicable financial intelligence or anti-money-laundering legislation;

4.1.6. to respond to queries, complaints and requests for information (including PAIA requests); and

4.1.7. for direct marketing purposes, in the circumstances and subject to the conditions set out in clause 6 below.

4.2. We process your personal information on one or more of the following lawful grounds recognised by POPIA:

4.2.1. your consent;

4.2.2. performance of a contract with you (for example, the sale of a ticket);

4.2.3. compliance with a legal obligation;

4.2.4. or our legitimate interests, provided these do not override your own interests or fundamental rights.

5. HOW WE COLLECT YOUR PERSONAL INFORMATION

5.1. We collect personal information directly from you when you purchase a ticket (at the Club's premises, through the Club's online portal, from an authorised Club member seller, through applying for Club membership, correspond with us, or use our website.

6. DIRECT MARKETING

6.1. This clause explains how we use your personal information for direct marketing purposes, and applies specifically to direct marketing by means of any form of electronic communication, including email, SMS, WhatsApp and automated calling machines, as regulated by section 69 of POPIA. Section 69 of POPIA governs this activity and, in respect of electronic communications, has superseded section 45 of the Electronic Communications and Transactions Act 25 of 2002 for this purpose.

- 6.2. If you are not an existing customer of the Club (for example, you have never purchased a ticket, joined as a member, or otherwise transacted with us), we will not send you direct marketing electronic communications unless you have given your prior, express consent to receive them. Consent must be given in the manner and form prescribed under POPIA, and may be requested through our ticket purchase forms, membership application forms, our website, or other appropriate means.
- 6.3. If you are an existing customer of the Club (for example, because you have purchased a lottery ticket or hold Club membership), section 69(3) of POPIA permits us to send you direct marketing electronic communications about our own similar products or services (for example, future Club lotteries, membership renewals, or Club events) without your prior consent, but only where:
- 6.3.1. we obtained your contact details in the context of the sale of a product or service to you;
- 6.3.2. the direct marketing relates to our own similar products or services; and
- 6.3.3. we gave you a reasonable opportunity to object, free of charge and in a user-friendly manner, to the use of your details for that purpose, both when your details were first collected and on the occasion of each subsequent direct marketing communication.
- 6.4. You may object to receiving direct marketing communications from us, or withdraw any consent previously given, at any time and free of charge, by using the unsubscribe or opt-out mechanism provided in the relevant communication, or by contacting our Information Officer using the details in clause 2. We will give effect to any such objection or withdrawal without unreasonable delay, and will not charge you for exercising this right.
- 6.5. We will not send you direct marketing communications by electronic means in any manner that disguises or conceals the identity of the sender, or without a

valid return address or contact details to which you may send a request that such communications cease, as required by POPIA.

- 6.6. We will not sell, rent or otherwise disclose your personal information to any third party for that third party's own direct marketing purposes.
- 6.7. This clause does not restrict non-electronic communications ordinarily incidental to Club membership or governance, such as notices displayed at the Club's premises, communications sent to members in their capacity as members regarding Club administration, or matters raised at general meetings, which do not constitute direct marketing for purposes of section 69 of POPIA.

7. SHARING OF PERSONAL INFORMATION

- 7.1. We may share your personal information with the following categories of recipients, only to the extent reasonably necessary for the purposes described in clause 4 above:

- 7.1.1. LDP Compliance Proprietary Limited, our independent auditor and draw monitor;

- 7.1.2. the National Lotteries Commission, as required by the Lotteries Act 57 of 1997 and its Regulations;

- 7.1.3. prize and travel suppliers, including airlines, accommodation providers, event-ticketing agents, travel insurers and visa facilitation agents, solely to arrange and deliver the prize to the winner;

- 7.1.4. payment processors and our bankers, to process ticket payments;

- 7.1.5. our professional advisors (including our auditor and attorneys), where necessary; and

- 7.1.6. the Information Regulator, law enforcement or other authorities, where required or permitted by law.

7.2. We do not sell your personal information to third parties.

8. CROSS-BORDER TRANSFERS

8.1. Arranging the prize trip (including flights, accommodation and Irish visa applications) necessarily involves sharing the winner's and their companion's personal information with travel and visa-processing service providers located outside South Africa, including in Ireland and other countries through which the trip is arranged or transacted. We will only make such transfers where the recipient is subject to a law, binding corporate rules, or contractual provisions that provide an adequate level of protection substantially similar to POPIA, or where you have consented to the transfer, in accordance with section 72 of POPIA.

9. RETENTION OF PERSONAL INFORMATION

9.1. We retain personal information only for as long as necessary to fulfil the purposes described in this policy, or as required by law. Lottery-related records (including ticket sales, draw and winner records) are generally retained for at least five years to meet our reporting obligations to the National Lotteries Commission and applicable tax and accounting record-keeping requirements. Once no longer required, personal information is securely deleted, destroyed or de-identified.

10. SECURITY OF PERSONAL INFORMATION

10.1. We implement reasonable technical and organisational measures to protect personal information against loss, unauthorised access, interference, modification, destruction or disclosure, including restricting access to authorised personnel on a need-to-know basis and using secure payment processing for ticket transactions. No system can be guaranteed completely secure, and we will notify you and the Information Regulator of any security compromise affecting your personal information as required by POPIA.

11. YOUR RIGHTS

11.1. Subject to POPIA, you have the right to:

- 11.1.1. be notified that we hold your personal information and for what purpose;
- 11.1.2. request access to the personal information we hold about you, free of charge for your own information (subject to the PAIA request process described in our PAIA Manual);
- 11.1.3. request that we correct or update inaccurate, incomplete, misleading or outdated personal information;
- 11.1.4. request that we delete or destroy personal information that we are no longer authorised to retain, subject to our legal record-keeping obligations;
- 11.1.5. object, on reasonable grounds, to the processing of your personal information, and specifically to object to the use of your personal information for direct marketing purposes at any time and free of charge, as described in clause 6;
- 11.1.6. withdraw any consent you have given, at any time, without affecting the lawfulness of processing carried out before withdrawal; and
- 11.1.7. lodge a complaint with the Information Regulator if you believe your rights under POPIA have been infringed.

11.2. To exercise any of these rights, please contact our Information Officer using the details in clause 2 above.

12. COMPLAINTS TO THE INFORMATION REGULATOR

Information Regulator (South Africa)	
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Physical address	Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191
Telephone	010 023 5200 Toll-free: 0800 017 160
General enquiries	enquiries@inforegulator.org.za
POPIA complaints	POPIAComplaints@inforegulator.org.za
Website	www.inforegulator.org.za

13. COOKIES AND THE CLUB WEBSITE

- 13.1. Our website and online ticketing portal may use cookies or similar technologies to support functionality (such as completing a ticket purchase) and to understand website usage. You can manage cookie preferences through your browser settings; disabling cookies may affect the functionality of the online ticketing portal.

14. CHILDREN

- 14.1. Our services, including the purchase of lottery tickets and receipt of direct marketing communications, are not directed at, and are not available to, persons under the age of 18. If we become aware that we have inadvertently collected personal information from a child without appropriate consent, we will take reasonable steps to delete that information.

15. CHANGES TO THIS POLICY

- 15.1. We may update this Privacy Policy from time to time to reflect changes in our practices or in applicable law. The current version will always be available at www.swcountryclub.co.za and at the Club's offices, with the effective date shown at the top of this policy.

16. CONTACT US

- 16.1. If you have any questions about this Privacy Policy, our direct marketing practices, or how we handle your personal information, please contact our Information Officer, Sonja Koehler, at chairperson@swcountryclub.co.za or 021 852 2925, or write to us at Rue De Jacqueline, Somerset West Country Club, Cape Town, 7130.