



<p style="text-align: center;">La Vita Dreams Guesthouse Privacy Policy in terms of the Protection of Personal Information Act, No. 4 2013 (South Africa)</p>	
Organisation	La Vita Dreams Guesthouse
Scope of policy	This policy applies to the business of La Vita Dreams Guesthouse wherever it is conducted but based at the registered office. It applies to paid staff.
Policy operational date	2021/05/01
Policy prepared by	Johan du Toit
Date approved by Information Officer	
Next policy review date	2022/05/01
<b><u>Introduction</u></b>	
Purpose of policy	<p>The purpose of this policy is to enable La Vita Dreams Guesthouse to:</p> <ul style="list-style-type: none"> <li>• Comply with the law in respect of the data it holds about individuals.</li> <li>• Follow good practice; protect La Vita Dreams Guesthouse</li> <li>• Staff and other individuals</li> <li>• Protect the organisation from the consequences of a breach of its responsibilities.</li> </ul>
Personal information	This policy applies to information relating to identifiable individuals, in terms of the Protection of Personal Information Act, 2013 (hereinafter POPI Act).
Policy statement	<p>La Vita Dreams Guesthouse will:</p> <ul style="list-style-type: none"> <li>• comply with both the law and good practice.</li> <li>• respect individuals' rights</li> <li>• be open and honest with individuals whose data is held.</li> <li>• provide training and support for staff who handle personal data, so that they can act confidently and consistently.</li> </ul>



	<p>La Vita Dreams Guesthouse recognises that its priority under the POPI Act is to avoid causing harm to individuals. In the main this means:</p> <ul style="list-style-type: none"> <li>• keeping information securely in the right hands, and</li> <li>• retention of good quality information.</li> </ul> <p>Secondly, the Act aims to ensure that the legitimate concerns of individuals about the ways in which their data may be used are taken into account. In addition to being open and transparent, La Vita Dreams Guesthouse will seek to give individuals as much choice as is possible and reasonable over what data is held and how it is used.</p>
<p>Key risks</p>	<p>La Vita Dreams Guesthouse has identified the following potential key risks, which this policy is designed to address:</p> <ul style="list-style-type: none"> <li>• Breach of confidentiality (information being given out inappropriately).</li> <li>• Insufficient clarity about the range of uses to which data will be put — leading to Data Subjects being insufficiently informed.</li> <li>• Failure to offer choice about data use when appropriate.</li> <li>• Breach of security by allowing unauthorised access.</li> <li>• Harm to individuals if personal data is not up to date.</li> <li>• Data Operator contracts</li> </ul>
<p><b><u>Information Officer Responsibilities</u></b></p>	
<p>Scope</p>	<p>The scope of this aspect of the policy is defined by the provisions of the POPI Act, Condition 1, and Chapter 5, Part B.</p>
<p>Information Officer Responsibilities</p>	<p>The Information Officer has the following responsibilities:</p> <ul style="list-style-type: none"> <li>• Developing, publishing, and maintaining a POPI Policy which addresses all relevant provisions of the POPI Act, including but not limited to the following:</li> <li>• Reviewing the POPI Act and periodic updates as published</li> <li>• Ensuring that periodic communication awareness on POPI Act responsibilities takes place.</li> <li>• Ensuring that Privacy Notices for internal and external purposes are developed and published.</li> <li>• Approving unusual or controversial disclosures of personal data.</li> <li>• Ensuring that appropriate policies and controls are in place for ensuring the Information Quality of personal information.</li> <li>• Ensuring that appropriate Security Safeguards in line with the POPI Act for personal information are in place.</li> <li>• Handling all aspects of relationship with the Regulator as foreseen in the POPI Act.</li> </ul> <p>Provide direction to any Deputy Information Officer when appointed.</p>



Appointment	<p>The appointment of the La Vita Dreams Guesthouse Information Officer will be authorised by the Designated Head.</p> <p>Consideration will be given an annual basis of the re-appointment or replacement of the Information Officer; the need for any Deputy to assist the Information Officer.</p>
<b><u>Processing Limitation</u></b>	
Scope	The scope of this aspect of the policy is defined by the provisions of the POPI Act, Condition 2.
Processing Limitation	La Vita Dreams Guesthouse undertakes to comply with the POPI Act, Conditions 2 in terms of processing limitation, sections 9 to 12, subject to the following stipulation (Forms of Consent).
Forms of consent	La Vita Dreams Guesthouse undertakes to gain written consent where appropriate; alternatively, a recording must be kept of verbal consent.
Nature of Personal Information	La Vita Dreams Guesthouse has used the POPI-Personal Information Diagnostic tool to identify all instances of personal information in the organisation. La Vita Dreams Guesthouse will ensure to only collect the minimum required personal information for their purpose. As a company we strive to only access information that is relevant.
<b><u>Purpose specification</u></b>	
Scope	The scope of this aspect of the policy is defined by the provisions of the POPI Act, Condition 3.
Purpose specification	La Vita Dreams Guesthouse undertakes to comply with the POPI Act, Conditions 2 in terms of processing limitation, sections 13 and 14, subject to the following stipulation (Retention periods).
Retention periods	<p>La Vita Dreams Guesthouse will establish retention periods for at least the following categories of data:</p> <ul style="list-style-type: none"> <li>• Directors</li> <li>• Staff</li> <li>• Customers</li> <li>• Suppliers</li> </ul> <p>Detailed coverage of the relevant retention periods has been documented in the Personal Information Diagnostic tool.</p>
<b><u>Further processing limitation</u></b>	
Scope	The scope of this aspect of the policy is defined by the provisions of the POPI Act, Condition 4.



Further processing limitation	La Vita Dreams Guesthouse undertakes to comply with the POPI Act, Conditions 2 in terms of processing limitation, section 15 and is obliged to prevent the processing of information in a manner that is incompatible with the purpose for which the information was collected.
<b><u>Information quality</u></b>	
Scope	The scope of this aspect of the policy is defined by the provisions of the POPI Act, Condition 5. Media Works will comply with all the aspects of Condition 5, section 16.
Accuracy	La Vita Dreams Guesthouse will regularly review its procedures for ensuring that its records remain accurate and consistent and, in particular: <ul style="list-style-type: none"> <li>• ICT systems will be designed, where possible, to encourage and facilitate the entry of accurate data.</li> <li>• Data on any individual will be held in as few places as necessary, and all staff will be discouraged from establishing unnecessary additional data sets.</li> </ul> <p>Effective procedures will be in place so that all relevant systems are updated when information about any individual changes.</p> <ul style="list-style-type: none"> <li>• Staff who keep more detailed information about individuals will be given additional guidance on accuracy in record keeping.</li> </ul>
Updating	La Vita Dreams Guesthouse will review all personal information on an annual basis in November of each year.
Archiving	Archived electronic records of La Vita Dreams Guesthouse are stored securely under a password. Paper record of all Guests, suppliers and staff are locked away.
<b><u>Openness</u></b>	
Scope	The scope of this aspect of the policy is defined by the provisions of the POPI Act, Condition 6.
Openness	In line with Conditions 6 and 8 of the Act, La Vita Dreams Guesthouse is committed to ensuring that in principle Data Subjects are aware that their data is being processed and <ul style="list-style-type: none"> <li>• for what purpose it is being processed.</li> <li>• what types of disclosure are likely; and</li> <li>• how to exercise their rights in relation to the data.</li> </ul>



<p>Procedure</p>	<p>Data Subjects will generally be informed in the following ways:</p> <ul style="list-style-type: none"> <li>• Staff: through this policy</li> <li>• Customers and other interested parties: through the La Vita Dreams Guesthouse Privacy Notice</li> </ul> <p>Whenever data is collected, the number of mandatory fields will be kept to a minimum and Data Subjects will be informed which fields are mandatory and why.</p>
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<b><u>Security Safeguards</u></b>	
<p>Scope</p>	<p>The scope of this aspect of the policy is defined by the provisions of the POPI Act, Condition 7, section 19 to 22.</p> <p>This section of the policy only addresses security issues relating to personal information. It does not cover security of the building, business continuity or any other aspect of security.</p>
<p>Specific risks</p>	<p>La Vita Dreams Guesthouse has identified the following risks:</p> <ul style="list-style-type: none"> <li>• Staff with access to personal information could misuse it.</li> <li>• Staff may be tricked into giving away information, either about customers / member or colleagues, especially over the phone, through “social engineering”.</li> </ul>
<p>Setting security levels</p>	<p>Access to information on the main La Vita Dreams Guesthouse computer system will be controlled by function.</p> <p>La Vita Dreams Guesthouse has used the POPI-Personal Information Diagnostic tool to identify security levels required for each record held which contains Personal Information.</p>
<p>Security measures</p>	<p>La Vita Dreams Guesthouse will ensure that all necessary controls are in place in terms of access to personal information.</p>
<p>Business continuity</p>	<p>La Vita Dreams Guesthouse will ensure that adequate steps are taken to provide business continuity in the event of an emergency.</p>
<p>Related policy</p>	<p>Please see the La Vita Dreams Guesthouse Information Security Policy for further guidance.</p>
<b><u>Data Subject participation</u></b>	
<p>Scope</p>	<p>The scope of this aspect of the policy is defined by the provisions of the POPI Act, Condition 8, sections 23 to 25.</p>
<p>Responsibility</p>	<p>Any subject access requests will be handled by the POPI Act Information Officer in terms of Condition 8.</p>

Procedure for making request	Requests for access to personal information will be handled in compliance with the POPI Act and in compliance with the Promotion of Access to Information Act (PAIA), as defined in the La Vita Dreams Guesthouse PAIA Manual.
Provision for verifying identity	Where the individual making a subject access, request is not personally known to the POPI Act Information Officer their identity will be verified before handing over any information.
Charging	Fees for access to personal information will be handled in compliance with the PAIA Act.
Procedure for granting access	Procedures for access to personal information will be handled in compliance with the PAIA Act, as defined in the La Vita Dreams Guesthouse PAIA Manual.
<b><u>Processing of Special Personal Information</u></b>	
Scope	The scope of this aspect of the policy is defined by the provisions of the POPI Act, Part B, sections 26 to 33.
Processing of Special Personal Information	La Vita Dreams Guesthouse has the policy of adhering to the process of Special Personal Information which relates to the religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life or biometric information of a data subject. Special personal information includes criminal behaviour relating to alleged offences or proceedings dealing with alleged offences. Unless a general authorisation, alternatively a specific authorisation relating to the different types of special personal information applies, a responsible party is prohibited from processing special personal information.
<b><u>Processing of Personal Information of Children</u></b>	

Scope	The scope of this aspect of the policy is defined by the provisions of the POPI Act, Part C, sections 34 and 35.
Processing of Personal Information of Children	La Vita Dreams Guesthouse has the policy of adhering to the process of Special Personal Information of children. This applies to under-18 individuals, so an age check is required for all personal information records.
<b><u>Prior Authorisation</u></b>	
Scope	The scope of this aspect of the policy is defined by the provisions of the POPI Act, Chapter 6.
Prior Authorisation	La Vita Dreams Guesthouse has the policy of adhering to the process of Prior Authorisation in terms of sections 57 to 59.



<b>Direct Marketing, Directories and Automated Decision Making</b>	
Scope	The scope of this aspect of the policy is defined by the provisions of the POPI Act, Chapter 8.
Direct Marketing, Directories and Automated Decision Making	La Vita Dreams Guesthouse undertakes to comply with the POPI Act Chapter 8, sections 69 to 71.
Opting in	Whenever data is first collected which might be used for any marketing purpose, this purpose will be made clear, and the Data Subject will be given a clear opportunity to opt in.
Sharing lists	<p>La Vita Dreams Guesthouse has the policy of sharing lists (or carrying out joint or reciprocal mailings) only on an occasional and tightly controlled basis. Details will only be used for any of these purposes where the Data Subject has been informed of this possibility, along with an option to opt out, and has not exercised this option.</p> <p>La Vita Dreams Guesthouse undertakes to obtain external lists only where it can be guaranteed that the list is up to date and those on the list have been given an opportunity to opt out.</p>

Electronic contact	Whenever e-mail addresses are collected, any future use for marketing will be identified, and the provision of the address made optional.
<b><u>Trans-border information flows</u></b>	
Scope	The scope of this aspect of the policy is defined by the provisions of the POPI Act, Chapter 9.
Trans border information flows	<p>La Vita Dreams Guesthouse will ensure that the POPI Act Chapter 9, section 72 is fully complied with.</p> <p>Media Works has used the POPI-Personal Information Diagnostic tool to identify Trans border flows which contain Personal Information.</p> <p>Compliance with section 72 will be achieved using the necessary contractual commitments from the relevant third parties.</p>
<b><u>Staff training &amp; acceptance of responsibilities</u></b>	
Scope	The scope of this aspect of the policy is written in support of the provisions of the POPI Act, Chapter 5, Part B.
Documentation	Information for staff is contained in this policy document and other materials made available by the Information Officer.
Induction	The La Vita Dreams Guesthouse Information Officer will ensure that all staff who have access to any kind of personal information will have their responsibilities outlined during their induction procedures.
Continuing training	La Vita Dreams Guesthouse will provide opportunities for staff to explore POPI Act issues through training, team meetings, and supervisions.



Procedure for staff signifying acceptance of policy	La Vita Dreams Guesthouse will ensure that all staff sign acceptance of this policy once they have had a chance to understand the policy and their responsibilities in terms of the policy and the POPI Act.
<b><u>Policy review</u></b>	
Responsibility	The La Vita Dreams Guesthouse Information Officer is responsible for an annual review to be completed prior to the policy anniversary date.
Procedure	The La Vita Dreams Guesthouse Information Officer will ensure relevant stakeholders are consulted as part of the annual review to be completed prior to the policy anniversary date.

**APPENDIX A: LA VITA DREAMS GUESTHOUSE CUSTOMER PRIVACY NOTICE  
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**Introduction**

We respect the privacy of everyone who visits our Guesthouse. As a result, we would like to inform you regarding the way we would use your Personal Information. We recommend you read this Customer Privacy Notice and Consent so that you understand our approach towards the use of your Personal Information. By submitting your Personal Information to us, you will be treated as having given your permission – where necessary and appropriate – for disclosures referred to in this policy. By using this web site, you acknowledge that you have reviewed the terms of this Customer Privacy Notice and Consent to Use of Personal Information (the “Customer Privacy Notice and Consent”) and agree that we may collect & use your information.

If you do not agree with these terms, you may choose not to use our site, and please do not provide any Personal Information through this site. This Customer Privacy Notice and Consent forms part of our Site Terms and Conditions of Use and such shall be governed by and construed in accordance with the laws of South Africa. This Notice explains how we obtain, use, and disclose your personal information, as is required by the Protection of Personal Information Act, 2013 (POPI Act). At La Vita Dreams Guesthouse we are committed to protecting your privacy and to ensure that your Personal Information is collected and used properly, lawfully and openly.



**Who we are.**

La Vita Dreams Guesthouse is an established company that specialises in providing accommodation to companies and/or individuals.

We offer breakfast, dinner and if needed a little extra (romantic room décor, snacks, etc). We believe that everyone deserves a break or a little pampering.

The primary objective of La Vita Dreams Guesthouse is to be the guests home away from home, by going the extra mile to provide comfort and relaxation. Our business is in popular command and we have a lot of competitors.

**The information we collect.**

Collection of Personal Information

We collect and process your Personal Information mainly to provide you with access to our services and products, to help us improve our offerings to you and for certain other purposes explained below. The type of information we collect will depend on the purpose for which it is collected and used. We will only collect information that we need for that purpose.

We collect information directly from you where you provide us with your personal details.

**Examples of information we collect from you are:**

- Name & Surname.
- Address.
- Email address.
- Telephone/cell number.
- User-generated content, posts, and other content you submit to our web site.
- ID number/date of birth.
- Next of kin (for emergencies)

**How we use your information.**

We will use your Personal and Non-Personal Information only for the purposes for which it was collected or agreed with you, for example:

- For audit and record keeping purposes.
- In connection with legal proceedings.
- Offer you the opportunity to take part in competitions or promotions.
- To confirm and verify your identity for security purposes.
- To contact you regarding products and services which may be of interest to you, provided you have given us consent to do so or you have previously requested a product or service from us and



the communication is relevant or related to that prior request and made within any timeframes established by applicable laws.

- To notify you about changes to our service.
- To respond to your queries or comments.
- You can opt out of receiving communications from us at any time. Any direct marketing communications that we send to you will provide you with the information and means necessary to opt out.

### **Disclosure of Personal Information.**

We may also disclose your information:

- Where we have a duty or a right to disclose in terms of law or industry codes;
- Where we believe it is necessary to protect our rights.

### **Personal Information Security**

We are legally obliged to provide adequate protection for the Personal Information we hold and to stop unauthorised access and use of personal information. We will, on an on-going basis, continue to review our security controls and related processes to ensure that your Personal Information is secure.

Our security policies and procedures cover:

- Acceptable usage of personal information.
- Access to personal information.
- Computer and network security.
- Physical security.
- Retention and disposal of information.
- Secure communications.

We will ensure that anyone to whom we pass your Personal Information agrees to treat your information with the same level of protection as we are obliged to.

### **Access to your Personal Information.**

You have the right to request a copy of the Personal Information we hold about you. To do this, simply contact us at the numbers/addresses listed on our home page and specify what information you would like. We will take all reasonable steps to confirm your identity before providing details of your personal information.

**Correction of your Personal Information.**

You have the right to ask us to update, correct or delete your personal information. We will take all reasonable steps to confirm your identity before making changes to Personal Information we may hold about you. We would appreciate it if you would take the necessary steps to keep your Personal Information accurate and up to date by notifying us of any changes we need to be aware of.

**Definition of Personal Information.**

According to the POPI Act “Personal Information” means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person. The POPI Act, which has more specific examples if you need them, can be found at the following link: [www.gov.za/documents/download.php?f=204368](http://www.gov.za/documents/download.php?f=204368)

**Changes to this notice.**

Please note that we may amend this notice from time to time. Please check our website periodically to inform yourself of any changes.

**How to contact us.**

If you have any queries about this notice or believe we have not adhered to it, or need further information about our privacy practices or wish to give or withdraw consent, exercise preferences or access or correct your personal information, please contact us at the numbers/addresses listed on our website [www.lavitaguesthouse.co.za](http://www.lavitaguesthouse.co.za).

**APPENDIX B: LAVITA DREAMS GUESTHOUSE POLICY  
FOR OBTAINING CONSENT FROM CUSTOMERS / MEMBERS**

La Vita Dreams Guesthouse collects personal information from when you check in and get your room keys. We will only use this information to inform you of specials and/or to wish you a happy birthday. We will protect your personal information in accordance with our Customer Privacy Notice and the provisions of the Protection of Personal Information Act, 2013 (South Africa). If you agree, we will use your information to send marketing information to you.

La Vita Dreams Guesthouse will not share your personal information with external companies.

Personal information will be protected in accordance with the conditions contained in Protection of Personal Information Act, No 4 2013 (South Africa).



### **APPENDIX C: LA VITA DREAMS GUESTHOUSE POLICY FOR CONDITION FOR SPECIFIC PURPOSE**

La Vita Dreams Guesthouse will only collect personal information from you when the purpose for collection been explicitly defined and agreed. We undertake to ensure that as the data subject, you are aware of the purpose for collecting your personal information.

### **APPENDIX D: LA VITA DREAMS GUESTHOUSE POLICY FOR ENSURING INFORMATION QUALITY**

La Vita Dreams Guesthouse will take reasonable steps to ensure that information is complete, accurate, not misleading and, where necessary, updated.

La Vita Dreams Guesthouse will ensure that appropriate information security measures are established to ensure that personal information is protected in line with industry practices and standards.

### **APPENDIX E: LA VITA DREAMS GUESTHOUSE CONSENT NOTICE FOR NOTIFICATION TO DATA SUBJECT (POLICY)**

La Vita Dreams Guesthouse will ensure that you, as the data subject, are made aware of information being collected. If the data has not been collected directly from the data subject, the source of collection will be provided together with name and address of the party. The purpose of collection will be provided.

Information relating to the following will also be provided where relevant:

- Whether the supply of information by the data subject is voluntary or mandatory.
- The consequences of failing to provide information.
- The legislation requiring the collection of information.