

Merdjan Health Spas t/a Camelot Spa Privacy Notice

Introduction:

Merdjan Health Spas t/a Camelot Spa respects privacy and is committed to protecting the privacy of our clients and employees on our online platforms. Camelot Spa seeks to employ best practice when it comes to the collection and processing of personal information in accordance with data protection or privacy legislation.

Who we are:

Camelot Spa is a provider of spa and wellness services.

The type of personal information we collect:

We currently collect and process the following information:

We may process different kinds of personal data about you which we have grouped together as follows:

- **_Identity Data**, which includes information concerning your name, username or similar identifier, marital status, age, date of birth, gender, identity number, medical information.
- **_Contact Data**, which includes billing addresses, delivery addresses, email addresses and telephone numbers.
- **_Financial Data**, which may include bank account and payment card details.
- **_Transaction Data**, which includes details about payments to and from you.
- **_Service Data**, which includes information concerning your interactions with Camelot Spa.
- **_Security Data**, which may include records of your access to our facilities.
- **_Technical Data**, which includes your internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access the Website.
- **_Usage Data**, which includes information about how you use our website, products and services; and
- **_Marketing and Communications Data**, which includes your preferences in receiving marketing from us and your communication preferences, You may opt out of receiving direct marketing communications from us at any time by requesting us (in the manner set out in the communication or by contacting us at the contact details set out in this document) to desist from initiating any direct marketing to you.

If any information you provide us contains the processing of personal information of a minor, this processing of personal information may only be carried out with the prior consent of the competent person such as a parent or legal guardian, unless lawful basis exists allowing us to process such information without the aforementioned consent.

How we get the personal information and what we use is for:

Most of the personal information we process is provided to us directly by you for one of the following reasons:

- We may require you to submit certain information in order for you to access certain portions of our website and to enable us to provide certain services to you (e.g., providing further requested information, applying for a vacancy, enrolling in a course, requesting a prospectus etc.) or to conclude an agreement with us, or to fulfil our statutory obligations. We also collect information directly from you when you communicate directly with us, for example via email, telephone calls, feedback forms and site comments.
- If you contact us, we may keep a record of that correspondence. The information we may actively collect from you may include any of the information listed in section 2 of this Privacy Notice.

We also receive personal information indirectly, from the following sources in the following scenarios:

- We passively collect some of your personal information from devices that you use to access and navigate through our website or to access any network administered by Camelot Spa (each an "Access Device"), using various technological means. The information which we passively collect from your Access Device may include your Identity Data, Contact Data, Security Data, Technical Data, Usage Data, Marketing and Communications Data, and any other information which you permit us, from time to time, to passively collect from your Access Device.

We use the information that you have given us in order to:

- provide our services to you;
- administer our education courses;
- comply with our statutory obligations, as well as interacting with regulatory authorities;
- conduct Camelot Spa's recruitment exercises, including the capturing of a job applicant's details and the providing of status updates to such a job applicant.
- retain and make information available to you on the website;
- to provide you with marketing that is relevant to you, or to direct information concerning Camelot Spa;
- maintain and update our student, or potential student databases;
- to protect our rights in any litigation;
- communicate with you and keep a record of our communications with you and your communications with us;
- understand and analyze how you use our website;

- for any other purposes relevant to our business activities, provided they are lawful.

Demographical and statistical information about user behavior may be collected and used to analyse the popularity and effectiveness of Camelot Spa's websites. Any disclosure of this information will be in aggregated and anonymized form and will not identify individual users.

We may share this information with:

- Camelot Spa will restrict its processing of your Personal Information to the original purposes for which it was collected, unless Camelot Spa reasonably considers that it is required to be processed for another purpose and that purpose is compatible with the original purpose. If you would like us to explain how the further processing for the new purpose is compatible with the original purpose, please contact us.

When will we process your personal information:

In terms of the Protection of Personal Information Act (POPIA), the justification ground which we base our processing on consist out of the following:

- The data subject or a competent person where the data subject is a child **consents** to the processing. Kindly note that you have the right to withdraw your consent;
- The processing is **necessary** to carry out actions for the conclusion or performance of a contract to which the data subject is a party;
- The processing complies with an **obligation** imposed by law on the business;
- The processing protects a **legitimate** interest of the data subject;
- The processing is necessary for the proper performance of a **public law** duty by the business;

Or

- The processing is necessary for pursuing the legitimate **interests** of the business or of a third party to whom the information is supplied.

How we store your personal information:

Your information is securely stored:

We keep your information only as long as required or for a period of five (5) years or as per our Data Retention Policy where legally required.

We will then dispose of your information by shredding or data disposal or as per our Data Destruction Policy .

Your data protection rights:

- You are entitled to access your personal data by sending a written request to info@camelotspa.co.za. We may charge you a fee for this service.
- You may also request Camelot Spa to correct or supplement any of your personal data which Camelot International will undertake as soon as practicable.
- Request the destruction of your personal data. Camelot Spa will consider your request in light of any other laws or regulations prohibiting Camelot Spa from destroying your personal data.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us if you wish to make a request.

Contact details:

Name: Debbie Merdjan

Address: 7 11th Avenue, Houghton, Johannesburg, South Africa, 2198

Phone Number: +2711 880 3850

E-mail: info@camelotspa.co.za

How to complain:

If you have any concerns about our use of your personal information, you can make a complaint to us at info@camelotspa.co.za.

You can also complain to the Information Regulator if you are unhappy with how we have used your Information.

Their contact details are as follows:

The Information Regulator (South Africa)

33 Hoofd Street
Forum III, 3rd Floor Braampark
P.O Box 31533
Braamfontein, Johannesburg, 2017

Complaints email: complaints.IR@justice.gov.za