



MANHATTAN HOTEL

Pretoria

redefining the art of hospitality

MANHATTAN HOTEL PRIVACY POLICY

Definitions

CIPC	Companies and Intellectual Properties Commission where Manhattan Hotel is registered in terms of the Companies Act
Cookies	Data sent by an Internet server to a browser, which is returned by the browser each time it subsequently accesses the same server, used to identify the user or track their access to the server
CCTV	Closed Circuit Television
Data	An unorganized collection of raw facts, without meaning in its raw form
Data Subject	The person / organization to whom / to which personal information relates
Deputy Information Officer	The person in the organization on whom operational duties have been conferred – at Director level for each wholly owned subsidiary
Information	Data that has been organized and / or structured to have meaning
Information Officer	The person in the organization with direct oversight of data and information processing
ISP	Internet Service Provider
PAIA	Promotion of Access to Information Act 2 of 2002
POPI	Protection of Personal Information Act 4 of 2013
Privacy Custodians	At Heads-of-Division level / Team Leader level
Pronouns “we”, “us” and “our” used in this policy	Refers to the organization in its entirety – all employees
Touchpoints	All connection points between Manhattan Hotel and data subjects

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Privacy Policy

1 Policy Statement

- Manhattan Hotel Pty Ltd is a private company registered with the CIPC, providing Accommodation, Conference and Spa services.
- We recognise the statutory requirement to comply with access to information and data privacy laws in South Africa – POPI and PAIA, and relevant statute in other countries where we may fulfil business requirements.
- The organisation recognises the legal, ethical, and moral imperatives in processing information, and we are committed to protecting the rights of guests, clients, vendors, and employees, insofar as such rights relate to data gathering and information processing.
- Our behaviour and actions related to data privacy and data security will reflect adherence to relevant laws, and policies.

2 Policy Purpose

The purpose of this policy is to:

- Provide guidance to employees on how to maintain the required level of compliance with relevant privacy laws in South Africa and inform stakeholders of our commitment to data privacy.
- Indicate how we will exercise proper management of data gathering and information processing.
- State our awareness of laws and regulations related to data privacy.
- Provide a true reflection of our adherence to data privacy policies provided by the Department of Justice, whilst operating within the scope of our business operations.
- Ensure that training on data privacy is provided to all employees.

3 Why we use data

- The organisation receives and processes data from several sources to maintain quality standards, to ensure consistency in its processes, and to remain compliant with statute, as permissible by law for our business sector.
- The organisation receives, gathers, and processes employee, guest, and supplier data from internal and external sources for a variety of reasons, specifically to ensure that the organisation adheres to provisions in contracts and agreements with stakeholders.

4 Application of Policy

- This policy applies to all employees at Manhattan, to any person and entity purchasing goods and services from the company, all stakeholders who engage and communicate with us, and all visitors to our website.

4.1 Sources of Data

- In the processes of our business, we have certain touchpoints relating to our business with guests, suppliers, and employees. We process personal data through every one of these touchpoints, including:
 - Our website (anonymous visitor data, cookies and personal information that might be given on online booking systems)
 - Daily correspondence (e-mails, calendar invitations, info relating to bookings, staff profiles)
 - Contracts (including client, supplier, vendor and employee and third-party data)

- Data from the Manhattan Hotel's property management system.

Some of this information may contain data that might identify you as an individual or relate to you as an identifiable individual:

- Name & Surname
- Gender
- Postal & Physical address -
- Telephone number
- Email address
- Credit and Debit card info as allowed by law or other payment data.
- Date of Birth
- Nationality, passport, visa, or other government-issued identification data
- Important dates: birthdays, anniversaries, and special occasions
- Membership or loyalty program data
- Employer details
- Travel itinerary, tour group, or activity data
- Prior guest stays or interactions, goods and services purchased, special service and amenity requests.
- Social media account ID, profile photo and other data publicly available, or data made available by linking your social media and loyalty accounts.

In more limited circumstances, we may also collect:

- Data about family members and companions, names, and ages of children
- Biometric data
- Financial information
- Images and video and audio data via, security cameras located in public areas, such as hallways and lobbies, in our property.
- We may also collect information about your **Preferences** that we use to make your current and future stays and experience with us more enjoyable,
- Information about your interests and other relevant information about you that we learn about when you fill out our client info cards, guest questionnaires or quote request. This may also include any likes and dislikes about our services that you tell us about so that we can improve our services, and specific dietary or health restrictions to ensure your wellbeing.
- We may also collect your "**Personal Preferences**," that may include details of your special anniversaries (such as your birthday or wedding anniversary), what type of activities you prefer to take part in when staying with us and your hobbies, should you wish to provide that.
- If any Personal Data about other people are submitted to us or our Service Providers (e.g., if a reservation is made by travel bookers or travel agents for another individual or groups), you or your entity represent that you have the authority to do so and you permit us to use the data in accordance with this Privacy Statement.
- We will only use and share your information with companies who have appropriate safeguards in place to protect your data.

4.2 Cookies

- **Cookies.** We collect certain data from cookies, which are pieces of data stored directly on the computer or mobile device that you are using. Cookies allow us to collect browser type, time spent on the Online Services, pages visited, referring URL, language preferences

and other aggregated traffic data. We use functional cookies to obtain the data for security purposes, to facilitate navigation, to display content more effectively, to collect statistical data, to personalize your experience while using the Online Services and to recognize your computer to assist your use of the Online Services. We also gather statistical cookie data about use of the Online Services to continually improve design and functionality, understand how they are used and assist us with resolving questions. Advertising cookies further allow us to select which advertisements or offers are most likely to appeal to you and display them while you are using the Online Services. We also use them to send marketing emails and to track responses to online advertisements and marketing emails, with your permission.

➤ Third Party Advertising:

- We may use third-party advertising companies to serve advertisements regarding goods and services that may interest you when you access and use the Online Services, other websites, or online services. To serve such advertisements, these companies place or recognize a unique cookie on your browser (including through use of pixel tags)
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5. How We Manage Security of Data

- Employees at our organisation process and store data whilst they work on their laptops, with data undergoing a back-up procedure daily.
- Data that has been backed up is stored on a NAS external drive, on a separate location from our on-site server room, for which a contract is in place with Ukuvuma Solutions (Pty) Ltd for usage, and secure handling of our data is written into the vendor's terms and conditions.
- Vendors and suppliers must have Privacy Policies in place for us to consider doing business with them. Our confidentiality commitment at all touchpoints includes a statement indicating that we use data and information only for the agreed purpose.
- All laptops and storage devices are protected from illicit access with unique usernames and passwords.

5.1 At Internet Service Provider (ISP) Level is:

Hosted platform: our website: XNeelo

- SSL (Secure Socket Layer) Encryption.
- Automated daily backups.
- Core system and plugins regularly updated to keep sites protected.
- Strong Administrator passwords are enforced.

5.2 In our Financial Systems

- All data is being processed and saved digitally.
- Automated daily of -site backups are done.
- All devices are password-protected.
- Records with financial data and client data will be retained for a 7-year period.

5.3 In our Guest Booking System

- All data on clients and guests are processed and saved digitally.
- Automated off-site back-ups are done daily.

- All devices are password protected with restricted access to information.
- Marketing data will be kept for as long as the consent is not withdrawn.

5.4 Security system and CCTV

- The Manhattan Hotel operates a digital access control system, used upon entry to the premises, recording your vehicle and driver's license details.
- All information is processed and saved digitally.
- All access control information is cloud based and protected.
- The Manhattan operates a multi camera, multi-screen, digital CCTV system.
- Cameras are only placed where they do not intrude on any person's privacy.
- All CCTV footage will be kept for a period of maximum 1 month, after which time it will self-delete.
- Any footage that has been saved for investigation, is deleted once the case is completed.

6 Conditions for Gathering & Processing Data

We recognise the eight conditions under the Act that allow for lawful processing of data, and we openly state the following approach to each condition.

Condition	Our Approach
Accountability	We will ensure that we appoint an IO and a DIO, and we commit to total compliance with privacy laws
Processing limitation	Any data received by us will be used in a lawful and ethical manner
Purpose specification	We commit to using data and identifiable information solely for the original purpose for which consent was received
Use limitation	We will ask for your consent if we want to further process your data
Information quality	The data we obtain and the information we process will be accurately maintained
Openness	We are committed to ensuring that we tell you when we collect data, and we will ask for your consent before your data is used
Security safeguards	Our internal systems and process will be maintained in a manner that minimizes breach or unlawful access
Individual participation	We will develop, maintain, and provide a PAIA manual to ensure that data subjects know how to request information from us; that they know how to correct their information held by us, and that they know how to ask for their records to be deleted

6.1 Accessing & Processing Data

- We will not access your data without asking for your permission.
- We will not ask for data that cannot be directly connected with a specific purpose.
- We will never use your data for an unlawful purpose.
- We will not process data for any purpose other than the original intent for which permission was obtained.

- We will never sell your data to any person nor to any organisation.

6.2 Transferring Data

- We will never transfer your data to any entity or person who is not involved in the transaction for which you engaged our services.
- We will never transfer your data to a third party in another country unless it is for the purpose of meeting a legal obligation inherent to and relating to the purpose of the original request.
- We will always take cognisance of data privacy laws in other countries, when we deal with employees, guests, and suppliers in other countries.
- We may share your information with systems allow us to fulfil your reservation, such as sending out confirmation, guest questionnaires, and transferring your booking details from the online travel booking system on the Manhattan Hotel's property management system.

7 Audit and Review

- We undertake to conduct regular audits of our information compliance framework, and to review related processes at least once per year.

8 Information Officer

- The Information Officer (IO) has the legal mandated authority to appoint persons to take care of day-to-day matters pertaining to data privacy for the organisation.
- Accountability for data privacy in the group lies with the IO.
- The following roles have been designated in the context of information privacy:
- IO – authority to manage the organisation's compliance framework.
- Deputy Information Officer – mentor and coach all employees on data privacy.
- Privacy Custodians - at Team Leader level and responsible for ensuring that operational processes exist, to support policy.
- The organisation will ensure that the IO and DIO are registered with the Information Regulator of South Africa.

9 Requests for Information

- We will provide a PAIA Manual and related forms for data subjects to request information.

10 Employee Awareness and Training

- The IO is accountable to authorities for the existence of a training and awareness programme.
- The Deputy IO is mandated to ensure that a training and awareness programme exists for all employees (future and incumbent).
- Privacy Custodians have authority and responsibility for implementing training and awareness programmes, and for maintaining records of such training for all employees (future and incumbent)

11 Compliance Framework

- Our approach to data privacy is indicated in our Compliance Framework, Figure 1.

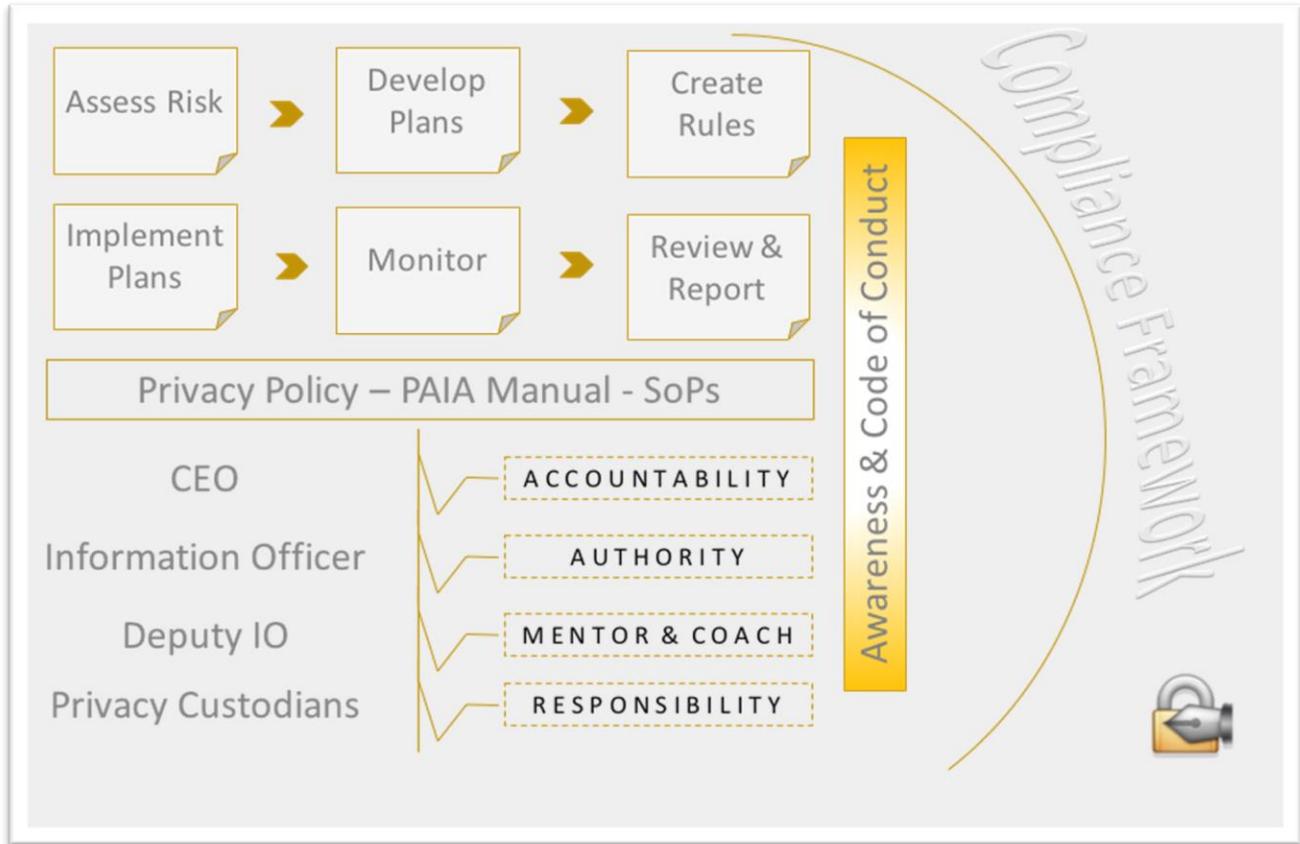


Figure 1 – Manhattan Hotel Pty Ltd POPI Compliance Framework

12 Risk Management

Due to the nature of our business, information is gathered in various forms, via different channels. It is also handled by various departments for a variety of reasons.

To identify risks to data management, we will:

- Regularly conduct proper assessments of information management and processing in every department that handles and processes information.
- Training on correct data processing will be provided continuously by the IO and DIO.
- Apply the fundamental principles in this policy.

12.1 Breach Notification

- In the event of a breach, which may result in a risk to the rights of data subjects, we will within 72-hours inform data subjects and relevant supervisory authorities.

The breach notification will outline the following information:

- The nature of the breach.

- The name and contact details of Manhattan Hotel's IO and DIO
- The proposed measures to be taken to deal with the data breach.

These actions are reviewed on a regular basis as part of the management process concerned with data protection.

13. Employees

The Company requires the informed permission from employees to process his/her Personal Information.

Type of Information:

Curriculum Vitae, ID, academic transcripts, and related information required by the company for purposes of employment to ensure legal compliance and to complete business processes.

Nature/category of Information:

Personal information for employment and employment related matters.

Purpose:

Required for purposes of employment in terms of legislation. All Personal Information which the subject provides to Manhattan Hotel will only be used for the purposes for which it is collected.

Source:

From the employee (data subject) directly.

Processing information:

By providing us with personal information, the employee expressly consents to Manhattan processing personal information for legitimate and employment related purposes.

14 Laws and Regulations Related to this Policy

- The Constitution of the Republic of South Africa 1996
- The Promotion of Access to Information Act 2 of 2000
- The Promotion of Access to Information Act 2 of 2000 Regulations 2002
- The Promotion of Access to Information Act 2 of 2000 Amended Regulations 2007
- The Protection of Personal Information Act 4 of 2013
- The Protection of Personal Information Act 4 of 2013: Information Regulator: Regulations relating to the protection of personal information, 2018

15 Updates to Policy

- Updates to this policy are noted in the "document administration" section of this policy, with new versions of the policy made available on our website. Stakeholders may also request a copy of the policy by communicating directly with the designated Information Officer, or Deputy Information Officer.

- Document Administration

Compiler:	Anchen Lindeque and Willie van der Wal
Date of original compilation:	June 2021
Approved by: The Chief Executive Officer	Mr. Nico Rowan 

16 Document Revision

Date Revised	Rev #	Description of Revision	Revision by

17 Record Keeping

1. This policy and all related documentation must be stored according to the organisation's document management policies.
2. Access to be granted only to personnel who have the authority to work with such documentation, in the normal course of performing their daily tasks.

End of Document