



RE: PROTECTION OF PERSONAL INFORMATION POLICY (POPIA)

1. PURPOSE

- 1.1. The purpose of this Policy is to ensure that Andri Tiran Tennis Academy("ATTA") processes personal information lawfully, responsibly, and in accordance with the Protection of Personal Information Act ("POPIA").
- 1.2. ATTA is committed to protecting the privacy, confidentiality, and integrity of personal information entrusted to it by clients, Members, contractors, suppliers, and other stakeholders.

2. SCOPE

2.1. This Policy applies to:

- Directors
- Members
- Contractors
- Consultants
- Temporary staff
- Service providers acting on behalf of ATTA

The Policy applies to all personal information processed by ATTA, whether in physical or electronic format.

3. DEFINITIONS

3.1. Data Subject:

- 3.1.1. The individual or juristic person whom the personal information relates to

3.2. Processing:

3.2.1. Any operation involving personal information including:

- Collection
- Storage
- Recording
- Updating
- Sharing
- Destruction

3.3. Personal information

3.3.1. Information relating to an identifiable living natural person or existing juristic person, including but not limited to:

- Names
- Identity numbers
- Contact details
- Employment information
- Financial information
- Correspondence
- Opinions and evaluations

4. PRINCIPLES OF PROCESSING

4.1. Accountability – ATTA accepts responsibility for compliance with POPIA

4.2. Lawfulness - Information shall only be processed where there is a lawful basis

4.3. Specific Purpose – Information shall only be collected for a legitimate purpose



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- 4.4. Limitations – Only information required for the intended purpose shall be collected
- 4.5. Accuracy – Reasonable steps shall be taken to ensure information is accurate and up to date
- 4.6. Security – Appropriate safeguards shall be implemented
- 4.7. Transparency – Data subjects shall be informed regarding the processing of their personal information

5. PERSONAL INFORMATION PROCESSED

5.1. Member Information

- Names
- Identity numbers
- Contact details
- Employment records
- Disciplinary documentation
- Memberships
- Financial information and academy administration information

6. PURPOSES FOR PROCESSING:

6.1. Your information will be used for among other things:

- To process your information in order to integrate you into the academy for the purposes of providing and communicating tennis lessons and related activities.
- To communicate with you about your tennis related activities, news, events or tournaments including adding you on a WhatsApp group.
- To process payments
- To manage your tennis schedule with the coach
- To ensure the safety and security of our members and property through CCTV surveillance.



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- To promote the Academy on our website, social media, and other marketing materials (with consent where required)

7. LAWFUL BASIS FOR PROCESSING

7.1. Personal information may be processed where:

- Consent has been obtained;
- Processing is necessary to perform a contract;
- Processing is required by law;
- Processing protects a legitimate interest of the data subject;
- Processing protects ATTA legitimate business interests.

8. DISCLOSURE OF PERSONAL INFORMATION

8.1. Disclosure shall be limited to what is reasonably necessary.

8.2. ATTA may disclose information to:

- Courts, CCMA, Bargaining Councils
- Tennis South Africa, Tswane Tennis Federation
- Coaches
- Government departments
- Professional advisors
- Auditors
- IT service providers
- External consultants
- SARS

9. INFORMATION SECURITY



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9.1. Members shall not share passwords or grant unauthorised access to company information.

9.2. ATTA shall implement reasonable technical and organisational measures including:

- Password protection
- Multi-factor authentication
- Anti-virus protection
- Secure cloud storage
- Access controls
- Physical security measures
- Secure disposal of information

10. RETENTION OF INFORMATION

10.1. Personal information shall be retained only for as long as:

- Required by law;
- Required for business purposes;
- Necessary to resolve disputes.

Where information is no longer required, it shall be securely destroyed.

11. RIGHTS OF DATA SUBJECTS

11.1. Data subjects have the right to:

- Access their personal information;
- Request correction of information;
- Request deletion where legally permissible;
- Object to processing;
- Withdraw consent where processing is based on consent;



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- Lodge complaints with the Information Regulator.

12. DATA BREACHES

12.1. Anyone who becomes aware of any data breach must report it to the information officer

12.2. Examples include but is not limited to:

- Lost devices;
- Incorrect emails sent to third parties;
- Unauthorised access;
- Hacking incidents;
- Disclosure of confidential information.

12.3. An investigation will be done in accordance with the company's procedures herein.

13. INFORMATION OFFICER

13.1. Andri Tiran – Director(andri.tiran@gmail.com)

13.2. Responsible for:

- Monitoring POPIA compliance;
- Managing requests from data subjects;
- Conducting awareness training;
- Maintaining compliance documentation;
- Liaising with the Information Regulator.

14. ACADEMY RESPONSIBILITIES

14.1. The academy shall::

- Protect confidential information;
- Follow security procedures;
- Report incidents immediately;
- Process information only for authorised purposes;
- Attend POPIA training where required.

Failure to comply with the above may result in disciplinary action

15 MINOR CHILDREN

Where Andri Tiran Tennis Academy processes personal information relating to a child under the age of 18 years, the Academy will take reasonable steps to ensure that such information is processed lawfully and in the best interests of the child.

Where required by law, the Academy will obtain the consent or authorisation of the child's parent or lawful guardian before collecting, using or disclosing the child's personal information.

Personal information relating to children will only be collected and processed for legitimate Academy purposes, including membership administration, tennis activities, tournaments, coaching, communication with parents or guardians, safety and security, and participation in Academy events.

The Academy will take reasonable steps to limit access to children's personal information to persons who require such information for authorised Academy purposes.

Photographs or videos of children taken at Academy activities, tournaments or events will not be used for public or promotional purposes where consent is required unless the necessary consent has been obtained from the child's parent or lawful guardian.

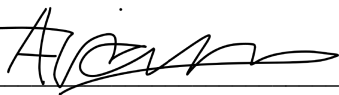
Parents or lawful guardians may contact the Information Officer regarding any questions, requests or concerns relating to the processing of their child's personal information.



16. POLICY REVIEW

16.1. This Policy shall be reviewed annually or whenever legislative changes require amendment.

Signed and approved on this 01 day of October 2026

A handwritten signature in black ink, appearing to read 'A. Tiran', is written over a horizontal line.

A Tiran