

PRIVACY POLICY

C2R Cycling Development (Pty) Ltd ("C2R" "we", "us", "our") respects your privacy and is committed to protecting your Personal Information and complying with applicable data protection and privacy laws. This policy ("Policy") will inform you as to how we process your Personal Information and tell you about your privacy rights and how the law protects you (as Data Subject).

It is important that you read this Policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing Personal Information about you so that you are fully aware of how and why we are using your information.

By submitting Personal Information to C2R's, it will be seen as your consent to us to process the Personal Information. Reference to "consent", "your consent" or "your explicit consent" shall include the ticking of a tick box or clicking on a "Submit", "subscribe" or "I agree" or "Send" button on our site(s).

1) IMPORTANT INFORMATION AND WHO WE ARE

a) Purpose of this Policy

- i) This Policy aims to give you information on how C2R Cycling Development (Pty) Ltd collects and processes your Personal Information through your use of C2R coaching services, including any information you may provide us with.
- ii) It is important that you read this Policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing Personal Information about you so that you are fully aware of how and why we are using your data. This Policy supplements other notices and privacy policies and is not intended to override them.

b) Responsible Party

- i) C2R is the Responsible Party when engaging with you as a potential participant, member or user of C2R's website (<https://www.cycle2ride.co.za/>) and other social media sites ("Sites") or other communication channels and responsible for your Personal Information.
- ii) The registration of participants, processing of participant entry information for C2R's MTB Festivals will be coordinated by an independent third party, DirtPass on the website <https://www.dirtpass.co.za/register>. Submission of your personal information on <https://www.dirtpass.co.za/register> for registration for C2R's MTB Festivals will be dealt with as per DirtPass' privacy policy and subject to the Operators Agreement between Us and DirtPass.
- iii) In certain circumstances DirtPass may act as an Operator on behalf of C2R which shall act as Responsible Party. DirtPass may also be considered a joint responsible party in processing your (a participant's) personal information.

c) Contact details

- i) We have appointed an Information Officer (IO) who is responsible for overseeing questions in relation to this Privacy Policy. If you have any questions about this Policy, including requests, or our privacy practices, please contact our Information Officer on the contact details below:
 - (1) Full name of legal entity: C2R Cycling Development (Pty) Ltd
 - (2) Information Officer: Jaco Kotzé
 - (3) Email address: info@cycle2ride.co.za
 - (4) Other Contact details: as per our website ([click here](#) to communicate via our website) or telephone at 087 284 6994

d) Registered address: Changes to the Privacy Policy and your duty to inform us of changes

- i) We keep our Privacy Policy under regular review. This version was last updated as per the date in the footer. Archived versions (if available) can be obtained by contacting us. Any changes made to our Privacy Policy in future will be posted on [our website](#) or made available during your engagement with C2R. The new version will apply the moment it is published on our website or incorporated by reference in any communication.
- ii) **It is important that the Personal Information we hold about you is accurate and current. Please keep us informed if your Personal Information changes during your relationship with us.**

e) **Integration into other websites:** In terms of our website or events with references to other third party service providers - This Privacy Policy applies to our website(s) and other engagements with you. We do not exercise control over third party websites that provide services or products to C2R as part of their own offering. These other sites may place their own cookies or other files on your computer, collect data or solicit Personal Information from you. We cannot be held responsible for any wrongful handling of end users' information by other sites.

f) **Third-Party Links:** Our Sites may include links to Third-Party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. If you disclose your Personal Information to a Third-Party, such as an entity that operates a website linked to this our website or social media sites, **C2R SHALL NOT BE LIABLE FOR ANY LOSS OR DAMAGE, HOWSOEVER ARISING, SUFFERED BY YOU AS A RESULT OF THE DISCLOSURE OF SUCH INFORMATION TO THE THIRD-PARTY.** This is because we do not regulate or control how that Third-Party uses your Personal Information. You should always ensure that you read the privacy policy of any Third-Party. When you leave our website, we encourage you to read the privacy policy of every website you visit.

2) THE DATA WE COLLECT ABOUT YOU

a) **Personal Information means the information as per the Definitions. It does not include data where the identity has been removed (anonymous data).**

b) We may Process different kinds of Personal Information about you when we engage with you, which we have grouped together as follows:

- i) **Identity Data** includes first name, last name, age, nationality, job title, date of birth and gender.
- ii) **Contact Data** includes billing address, physical address, email address and telephone numbers.
- iii) **Financial Data** includes banking details and/or payment card details and credit information.
- iv) **Special Personal Information** includes religious, biometric and health information.
- v) **Transaction Data** includes details about payments to and from you and other details of Products you have accessed on our website.

PRIVACY POLICY

- vi) **Technical Data** includes internet protocol (IP) address, your login data, 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 this website.
- i) **Usage Data** includes information about how you use our website and/or products. This information shall include the full Uniform Resource Locators (URL) Clickstream to, through and from our website (including the date and time) and the products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs) and methods used to browse away from the page and any phone number used to call us, service transaction instructions from and to you via our APIs.
- ii) **Marketing and Communications Data** includes your preferences in receiving marketing from us and our Third parties and your communication preferences.
- c) We also collect, use and share **aggregated data** and **pattern data** such as (but not limited to) statistical or demographic data and/or product transactional data for any purpose. Aggregated data or pattern data could be derived from your Personal Information but is not considered Personal Information in law as this data will not directly or indirectly reveal your (the data subject's) identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature or executing a specific transaction type (where applicable). However, if we combine or connect aggregated data or pattern data with your Personal Information so that it can directly or indirectly identify you, we will treat the combined data as Personal Information which will be used in accordance with this Privacy Policy.
- d) You may choose to provide additional Personal Information to us, in which event you agree to provide accurate and current information, and not to impersonate or misrepresent any person or entity or falsely state or otherwise misrepresent your affiliation with anyone or anything.
- e) We do not collect any **Special Personal Information** about you. In the event we do process Special Personal Information about you, we will process this Special Personal Information in accordance with this privacy policy.
- f) **Children Information (Children Data):** we will Process Personal Information of Children subject to i) Consent from a Competent Person, ii) necessary for the establishment, exercise or defence of a right or obligation in law and iii) in emergencies (after we have tried to contact the Competent Person) for e.g. a medical emergency, from a responsible person associated with the Child or from the Child directly.
- g) **Submission of Personal Information on behalf of another:** If you provide information on behalf of someone else, then it is your responsibility to obtain the necessary consent from the person before making the Personal Information available to us. On receipt of Personal Information, we assume that the necessary consent has been obtained and will process the Personal Information as per your instructions. By submitting such Personal Information on behalf of another person, you indemnify us against any Third-Party claim, where such Third-Party claim relates to Personal Information that has been processed without the necessary consent or other available exception allowed by law.
- h) **If you fail to provide Personal Information:** Where we need to collect Personal Information by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with products (including products for no charge)). In this case, we may have to cancel a product order you have with us, but we will notify you if this is the case at the time.

3) HOW IS PERSONAL INFORMATION COLLECTED?

We use different methods to collect data from and about you including through:

- a) **Direct interactions.** You may directly provide us with your Personal Information when you:-
 - i) subscribe to our newsletter or blog (if any);
 - ii) register yourself or child for coaching services;
 - iii) access any of our facilities/premises/ race or event venues;
 - iv) attend any of our cycling events, activities, races, or coaching;
 - v) purchase any entry to C2R's events;
 - vi) purchase merchandise from C2R's website;
 - vii) enter a competition or promotion conducted by C2R;
 - viii) contact us via email, telephone, WhatsApp or our Sites;
 - ix) engage with us via Zoom, Skype or any other Video conferencing facility;
 - x) sign up for any of our Services / download our Software (subject to the Service terms and conditions / License);
 - xi) request marketing material from us;
 - xii) give us feedback; or
 - xiii) contact us via our contact form, WhatsApp or other social media sites messaging platforms we may subscribe to.
- b) **Automated technologies or interactions.** As you interact with our us or [our website](#), we will automatically collect Technical Data about your equipment, browsing actions, patterns and device(s). We collect this Personal Information by using cookies (see section 4) below), server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies.
- c) **Third parties or publicly available sources.** We will receive Personal Information about you from various third parties and public sources as set out below:
 - i) Contact, Financial and Transaction Data from providers of technical, payment and delivery services.
 - ii) Identity and Contact Data from data brokers or aggregators.
 - iii) Identity and Contact Data from publicly available sources such as Company and Intellectual Property Commission (CIPC).

PRIVACY POLICY

4) COOKIES

- a) Our website makes use of cookies to help us understand our users better. Cookies are small pieces of information sent by an organisation to your computer and stored on your hard drive to allow that website to recognise you when you visit. Cookies do not harm your computer or any files on your computer. Depending on the type of cookie we use, cookies also allow us to make our websites more user friendly.
- b) To see our Cookies policy – [click here](#)

5) HOW WE USE YOUR PERSONAL INFORMATION

- a) We will not sell your Personal Information. We will only use Personal Information within the framework of the law. Most commonly, we will use Personal Information in the following circumstances:
 - i) where you have given us your consent; or
 - ii) where we need to perform the contract, we are about to enter into or have entered into with you; or
 - iii) where it is necessary for the protection of the Data Subject's legitimate interest; or
 - iv) where it is necessary for our legitimate interests (or those of a Third-Party) and your interests and fundamental rights do not override those interests; or
 - v) where you need to comply with a legal obligation.
- b) **Purposes for which we will use Personal Information:**
 - i) We have set out in the table below a description of all the ways we plan to use Personal Information, and which of the legal basis we rely on to do so. We have also identified what our legitimate interests are where appropriate.
 - ii) Note that we may process Personal Information for more than one lawful ground depending on the specific purpose for which we are using the data. Please contact us if you need details about the specific legal ground we are relying on to process your Personal Information where more than one ground has been set out in the table below.
- c) C2R only shares Personal Information with other companies or individuals outside of C2R in the following circumstances:
 - i) We have your consent. We may require informed consent for the sharing of any Special Personal Information from the Data Subject and/or the parent/legal guardian (where applicable).
 - ii) We may provide such information to affiliates in the C2R- group of companies, to collaborating companies or other trusted businesses or persons for the purpose of processing Personal Information on our behalf. We require that these parties agree to process such information based on our instructions and in compliance with this Privacy Policy and any other appropriate confidentiality and security measures.
 - iii) We have a good faith belief that access, use, preservation or disclosure of such information is reasonably necessary to:
 - satisfy any applicable law, regulation, legal process or enforceable governmental request;
 - enforce applicable Terms of Use, including investigation of potential violations thereof;
 - detect, prevent, or otherwise address fraud, security or technical issues; or
 - iv) **protect against imminent harm to the rights, property or safety of C2R, users of this website or the public as required or permitted by law.**

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To sign you up for our newsletter (if any)	(a) Identity; and (b) Contact	Consent
More information about our services	(a) Identity; and (b) Contact	Potential customer of C2R: Consent Existing customer: automatically, unless otherwise selected by you
To register you as a member/participant for an event	(a) Identity; (b) Contact; and (c) Special Personal Information	Consent Performance of a contract with you

PRIVACY POLICY

<p>To process and assist with payment for Services executed or Products delivered to you:</p> <p>(a) Manage payments, fees and charges (b) Collect and recover money owed to us</p>	<p>(a) Identity; (b) Contact; (c) Financial; (d) Transaction; and (e) Marketing / Communications</p>	<p>(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)</p> <p>[TAKE NOTE: we do not store credit card information – we use third party service providers to execute transactions where you use your card. You should read their privacy policy].</p>
<p>To manage our relationship with you as customer:</p> <p>(a) To deliver the Services and/ or Products; (b) Notifying you about changes to our terms or privacy policy or Service/Product terms and conditions; (c) To reply to your submission via our “Contact-Us” page</p>	<p>(a) Identity; (b) Contact; and (c) Marketing / Communications</p>	<p>(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/ services)</p>
<p>To administer and protect our business, website and other electronic platforms (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity; (b) Contact; and (c) Technical</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation</p>
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<p>(a) Identity; (b) Contact; (c) Profile; (d) Usage; (e) Marketing / Communications; and (f) Technical</p>	<p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)</p>
<p>To use data analytics to improve our website, products/ services, marketing, customer relationships and experiences</p>	<p>(a) Technical; and (b) Usage</p>	<p>Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</p>
<p>To make suggestions and recommendations to you about Products or Services that may be of interest to you</p>	<p>(a) Identity; (b) Contact; (c) Technical; (d) Usage; (e) Profile; (f) Marketing / Communications</p>	<p>Necessary for our legitimate interests (to develop our products/ services and grow our business)</p>
<p>To ensure security at C2R events, races and premises</p>	<p>(a) Identity (b) Contact (c) Special Personal Information</p>	<p>(a) Consent (b) Performance of contract</p>

PRIVACY POLICY

To organise medical treatment for you	(a) Identity (b) Contact (c) Special Personal Information	(a) Consent (b) Performance of a contract with you (c) Necessary for legitimate interests of the data subject
To enable you to partake in a prize draw, competition, promotion or complete a survey (where available)	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/ services, to develop them and grow our business)
To make suggestions and recommendations to you about Services and/or Products that may be of interest to you, i.e. cycling related merchandise, events, activities and opportunities	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	(a) Existing customer: customer as per POPIA (b) Potential customer: Consent

PRIVACY POLICY

- d) **Marketing:** We strive to provide you with choices regarding certain Personal Information uses, particularly around marketing and advertising.
- i) **Promotional offers from us**
 - (1) **As a Customer/Client/ C2R race participant:**
 - (a) Once you **have** registered membership **or** entered into one of our events or made use of our website (browse wrap agreement) we will deal with you as a customer/client of C2R under POPIA.
 - (b) As a customer/client we may use your contact information to submit to you information/material of our other services that are related and that we feel may be of interest to you.
 - (c) **Important:** you may ask us on submission of your Identity, and contact information not to send you the abovementioned information. At any time subsequent to our initial engagement you can make use of the opting out options under 5)iii) below.
 - ii) **Third-party marketing**
 - (1) We will get your express opt-in consent before we share your Personal Information with any third-party for marketing purposes.
 - (2) **TAKE NOTE:** We may provide (without your consent) Third party marketing parties/ advertisers with anonymous aggregate information about our users (for example, we may inform them that 500 men aged under 30 have clicked on a specific product or advertisement on any given day). We may also use such aggregate information to help advertisers reach the kind of audience they want to target (for example, women in Gauteng). We may make use of the Personal Information we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience. **IMPORTANT: We do not disclose information about identifiable individuals to our advertisers**
 - iii) **Opting out**
 - (1) You can ask us or third-parties to stop sending you marketing messages at any time by using the unsubscribe function on our direct marketing communications or by contacting our Information Officer and requesting to opt-out of our marketing services.
 - (2) Where you opt out of receiving these marketing messages, this will not apply to Personal Information provided to us as a result of a product purchase or other transactions.
- e) **Change of purpose**
- i) We will only use your Personal Information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please [contact us](#).
 - ii) If we need to use your Personal Information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.
 - iii) Please note that we may process your Personal Information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

6) DISCLOSURES OF PERSONAL INFORMATION

- a) We may share Personal Information with the parties set out below for the purposes set out in the table above and C2R will only share your Personal Information with other companies or individuals outside of C2R in the following circumstances:
- i) Where we have your Consent.
 - ii) **Internal Third-Parties** as set out in the *Definitions*. Where we share your Personal Information to employees/volunteers of C2R race or coaches, if registered for such service. We ensure your Personal Information is protected by requiring all internal parties to follow this Policy or such similar policy when processing your Personal Information.
 - iii) **External Third-Parties** as set out in the *Definitions*.
 - iv) Third-Parties to whom we may choose to sell, transfer or merge all or parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your Personal Information in the same way as set out in this Privacy Policy.
- b) We require all Third-Parties to respect the security of your Personal Information and to treat it in accordance with the law. We do not allow our Third-Party service providers to use your Personal Information for their own purposes and only permit them to process your Personal Information for specified purposes and in accordance with our instructions.

7) DATA SECURITY

- a) We have put in place appropriate technological and organisational measures to prevent Personal Information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to Personal Information to those personnel, volunteers, agents, contractors and other third-parties who have a business need to know. They will only process Personal Information on our instructions, and they are subject to a duty of confidentiality.
- b) We have put in place procedures to deal with any suspected Personal Information breach and where required by law we will notify you and any applicable regulator of a breach where we are legally required to do so.

8) DATA RETENTION

How long will we use your Personal Information for?

- a) We will only retain your Personal Information for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your Personal Information for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect of our relationship with you.

PRIVACY POLICY

- b) To determine the appropriate retention period for Personal Information, we consider the amount, nature and sensitivity of the Personal Information, the potential risk of harm from unauthorised use or disclosure of your Personal Information, the purposes for which we process your Personal Information and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.
- c) In some circumstances, you can ask us to delete your data: see *your legal rights* in clause 11) below for further information.
- d) In some circumstances we will anonymise your Personal Information (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

9) RECORDS

We will keep detailed, accurate and up-to-date written records regarding any Processing of Personal Information it carries out, including but not limited to, the access, control and security of the Personal Information and approved subcontractors, the processing purposes, categories of processing, any transfers of Personal Information to a third country and related safeguards, the instructions as received from our customers and a general description of the technical and organisational security measures and retention and destruction of Personal Information.

10) SOCIAL MEDIA

- a) Our website(s) or services may, in certain circumstances, provide you with social plug-ins from various social media networks. If you choose to interact with a social network such as Instagram, Facebook, Twitter or YouTube (for example by registering an account or click on the links from our website), your activity on our website(s) will also be made available to that social network. This is necessary for the performance of your contract with us which allows you to interact with a social network. If you are logged in on one of these social networks during your visit to our website(s) or are interacting with one of the social plug-ins, the social network might add this information to your respective profile on this network based on your privacy settings. If you would like to prevent this type of information transfer, please log out of your social network account before you enter our website(s), or change the necessary privacy settings, where possible.
- b) Communication, engagement and actions taken through external social media networks that we participate in are custom to the terms and conditions as well as the privacy policies held with each social media platform respectively.
- c) You are advised to use social media networks wisely and communicate/engage with them with due care and caution in regard to their own privacy policies (if any). **PLEASE NOTE: WE WILL NEVER ASK FOR PERSONAL OR SENSITIVE INFORMATION THROUGH SOCIAL MEDIA NETWORKS AND ENCOURAGE USERS, WISHING TO DISCUSS SENSITIVE DETAILS OR TO RESOLVE ISSUES/ CONCERNS, TO CONTACT US THROUGH PRIMARY COMMUNICATION CHANNELS SUCH AS BY TELEPHONE OR EMAIL.**
- d) Our social media network page(s) may share web links to relevant web pages. By default, some social media platforms shorten lengthy URL's. You are advised to exercise caution and due care before clicking on any shortened URL's published on social media platforms by this website. Despite our best efforts to ensure that only genuine URL's are published, many social media platforms are prone to spam and hacking and therefore our website and its owners cannot be held liable for any damages or implications caused by visiting any shortened links.

11) YOUR LEGAL RIGHTS

- a) Under certain circumstances, you have the following rights under data protection laws in relation to your Personal Information:
 - i) **Request for Access:** Request access to Personal Information (commonly known as a "data subject access request"). There may be a fee associated with this request – see below 11)c). This enables you to receive a copy of the Personal Information we may hold about you and that you are entitled to obtain and to verify whether we are lawfully processing it.
 - ii) **Request Correction** of the Personal Information that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
 - iii) **Request erasure** of your Personal Information. This enables you to ask us to delete or remove Personal Information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your Personal Information where you have successfully exercised your right to object to processing (see below 11)a)v)), where we may have processed your information unlawfully or where we are required to erase your Personal Information to comply with local law. **Note**, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
 - iv) **Object to processing** of your Personal Information where we are relying on a legitimate interest (or those of a third-party) and there is something about your particular situation which makes you want to object to processing on this ground, as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your Personal Information for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
 - v) **Request restriction of processing** of your Personal Information. This enables you to ask us to suspend the processing of your Personal Information in the following scenarios:
 - (1) If you want us to establish the data's accuracy.
 - (2) Where our use of the data is unlawful, but you do not want us to erase it.
 - (3) Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
 - (4) You have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.
 - vi) **Request the transfer** of your Personal Information to you or to a third-party. We will provide to you, or a third-party you have chosen, your Personal Information in a structured, commonly used, machine-readable format. **Note:** that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you. [Contact us](#) if you need to transfer your Personal Information.
 - vii) **Withdraw consent** at any time where we are relying on consent to process your Personal Information. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain Services to you. We will advise you if this is the case at the time you withdraw your consent.
- b) **If you wish to exercise any of the rights set out above, please contact us at the details mentioned 1)c) above.**

PRIVACY POLICY

- c) **Fee required:** Apart from any prescribed fees under any applicable data protection legislation (i.e. PAI Act (see our PAI Manual), you will not have to pay a fee to access your Personal Information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.
- d) **What we may need from you:** We may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal Information (or to exercise any of your other rights). This is a security measure to ensure that Personal Information is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.
- e) **Time limit to respond:** We try to respond to all legitimate requests within 30 (thirty) days. Occasionally it could take us longer than 30 (thirty) days if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

12) DEFINITIONS

- a) **Child** means any person under the age of eighteen (18) years;
- b) **Consent** means any voluntary, specific and informed expression of will in terms of which permission is given for the processing of Personal Information.
- c) **Data Subject** means the person to whom Personal Information relates and, in this document, refers to you as the party providing Personal Information that will be processed by C2R or a relevant third-party.
- d) **Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best product and the best and most **secure** experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your Personal Information for our legitimate interests. We do not use your Personal Information for activities where our interests override the impact such use may have on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us. Examples of legitimate C2R interest:- organise races and events, to process and publish results, to process data from competitions; market C2R's services (including race entry tickets, and events); ensure the security of C2R races, events and premises, including by recording individuals' photographs as part of event accreditation processes and capturing individuals' images using CCTV monitoring; operate a customer services team, conduct surveys and seek advice from advisers with the aim of improving C2R; keep appropriate records of officials and volunteers; and secure access to Personal Information; and research and statistical analysis.
- e) **Operator** means a person who processes Personal Information for a Responsible party in terms of a contract or mandate, without coming under the direct authority of the **party**.
- f) **Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
- g) **PAI Act** means the [Promotion of Access to Information Act](#), Act 2 of 2000.
- h) **Personal Information** means information as defined under POPIA.
- i) **POPIA** means the [Protection of Personal Information Act](#), Act 4 of 2013.
- j) **Responsible Party** means a public or private body or any other person which, alone or in conjunction with others (Joint Responsible party) determines the purpose of and means for processing Personal Information.
- k) **Special Personal Information** means information as defined under section 26 of POPIA (this includes details about race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and biometric information or criminal convictions and offences).
- l) **THIRD-PARTIES:**
 - i) **Internal Third-Parties:** Other divisions within C2R, acting as joint responsible parties or operators and who are based in South Africa and who may also provide employee benefit services (such as internal training) or agricultural products similar to those of C2R.
 - ii) **External Third-Parties:**
 - (1) Service providers acting as operators who provide third-party services to C2R including services such as accounting or loan services and/or payroll system services.
 - (2) Event organisers (i.e DirtPass);
 - (3) Emergency or health professional attending to you on event day for purposes of giving you medical treatment and care.
 - (4) Service providers and administrators who assist C2R in the provision and administration of IT services, medical services, catering, accommodation and the like.
 - (5) Professional advisers acting as operators or joint Responsible Parties, including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
 - (6) The South African Revenue Services, regulators and other authorities acting as operators or joint Responsible Parties who require reporting of processing activities in certain circumstances.
 - (7) Courts of law or any other authorities where we have an obligation under law to share your Personal Information.
 - (8) In the event that we sell or buy any business or assets, in which case we may disclose your Personal Information to the prospective seller or buyer of such business or assets.

END OF DOCUMENT