NOUVELLE ERE
Beauty Spa & Boutique Guest House

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Website Privacy & Cookies Policy

The Protection of Personal Information Act, 2013 ("POPIA") became fully enforceable on 1 July 2021 and requires us to take appropriate, reasonable steps to protect the personal information we hold about you. Protecting your personal information is a priority for NOUVELLE ERE BEAUTY SPAR (PTY) LTD T/A Nouvelle Ere Beauty Spa & Boutique Guest House, and we take reasonable measures to keep it private and secure.

In addition to this document serving as our privacy policy, this document also constitutes our Data Subject Notification as contemplated in Section 18 of POPIA. It explains what personal information we collect, why we collect it, how we use it, and the safeguards we have in place to protect it. Processing your personal information is necessary to deliver our spa, beauty, and guest house services, or to comply with legal obligations. Where the law requires us to obtain your consent, we will ask for it explicitly, ensuring that such consent is voluntary, specific, and informed.

Where we refer to "process", we mean how we collect, use, store, make available, destroy, update, disclose, or otherwise deal with your personal information. As a general rule, we will only process your personal information where this is required to deliver or offer a service, provide a product, or carry out a transaction.

We may combine your personal information and use the combined personal information for any of the purposes stated in this Privacy Policy.

In this document, any reference to "we", "us", or "our" refers to NOUVELLE ERE BEAUTY SPAR (PTY) LTD T/A Nouvelle Ere Beauty Spa & Boutique Guest House. If you use our services, goods, and/or products — including spa and beauty treatments, guest house accommodation, our online shop, or our loyalty programme and vouchers — we may process your personal information as explained in this Privacy Policy and only where a lawful basis allows us to do so.

We may change this Privacy Policy from time to time if the law or our business practices require it. The version of the Privacy Policy displayed on our website at the time of your interaction with us will apply.

What is personal information?

Personal information refers to any information that identifies you or specifically relates to you. This includes, but is not limited to, information such as:

- your name, surname, title, contact number, email address, physical address, and billing or delivery details;
- booking, reservation, treatment, accommodation, purchase, voucher, and loyalty programme information;
- payment, invoice, transaction, and account information, but not full card details where these are processed by secure payment providers;
- limited health, allergy, skin, pregnancy, or medical information that you provide for treatment safety;

- website and device information such as IP address, browser type, device identifiers, cookies, pages visited, and interaction with our website;
- communications with us, including emails, calls, WhatsApp messages, enquiries, complaints, reviews, and feedback; and
- any other information you provide to us or that we lawfully collect in connection with our services.

Is the supply of personal information voluntary or mandatory?

The supply of certain personal information is mandatory, meaning we are required by law to collect it. If you do not supply this information, we may be unable to comply with our legal obligations or provide you with our services. We collect personal information as required or permitted by legislation including:

- Protection of Personal Information Act, No. 4 of 2013 (POPIA)
- Promotion of Access to Information Act, No. 2 of 2000 (PAIA)
- Consumer Protection Act, No. 68 of 2008
- Cybercrimes Act, No. 19 of 2020
- Companies Act, No. 71 of 2008
- Income Tax Act, No. 58 of 1962
- Basic Conditions of Employment Act, No. 75 of 1997
- Labour Relations Act, No. 66 of 1995
- Employment Equity Act, No. 55 of 1998
- Occupational Health and Safety Act, No. 85 of 1993
- Compensation for Occupational Injuries and Diseases Act, No. 130 of 1993
- Unemployment Insurance Act, No. 63 of 2001

In other instances, the supply of personal information is voluntary — there is no law compelling us to collect it. However, we may still require certain voluntary information (such as treatment preferences or dietary requirements) in order to deliver our products and services to you. If you do not supply this information, we may not be able to provide the relevant product or service.

When will we process your personal information?

We will only process your personal information for lawful purposes relating to our business where:

- you have consented to it;
- a person legally authorized by you, the law, or a court has consented to it;
- it is necessary to conclude or perform under a contract we have with you (e.g. a booking or purchase);
- the law requires or permits it; or
- it is required to protect or pursue your, our, or a third party's legitimate interest.

What is special personal information?

Special personal information is personal information relating to, among others: health information, biometric information, race or ethnic origin, religious or philosophical beliefs, political persuasion, trade union membership, criminal behavior, and sex life.

As a spa and guest house, we may collect limited health-related information (such as allergies, skin conditions, pregnancy, or medical conditions) where this is necessary to safely deliver a treatment or service, or where you disclose it voluntarily on a consultation or indemnity form. We will only process such information:

- where you have consented to the processing (e.g. via our consultation or indemnity form);

- where necessary to safely provide a treatment or service to you;
- where the processing is needed to create, use, or protect a right or obligation in law;
- where the special personal information was made public by you; or
- where the processing is otherwise required or permitted by law.

We limit access to special personal information to staff and therapists who need it to safely provide your treatment, and to any legal, insurance, or compliance requirements applicable to our business.

When and from where do we obtain personal information about you?

We may collect personal information about you:

- directly from you (e.g. via our website, booking forms, consultation cards, indemnity forms, telephone, email, or WhatsApp);
- from our online booking, shop, and payment platforms;
- from travel or accommodation booking platforms and corporate clients making bookings on your behalf;
- from publicly available sources or areas where you have deliberately made information public (e.g. online reviews);
- based on your use of our website, online shop, and services;
- from third parties, where the law allows; and
- from another source where you have given us consent to do so.

Cross-border transfer of personal information

Some of our service providers, booking platforms, payment providers, website tools, cloud services, or analytics providers may process or store personal information outside South Africa. Where personal information is transferred across borders, we will take reasonable steps to ensure that the recipient is subject to appropriate safeguards, binding contractual terms, consent, or another lawful basis permitted by POPIA.

Who do we share your personal information with?

We will only share your personal information where one or more of the following apply: you have consented; it is necessary to perform a contract with you; the law requires it; or it is necessary to protect a legitimate interest. We may share personal information with:

- payment processing providers and banks that process your card or EFT payments;
- online booking, e-commerce, and reservation platform providers;
- our accountants, auditors, and legal advisors;
- couriers and delivery service providers (for online shop orders);
- our website hosting, IT, and cybersecurity service providers;
- law enforcement and fraud prevention agencies, where required;
- regulatory authorities and tax authorities, where required; and
- courts of law or tribunals, where required.

Reasons we process your personal information

We process your personal information to, among other things:

- process bookings and reservations for spa treatments, beauty services, and guest house stays;
- process orders placed through our online shop;
- provide safe and appropriate treatments, taking into account any health information you disclose;
- process payments and issue invoices, receipts, and vouchers;
- communicate with you regarding bookings, enquiries, and requests for quotes;
- administer our loyalty programme and vouchers;
- market our treatments, packages, special offers, and corporate offerings to you;
- respond to enquiries, complaints, and reviews;
- improve our services, website, and customer experience;
- comply with legal, tax, and regulatory requirements; and
- protect the security of our premises, guests, staff, and systems (including CCTV where applicable).

How we use your personal information for marketing

We may use your personal information to market our spa, beauty, and guest house products and services to you, including special offers, packages, and loyalty rewards. We may do this in person, by post, telephone, or electronic channels such as SMS, WhatsApp, email, and social media.

If you are not an existing customer, or where the law otherwise requires, we will only market to you electronically with your consent. You may ask us to stop sending marketing communications at any time by contacting us using the details below or by using any unsubscribe or opt-out option included in our electronic marketing communications, where applicable.

How we secure your personal information

We take appropriate and reasonable technical and organizational measures to protect your personal information, in line with industry best practice. This includes:

- keeping our booking, payment, and website systems secure, including access monitoring;
- using reputable, secure payment gateways for online transactions;
- storing physical records (such as consultation and indemnity forms) securely and restricting access;
- controlling access to our premises, systems, and records; and
- safely destroying or deleting records once no longer required.

How long do we keep your personal information?

We keep your personal information for as long as:

- the law requires us to keep it;
- a contract between you and us requires us to keep it;
- you have consented to us keeping it;
- we require it to achieve the purposes set out in this Privacy Policy; or
- we require it for our lawful business, tax, or record-keeping purposes.

For example, we may retain booking and reservation records, consultation and indemnity forms, tax and accounting records, payment records, enquiry records, complaint records, marketing consent records, and website/security logs for the period required by law or for as long as reasonably necessary for the purpose for which they were collected. Once the information is no longer required, we will delete, destroy, de-identify, or archive it in a secure manner.

Children's privacy

In terms of POPIA, a child is any natural person under the age of 18 years. In line with our Spa Policy, guests must generally be 16 years or older to receive treatments, unless prior arrangements have been made with spa management. We do not knowingly collect personal information from children without the required parental or guardian consent. If you believe a child has provided us with personal information without appropriate consent, please contact us immediately so that we can address it.

Our cookie policy

A cookie is a small piece of data sent from our website to your computer or device, where it is stored by your browser. Cookies and similar technologies help our website function, remember your preferences, improve security, analyse website use, and support relevant marketing where permitted.

We may use strictly necessary cookies that are required for the website to operate, for example to support security, booking functionality, shopping-cart functions, fraud prevention, and session management. Where we use non-essential cookies, such as analytics, performance, functionality, personalisation, or marketing cookies, we will provide appropriate information and obtain consent where required before placing or using those cookies.

- Strictly necessary cookies: required for the website, booking, payment, security, and shop functions to work properly.
- Analytics and performance cookies: help us understand how visitors use the website so that we can improve it.
- Functionality and personalisation cookies: remember preferences and improve your website experience.
- Marketing or tracking cookies: may be used to measure campaigns or show relevant offers, but only where permitted and subject to your choices.

You can accept, reject, or manage non-essential cookies through any cookie banner or preference tool made available on our website. You can also control or disable cookies through your browser settings, although disabling certain cookies may affect website functionality.

Your rights regarding your personal information

You must provide proof of identity when exercising any of the rights below, and please let us know if your personal information changes. To exercise any of these rights, please contact our Information Officer using the details below.

You have the right to:

- request confirmation of whether we hold personal information about you, and request a copy or description of it;
- request the identity of third parties who have had access to your personal information;
- request correction or deletion of personal information that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, or unlawfully obtained;
- object, on reasonable grounds, to the processing of your personal information;
- withdraw consent previously given, where processing is based on consent (this will not affect processing already carried out, and we may still be required to process certain information after withdrawal, where the law permits); and
- lodge a complaint with us or with the Information Regulator regarding the processing of your personal information.

Please note the law may limit certain of these rights, and it may take us up to 15 business days for a requested change to reflect on our systems.

How to lodge a complaint with the Information Regulator

Email	POPIAComplaints@inforegulator.org.za
Postal Address	P.O. Box 31533, Braamfontein, Johannesburg, 2017
Physical Address	JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

How can you get in touch with us?

For any queries relating to this Privacy Policy or our processing of your personal information, please contact our Information Officer:

Business name: NOUVELLE ERE BEAUTY SPAR (PTY) LTD T/A Nouvelle Ere Beauty Spa & Boutique Guest House

Information Officer: Mr Fortune Kateko Sambo

Contact number: +27 83 271 0992

Email address: info@nouvellespa.co.za

Physical address: 222 Panorama Rd, The Reeds, Centurion, 0175

Website: www.nouvellespa.co.za