



DATA POLICY IN RESPECT OF PERSONAL DATA BY WESTERN CAPE CLIMBING AND AFFILIATED DISTRICTS

The following information is given to protect natural persons during the processing of their Personal Data and ensure the free movement of such data. It is understood that the above processing shall be based on the principles of lawfulness, fairness and transparency pursuant to the POPI act and any further applicable legislation and shall apply to Personal Data that are or will be in the possession of and processed by Western Cape Climbing.

1. The Controller.

The Controller of Personal Data for the purposes hereof is Western Cape Climbing.

2. Purposes of Personal Data processing

The Personal Data provided shall be processed by the Controller for the following purposes:

- A) To complete an affiliation or licensing procedure and to have a record for reporting purposes of climbers registered with Western Cape Climbing.
- B) To manage competitions, to assess compliance with the applicable regulations, and to give notice of any competitions, results, ranking lists, disciplinary measures and, in any case, anything related to WCC institutional activities.
The Controller can use and publish identification data (e.g. name, surname, date of birth, picture), results and ranking of the Data Subjects also for historical and statistical purposes.
- C) To manage procedures for the assessment of compliance with antidoping rules, and to take the necessary steps (including disciplinary measures) in the event of any violations.
- D) To acquire audiovisual materials (i.e. audio or video recordings or pictures) of the Data Subjects during events and competitions and publish them; to publish, on any medium relevant to climbing, any pictures made available during the licensing procedure, as well as the Data Subjects' identification data, and any disciplinary or antidoping measures, or decisions with regard to appeals brought against a disciplinary or antidoping measure.
- E) To defend itself in court, if necessary.

3. Processing of special categories of Personal Data

The Controller will also necessarily have to process data related to the data subject's health in order to complete the licensing procedure, manage all procedures for the assessment of compliance with antidoping rules, take the necessary steps (including disciplinary measures) in the event of violations, verify the Data Subject's body mass index, and create a profile on the WADA Doping Control Clearing House.

4. Categories of Recipients to which or whom Personal Data have been or will be disclosed

The categories of Recipients to which or whom Personal Data have been or will be disclosed are as follows:

- a) Persons or entities whose service is needed in relation to, or as a result of the performance of a Contract (including, e.g., the financial management of payments by banks or other institutions)
- b) Authorized persons and on instructions from the Controller, who are bound by a specific confidentiality obligation by contract or law (e.g. the Controller's staff and volunteer assistance);
- c) The Controller may also be under the obligation to disclose or transmit data to Public Authorities, including Judicial Authorities.



6. Transfer of data to Third Countries or international organisations

The Controller shall have the right to disclose or transfer the Personal Data of a Data Subject to the South African National Climbing Federation, the Western Cape Provincial Sport Confederation, the Provincial and National Sport Ministries within South Africa and if necessary to the International Sport Climbing Federation.

7. Duration of the Processing

The Controller shall process the Personal Data of the Data Subjects for the time required to achieve its purposes, including those provided for by the law (e.g., without limitation, tax purposes) or to execute an order by an authority or, where necessary, to defend legal claims in court.

8. Nature of Data provision and consequences arising out of any refusal

The provision of any Data requested from a Data Subject is required; as a result, any failure to provide such data by the Data Subject will prevent the granting of a license, or the performance of any activities related to, or arising from such granting.

9. Rights of the Data Subjects

The POPI act grants Data Subjects the following rights with regard to the processing of their Personal Data:

- a) right of access to the processed data, and right to obtain a copy thereof
- b) right to rectification of inaccurate Personal Data without undue delay, and right to have incomplete Personal Data completed
- c) right to erasure of Personal Data without undue delay – known as ‘right to be forgotten’
- d) right to data portability
- f) right to object (art. 21, GDPR), on grounds related to their particular situation, to processing of Personal Data concerning them pursuant to points (e) or (f) of art. 6(1), GDPR, including profiling.

10. Withdrawal of consent

Data Subjects shall have the right to withdraw their previously given consent at any time, although such withdrawal shall not affect the lawfulness of processing based on consent before such withdrawal.

Please note that failure to give consent to processing, where required, could prevent the management of any activities related to licensing and, consequently, prevent the granting of a license or cause its revocation.

11. Right to lodge a complaint with a Supervisory Authority

Data Subjects who believe that processing of Personal Data concerning them infringes and have exhausted attempts to rectify the problem with the data controller may address their complaints to POPIAComplaints@inforegulator.org.za.

Signed