PRIVACY SUPPLEMENT

South Africa Privacy Supplement

Additional information for data subjects in South Africa, under the Protection of Personal Information Act.

BS-PRI-002 · Version 1.0 · Effective 15 October 2026 · Live
Applies to: Members and visitors in South Africa · Governing law: Protection of Personal Information Act 4 of 2013 (POPIA) · Owner: Information Officer, BabuSpace Ltd

South Africa is one of BabuSpace's two core markets. Johannesburg and Cape Town are served directly, and POPIA applies to how we handle your information. This supplement adds to the Privacy Policy (BS-POL-003); it does not replace it.

1. Who is responsible

1.1 **Responsible party:** BabuSpace Ltd, a company registered in England and Wales (No. 17291878), Holborn, London. We process personal information in South Africa and are therefore subject to POPIA.

1.2 We have appointed an **Information Officer**, registered with the Information Regulator as POPIA requires. Name and registration details are published at babuspace.uk/legal.

1.3 Contact: info@babuspace.uk, subject line "POPIA Request".

2. The conditions we process under

POPIA sets eight conditions for lawful processing. In plain terms, this is how we meet them.

Condition	How we meet it
Accountability	The Information Officer is answerable for compliance and reports internally on it
Processing limitation	We collect only what a booking, a payout, verification or a legal duty requires, and we collect it directly from you wherever possible
Purpose specification	Every purpose is listed in BS-POL-003 §3. We do not add purposes quietly
Further processing limitation	We do not repurpose your information for anything incompatible with why we collected it
Information quality	You can correct your details in Account settings at any time, and we will correct anything you tell us is wrong
Openness	This supplement, the Privacy Policy and our PAIA manual are published, not supplied on request
Security safeguards	Encryption in transit and at rest, restricted and logged production access, multi-factor authentication for administrators
Data subject participation	The rights in section 3

3. Your rights

3.1 You may:

- ask what personal information we hold about you, and be given a record of it;
- ask us to **correct or delete** information that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or unlawfully obtained;
- **object** to processing, on reasonable grounds, where we rely on legitimate interests or public interest;
- **object to direct marketing** by unsolicited electronic communication at any time;
- **withdraw consent** where consent is what we relied on;
- **not be subject to a decision based solely on automated processing** that has legal consequences or substantially affects you. See BS-PRI-007;
- **submit a complaint to the Information Regulator**;
- **institute civil proceedings** for a breach of POPIA.

3.2 Requests are free and answered within a reasonable period. Our internal standard is **one month**, matching our UK standard, and we apply it here.

3.3 Where a request form is prescribed under POPIA, we will accept a request in any clearwritten form and will not refuse one for being on the wrong paper.

4. Direct marketing

4.1 POPIA restricts unsolicited electronic direct marketing. We send it only where you have consented, or where you are an existing customer and it relates to a similar service, and we give you a free opt-out every time.

4.2 One request to stop is enough. We will not ask you to confirm it more than once.

5. Transfers out of South Africa

5.1 Your information is transferred to and stored in the United Kingdom and other countries where our providers operate.

5.2 We rely on section 72 of POPIA. The recipient is bound by an agreement, binding corporate rules or a law that provides an adequate level of protection, upholds principles for lawful processing substantially similar to POPIA's conditions, and includes provisions substantially similar to section 72 for onward transfers.

5.3 You may ask us for a description of the safeguards applying to a specific transfer.

6. Security compromises

6.1 Where there are reasonable grounds to believe your personal information has been accessed or acquired by an unauthorised person, we notify the **Information Regulator** and we notify you, as soon as reasonably possible after discovering it.

6.2 The notification will tell you what happened, what information was involved, what we are doing about it, and what you can do to protect yourself.

7. Access to records

7.1 We maintain a manual under the Promotion of Access to Information Act, published at babuspace.uk/legal, explaining what records we hold and how to request access.

8. The Regulator

Information Regulator (South Africa)

- inforegulator.org.za
- Complaints: complaints.IR@inforegulator.org.za
- General enquiries: enquiries@inforegulator.org.za
- JD House, 27 Stiemens Street, Braamfontein, Johannesburg

8.1 You may complain to the Regulator directly. You do not need to raise it with us first.

9. Hosts in South Africa

9.1 If you host through BabuSpace in South Africa, you are a **responsible party in your own right** for the Guest information you receive. You may need to appoint and register your own Information Officer. See BS-POL-008.

9.2 Our registration does not cover you, and our compliance is not your compliance.

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BabuSpace Ltd · Registered in England and Wales, Company No. 17291878 · Holborn, London, United Kingdom Sits beneath the BabuSpace Privacy Policy (BS-POL-003); it adds to that Policy and does not replace it. Questions:
info@babuspace.uk