

PROTECTION OF PERSONAL INFORMATION POLICY



MPANDE PROPERTY FUND MANAGER PROPRIETARY LIMITED

Registration Number: 2018/581471/07

FSP NUMBER 51556

1. INTRODUCTION

- 1.1. Personal information is information that can be related to an identifiable natural person or, to the extent applicable, a juristic person (known as a “data subject”)
- 1.2. Protection of personal information is enshrined in the Constitution of South Africa, and this policy aims to give effect to this right by regulating the way Mpande Property Fund Manager (Pty) Ltd and or its subsidiaries (“Mpande”) process personal information.
- 1.3. Processing of personal information refers to any activity concerning personal information including the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use, dissemination by means of transmission, distribution or making available in any other form, or merging, linking, as well as restriction, degradation, erasure or destruction of information.
- 1.4. Mpande is an authorised financial services provider whose business includes buying and letting of commercial real estate. Mpande may therefore need to collect personal information from its clients to comply with applicable laws and/or to render efficient and effective services.
- 1.5. Mpande, as the responsible party, is committed to principles of accountability, transparency and consensual and responsible processing of personal information.
- 1.6. It is the intention of Mpande, that this policy will protect an individual’s personal information from being prejudiced in any way and this policy is consistent with the privacy laws applicable in South Africa.

2. PURPOSE OF PROCESSING PERSONAL INFORMATION

- 2.1. Personal information collected/ processed from or in relation to each data subject and the purpose for such collection/ processing by Mpande is:
 - 2.1.1. In compliance with the Financial Intelligence Centre Act No. 38 of 2001 (FICA), such personal information is collected/ processed from tenants, suppliers and new employees joining the organisation;
 - 2.1.2. Preparation of lease and other agreements with tenants;
 - 2.1.3. Preparation of invoices and collection of arrears;
 - 2.1.4. When requesting the rendering of services from external service providers;
 - 2.1.5. Settlement of invoices and accounts to service providers;

- 2.1.6. Audit purposes (verification of BEE status);
- 2.1.7. In relation to employees and directors, information is collected/ processed for recruitment processes, including evaluating and interviewing candidates;
- 2.1.8. Processing of payroll;
- 2.1.9. Reporting to SARS;
- 2.1.10. BBBEE audit purposes.
- 2.2. Any further processing of data must be compatible with the purpose(s) for which the information was collected.
- 2.3. Personal information that an individual submits is used only for the purpose for which it was intended. Copies of correspondence that may contain personal information, are stored in archives for record-keeping and back-up purposes only.
- 2.4. Mpande will not, without an individual's consent, share information with any other third parties, for any purposes whatsoever, without written consent by the person to whom the personal information relates.

3. OBTAINING PERSONAL INFORMATION

- 3.1. Personal information is acquired with the consent of the data subject, which consent can be withdrawn at any time by notification to Mpande.
- 3.2. As far as possible, personal information is collected directly from the data subject.
- 3.3. Mpande will take reasonable steps to ensure that all personal information collected is complete, accurate and not misleading.
- 3.4. Where personal information is collected/ received from third parties, Mpande will take reasonable steps to confirm that the information is correct by verifying the accuracy of the information with the data subject or by way of independent sources.

4. STORAGE AND SECURITY OF PERSONAL INFORMATION

- 4.1. Personal information is processed and stored at Fulham House, Ground Floor, Hampton Office Park, 20 Georgian Crescent, Bryanston.



- 4.2. Mpande strives to ensure the security, integrity and privacy of personal information submitted. Mpande will review and update its security measures in accordance with legislation and technological advances. Unfortunately, no data transmission over the Internet can be guaranteed to be totally secure, however, Mpande will endeavour to take all reasonable steps to protect the personal information, which an individual submits to Mpande. Mpande will always set the highest standards to ensure the integrity of their systems.
- 4.3. Mpande may engage with other organisations to provide support services to Mpande. Third Parties are obliged to respect the confidentiality of any personal information held by Mpande. A Service Level agreement is in place with all Third parties to ensure adherence to all Privacy Policies.
- 4.4. Mpande's employees are obliged to respect the confidentiality of any personal information held by Mpande. All employees are required to sign an employment contract which includes a confidentiality clause.
- 4.5. Mpande will not reveal any personal information to anyone unless:
 - 4.5.1. It is compelled to comply with legal and regulatory requirements or when it is otherwise allowed by law;
 - 4.5.2. It is in the public interest to prevent financial loss;
 - 4.5.3. Mpande needs to do so to protect its rights.
- 4.6. Mpande endeavours to take all reasonable steps to keep secure any information which they hold about an individual, and to keep this information accurate and up to date.
- 4.7. Mpande will not retain and/or store personal information longer that is necessary given the purpose for which the personal information was collected except where legally required to do so, or for historical, statistical and research purposes and then only with suitable safeguards in place to ensure the privacy and integrity of the personal information.

5. DESTRUCTION OF DOCUMENTS

- 5.1. Mpande is responsible for the destruction of any documents and electronic records of personal information that are no longer required or in use.
- 5.2. The documents will be shredded by Mpande or the company will procure services of an approved document disposal company.

- 5.3. Deletion of electronic records will be done in consultation with the company's IT function, to ensure that deleted information is incapable of being reconstructed and / or recovered.

6. RIGHTS OF THE DATA SUBJECT

- 6.1. Where a data subject believes that its personal information held by Mpande is incorrect or incomplete, the data subject has the right to request to view this information, rectify it or have it deleted.
- 6.2. In addition, a data subject may lodge a complaint about how Mpande has handled its personal information,
- 6.3. Alternatively, if a data subject believes that its query relating to its personal information is not, adequately dealt with, the data subject may contact the Information Regulator on 012 406 4818 or infoereg@justice.gov.za to file an official complaint.

7. BREACH OF SECURITY

- 7.1. Mpande undertakes to ensure reasonable organisation and technical measures are in place to prevent, insofar as possible, any infringements on the privacy and integrity of personal information.
- 7.2. In the event of a breach of security Mpande undertakes to notify the Regulator and the data subject in writing as soon as possible of any breach of security.
- 7.3. Notification to the data subject shall be done via mail to the data subject's last known physical or postal address / e-mail to the data subject's last known e-mail address / publication on the data subject's website, or as directed by the Regulator.

8. TRAINING

As part of its commitment to ensuring organisation wide compliance with this policy, Mpande implements annual training for all its staff members.

9. INFORMATION OFFICER/CONTACT DETAILS

- 9.1. Any questions relating to Mpande's privacy policy or the treatment of an individual's personal data should be addressed to the Information Officer, whose contact details are:

INFORMATION OFFICER:

Information Officer: Nomzamo Letswele

Telephone number: +27 10 746 0410 (switchboard)

Postal address: Fulham House, Ground Floor, Hampton Office Park, 20 Georgian Crescent, Bryanston



Physical address: Fulham House, Ground Floor, Hampton Office Park, 20 Georgian Crescent, Bryanston

Email address: nomzamo.letswele@mpandeasset.com