

URBAN REAL ESTATE (PTY) LIMITED PRIVACY POLICY

1. PRIVACY NOTICE

- 1.1 Urban Real Estate (Pty) Limited (**we** or **us**) process personal information in terms of this policy when we act as a responsible party (we decide why and how to process the personal information).
- 1.2 Privacy is very important to us.
- 1.3 This policy (read with other notices given to individual data subjects) is our notice in terms of section 18 of the Protection of Personal Information Act, 2013 (**POPIA**).
- 1.4 This policy describes what personal information we process, where we collect it, why we process it and the legal basis on which we do so, and generally how we do so.

2. THE INFORMATION WE COLLECT AND PROCESS

2.1 INFORMATION RELATING TO OUR SERVICES

- 2.1.1 We process personal information in relation to our property letting and management services (**Service Information**) including names, identity, passport or registration numbers, VAT numbers, contact information (phone numbers, email and other addresses), information in communications with tenant applicants and tenants and others relating to our services, bank account details, financial information and credit history and marital status. The Service Information which we process may include Service Information about references, spouses, employers and previous landlords of tenant applicants and tenants.
- 2.1.2 Tenant applicants and tenants and their employees or representatives are the main source of the Service Information but we also source it from others on tenant applicants' and tenants' instructions (eg references, external auditors), public records and licensed databases.
- 2.1.3 We process Service Information to provide our services, bill and obtain payment of amounts in respect of the properties we let out and manage, bill and obtain payment for our services, decide whether to let properties to tenant applicants, ensure the security of our business and systems including our website, comply with the law (eg identifying tenant applicants and tenants in terms of money laundering laws), charging VAT and keeping records of our dealings with tenant applicants and tenants, including backups of our databases, communicating and managing relationships and contracts with tenants, securely and properly administering our business, marketing our services and properties.
- 2.1.4 The legal bases on which we process Service Information are consent or compliance with the law or concluding and performing a contract for our services or our legitimate interests in properly and securely administering our business and marketing our services.

2.2 INFORMATION VIA OUR WEBSITE AND SOCIAL MEDIA PLATFORMS

- 2.2.1 You don't have to provide personal information to us when you visit our website or communicate with us using a social media platform on which we have an account but you can do so by:
 - 2.2.1.1 sending an enquiry to us;
 - 2.2.1.2 subscribing for newsletters and marketing communication;

- 2.2.1.3 registering for an event;
- 2.2.1.4 booking a restaurant table with us by phoning one of the restaurants listed on our website;
- 2.2.1.5 applying for a job by emailing us or, where applicable, through our website or social media accounts.
- 2.2.2 If you provide us with personal information using our website or when you communicate with us using our social media accounts, we source that information from you, with your consent and we only use it for the purpose for which you provide it.
- 2.2.3 Your email enquiries are held on our email server, by the addressee and by anyone in our business to whom the addressee refers your email for a response. Your subscriptions and registrations are held by our marketing personnel. Job applications are held by our human resources personnel and anyone to whom our human resources personnel refer your application for consideration.
- 2.2.4 We use the personal information that you provide to us through our website or when communicating with us using our social media accounts:
 - 2.2.4.1 for the purposes for which you provided it;
 - 2.2.4.2 to administer and improve our website;
 - 2.2.4.3 to improve our services;
 - 2.2.4.4 to communicate with you.
- 2.2.5 When you use our website or our social media accounts, we process personal information about how you do so including your IP address and information about your use of the website (eg the search terms you use, what pages you access, the links you click, when you visited and the web browser you use) (**Analytics Information**). We don't collect any of your other personal information when you use our website and we don't use the Analytics Information to identify any person. We collect the Analytics Information from our website analytics service provider, Google Analytics. The legal basis on which we use the Analytics Information is our legitimate interest in analyzing use of, and improving, our website.
- 2.2.6 We use **cookies** on our website. Cookies are small pieces of data stored on your device when you use a website for your browsing session only (session cookie) or permanently (persistent cookie) which allow that website to recognize you and track your preferences. **You can set your browser to notify you whenever you receive a cookie.** Most Internet browsers allow the use of cookies. You can change your cookie settings on your browser at any time. You can also delete cookies at any time. **Your ability to access and use our website may be affected if you block cookies.** We use first party cookies on our website to learn how you use it, to improve it, to identify language and location preferences and for basic website functionality. The cookies we use don't contain personal information and we don't combine them with other data so that we can identify you.
- 2.2.7 Our website service providers (including Google Analytics and Google Maps), may also use cookies (**Third Party Cookies**) to track your activity when you use our website. Third Party Cookies belong to and are managed by our website service providers. We don't control these service providers. These website service providers have their own privacy policies which you can find on their websites.
- 2.2.8 We use **social media platforms** such as [Facebook, YouTube, LinkedIn and Twitter] to communicate with the public about our business and services. You don't have to provide us with any personal information when communicating with us on our social

media accounts but if you do so, we may store and use that information to respond to you or otherwise deal with your communication. The legal basis on which we process information which you provide to us on our social media accounts is our legitimate business interest in marketing properties we let and manage and responding to enquiries. When you communicate with us using our social media accounts, please remember that each social media platform may collect your personal information for its own purposes including tracking your use of our website on the pages on which links to the social media platform are displayed. If you are logged in to a social media platform (including any Google service) while you visit our website or our social media accounts, the social media platform's tracking will be associated with your profile with that social media platform. Social media platforms are beyond our control. They have their own independent privacy policies which you can find on their websites.

2.2.9 We may use SMSs and **WhatsApp** to communicate in relation to our services. You don't have to provide us with any personal information using SMSs or WhatsApp but if you do so, we may use and store and process that information in relation to our services (**Message Information**). If you provide us with Message Information, we source that information from you, with your consent and we only use it for the purpose for which you provide it. The legal bases on which we process Message Information are consent or concluding and performing a contract for our services or our legitimate interests in properly and securely administering our business and marketing our services. Telecommunications companies and WhatsApp may collect your personal information for its own purposes when you communicate with us using SMSs and WhatsApp. The telecommunications companies and WhatsApp are beyond our control. They have their own independent privacy policies which you can find on their websites.

2.2.10 On our website or social media we may have **links to other websites and platforms** (such as YouTube, LinkedIn and Facebook). These linked websites and platforms are beyond our control. If you click on links on our website, the linked website or platform may send its own cookies to your device, collect data or process your personal information. You access other websites and platforms through links on our website at your own risk. Please check the privacy policies of websites and platforms which are linked to our website. You don't have any recourse against us if you access a third party website or platform, even if you do so using a link on our website.

2.2.11 If you post information on our website or on our social media accounts, we may process personal information in your posts (**Published Information**). We may process the Published Information to enable publication of your posts and in administering our website and marketing our services. The legal basis on which we process Published Information is your consent or our legitimate interests in properly administering our business including our website and marketing our services or entering or performing a contract with you.

2.3 **INFORMATION OF OUR EMPLOYEES, THEIR FAMILY MEMBERS AND BENEFICIARIES**

2.3.1 We process personal information in relation to our directors and employees and their family members and beneficiaries (**Employee Information**) including names, identity or passport numbers, contact information (phone numbers, email and other addresses) information in communications relating to our directors' directorships and our employees' employment, bank account details, directors' fees and payroll information, tax numbers, financial, education and employment information, marital status, children, race, gender and biometric information.

2.3.2 Our directors and employees are the main source of the Employee Information but we also source it from recruitment agents and websites, references, public records and licensed databases.

2.3.3 We process Employee Information in marketing and providing our services, responding to tender invitations, receiving and dealing with potential tenant enquiries, receiving

and dealing with tenant applications, concluding and managing contracts with employees, in relation to benefits such as medical scheme, retirement fund and group life insurance membership, to comply with applicable laws including employment laws, tax laws, laws relating to COVID-19, determining our employment equity compliance in respect of diversity categories including age, gender, ethnicity, nationality, disability and marital or family status, in our legitimate business interests in determining our broad-based black economic empowerment contribution level, so we know who to contact in an emergency involving a director or employee, in implementing, monitoring and applying access and security controls for our offices and databases, in dealing with disputes and claims by and against us involving any of our directors or employees, including legal proceedings in any forum.

- 2.3.4 The legal bases on which we process Employee Information are consent or compliance with the law or concluding and performing a contract with our director or employees or our legitimate interests in providing our services, marketing our services, administering our business, securing our offices and databases, ensuring a proper standard of service to tenants and communicating with and managing our relationship with our directors and employees.

2.4 SHAREHOLDER INFORMATION

- 2.4.1 We process personal information in relation to our shareholders (**Shareholders**), the shareholders of our Shareholders and their respective employees and directors (**Shareholder Information**) including names, identity or passport numbers, registration numbers, VAT numbers, contact information (phone numbers, email and other addresses), information in communications relating to our relationship with them, bank account details, details of dividends payable and paid to them and financial information.

- 2.4.2 Our Shareholders are the main source of the Shareholder Information but we also source it from public records and licensed databases.

- 2.4.3 We process Shareholder Information in relation to our business, receiving and making payments to our Shareholders, compliance with company and tax laws and other applicable laws, in our legitimate business interests in determining our broad-based black economic empowerment contribution level, so we know who to contact to communicate with our Shareholders.

- 2.4.4 The legal bases on which we process Shareholder Information are consent or compliance with company law and tax laws, our Shareholders' legitimate interests in monitoring and managing their share investment in us and receiving dividends, our legitimate interests in securing and retaining shareholder investment and communicating with and managing our relationship with our Shareholders, dealing with disputes and claims involving us and any of our Shareholders, including legal proceedings in any forum.

2.5 INFORMATION OF OUR PRINCIPALS

- 2.5.1 We process personal information in relation to the owners of the properties we let out and manage (**Principals**), the shareholders of Principals and their respective employees and directors (**Principal Information**) including names, identity or passport numbers, registration numbers, VAT numbers, contact information (phone numbers, email and other addresses) information in communications with our Principals, information about properties in respect of which our Principals require or use our services, bank account details and financial information.

- 2.5.2 Our Principals are the main source of the Principal Information but we also source it from public records and licensed databases.

- 2.5.3 We process Principal Information in relation to our services, marketing our services, responding to tender invitations, dealing with potential tenant enquiries, concluding and

managing our contracts with our Principals and communicating with our Principals, making payments to our Principals, complying with company laws, tax laws, laws relating to estate agents and other applicable laws, in our legitimate business interests in determining our broad-based black economic empowerment contribution level.

- 2.5.4 The legal bases on which we process Principal Information are consent or compliance with the law or concluding and performing a contract with our Principals or our legitimate interests in providing our services, marketing our services, administering our business and communicating with and managing our relationship with our Principals.

2.6 INFORMATION RELATING TO JOB APPLICATIONS

- 2.6.1 We process the personal information relating to job applicants including names, contact details (including phone numbers, email and other addresses), education and employment history, race, gender and any other personal information included in the job application (**Applicant Information**).

- 2.6.2 We source most of the Applicant Information from the job applicant in person, by email or, where applicable, through our website. We may also source Applicant Information from recruitment agents and websites such as LinkedIn, from references, public records and licensed databases.

- 2.6.3 We process Applicant Information to consider and deal with the job applications and so that we can contact applicants about possible job opportunities.

- 2.6.4 The legal basis on which we process the Applicant Information is consent or our legitimate interests in recruiting employees for our business.

2.7 SUPPLIER INFORMATION

- 2.7.1 We process personal information relating to potential and actual suppliers of goods and services including names, identity or registration numbers, contact information (including phone numbers, email and other addresses), VAT numbers, bank account details (**Supplier Information**).

- 2.7.2 We usually source the Supplier Information directly from our potential or actual suppliers but we may source it from quotations, adverts, references or other suppliers.

- 2.7.3 We process Supplier Information in relation to the quotations we obtain and supply contracts we conclude in relation to our business and in providing our services to tenants. The legal bases on which we process Supplier Information include consent or concluding and performing contracts with suppliers or our legitimate interests in managing relationships and communicating with our suppliers, receiving, processing and paying supplier invoices, complying with applicable laws including tax laws, dealing with disputes and claims by and against us relating to any of our suppliers, including legal proceedings in any forum.

2.8 OTHER TYPES OF INFORMATION

- 2.8.1 We also share personal information as necessary to open accounts and receive and process payments through banks (**Bank Information**). We share Bank Information with banks where necessary to comply with money laundering and terrorist financing laws including the Financial Intelligence Centre Act, 2001, to receive and make payments, pay refunds and communicate with you and the bank in relation to such payments or refunds. The source of the Bank Information is usually the account holder but sometimes we source Bank Information from the banks themselves and from people (not the account holder) for whom, to whom or from whom the payment is made or received. The legal basis on which we process Bank Information is consent or compliance with the law or performance of a contract such as paying an employee,

supplier, Shareholders or Principals or refunding a tenant. Every bank has a privacy policy which you can find on its website.

- 2.8.2 If you visit any of the properties let out and managed by us, we may process your personal information such as your name, contact details, identity number, vehicle registration number, driver's licence number and expiry date and health information (**Access Information**). We process Access Information for the purposes of implementing, monitoring and applying access and security controls for our offices, the properties which we let out and manage and tenants. We also process Access Information to comply with the law (e.g Covid 19 monitoring laws) and our legitimate interests in providing our services and managing the properties which we let out.
- 2.8.3 If you enquire about our services, we may process your personal information (**Enquiry Information**). We process Enquiry Information about our services for the purposes of responding to your enquiry and marketing our services to you. Consent and our legitimate interest in providing and marketing our services are the legal bases on which we process your Enquiry Information.
- 2.8.4 If you subscribe to our newsletters and emailed marketing communications, we process your personal information (**Marketing Information**). We source Marketing Information from you. We process Marketing Information for our legitimate purposes of marketing our services including sending you invitations to events, updates, newsletters and other communications about our business and the properties we let and manage. The legal basis on which we process Marketing Information is your consent and our legitimate business interests in marketing our business and the properties we let and manage.
- 2.8.5 We process information when you communicate with us (**Communication Information**). The Communication Information may include your name and contact details, the content of your communication and if you use our website or social media accounts for your communication, related metadata. We process Communication Information to communicate with you and keep records. The legal basis on which we process Communication Information is our legitimate interest in properly administering our business and website, marketing our services to potential tenants and responding to enquiries.
- 2.8.6 We process any of the personal information identified in this policy to investigate, assess, establish, exercise or defend legal claims by, against or involving us in any forum (**Claims Information**). The legal basis on which we process Claims Information is our legitimate interest in protecting and enforcing our rights or the rights of others and the proper administration and protection of our business.
- 2.8.7 We process any of the personal information identified in this policy when necessary for audits, to obtain expert advice, to identify, mitigate and manage risks and to obtain and maintain and claim under insurance cover (**Risk Information**). The legal basis on which we process Risk Information is our legitimate interest in identifying, managing and protecting our business against risk and dealing with any related disputes or claims by or against us, including legal proceedings in any forum.
- 2.8.8 We process any of the personal information described in this policy and your health information when necessary to comply with the law (e.g. COVID 19 laws) and when necessary to cooperate with any investigation by any regulatory authority or law enforcement agency.
- 2.8.9 We process any of the personal information described in this policy when necessary to protect your life or other vital interests or those of any other person.

3. **SHARING YOUR PERSONAL INFORMATION WITH OTHERS**

- 3.1 We will not sell personal information to anyone.

- 3.2 When necessary, our trusted third party operators process personal information for us. We contract with our operators binding them to comply with applicable data privacy laws including POPIA. Our contracts oblige our operators to process information only for the purposes and means of processing we prescribe.
- 3.3 We use the following service providers to process personal information: hosting provider, web analysis service provider, providers of online platforms, IT programming and maintenance service providers (including website and email exchange), archiving and document storage service providers (electronic and hard copy), practice management system service providers, payroll service providers and data destruction service provider (physical files).
- 3.4 We disclose personal information to regulators and law enforcement agencies where required by law and where we reasonably believe disclosure is necessary to identify, contact or stop someone who may breach our privacy policy or who may cause harm to, or interfere with, our rights, property, safety or interests or those of anyone else including other users of our website or our social media accounts.
- 3.5 We disclose personal information to underwriters and professional advisors when necessary so that we can obtain or maintain insurance cover, manage risk, get their advice or to establish, exercise or defend our rights including in relation to claims by or against us in any legal proceedings in any forum and in any negotiation.
- 3.6 We disclose Employee Information to medical schemes, retirement funds, group life underwriters and brokers for these schemes and funds for the purposes of making benefits available to our employees, their families and beneficiaries.

4. OFFSHORE TRANSFERS

- 4.1 Where you publish information on our website or on our social media accounts or where you instruct us to use an online platform which transfers personal information offshore, you consent to the transfer of your personal information to third parties in foreign countries and you acknowledge that that personal information may be available through the Internet around the world. We cannot prevent unauthorized access to, misuse of, damage to, or destruction of, that personal information.
- 4.2 If we are obliged by law to use an online platform which may transfer personal information offshore, we do not control that online platform and we cannot prevent unauthorized access to, misuse of, damage to, or destruction of, that personal information.
- 4.3 Where we transfer personal information to countries which don't have an adequate level of data protection similar to POPIA's conditions for lawful processing and the transfer is not covered by section 72 (1) (b) (consent to transfer), (c) (transfer needed to perform a contract with the data subject or take pre-contract steps), (d) (transfer needed to conclude or perform a contract in the data subject's interests) or (e) (the transfer is for the data subject's benefit and it's not reasonably practicable to obtain the data subject's consent) of POPIA, we will conclude contracts with the third parties to whom the information is transferred binding them to process your information to the standards required by POPIA and not transfer your information to any other country without similar protection.
- 4.4 If a Microsoft Teams meeting with us is recorded, that recording may be stored on Microsoft OneDrive which is backed up in the European Union. The European Union has data protection laws which provide an adequate level of protection that upholds principles for reasonable processing of personal information substantially similar to the conditions for lawful processing applied by POPIA.

5. MANDATORY AND VOLUNTARY DISCLOSURE

- 5.1 Where we have to collect and process personal information to comply with the law, we can't provide our services to you unless you provide that information.

5.2 Except where providing personal information to us is required by law, tenant applicants and tenants are free to volunteer personal information to us. If a tenant applicant or tenant chooses not to provide personal information which we request to enable us to provide our services, this may restrict or prevent us from letting out space to that tenant applicant or tenant.

6. **PROTECTING PERSONAL INFORMATION**

6.1 We take appropriate and reasonable technical and organisational steps to protect your personal information against unauthorised access or disclosure.

6.2 The steps we take include physical and electronic access control, encryption, appropriate firewalls and malware and virus protection.

7. **SUMMARY OF DATA SUBJECT RIGHTS**

7.1 For convenience, we've summarized every data subject's rights in this paragraph. This is just a summary and to get a proper understanding of your rights, please read the relevant provisions in POPIA.

7.2 Subject to POPIA and other laws, by completing and sending us the request form available on request from Brett@urban.co.za, you may:

7.2.1 ask us to confirm, free of charge, if we hold personal information about you;

7.2.2 for the prescribed fee, obtain a record or description of the personal information we hold and a list of third parties or the categories of third parties who hold it;

7.2.3 where the legal basis on which we process your personal information is consent, you may withdraw your consent but this will not affect the lawfulness of our processing before your withdrawal and even if you do withdraw your consent, we can continue processing your personal information where there is another legal basis for that processing such as compliance with applicable laws;

7.2.4 if any of your personal information that we have processed is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, obtained unlawfully or if we are no longer authorised to retain that personal information, you may ask us to correct, destroy or delete the personal information but we emphasize that, despite your request, we may not destroy or delete personal information where we are entitled to continue processing it;

7.2.5 object to the processing of your personal information if that processing is not necessary:

7.2.5.1 for the proper performance of a public law duty by a public body; and

7.2.5.2 to pursue your legitimate interests;

7.2.5.3 to pursue our legitimate interests or those of a third party to which the personal information is supplied;

7.2.6 at any time, object to the processing of personal information for direct marketing (other than direct marketing by means of unsolicited electronic communications);

7.2.7 if you feel that we have processed your personal information unlawfully, to complain to the Information Regulator who can be contacted at:

7.2.7.1 JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

7.2.7.2 P.O Box 31533, Braamfontein, Johannesburg, 2017; or

7.2.7.3 Complaints email: complaints.IR@justice.gov.za.

8. **AMENDING THIS POLICY**

8.1 We may update this policy from time to time by publishing a new version on our website.

8.2 We may email you to tell you about important changes to this policy.

8.3 You can also obtain the current version of this policy at any time by emailing a request to Brett@urban.co.za.

9. **OUR ADDRESS AND OUR INFORMATION OFFICER'S DETAILS**

9.1 Our head office is at 206 Sherwood House, Greenaces, Cnr Victory & Rustenburg Rd, Victory Park, Gauteng, South Africa.

9.2 Our Information Officer is Brett Newby and you can contact him on Brett@urban.co.za or 011 888 7878.