



PRIVACY POLICY

FOR

CITY PROPERTY ADMINISTRATION PROPRIETARY

LIMITED

in terms of

PROTECTION OF PERSONAL INFORMATION ACT OF 2013

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1. INTERPRETATIONS

- 1.1 “Consent” means the voluntary, specific and informed expression of will;
- 1.2 “Confidential Information” means all information or data disclosed to or obtained by the Group by any means whatsoever;
- 1.3 “CPA” means City Property Administration Proprietary Limited (Registration number: 1968/010808/07)
- 1.4 “Data Subject” means the natural or juristic person to whom the Personal Information relates;
- 1.5 “Direct Marketing” means approaching a Data Subject personally for the purpose of selling them a product or service;
- 1.6 “ECTA” means Electronic Communications and Transactions Act, 25 of 2002;
- 1.7 “Electronic communication” means communication by means of data messages.
- 1.8 “Electronic signature” means data attached to, incorporated in, or logically associated with other data and which is intended by the user to serve as a signature;
- 1.9 “Electronic transactions” include e-mails sent and received;
- 1.10 “PAIA” means Promotion of Access to Information Act, 2 of 2000;
- 1.11 “Personal Information” means information relating to an identifiable, living, natural person, or an identifiable, existing juristic person
- 1.12 “POPIA” means the Protection of Personal Information Act, No. 4 of 2013;
- 1.13 “Processing” means an operation or activity, whether or not by automatic means, concerning Personal Information;
- 1.14 “The Group” means City Property Administration Proprietary Limited (Registration number: 1968/010808/07) (“CPA”), Octodec Investments Limited (Registration No: 1956/002868/06) (“Octodec”) and/or any other entity or individual in respect of which CPA provides a property management function and/or in terms of which CPA acts as its duly authorised representative and as a result an operator as defined in POPIA, from time to time and thereby deemed an operator as defined in POPIA. Any subsidiary within, any successor-in-title employees, directors, board members, contractors, sub-contractors, agents, and appointees of the aforementioned shall be included in this definition.

2. INTRODUCTION

This Policy sets out the manner in which The Group accesses and processes personal information in compliance with the prescribed legislation and as dictated by business practice from time to time.

3. SCOPE

The Policy applies to the Group, their employees, directors, shareholders, contractors, agents, and appointees. The provisions of this Policy are applicable to both on and off-site processing of personal information.

4. WHAT INFORMATION IS COLLECTED

4.1 Categories of Data Subjects and their Personal Information

4.1.1 Data Subject: Natural Person

Names; contact details; physical and postal addresses; date of birth; ID/Passport number, permit information; financial/banking information, tax related information; nationality; gender; employment/business information; correspondence.

4.1.2 Data Subject: Juristic Person/Entities

Names of contact persons; name of legal entity; physical and postal address and contact details; financial/banking information; registration number; registration information; tax related information; authorised signatories; beneficiaries; ultimate beneficial owners; shareholding information; BBBEE information, permit information.

4.1.3 Service Providers / Contractors / Sub-contractors

Names of contact persons; name of legal entity; physical and postal address and contact details; financial information; registration number; registration information; tax related information; authorised signatories; beneficiaries; ultimate beneficial owners; shareholding information; BBBEE information.

4.1.4 **Employees / Directors / Board Members**

Gender; pregnancy; marital status; colour, race; age; language; education information; financial information; employment history; ID/passport number; permit information; physical and postal address; contact details; criminal record; well-being medical information.

5. **HOW PERSONAL INFORMATION IS COLLECTED**

All information is obtained directly from the data subject and/or an authorised representative.

6. **HOW PERSONAL INFORMATION IS PROCESSED**

6.1 Only necessary personal information is collected and is then processed for the purposes for which it was collected and in the manner agreed to with data subject. In addition, where necessary information may be retained for legal or research purposes.

6.2 All Company and client information must be dealt with in the strictest confidence and may only be disclosed, without fear of redress, in the following circumstances:

6.2.1 where disclosure is under compulsion of law;

6.2.2 where there is a duty to the public to disclose;

6.2.3 where the interests of the Company require disclosure; and

6.2.4 where disclosure is made with the express or implied consent of the data subject;

6.3 Disclosure to third parties is only permitted if the data subject has consented thereto. The Group may supply the Personal Information to any party to whom the Group may have assigned or transferred any of its rights or obligations under any agreement, and/or to service providers who render the following services:

6.3.1 Capturing, organising and storing of data;

6.3.2 Correspondence with Data Subjects;

6.3.3 Conducting due diligence checks and Auditing; and/or

- 6.3.4 Administration of Property Management and Human Resource services;
- 6.3.5 Direct marketing and information sharing to specified third parties as expressly consented to by the data subject

7. **SAFEGUARDING OF PERSONAL INFORMATION**

- 7.1 It is a requirement of POPIA to adequately protect personal information and therefore the Group has put the following procedures and controls in place in order to safeguard personal information in its possession:
 - 7.1.1 Appointment of an **Information Officer** (details set out under clause 11 below) who is responsible for the compliance with the conditions of the lawful processing of personal information and other provisions of POPIA and related privacy and access to information legislation.
 - 7.1.2 **This Policy** has been put in place and The Groups employees have received training on POPIA;
 - 7.1.3 Service Providers / Contractors / Sub-contractors have been requested to sign **Service Level Agreements** and/or **Data Protection Agreements** to ensure that they align with The Groups vision and policies in respect of POPIA and are committed to the protection of personal information;
 - 7.1.4 The applicable and necessary **consents** are obtained from Data Subjects before any personal information is processed and/or shared by the Group;
 - 7.1.5 All hard copy records are scanned electronically and then archived and/or stored securely on and off site. Access to the records and the storage areas are limited to authorised personal only and record is keep of such access;
 - 7.1.6 All electronic files or data are **backed up** where necessary, by the Groups IT Division which is also responsible for system security that protects third party access and physical threats. The Group IT Division is responsible for Electronic Information Security.

8. **DESTRUCTION OF PERSONAL INFORMATION**

- 8.1 All personal information which has become obsolete must be destroyed.
- 8.2 Each department is responsible for attending to the destruction of records under the control of the relevant department, which must be done as and when necessary. Files must be checked in order to make sure that they may be destroyed and also to

ascertain if there are important original documents in the file. Original documents must be returned to the holder thereof, failing which, they should be retained by the Company pending such return.

8.3 Personal Information is destroyed in accordance with all applicable legislation.

9. ACCESS TO INFORMATION

9.1 Data Subjects have the right to access the personal information that The Group holds about them.

9.2 Data Subjects are also required to update, correct or delete their personal information on reasonable grounds.

9.3 The Group's manuals in terms of Access to Information including the requirements of PAIA, which contains the prescribed forms and details of prescribed fees, is available on the CPA and Octodec websites:

9.3.1 www.cityproperty.co.za

9.3.2 www.octodec.co.za

9.4 Confidential company and/or business information may not be disclosed to third parties as this could constitute industrial espionage. The affairs of the Group must be kept strictly confidential at all times unless required in terms of law.

10. CONTRAVENTION

The Company views any contravention of this policy very seriously and employees who are guilty of contravening the policy will be subject to disciplinary procedures, which may lead to the dismissal of any guilty party.

11. QUERIES / COMPLAINTS

11.1 All complains by Data Subjects can be addressed to the Information officer, the details of whom is reflected in clause 12.2 below.

11.2 A data subject may at any time complain to the Information Regulator if misuse is suspected, the details of whom is reflected in clause 12.3 below.

12. IMPORTANT DETAILS

The Groups representative

Company:	City Property Administration Proprietary Limited
Registration Number:	1968/010808/07
Directors:	JP Wapnick S Wapnick P Kruger

Information Officer

Designated Information Officer:	JP Wapnick
Email Address:	jeff@cityprop.co.za
Postal Address:	PO Box 15, Pretoria, 0001
Registered Address:	CPA House, 101 Du Toit Street, Pretoria, 0002
Telephone number:	012 319 8781
Facsimile number:	086 647 1598
Website:	www.cityprop.co.za
General Enquiries:	propworld@cityprop.co.za

Information Regulator

Complaints Email Address:	complaints.IR@justice.gov.za
Postal Address:	P.O Box 31533, Braamfontein, Johannesburg, 2017
Registered Address:	JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
Website	www.justice.gov.za
General Enquiries:	inforeg@justice.gov.za

13. AMENDMENTS TO THIS POLICY

13.1 Amendments to, or a review of this Policy, will take place on an ad hoc basis as and when required. Data Subjects are advised to access THE GROUP's website periodically to keep abreast of any changes.