FAIRCAPE GROUP

PRIVACY POLICY

1. INTRODUCTION

1.1. Faircape is committed to protecting the privacy and personal information of all persons with whom it interacts, including customers, clients, residents, patients, employees, prospective employees, service providers, business partners and visitors to its websites.

1.2. This Privacy Policy explains how Faircape collects, uses, processes, stores, shares and protects personal information in accordance with the Protection of Personal Information Act 4 of 2013 ("**POPIA**") and other applicable legislation.

1.3. For purposes of this Privacy Policy, "**Faircape"** means and refers to the Faircape Group, comprising Faircape Group Holdings (Pty) Ltd and all of its associated and affiliated entities, which includes, but is not limited to, the following entities:

- **Faircape Group Holdings (Pty) Ltd**
- **Faircape Management Trust;**
- **Faircape Fibre (Pty) Ltd;**
- **Faircape Security Solutions (Pty) Ltd;**
- **Faircape Energy (Pty) Ltd;**
- **Faircape Life Right Holdings (Pty) Ltd;**
- **Faircape Health Institute (Pty) Ltd;**
- **Faircape Water Services (Pty) Ltd;**
- **Faircape Sales & Leasing CC;**
- **Faircape Management Services (Pty) Ltd;**
- **Internect South Africa CC;**
- **Faircape Financial Services CC;**
- **Faircape Longevity Science (Pty) Ltd; and**
- **Claims Facilitation Services (Pty) Ltd.**

1.4. This Privacy Policy applies to personal information processed by Faircape in the course of its business operations, including information collected through its websites, electronic communications, online enquiry forms, applications, contractual relationships and the provision of services.

1.5. The relevant Faircape entity responsible for determining the purpose and means of

processing personal information shall be regarded as the responsible party for purposes of POPIA. Where applicable, more than one entity may act as a responsible party in relation to particular processing activities.

1.6. This Privacy Policy must be read together with any additional privacy notices or disclosures applicable to specific services or activities.

2. PERSONAL INFORMATION WE COLLECT

2.1. Faircape may collect and process personal information reasonably necessary for its business operations, including, where applicable:

2.1.1. Names, surnames, identity or registration numbers and other identifying information;

2.1.2. Contact information, including telephone numbers, email addresses and physical or postal addresses;

2.1.3. Information relating to properties, premises, accommodation, utilities and services requested or provided;

2.1.4. Customer, client, resident, patient, tenant, owner, supplier and other contractual information;

2.1.5. Financial, banking, payment, billing and account information;

2.1.6. Employment-related information, including job applications, qualifications and employment history;

2.1.7. Correspondence, enquiries, complaints, requests and other information communicated to Faircape;

2.1.8. Information required for identity verification, access control, security or compliance purposes;

2.1.9. Health-related or other special personal information, where reasonably necessary and lawfully permitted; and

2.1.10. Any other personal information reasonably necessary for the relevant purpose for which it is collected.

2.2. The nature and extent of the personal information collected will depend on the particular relationship, enquiry, transaction or service concerned.

2.3. Faircape will take reasonably practicable steps to ensure that personal information collected is adequate, relevant and not excessive in relation to the purpose for which it is processed.

3. HOW PERSONAL INFORMATION IS COLLECTED

3.1. Faircape may collect personal information directly from individuals through:

3.1.1. Its websites and online enquiry or contact forms;

3.1.2. Emails, telephone calls and other communications;

3.1.3. Applications, registrations, agreements and contractual documentation;

3.1.4. Requests for information, quotations or services;

3.1.5. Customer service interactions, correspondence and complaints; and

3.1.6. Other lawful interactions in the ordinary course of business.

3.2. Where permitted by law, Faircape may also obtain personal information from third parties, including authorised representatives, service providers, business partners, public records or other lawful sources.

3.3. Where personal information is collected from a source other than the individual concerned, Faircape will comply with the applicable notification requirements and exceptions provided for under POPIA.

4. INFORMATION COLLECTED THROUGH OUR WEBSITES

4.1. Faircape operates websites through which visitors may request information, submit enquiries, request quotations, arrange appointments or express an interest in the products and services offered by Faircape or its associated entities.

4.2. When a visitor voluntarily completes an online form or submits an enquiry, Faircape may collect information such as:

4.2.1. The visitor's name and surname;

4.2.2. Email address and telephone number;

4.2.3. The product, service, property, facility or business about which the visitor is enquiring; and

4.2.4. Any additional information voluntarily provided in the enquiry or message.

4.3. Personal information submitted through Faircape's websites will be used for purposes reasonably connected with the relevant enquiry, including:

4.3.1. Responding to requests for information;

4.3.2. Contacting the visitor regarding the product or service enquired about;

4.3.3. Providing quotations, proposals or further information;

4.3.4. Arranging appointments, consultations, viewings or meetings;

4.3.5. Referring the enquiry to the relevant Faircape entity, department or authorised representative; and

4.3.6. Following up on the enquiry and facilitating the provision of the requested services.

4.4. Information submitted through a website may be shared with the relevant Faircape entity or authorised employee responsible for handling the enquiry.

4.5. The provision of personal information through website enquiry forms is voluntary. However, where information reasonably required to respond to an enquiry is not provided, Faircape may be unable to respond adequately or provide the requested information or services.

4.6. Website visitors are requested not to submit sensitive personal information, including medical information, identity documents or banking details, through general enquiry forms unless specifically requested through an appropriate channel.

5. PURPOSES FOR WHICH PERSONAL INFORMATION IS PROCESSED

5.1. Faircape may process personal information for lawful purposes associated with its business operations, including:

5.1.1. Providing, administering and managing its products and services;

5.1.2. Responding to enquiries, applications, requests and communications;

5.1.3. Establishing, performing and administering contractual relationships;

5.1.4. Managing properties, residential accommodation, retirement services, healthcare services, infrastructure, utility services, connectivity services and other associated business operations;

5.1.5. Managing customer accounts, payments, billing, collections and financial records;

5.1.6. Providing customer service, technical support, maintenance and related operational assistance;

5.1.7. Processing recruitment applications and administering employment relationships;

5.1.8. Maintaining appropriate security, access control and protection of persons and property;

5.1.9. Complying with legal, statutory, regulatory and contractual obligations;

5.1.10. Exercising or defending legal rights and claims; and

5.1.11. Other lawful purposes reasonably related to Faircape's business operations and the purpose for which the information was collected.

5.2. Faircape will not process personal information for purposes incompatible with the original purpose of collection, unless such further processing is permitted under POPIA or other applicable law.

6. LAWFUL PROCESSING OF PERSONAL INFORMATION

6.1. Faircape will process personal information only where a lawful basis exists under POPIA.

6.2. Depending on the circumstances, this may include processing:

6.2.1. With the consent of the person concerned;

6.2.2. Where necessary for the conclusion or performance of a contract;

6.2.3. To comply with an obligation imposed by law;

6.2.4. To protect a legitimate interest of the person concerned;

6.2.5. Where necessary for the proper performance of a public law duty by a public body, where applicable; or

6.2.6. Where necessary to pursue the legitimate interests of Faircape or a third party to whom the information is supplied, as permitted by POPIA.

6.3. Consent will be obtained where required by law. Where processing is based on consent, the person concerned may withdraw that consent, subject to applicable legal requirements and any other lawful grounds for continued processing.

7. SPECIAL PERSONAL INFORMATION

7.1. Certain Faircape entities may, in the ordinary course of providing their services, be required to process special personal information as defined in POPIA, including health-related or biometric information.

7.2. Where applicable, Faircape will implement appropriate safeguards and access restrictions having regard to the nature and sensitivity of the information concerned.

7.3. Additional privacy notices or disclosures may be provided where necessary, particularly in relation to healthcare, patient care, retirement services, security surveillance services or other activities involving sensitive personal information.

8. DISCLOSURE AND SHARING OF PERSONAL INFORMATION

8.1. Faircape respects the confidentiality of personal information and will not sell personal information to third parties.

8.2. Personal information may be disclosed or shared where reasonably necessary and legally permitted, including with:

8.2.1. Associated or affiliated entities within the Faircape Group, where relevant to the enquiry, transaction, service or lawful business purpose concerned;

8.2.2. Employees, authorised representatives and service providers who require access to the information to perform their duties;

8.2.3. Contractors, suppliers, professional advisers and other third parties engaged in connection with Faircape's operations;

8.2.4. Banks, payment processors, insurers and other relevant service providers, where applicable;

8.2.5. Regulatory authorities, government departments, law enforcement authorities or other persons where disclosure is required or permitted by law; and

8.2.6. Other persons where disclosure is authorised by the person concerned or otherwise lawfully permitted.

9. RETENTION OF PERSONAL INFORMATION

9.1. Faircape will retain personal information only for as long as reasonably necessary to fulfil the purposes for which it was collected, or for such longer period as may be required or permitted by applicable law.

9.2. Retention periods may depend on the nature of the information, the relevant business relationship, applicable statutory obligations, contractual requirements, and the establishment, exercise or defence of legal rights.

9.3. Where personal information is no longer required and there is no lawful basis for its continued retention, Faircape will take appropriate steps to securely delete, destroy or de-identify such information in accordance with POPIA.

10. SECURITY OF PERSONAL INFORMATION

10.1. Faircape is committed to protecting personal information against loss, damage, unauthorised access, unlawful processing, disclosure or destruction.

10.2. Faircape implements reasonable technical and organisational security measures appropriate to the nature of the information processed and the risks associated with such

processing.

10.3. Access to personal information is restricted, where appropriate, to authorised persons who reasonably require access for legitimate business purposes.

10.4. While Faircape takes reasonable steps to safeguard personal information, no method of electronic transmission or storage can be guaranteed to be completely secure.

10.5. Where Faircape has reasonable grounds to believe that personal information has been accessed or acquired by an unauthorised person, Faircape will investigate the circumstances and comply with applicable notification requirements under POPIA, including notification to the Information Regulator and affected persons where required by law.

11. INTERNATIONAL TRANSFERS

11.1. Faircape may, where necessary for legitimate business purposes, make use of third-party systems, technology platforms or service providers that involve the transfer, storage or processing of personal information outside South Africa.

11.2. Faircape will take appropriate steps to ensure that international transfers are subject to the safeguards or other lawful grounds required under POPIA.

12. DIRECT MARKETING AND COMMUNICATIONS

12.1. Faircape may communicate with individuals regarding enquiries, applications, products or services in which they have expressed an interest.

12.2. Where Faircape undertakes electronic direct marketing, it will comply with the requirements of POPIA, including obtaining consent where required.

12.3. Individuals receiving electronic promotional communications may opt out of further marketing communications by following the unsubscribe instructions provided or by contacting Faircape directly.

12.4. An objection to direct marketing will not necessarily prevent Faircape from sending communications reasonably necessary for the administration of an existing contractual or service relationship.

13. WEBSITE COOKIES AND ANALYTICS

13.1. Faircape's websites use cookies and similar technologies to support website functionality, improve user experience and collect information about how visitors interact with its websites.

13.2. Cookies are small text files stored on a visitor's device when accessing a website. Faircape may use cookies and third-party analytics tools to collect information such as:

13.2.1. Internet Protocol (IP) addresses;

13.2.2. Browser type, device information and operating system;

13.2.3. Pages visited, time spent on the website and navigation patterns;

13.2.4. Referring websites and general geographic location; and

13.2.5. Other technical information relating to website usage and performance.

13.3. Information collected through cookies and analytics tools may be used to monitor website traffic, analyse visitor behaviour, identify technical issues, improve website functionality and enhance the Group's online services and content.

13.4. Faircape may use third-party service providers to assist with website analytics and performance monitoring. Information collected through these services will be processed in accordance with applicable privacy legislation and appropriate data protection safeguards.

13.5. Visitors may manage, restrict or disable cookies through their browser settings. Disabling certain cookies may affect the functionality or performance of parts of the websites.

13.6. Where cookies or similar technologies involve the processing of personal information, Faircape will comply with the applicable requirements of POPIA, including obtaining consent where legally required.

14. RIGHTS OF DATA SUBJECTS

14.1. Subject to POPIA and other applicable legislation, persons whose personal information is processed by Faircape have the right to:

14.1.1. Request confirmation of whether Faircape holds personal information relating to them;

14.1.2. Request access to personal information held by Faircape;

14.1.3. Request the correction, updating, deletion or destruction of personal information where permitted by law;

14.1.4. Object to certain processing of their personal information on grounds recognised under POPIA;

14.1.5. Withdraw consent where processing is based on consent.

14.2. Requests relating to personal information may be directed to Faircape using the contact details provided below.

14.3. Faircape may require reasonable verification of identity before disclosing, correcting or deleting personal information.

14.4. Faircape may decline a request where permitted or required by law, including where information must be retained for statutory, contractual or other lawful purposes.

14.5. Requests for access to records will be dealt with in accordance with POPIA, the Promotion of Access to Information Act 2 of 2000 ("PAIA"), and other applicable requirements. Any prescribed fees will be communicated where applicable.

15. INFORMATION OFFICER AND CONTACT DETAILS

15.1. Any enquiries, requests or complaints regarding this Privacy Policy or the processing of personal information may be directed to Faircape using the following details:

Privacy Contacts: Gamiema Abrahams and Sarah Pietersen

Telephone: +27 21 815 5700

Email: enquiries@faircape.co.za

Physical Address:
5th Floor, The Terraces
25 Protea Road
Claremont, Cape Town
7708

Postal Address: Same as physical address above.

15.2. Faircape will refer enquiries or requests to the appropriate Information Officer, Deputy Information Officer or responsible entity, as applicable.

16. CHANGES TO THIS PRIVACY POLICY

16.1. Faircape reserves the right to amend or update this Privacy Policy from time to time to reflect changes in applicable legislation, business operations, technology or information processing practices.

16.2. The latest version of this Privacy Policy will be made available on Faircape's websites.

16.3. Any material changes affecting the processing of personal information will be communicated where required by applicable law.