

FPG HOLDINGS PTY LTD – PRIVACY POLICY

22 NOVEMBER 2018 | VERSION 1.0

Introduction

FPG Holdings (Pty) Ltd (“FPG”, “we”, or “us”, “our”) is committed to safeguarding the privacy of your personal information or data (“PI”). This Privacy Policy (“Policy”) explains how we process your PI, which means, in relation to your PI, various activities including collecting, receiving, recording, storing, updating, using, transferring or erasing.

This Policy applies to your use of any of our websites and forms part of our website application terms and conditions. By visiting or using any of our websites, you agree to the terms of this Policy as updated from time to time. We will let you know of any material changes to the Policy.

Further information can be found in our Access to Information manual (“Manual”) which you can access [here](#). If you have any questions about this privacy notice, please contact our Information Officer or the relevant Deputy Information Officer, whose contact details can also be found in the Manual.

Scope

This Policy applies to all data subjects (persons, whether a natural or juristic person, to whom PI relates) (“you”, “your”), who’s PI we collect, regardless of the country where you live or work.

This policy applies to all PI, whether it was provided to us through our websites or through any other form of communications with you such as email, telephone, or otherwise (“Channels”), through or by third parties or tools that collect PI.

WHAT PERSONAL INFORMATION DO WE COLLECT?

PI means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including: information relating to race, gender, marital status, ethnic or social origin, age, disability (mostly as required by labour and credit laws); an identifiable number, e-mail address, physical address, telephone number, identification number, location information, online identifier; education history; biometric information; personal preferences, views or opinions; correspondence of a private or confidential nature; and a name if it appears with other PI relating to you or if disclosing your name itself will reveal information about you.

The PI we collect about you is dependent on (i) the transaction you are completing, (ii) the reason you are communicating with us and (iii) the Channel used to communicate with us. PI may include your: name, contact information including e-mail address, postal address, physical address, primary and secondary telephone numbers, date of birth; employment history, criminal history, ethnic origin, language, gender, age, financial information (as required by law, relating to financial services), biometric information (in order for us to identify you when you contact us or for access into our properties), billing information, education history (if applying for a student housing lease or employment), additional information which we are required or permitted by applicable legislation to collect and process, as well as information you elect to share publicly, including on social media and customer forums.

WHEN DO WE COLLECT YOUR PERSONAL INFORMATION?

We collect your PI when you:

- voluntarily provide us with information when you interact with us, for example when you send us online enquiries, or you subscribe to or consent to receiving newsletters or other communications from us;
- browse, visit or participate in our various Channels;
- apply for a lease through our various Channels;
- enquire about a service from us;
- agree to the terms and conditions of credit checks and services that contain provisions dealing with the use or disclosure of your personal information;
- enter our promotional competitions;
- make general enquiries, lodge complaints, and communicate with us;

From time to time we collect your PI from trusted third parties, in which case we shall ensure that you have provided your consent for your PI to be disclosed to us.

We collect your banking details (bank name, bank branch, account type, account number) for billing purposes and credit checks. We do not collect or retain your bank card numbers. You are advised to never respond to emails that seem to be from us requesting bank card details as this request is most likely fraudulent and should be reported to us immediately.

We also collect your PI using cookies about when and how you use our websites, or when you click on an advert of ours that is contained on another website. A cookie is a small text file that is stored on your computer or mobile device when you use it. Cookies hold information such as the identity of the computer or device you used to access our Channels, your server address, domain name, the time and date that you visited our Channels, pages, product and documentation that you accessed or viewed and which internet browser you used. We do this so that we can provide you with more personalised service, communication and products by better understanding your browsing behaviour; track, count and analyse website visits and usage data; understand product preferences and popularity; improve our websites and your online application experience. We use trusted third party services including Google Analytics that collect, monitor and analyse our users' usage. For more information on how Google uses and collects your data while you make use of our websites, visit <https://policies.google.com/technologies/partner-sites>

To prevent your PI from being used by Google Analytics you can install an opt-out browser add-on (visit <https://tools.google.com/dlpage/gaoptout> for details). Most web browsers can be adjusted to inform you when a cookie has been sent to you and provide you with the opportunity to refuse that cookie. Refusing a cookie may, in some cases, preclude you from using, or negatively impact, the display or function of our websites or certain areas or features of our websites.

HOW DO WE USE AND PROCESS YOUR PERSONAL INFORMATION?

We use your PI to:

- process leasing applications that have been submitted online;
- communicate with you regarding new properties, services, offers and events that we think may be of interest to you;

- analyse, develop, continually improve and enhance the use, functionality and performance of our websites and services to manage the security of our sites, networks and systems;
- comply with applicable laws, including our obligations to make disclosures to authorities, regulators and government bodies;
- engage in our legitimate business and related interests, including but not limited to detecting and preventing fraud and conducting our business as a property company.

We will not use your PI other than for the purpose for which it was provided or collected, and in accordance with our legitimate interests and legal obligations.

Your PI will be processed mainly in South Africa where our offices are located, however certain PI may be transferred to countries outside of South Africa, for example where we make use of cloud based software services, in which case we shall ensure that the necessary security measures are in place relating to the processing and storage of your PI, where the data protection legislation in that particular country is less favourable than that in South Africa.

WHEN WILL WE DISCLOSE YOUR PERSONAL INFORMATION?

We may provide access to or share some of your PI, when necessary and for the reasons that it was provided or collected, to our associates, suppliers, service providers, auditors, consultants and agents if they are required to process it for us and/or to provide services for or to us, including leasing agents and property brokers, credit analysis service providers, e-mail service providers, analytics companies, distribution and courier companies, information hosting, communication providers, development and administration, information technology and related infrastructure services, technical support and other support services relating our legitimate business interests and our contractual obligations to you.

We may share PI with third parties in the event of a re-organisation, merger, sale, joint venture, assignment, transfer or other type of sale of all or any portion of our business, assets or stock.

We are required or may be permitted to provide access to or share your PI in terms of law, court order or other lawful reasons, where we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to government requests, including public and government authorities.

When we share or provide access to your PI with third parties, they are contractually restricted from using or disclosing your PI except as necessary to perform services on our behalf or to comply with legal requirements.

JUSTIFICATION FOR PROCESSING PERSONAL INFORMATION IF YOU ARE IN THE EU

To communicate with you and to attend to your requests, processing of your PI is required and we have a legitimate business interest in processing your PI:

- to process transactions with customers, suppliers, and applicants;
- to action applications,
- to perform a contract with you;
- to process PI in relation to marketing and promotional activities based on your consent when your PI was collected;

- pursuant to our legitimate business interest to market and promote our products and services;
- to analyse, develop, improve and optimize our Channels, products and services, and to maintain the security of our sites, networks and systems;
- to comply with applicable laws, or
- to process your opt-out instruction.

STORAGE AND RETENTION OF PERSONAL INFORMATION

We will keep your PI for different periods of time depending on the use or purpose your PI was provided or collected, as well as your preferences regarding marketing, recruitment and other correspondence.

Unless there is a specific law requiring us to keep your PI, we will not keep it for longer than necessary. For details of records that we retain for legal purposes, please email us: info@fpggroup.co.za.

We will safely delete or destroy PI which we are no longer required or not permitted to retain, or for which we do not have your consent.

SECURING YOUR PERSONAL INFORMATION

We will secure the integrity and confidentiality of your PI that is in our possession and under our control by taking the appropriate reasonable technical and organisational measures to prevent loss, damage, unauthorised destruction, unlawful access, or unlawful processing of your PI. In doing so we will have due regard to generally accepted applicable or industry information security practices and procedures. While we strive to use commercially acceptable means to protect your PI, we cannot guarantee its absolute security.

The age requirement for engaging with our Channels is 18 years of age. To the extent required by applicable law, users under the age of 18 years of age must obtain parental or guardian consent. We will afford the same level of protection to all PI processed, regardless of the age of the person the PI pertains to.

YOUR RIGHTS

You have the following options available to you in respect of your PI that we process:

- you may inquire from us at no cost whether we hold your PI, as long as you provide us with adequate proof of your identity;
- where necessary, request the correction, destruction or deletion of your PI;
- object to, restrict or limit the processing of your PI,
- object to using your PI for purposes of direct marketing,
- request to not have your PI used to be sent unsolicited emails.

You can exercise any of your rights listed above by sending an email to info@fpggroup.co.za. If you want to change your email preferences, you can do so by responding to the most recent email that you received from us. Where we have reasonable doubt as to the identity of the person making an

enquiry we may request additional information in order to confirm the identity of the person, such as an identity document, including a drivers licence or passport.

Please note that the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply. Should we determine that you are not entitled to exercise a specific right, we will provide you with the reason(s) why.

Should we have reasonable grounds to believe that your PI has been accessed or acquired by any unauthorised person, we shall, as soon as is reasonably possible and lawfully required, notify the applicable regulator/s, as well as yourself, unless we are unable to establish the identity of the PI that has been unlawfully accessed.

CHANGES TO THIS PRIVACY POLICY

This Privacy Policy is effective as of 22 November 2018. The latest version of our Privacy Policy is always available on our Websites. We may need to update or change our Privacy Policy from time to time, and we will notify you regarding any material changes to this Privacy Policy using the channels that we normally use to communicate. Your continued use of our websites, products and services after you have been notified of any amendments to the Privacy Policy will represent your acknowledgment of any changes and your agreement to adhere to the updated Privacy Policy.

DISPUTE RESOLUTION OR LODGING A COMPLAINT

Should you have any concerns regarding relating to our privacy policy you may submit an email to info@fpggroup.co.za. We will review your concerns and try to resolve any complaint relating in accordance with this policy and applicable law.

If you live or work in the EU, and if you believe there has been an infringement of your data protection rights, you are entitled to submit a complaint to a data protection authority in the EU Member State where you live or work, where you suspect that there has been an infringement of applicable data protection laws. The contact details of each EU Data Protection Authority can be found at the following

website: http://ec.europa.eu/justice/data-protection/article-29/structure/data-protection-authorities/index_en.htm

We will acknowledge your request as required under applicable data protection laws. However, the rights mentioned in this Privacy Policy are not absolute: the rights do not always apply, and exemptions may be applicable. We will ask you to verify your identity and/or ask you information to assist us in better understanding your request. In the event we do not comply with your request, we will explain why.