

POPIA COMPLIANCE DOCUMENT

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Protection of Personal Information Policy

1. Introduction

POPIA was signed into law in November 2013 and the purpose of Act is to protect personal information, to strike a balance between the right to privacy and the need for the free flow of, and access to information, and to regulate how personal information is processed.

Deal Core Property Group is a real estate company, providing real estate related services and products across the Commercial and Industrial real estate spectrums. These services include the following:

- **Client Representation** - We exist because of our clients. It's the insights we have obtained from our clients that have led us to structure our offering the way we have.
- **Tenants Representation** - Tenant Representation services are distinguished by our in-depth knowledge of local markets, combined with strategic problem-solving abilities.
- **Buyer Representation** - We will take the time to understand your specific needs and goals to identify properties to meet your requirements.
- **Landlord Representation** - Our firm provides brokerage services that include collecting property data, seeking appropriate end users, preparing and presenting lease proposals, and working through the processes to complete the transactions.
- **Seller Representation** - Deal Core Property Group is committed to finding the right buyer to maximize your return on investment.

The purpose of this document is to inform the client of the manner in which **Deal Core Property Group** manages the collection, processing and or storage of Personal Information.

2. Definitions

In this document, unless the context indicates otherwise, the words and expressions used herein shall have the same meaning assigned to them in the Protection of Personal Information Act No. 4 of 2013 and related expressions shall have corresponding meanings. For ease of reference, some definitions are highlighted below.

“Personal Information” means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to—

- (a) information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;
- (b) information relating to the education or the medical, financial, criminal or employment history of the person;
- (c) any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
- (d) the biometric information of the person;
- (e) the personal opinions, views or preferences of the person;
- (f) correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
- (g) the views or opinions of another individual about the person; and

- (h) the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person;

“Responsible Party” means a public or private body or any other person which, alone or in conjunction with others, determines the purpose of and means for processing personal information;

“Operator” means a person who processes personal information for a responsible party in terms of a contract or mandate, without coming under the direct authority of that party

“Processing” means any operation or activity or any set of operations, whether or not by automatic means, concerning personal information, including –

- (a) the collection, receipt, recording, organization, collation, storage, updating or modification, retrieval, alteration, consultation or use;
- (b) dissemination by means of transmission, distribution or making available in any other form; or
- (c) merging, linking, as well as restriction, degradation, erasure or destruction of information

“Data Subject” means the person to whom personal information relates;

3. Collection of Personal Information

Generally, **Deal Core Property Group** collects Personal Information in the following ways:

- (a) Upon signing up for any of **Deal Core Property Group** products or services
- (b) When **Deal Core Property Group** conducts enquiries, audits, inspections or the like or in such a process seeks information from third parties in connection with the products and or services applied for
- (c) When interacting with **Deal Core Property Group’s** agents or employees (via telephone calls, letters, face-to-face meetings and emails)
- (d) When making use of any **Deal Core Property Group** real estate services
- (e) Upon submission of a request to be contacted or in response to marketing or promotions or initiatives by **Deal Core Property Group**
- (f) When **Deal Core Property Group** receives references from business partners and third parties
- (g) Upon submission of Personal Information to **Deal Core Property Group** for any other reason

4. Purpose for the Collection of Personal Information

Generally, **Deal Core Property Group** collects, processes and stores Personal Information for the following purposes:

- (h) Providing users with the products or services or mandates they have signed up for
- (i) To respond to complaints, queries, and any customer service related matters
- (j) To comply with company policies and procedures
- (k) To facilitate the daily operation of the products and or services offered by **Deal Core Property Group**
- (l) Credit and internal risk management
- (m) Processing of payment instructions and any billing related matters
- (n) Internal reporting and fulfilment of reporting requirements
- (o) Continued administration of client portfolios
- (p) For purposes reasonably related to the aforementioned

5. Processing of Personal Information

By providing Personal Information to **Deal Core Property Group** through the above means, clients acknowledge that there is consent for **Deal Core Property Group** to process such information.

In processing such information, the following principles are applied:

- (a) All Personal Information provided by the Client to **Deal Core Property Group**, or to which **Deal Core Property Group** may be exposed, shall constitute Confidential Information and will not disclose Personal Information unless prior written consent from the Client is obtained, or where **Deal Core Property Group** is required to do so by law.
- (b) **Deal Core Property Group** shall at all times strictly comply with all applicable Data Protection Laws which may be in force from time to time;
- (c) **Deal Core Property Group** shall not, at any time process Personal Information for any purpose other than with the express prior written consent of the Client, and to the extent necessary to provide the services for which the Client has signed up;
- (d) **Deal Core Property Group** shall ensure that all its systems and operations which it uses to provide the necessary services including all systems on which Personal Information is processed as part of providing the services, shall at all times be of a minimum standard required by all applicable Data Protection Laws;
- (e) **Deal Core Property Group** shall take appropriate and reasonable technical and organisational measures to prevent the loss of, damage to or unauthorised destruction of Data and the unlawful access to or Processing of Data. The measures taken must at all times be of a minimum standard required by all applicable Data Protection Laws;
- (f) **Deal Core Property Group** shall take reasonable steps to identify all reasonably foreseeable internal and external risks posed to Data under **Deal Core Property Group** possession or control and establish and maintain appropriate safeguards against any risks identified. **Deal Core Property Group** shall notify the Client as well as the Group Information Officer of any security compromises or suspected security compromises of which it becomes aware or suspects, immediately on becoming so aware or forming such a suspicion;
- (g) **Deal Core Property Group** will only process and collect Personal Information for a purpose consistent with the purpose for which it is required in a manner that is adequate, relevant and not excessive in the context of the purpose for which it is processed and collected.
- (h) **Deal Core Property Group** shall not be held responsible for the loss, damage, unauthorized use or unlawful access to Personal Information should the client not make use of security services or risk evaluations.

6. Retention of Personal Information

Deal Core Property Group retains Personal Information no longer than necessary in relation to the purposes for which it was collected or otherwise processed. To the extent required by applicable law, **Deal Core Property Group** will erase or destroy Personal Information in the following circumstances:

- (a) when the Data Subject withdraws consent to process Personal Information;
- (b) after a period of five (5) years and/or the expiry of compulsory statutory or regulatory retention periods relating to Personal Information; or
- (c) when it is necessary to comply with any court order, statutory and/or regulatory obligations to which **Deal Core Property Group** is bound

7. Queries Regarding Personal Information

Should a client like to withdraw consent to the use of Personal Information, or would like to access or make any amendments to their Personal Information they may contact their legal advisor who will assist them in this process.

Should a client withdraw their consent to the use of Personal Information, depending on the nature of the Personal Information, **Deal Core Property Group** may not be in a position to continue to render products or services to such a client or may not be in a position to continue with the contractual relationship between the client and **Deal Core Property Group**, which may result in the termination of any and or all agreements between the client and **Deal Core Property Group**

The details of **Deal Core Property Group** Information Officer and Head Office are as follows:

Information Officer : **Rika Indurjeeth**
Telephone Number : **031 – 266 7750**
E-Mail Address : **rika@dealcore.co.za**

Head Office Details

Telephone Number : **031 – 266 7750**
Postal Address : **Postnet Suite 50, Private Bag X3, Westville, Durban, 3630**
Physical Address : **97 Jan Hofmeyr Road, Westville, 3629**

19 May 2021

Dear Rika Indurjeeth

RE: APPOINTMENT AS INFORMATION OFFICER – POPI ACT

This letter serves to confirm that Rika Indurjeeth, ID No 7910110126086, has been appointed Information Officer for Deal Core Property Group as of 10 May 2021.

Yours faithfully



Ryan Berry
Managing Director



**INFORMATION
REGULATOR
(SOUTH AFRICA)**

*Ensuring protection of your personal information
and effective access to information*

REGISTRATION CERTIFICATE

Registration Number:3741/2021-2022/IRRTT

This is to certify that **Rika Indurjeeth** has been registered with the Information Regulator by **Lurinet (Pty) Ltd trading as Deal Core KZN** as the Information Officer in terms of section 55(2) of the Protection of Personal Information Act 4 of 2013 with effect from **19 May 2021**.



**Chief Executive Officer
INFORMATION REGULATOR**

NB: Please note that it is your responsibility to ensure that the particulars of an Information Officer and/or Deputy Information Officer(s) are correct and updated on an annual basis or as and when it becomes necessary.