

## PRIVACY POLICY

### 1 – Introduction

Growthpoint Properties is committed to protecting the privacy of the Personal Information of the users of this Website.

The purpose of this policy is to demonstrate this commitment and to inform you of the principles under which Growthpoint Properties processes Personal Information received from you.

This Privacy Policy complies with the privacy objectives and principles housed under the Protection of Personal Information Act, 4 of 2013 (hereinafter referred to as “POPI”).

This Privacy Policy may be updated at any time by Growthpoint Properties. The date of the most recent revision will appear on this page.

Please note that by ticking the box at the end of this Privacy Policy, you authorise Growthpoint Properties to process your Personal Information according to this Privacy Policy.

### 2 – Definitions

“Personal Information” is information or data about an identified or 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, received by Growthpoint Properties from any party in any format including, without limitation, electronic, paper, and verbal;

"Website" means <https://constantivillage.co.za/>

### 3 - When does Growthpoint Properties collect your Personal Information?

Growthpoint Properties collects Personal Information when you:

- Visit and browse our Website; and
- Send communication or submit an enquiry through our Website.

### 4 - What Personal Information does Growthpoint Properties collect about you?

Growthpoint Properties considers all information that could identify you directly or indirectly as Personal Information. Growthpoint Properties will mainly collect the following Personal Information:

- Information disclosed by you about your identity, in particular your first and last names, telephone number, and email address;
- Your preferences;
- Your IP address or information about how your device navigates through our Website.

The information detailed above is collected either electronically by using cookies or is provided voluntarily by you. You may determine cookie use independently through your browser settings.

### 4 - Why is your Personal Information collected?

Personal information is processed mainly for the following purposes:

- Administration of the Website;
- Customer Relationship Management (newsletters, surveys, etc.), the processing of which is made subject to your approval;
- To communicate with you regarding matters that you have asked to be contacted about;

- Market analysis and timing (profiling on the basis of your preferences and interests, analyses while navigating through the Website, statistics, reporting, etc.);
- Managing your requests (complaints, right to access, rectify, oppose and removal of Personal Information, etc.).

Growthpoint Properties may collect, maintain, save, compile, share or disclose any information collected from you, subject to the following provisions:

- Growthpoint Properties shall disclose Personal Information without your consent only if it is required to do so in order to comply with an obligation imposed on it by law;
- In every other instance, Growthpoint Properties shall not disclose your Personal Information unless you consent thereto;
- You have the right to access your Personal Information and to request Growthpoint Properties to rectify the information collected should it be incomplete or contain any errors; and
- Growthpoint Properties may compile, use and share any information that does not relate to any specific individual.

Growthpoint Properties owns and retains all rights to non-personal statistical information collected and compiled by Growthpoint Properties.

#### 5 – Does Growthpoint Properties disclose your Personal Information?

Growthpoint Properties will never share your Personal Information with advertisers who are not affiliated with Growthpoint Properties.

The Personal Information we are collecting about you is intended for Growthpoint Properties and is likely to be processed by a third party chosen for their expertise and reliability and acting on our behalf and at our direction (e.g. website hosting companies).

Growthpoint Properties authorises these third parties to use your Personal Information only to the extent necessary to perform services on our behalf or to comply with legal requirements and we strive to ensure that your Personal Information is always protected.

These third parties will be located in South Africa and if they are located outside of South Africa, Growthpoint Properties shall comply with section 72 of POPI to ensure that the

Personal Information is afforded the same level of data protection as in South Africa. In such a case, we will ensure either:

- To obtain your unambiguous consent to share your Personal Information with these third parties;
- To enter into appropriate data transfer agreements in full compliance with POPI.

Finally, we may also transmit your Personal Information to local authorities if required by POPI or other legislation or as part of an investigation and in accordance with local regulations and Growthpoint Properties shall endeavour to inform you of such request or legal obligation.

#### 6 - How will Growthpoint Properties protect the information about you?

Growthpoint Properties endeavours to take the appropriate technical and organisational measures, in relation to the nature of data and risks, to preserve the security and confidentiality of your Personal Information and, in particular, to prevent it from being altered, corrupted or transmitted to any unauthorized parties.

This may include practices such as retaining your Personal Information on a secure server protected by a firewall, the transmission of sensitive information using a Secure Sockets Layer (SSL), internal reviews of our practices and privacy policies and implementation of physical security measures to protect against unauthorized access.

#### 7 - What is the policy regarding minors?

Growthpoint Properties does not collect or process Personal Information from persons under the age of 18 (minors) without prior authorisation from their parent or legal guardian.

As soon as we acquire knowledge of the collection of Personal Information from any minors without prior authorisation from that minor's parent or legal guardian, we will take appropriate measures to delete all such Personal Information from our servers.

#### 8 – What is the cookies policy of Growthpoint Properties?

Growthpoint Properties makes use of cookies on the Website and shall provide you with the option to accept or deny the cookies access to the Website.

#### 9 - For how long is your Personal Information kept?

Growthpoint Properties strives to keep your Personal Information only for the time necessary for the purposes set out in this Privacy Policy and in accordance with the provisions in force. As a general rule:

- Your data will be kept for three years from the date of collection or after the last contact or the end of the commercial relationship, unless opposed by you. At the end of this three-year period, we may make contact with you again in order to find out whether or not you wish to continue to receive communications from us. If no clear positive answer is given by you, your data will be deleted or archived in accordance with POPI;
- Data to prove a right or a contract or if kept in compliance with a legal obligation can be archived in accordance with the law.

#### 10 - What are your rights regarding your Personal Information and how to contact us?

If you consent and provide us with your email address, phone number or mailing address, you may receive emails, calls or periodic messages from us about our properties. You can unsubscribe at any time from our mailing lists by contacting us at the address below or by following the "unsubscribe" link contained in each of our emails.

In accordance with POPI, you have the right to access, rectify, limit, oppose and delete Personal Information about you. You can also withdraw your consent to the processing of your Personal Information at any time.

You will be informed of the actions to be taken as soon as possible and in any case no later than one month after your request. However, we reserve the right not to respond to manifestly unfounded or excessive requests.

You can file a complaint with the Information Regulator at email: [infoirsa@justice.gov.za](mailto:infoirsa@justice.gov.za) if your Personal Information is misused.

Please contact Growthpoint Properties should you have any questions or comments in connection with this Privacy Policy.

I consent to the processing of my Personal Information in accordance with the terms hereof.