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**ABACUS MANAGEMENT COMPANY (PTY) LTD
NOTICE OF COMPLIANCE WITH
THE PROTECTION OF PERSONAL INFORMATION ACT 4 OF 2013**

Abacus Management Company (Pty) Ltd is committed to processing the personal information of our staff and clients in compliance with the Protection of Personal Information Act 4 of 2013 ("POPIA").

Our Privacy Policy can be viewed by contacting:

Information Officer: Scholtz Conradie
Telephone: 021 886 5262
Email: scholtz@aaam.co.za

Deputy Information Officers: Linda van Zyl / Helena du Plessis
Telephone: 021 886 5262
Email: linda@aaam.co.za / helena@aaam.co.za

1. IMPORTANT TERMS AS DEFINED IN POPIA

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|-----|------------------------|---|
| 1.1 | "Personal Information" | "Information relating to an identifiable, living, natural person and, where it is applicable, an identifiable, existing juristic person." |
| 1.2 | "Data Subject" | "The person to whom personal information relates." |
| 1.3 | "Responsible Party" | "For purposes of this Notice, the Responsible Party is Abacus Development Company (Pty) Ltd." |
| 1.4 | "Child" | "A natural person under the age of 18 years who is not legally competent." |

- 1.5 "Consent" "Voluntary, specific and informed expression of will in terms of which permission is given for the processing of personal information."
- 1.6 "Processing" "Any operation or activity or any set of operations, whether or not by automatic means, concerning personal information."
- 1.7 "Record" "Any recorded information."
- 1.8 "Regulation" "Information Regulator established in terms of Section 39."
- 1.9 "Special Personal Information" "Personal information of data subjects relating to their religious or philosophical beliefs; race or ethnic origin; trade union membership; political persuasion; health or sex life; biometric information and criminal behavior (to an extent)."

2. NATURE AND PURPOSE OF PERSONAL INFORMATION

- 2.1 The nature of the information we request for processing will be determined by the obligations imposed on us by legislation as a property developer and by general industry practice.
- 2.2 We collect and process this data mainly to render the service of developing properties. The purposes for the collection of such information include:
 - 2.2.1 Record-keeping in terms of applicable legislation; and
 - 2.2.2 Compliance with building regulations;

3. DATA PROCESSING PRACTICES

- 3.1 Any information provided to us by our clients is treated as strictly confidential.
- 3.2 Your rights as a data subject will always be explained to you before we process or store your personal information.
- 3.3 Our physical and electronic records are kept secure and, where necessary, password / lock protected.
- 3.4 Third parties to whom we provide your personal information are bound to treat such information with the same level of confidentiality and care as we undertake to do.
- 3.5 In instances where it is necessary to obtain personal information from a source other than the data subject, we will inform you.

4. THE PROCESSING OF SPECIAL PERSONAL INFORMATION

4.1 In compliance with the provisions of POPIA, we will not process your special personal information (as defined in 1.9 above), unless:

4.1.1 We have your consent;

4.1.2 Processing of such special personal information is necessary to establish or exercise an obligation as set out in law and / or regulations.

5. RETENTION PERIOD OF CLIENT PERSONAL INFORMATION

5.1 In terms of relevant legislation, we retain our client and employee records for a minimum period of five (5) years from the date of last entry, and longer for record-keeping purposes, where we hold the consent of the relevant data subject to do so (client or employee).

6. SECURITY SAFEGUARDS

We take all reasonable and practicable steps, both in relation to physical and electronic records, to guard the integrity of the client and staff personal information under our care.

7. THE RIGHTS OF THE DATA SUBJECT

7.1 You have the right to:

7.1.1 Have your personal information lawfully processed in accordance with the conditions as set out in POPIA;

7.1.2 Be notified that your personal information is being collected / has been assessed / acquired by an unauthorized person;

7.1.3 Establish whether we hold your personal information;

7.1.4 Request access to your personal information from us;

7.1.5 Request, where necessary, the correction, destruction or deletion of your personal information;

7.1.6 Object, on reasonable grounds, to the processing of your personal information; and

7.1.7 Lay a complaint to the Information Regulator or institute civil proceedings.

8. MARKETING

- 8.1 We will not use your personal information for marketing purposes without your consent.
- 8.2 Newsletters and website updates, amongst other things, will not be sent to you unless you have consented to receive such communication.
- 8.3 If you are currently receiving newsletters and other marketing-related communication from us, and should you wish not to receive such correspondence, please inform us and we will remove your details from our mailing list.