**Warren Jack Property Group** advises that from 1<sub>st</sub> July the Protection of Personal Information Act (POPIA) comes into effect.

In accordance with the Act, we will continue to protect your privacy when

processing your personal information.

Your privacy will remain of the utmost importance to us!

#### **Privacy Policy**

This is the Privacy Statement of Warren Jack Property Group (we or us).

It applies to the personal information of visitors to our website, available at https://www.warrenjack.co.za and all of our clients and potential clients who engage with us in any manner (collectively, you).

Use of the Website is also subject to our terms and conditions available.

Your relationship with us as a client is subject to any separate terms between us. We may need to change or update this Privacy Statement from time to time.

Any updated versions will be posted on the Website and will be effective from the date of posting.

Where practical, we may notify you of the changes.

#### 1. What personal information do we collect?

1.1 We respect your privacy rights and comply with all applicable laws in handling personal information.

When used in this Privacy Statement, the term "personal information" has the meaning given to it in the Protection of Personal Information Act, 2013 (POPIA), applicable in the Republic of South Africa. Generally speaking, personal information is any information that can be used to personally identify a natural or juristic person.

If any information that we collect personally identifies you, or you are reasonably identifiable from it, we will treat it as personal information.

Warren Jack Property Group requests for your Financial Intelligence Centre Act (FICA) information upon submission of an offer.

Such information may include but is not limited to the following:

Company CK registration /Individual ID, Proxy/ User certified ID documents, Certified Utility Bill, Company Resolution Mandate, Ultimate Beneficial Ownership Structure, Source of Funds, Trust Deed/Will, Letter of Authority, VAT certificate and

## WARREN JACK PROPERTY GROUP PRIVACY POLICY

The company BRNC document.

1.2 All registrations are conducted via face-to-face interviews or electronically.

When purchasing or leasing a property in a Company or Trust, you will be required to provide your company registration information and to provide the applicable FICA information based on the registration number you provide (e.g., Legal Entity/ Trust/ Sole Proprietor).

When uploading the information, we conduct due diligence/KYC (Know Your Clients) checks on the documents received.

Should there be a case whereby insufficient documentation had been provided, you will receive communication via telephone and email requesting for the outstanding documentation, once this is provided to us, you will be deemed FICA compliant.

1.3 Warren Jack Property Group currently conducts verification checks on your personal Information using third- party verification systems such as LexisNexis Windeed and Verified.

## 2. Use of Cookies

2.1 The Warren Jack Property Group Website does not use "cookies" to identify you or collect any information that you do not provide us.

2.2 If you provide us with personal information of third parties, please make sure that you are authorised to do so.

### 3 Why do we collect personal information on our website?

3.1 to respond to general enquiries summitted through our "contact us" page;

3.2 to conduct verification checks;

3.3 to communicate with you via emails and provide you with access to our information;

3.4 to gain insight into how our visitors use the website and to improve our website service;

3.5 We may handle anonymized information for research or analytics purposes or include it in our publications which we share with third parties. You will not be identifiable from this information.

## 4 What happens if you do not provide the personal information we require?

4.1 We may not be able to supply the products and/or services you require from us;

4.2 We may not be able to respond to your enquiry as submitted to us through the "contact us" page;

4.3 We will not be able to provide you with an account.

#### 5 Do we disclose personal information to third parties?

5.1 We may disclose your personal information to third parties as required by law, where it is necessary to give effect to a contract with you, or where we have a legitimate interest in doing so. We may disclose your personal information to:

5.1.1 The personal information provided here is subject to third party internal and external auditors, our employees, contractors or third-party service providers in connection with the Website, and our business operators;

5.1.2 our insurers, underwriters and professional advisors, including our

accountants, lawyers, business advisors and consultants;

5.1.3 employees and/or the managers of any entities through which they operate if we merge, combine or divest a part of our business;

5.1.4 law enforcement or regulatory bodies as required by law; and

5.1.5 any other juristic or natural person for any authorised purpose with your express consent.

5.2 We will never sell your personal information.

#### 6. Marketing

6.1 We may, with your prior consent, use your contact details to send you details of new products, listings or services which may interest you.

These communications may be sent in various forms (including by mobile phone and by email) in accordance with applicable marketing laws.

If you indicate a preference for a method of communication, we will endeavour to use that method.

6.2 All of these communications will set out how to unsubscribe from (or opt out of) receiving future communications if you no longer wish to receive promotional material.

## 7. Security

7.1 As the Website is accessible via the internet, and the internet is inherently insecure, we cannot guarantee the security of information you send to us online (including that it will not be intercepted). You send information to us online at your own risk.

7.2 We may keep your personal information in either electronic or hard copy form. In both cases, we take reasonable and appropriate steps to ensure that the personal information is protected from misuse and loss and from unauthorised access, modification or disclosure.

7.3 Personal information is destroyed or de-identified when no longer needed or when we are no longer required by law to retain it (whichever is the later).

## 8. How can you access and correct your personal information?

8.1 You have the right to contact us at any time requesting:

8.1.1 confirmation that we have your personal information;

8.1.2 access to the records containing your personal information or a description of the personal information that we hold about you; and

8.1.3 the identity or categories of third parties who have had, or currently have, access to your personal information.

8.2 You can make a request by emailing compliance@warrenjack.co.za When making a request, we will require adequate proof of your identity. We will try to provide you with suitable means of accessing information, where you are entitled to it, by for example, posting or emailing it to you.

8.3 There may be instances where we cannot grant access to your personal information. For example, if access would interfere with the privacy of others or would result in a breach of confidentiality, we may need to refuse access. If we refuse access, we will give written reasons for the refusal.

8.4 If you believe that any personal information that we hold about you is inaccurate, irrelevant, outdated, incomplete or misleading, you may ask us to correct it. If you believe that any personal information that we hold about you is excessive or have been unlawfully obtained or that we are no longer authorised to retain it, you may ask us to destroy or delete it. If we do not agree that there are grounds for action, you may ask us to add a note to the personal information stating that you disagree with it.

8.5 We may charge a reasonable fee to cover our administrative and other costs in providing information to you. We will not charge for simply making a request or for making any corrections to personal information.

# 9. Complaints

9.1 If you believe that your personal information has been unlawfully accessed or acquired, you can contact us and provide details of the incident so that we can investigate it.

9.2 We will treat your complaints confidential (unless otherwise required by law), investigate those complaints and aim to ensure that they are resolved within a reasonable time, in order to provide you with feedback.

# 10. Changes to your personal information

10.1.1 If your personal information changes, please let us know at <u>compliance@warrenjack.co.za</u> and provide us with all changes as soon as reasonably possible to enable us to update it.

# 11. Third party websites

11.1 This Privacy Statement does not apply to any third -party websites which may be accessible through links on the Website. We do not make any representations or warranties about the privacy practices of any third party and do not accept any responsibility for them.

Third party website providers are responsible for informing users about their own privacy practices and we suggest that you review the privacy policies of any third-party providers whose sites you access.

# **12 Contact information**

12.1 If users have any questions about this Privacy Statement, any general concerns or would like to lay a complaint regarding the treatment of your personal information or to access and correct your personal information, you can contact us at <u>compliance@warrenjack.co.za</u>