



Pareto Limited  
(Reg. No.: 1998/000118/06)

<b>PARETO LIMITED</b>	
<b>PRIVACY POLICY</b>	
<ol style="list-style-type: none"> <li>1. <b>Purpose</b></li> <li>2. <b>Objectives</b></li> <li>3. <b>Scope</b></li> <li>4. <b>Definitions</b></li> <li>5. <b>Consent to processing of Personal Information</b></li> <li>6. <b>Collection of Data / Personal Information</b></li> <li>7. <b>Why do we disclose your Personal Information?</b></li> <li>8. <b>Who would we share your Personal Information with?</b></li> <li>9. <b>What will we do with your Personal Information?</b></li> <li>10. <b>Where is the information stored?</b></li> <li>11. <b>How do we keep your Personal Information secure?</b></li> <li>12. <b>What are cookies and what information do they collect?</b></li> <li>13. <b>Retention and Destruction of your Personal Information</b></li> <li>14. <b>What are your rights?</b></li> <li>15. <b>Limitation</b></li> <li>16. <b>Changes to this Policy</b></li> <li>17. <b>Information Officer details</b></li> <li>18. <b>Policy Compliance</b></li> <li>19. <b>Review of Policy</b></li> </ol>	
<b>Policy Owner</b>	Risk and Compliance
<b>Policy Issue No.</b>	Version 0
<b>Policy effective date</b>	Date of approval by the Board of Directors

## 1. PURPOSE

- 1.1 Pareto Limited, its subsidiary (being Mowana Properties Proprietary Limited) and its sister company Business Venture Investments No. 1360 Proprietary Limited (collectively the “**Pareto Group**”, “**we**”, “**us**”) recognise the need to protect the personal information of all its employees, customers, tenants and suppliers as well as any other natural or legal persons (being data subjects) interacting with the Pareto Group, as referred to in the Protection of Personal information Act No. 4 of 2013 (“PoPIA”).
- 1.2 We are committed to protecting your personal information and have implemented appropriate measures to ensure that your personal information is collected, used, shared, stored and destroyed lawfully and kept confidential, as provided for in PoPIA or specifically in another Act of Parliament.

## 2. OBJECTIVES

- 2.1 The objectives of this Policy are to ensure that the manner in which we collect, use, share, store, destroy and protect the personal information of data subjects is disclosed and understood.
- 2.2 This Policy, accordingly, establishes the standard for the protection of personal information of data subject(s) by the Pareto Group. It contains principles relating to data subjects’ rights to privacy and to the safeguarding of their personal information.

## 3. SCOPE

This Policy applies to:

- 3.1 all data subjects whose personal information we collect and process;
- 3.2 all personal information, whether it was provided to us through our websites, mobile applications or through any other form of communications which you may have accessed such as email, telephone, or otherwise, through or by third parties or tools that collect personal information.

## 4. DEFINITIONS

- 4.1 Unless inconsistent with or otherwise indicated by the context, in this Policy document, the defined words and expressions commencing with letters in bold, shall have the following meanings assigned to them in this Policy:
- 4.1.1 “**data subject(s)**” means the person to whom personal information relates;
- 4.1.2 “**Information Regulator**” means the Information Regulator established in terms of section 39 of PoPIA;
- 4.1.3 “**Information Officer**” means an information officer or deputy information officer as contemplated in terms of PoPIA;
- 4.1.4 “**Policy**” means this Privacy Policy as approved by the Board from time to time;

- 4.1.5 “**personal information**” means information relating to an identifiable, living, natural person and where it is applicable, identifiable, existing juristic person, including all information as defined in the PoPIA;
- 4.1.6 “**processing**” means the creation, generation, communication, storage, destruction of personal information as more fully defined in the PoPIA;
- 4.1.7 “**You**” or the “**user**” means any person who accesses this Policy by whatever means and browses this website for any purpose.
- 4.2 In this Policy, unless the context indicates otherwise, any reference to:
  - 4.2.1 the singular includes the plural and *vice versa*; and
  - 4.2.2 one gender includes all genders.

## 5. **CONSENT TO PROCESSING OF YOUR PERSONAL INFORMATION**

- 5.1 By visiting or using any of our websites, electronic applications, electronic mails, mobile applications or WiFi services you agree to the terms of this Policy as updated from time to time.
- 5.2 By your continued use of our websites, electronic applications, electronic mails, mobile applications or WiFi services we accept that you have read, understood, accepted and agree to be bound by this Policy.
- 5.3 Data Subject(s) under the age of 18 years of age must obtain parental or guardian consent to access our websites or mobile applications. We will afford the same level of protection to all personal information processed, regardless of the age of the person the personal information pertains to.

## 6. **COLLECTION OF DATA / PERSONAL INFORMATION**

### 6.1 **WHY DO WE PROCESS PERSONAL INFORMATION?**

We will collect personal information from our employees, customers, tenants and suppliers as well as any other natural or legal persons (being data subjects) and process it in order (i) to provide a service; (ii) to help us improve our service offerings; (iii) to comply with regulatory and legislative requirements; and (iv) for legal and operational reasons.

### 6.2 **WHEN DO WE PROCESS PERSONAL INFORMATION?**

When data subject(s) themselves complete forms and/or visit our websites, electronic applications, electronic mails and/or access the WiFi service, or from their authorised representatives or indirectly from surveillance systems like CCTV.

### 6.3 **WHAT PERSONAL INFORMATION DO WE COLLECT?**

- 6.3.1 The type of personal information we collect will depend on the specific purpose for which it is collected and processed. In this regard we will only collect such information as is needed for that specific purpose.
- 6.3.2 If you contact us for any reason and through any means, we may keep a record of

such inter-action, including but not limited to correspondence. We may also ask you for personal information when you enter a competition and/or promotion and when you lodge a complaint.

- 6.3.3 In addition we may keep details of enquiries, orders or transactions you carry out through our website. We may also keep details of your visits to our website including, but not limited to, traffic data, location data, weblogs and other communication data, whether this is required for our own operational purposes or otherwise.

## **7 WHY WOULD WE DISCLOSE YOUR PERSONAL INFORMATION?**

We will take all appropriate steps to keep all your personal information confidential to protect it from loss, leakage or unauthorised sharing. We may need to disclose your personal information under the following circumstances:

- 7.1 where we are legally obliged to do so;
- 7.2 for the detection and prevention of fraud, money laundering, corruption, other criminal activities and/or malpractice;
- 7.3 it is in the public interest to do so;
- 7.4 our own legitimate interests require such disclosure including but not limited to complying with legal and regulatory requirements or industry codes of conduct to which we subscribe; or
- 7.5 where you have given consent.

## **8 WHO WOULD WE SHARE YOUR PERSONAL INFORMATION WITH?**

We will take all appropriate steps to ensure that we do not share your personal information with third parties outside of these parameters:

- 8.1 our approved suppliers and/or third parties who are involved in the delivery of services to you or us. In this regard, we have service level agreements in place to ensure that our service providers also comply with our privacy standards, contained in this Policy;
- 8.2 a credit bureau or a government agency with your consent and/or it is only in the execution of a legitimate purpose or required by law;
- 8.3 to a third party in order to obtain the personal information that we need, we will not disclose more of your personal information than we need to.

## **9 WHAT WILL WE DO WITH YOUR PERSONAL INFORMATION?**

We will process your personal information for the specific purposes for which it was collected, which typically includes, but not limited, to the following:

- 9.1 in order to discharge our contractual responsibilities and providing services to you;
- 9.2 assessing any applications you have made which may include (i) verifying your identity or that of your authorised representative(s) for security purposes; and (ii) credit scoring, credit assessment and credit management in order to provide you with services;

- 9.3 collecting money when you're in default of a contractual relationship or recovering any debt owed by you;
- 9.4 enforcing contractual terms and conditions and/or instituting or responding to or defending legal proceedings involving you;
- 9.5 conducting market research, statistical analysis or trends analysis to improve our service;
- 9.6 for audit purposes and record keeping purposes including statutory retention requirements;
- 9.7 to respond to your requests, enquiries and instructions made through or about our services;
- 9.8 with your separate and specific consent, to deliver advertising, including customised advertisements, sponsored content and promotional communications;
- 9.9 to operate, evaluate and improve our services and our business (including developing new services, enhancing and improving our current services, managing our communications services and customer base);
- 9.10 to protect against, identify and prevent fraud and other criminal activity, claims and other liabilities;
- 9.11 maintaining adequate security measures (including fraud detection);
- 9.12 to comply with and enforce applicable legal requirements, relevant industry standards and our policies, including this Policy.

## **10 WHERE IS THE INFORMATION STORED?**

- 10.1 The personal information which we collect from you may be transferred to, processed at and stored at a destination outside of South Africa by staff operating outside the country who works for one of our service providers.
- 10.2 By submitting your personal information, you agree to such cross-border transfers, processing and/or storage of your personal information. We will, however, take all reasonable steps to ensure that the privacy standards contained in this Policy are adhered to by our service providers and their staff.
- 10.3 We will, furthermore, only transfer your personal information to a service provider outside of the borders of South Africa if such a service provider operates from a country that is subject to legislation, binding corporate rules or legal agreements which provide an adequate level of protection of your personal information and that includes provisions that are substantially similar to the security standards contained in this Policy.
- 10.4 All personal information you provide to us will be stored in secure information technology systems and/or servers. However, the transmission of data via the internet is not completely secure. Although we will endeavour to take appropriate steps to protect your personal information, we cannot guarantee the security of any of your data transmitted to us through the internet. Accordingly, any such

transmissions will be at your own risk. Once we have received your personal information, we will use appropriate procedures and security features to prevent any loss, leakage or unauthorised access of your personal information from our information technology systems and/or servers.

## **11 HOW DO WE KEEP YOUR INFORMATION SECURE?**

- 11.1 We are serious about the protection of your personal information. We will therefore always do our best to comply with applicable data protection laws.
- 11.2 Our hosting company will host our website in a secure server environment that uses a firewall and other advanced security measures to prevent loss, damage, unauthorised destruction, unlawful access or unlawful processing of your personal information. We authorise access to personal information only for those employees who require it to fulfil their employment responsibilities.
- 11.3 We implement disaster recovery procedures where appropriate.
- 11.4 Where we store physical copies of your personal information

## **12 WHAT ARE COOKIES AND WHAT INFORMATION DO THEY COLLECT?**

- 12.1 “**Cookies**” refers to information that is sent from our website to your personal computer’s hard drive where it is saved and contains information to personalise your experience on our website. Accordingly, the next time you visit our website, we will recognise you and that you have visited our website before.
- 12.2 By using a “cookie file” we may:
  - 12.2.1 collect information about your personal computer, including where available your IP address, operating system and browser type for system administration and to report aggregate information to our advertisers and/or strategic business partners. This is purely statistical data about browsing activities and patterns and does not identify any individual data subject;
  - 12.2.2 obtain information about your internet usage by using the “cookie file” which is stored on the hard drive of your personal computer.
- 12.3 Cookies also help us to improve our website and to deliver a better and more personalised service. In this regard, they also enable us to:
  - 12.3.1 estimate our audience size and usage pattern;
  - 12.3.2 store information about your preferences and allow us to customise our website according to your individual interests and speed up your searches.
- 12.4 You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of our website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you visit our website.
- 12.5 Our website may also have links to the websites of our strategic business partners. If

you click-through on a link to any of these websites, please be aware that these organisations have their own privacy policies in place and that we do not accept any responsibility and/or liability for these privacy policies. Accordingly, please read any such privacy policies before you submit any of your personal information to any such websites. In addition, please be mindful that our strategic business partners may also use cookies, over which we have no control.

### **13 RETENTION AND DESTRUCTION OF YOUR PERSONAL INFORMATION**

- 13.1 We will only retain your personal information for as long as it is necessary to fulfil the purposes explicitly set out in this Policy and contained within our retention of documents policy, unless:
- 13.1.1 retention of the record is required or authorised by law; or
  - 13.1.2 you have consented to the retention of the record.
- 13.2 During the period of retention, we will continue to abide by confidentiality obligations and will not share your personal information outside of the scope of this Policy.
- 13.3 We may retain your personal information in physical or electronic records at our discretion.
- 13.4 We may retain de-identified, anonymised or pseudonymised information using techniques that do not permit your re-identification. If none of the afore-mentioned scenarios are required, we will permanently delete (electronic) and shred (paper) after the purpose of collection the information has expired.

### **14 WHAT ARE YOUR RIGHTS?**

You have the right to make the following requests and/or enquiries from our information officer at [info.officer@pareto.co.za](mailto:info.officer@pareto.co.za):

- 14.1 request a copy of the personal information we hold about you. Please note that any such access request may be subject to a payment of a fee, as prescribed/ allowed by the Information Regulator;
- 14.2 know the identity of all third parties that have or have had access to your personal information;
- 14.3 ask us to update, correct or delete or erase your personal information if it is inaccurate, irrelevant, excessive, outdated, incomplete or misleading or if we have obtained it unlawfully or you wish to withdraw consent for us to continue to process or store it. We may, however, require valid supporting documents to verify the accuracy of your personal information in order to make updates or corrections;
- 14.4 object on reasonable grounds to us processing your personal information. You may, however, not object to the processing of your personal information if you have provided consent or there is legislation that requires us to process it;
- 14.5 opt out of direct marketing directed to you;
- 14.6 withdraw your consent which allows us to process your personal information. We,

may, however, continue to process your personal information if legally permitted and/or obligated to do so;

- 14.7 file a complaint with us and you have the right to file a complaint with the Information Regulator about an alleged contravention of the protection of your personal information. The Information Regulator's contact detail is:

**Complaints** email: [complaints.IR@justice.gov.za](mailto:complaints.IR@justice.gov.za)

**General enquiries** email: [infoereg@justice.gov.za](mailto:infoereg@justice.gov.za).

## 15 LIMITATION

We are not responsible for, give no warranties, nor make any representations in respect of the privacy policies or practices of linked or any third-party websites.

## 16 CHANGES TO THIS POLICY

- 16.1 We reserve the right to amend this Policy at any time, for any reason, and without notice to you other than a posting of the updated Policy on our website.
- 16.2 We encourage you to visit our website frequently in order to familiarise yourself with any changes.
- 16.3 This Policy shall be governed by the laws of the Republic of South Africa.
- 16.4 If any of the provisions of this Policy are held to be invalid, illegal and/or unenforceable due to applicable law, it shall be presumed to be deleted and the remainder of this Policy shall not be affected and shall continue in full force and effect.

## 17 INFORMATION OFFICER CONTACT DETAILS

- 17.1 Should you have any questions in respect to the Policy as set out above, please contact our Information Officer or Deputy Information Officer at

Telephone number : (011) 258 6800

or

Email : [info.officer@pareto.co.za](mailto:info.officer@pareto.co.za)

## 18 POLICY COMPLIANCE

- 18.1 This Policy is fully sanctioned by the Board of Directors of each company within the Pareto Group and any disciplinary action arising from breach of this Policy shall be taken in accordance with the disciplinary code and grievance procedure of the Company.
- 18.2 Where an employee is suspected of breaching the Policy, an internal investigation will be undertaken, and depending on the outcome, appropriate punitive measures may be instituted against the employee.



## **19 REVIEW OF POLICY**

- 19.1 This Policy shall be reviewed at such intervals as and when the need arises and taking into account prevailing conditions and changes in the applicable legislation and/or operational requirements.
- 19.2 Any changes in the Policy shall be approved by the Board of Directors of each company in the Pareto Group as recommended by its applicable Committees.