



**Privacy Policy in terms of the Protection of Personal Information Act, No. 4 of 2013 (POPI)**

**PRIVACY STATEMENT AND POLICY**

*Noble Property Fund (Pty) Ltd respects your privacy and is committed to keeping your information confidential.*

**SCOPE**

Your privacy is important to Noble Property Fund (Pty) Ltd. This Privacy Statement and Policy applies to the collection of personal information via services operated by Noble Property Fund (Pty) Ltd. In general, you can visit our website [www.nobleprop.co.za](http://www.nobleprop.co.za) without having to divulge any personal information about yourself. However, while using our website you may provide information about yourself or it may be collected by us.

You may view your personal information that we hold and correct it if necessary on written request to Noble Property Fund (Pty) Ltd marked for the attention of the Information Officer.

Access to your personal information held by Noble Property Fund (Pty) Ltd may also be requested by yourself or third parties. The Promotion of Access to Information Act, 2 of 2000 regulates and sets out the procedure for such a request and under what circumstances such access may be refused.

**WHAT PERSONAL INFORMATION IS COLLECTED AND HOW IS THAT INFORMATION USED?**

Personal information is used as is appropriate in the normal course of business to provide the services you have requested. We may retain any information for purposes of reporting and administration.

We collect information about investors, professionals and management in a variety of ways including but not limited to direct from publicly available information, and direct correspondence with investors, professionals or management.

We do not share with others any of the information you provide, unless we say so in this Privacy Statement, or when we believe in good faith that the law requires it.

**HOW IS MY PERSONAL INFORMATION PROTECTED?**

We take all reasonable steps to protect your personal information, which is held in a firewalled server. We can however not guarantee the security of any information you transmit to us electronically and you do so at your own risk.

- We maintain administrative, technical and physical safeguards to protect against loss, misuse or unauthorised access, disclosure, alteration or destruction of the personal information you provide to us.
- Noble Property Fund (Pty) Ltd seeks to ensure compliance with Data Protection/Privacy regulations, laws and industry best practices in respects to security around personal information.

**WHO HAS ACCESS TO THE PERSONAL INFORMATION?**

- We will not make your personal information available to any unaffiliated parties, except our approved agents, suppliers and contractors, or as otherwise described in this Privacy Statement.

**Privacy Policy in terms of the Protection of Personal Information Act, No. 4 of 2013 (POPI)****1. PURPOSE**

- 1.1 This policy applies to information relating to identifiable individuals, in terms of the Protection of Personal Information Act, 2013 (hereinafter the POPI Act).
- 1.2 We are committed to:
- 1.2.1 Keeping information securely in the right hands, and
- 1.2.2 Retention of good quality information.
- 1.3 We further aim to ensure that the legitimate concerns of individuals about the ways in which their data may be used are taken into account. In addition to being open and transparent, we will seek to give individuals as much choice as is possible and reasonable over what data is held and how it is used.

**2. CLIENT INFORMATION**

- 2.1 All personal information from our clients that we obtain and process is collected mainly to ensure compliance with legislation as well as to provide our clients with the services that we deliver, and in order to enable us to comply with all statutory requirements in rendering our services. We collect information about individuals and professionals in a variety of ways: including but not limited to: direct from the individuals and publicly available information. We do not share any of the information you provide with others, unless we say so in this Privacy Statement, or when we believe in good faith that the law requires it.
- 2.2 The type of information we collect will depend on the purpose for which it is collected and used. We will only collect information that we need for the purpose of rendering services to our clients.
- 2.3 The information we require we collect directly from our clients.
- 2.4 With our client's consent, we may also supplement the information that they provide to us with information we receive from other companies and or organisations such as the South African Revenue Services (SARS) in order to enable us to render our services to our client.

**3. HOW DOES NOBLE PROPERTY FUND (PTY) LTD PROTECT THE PERSONAL INFORMATION THAT IT COLLECTS?**

We have implemented certain appropriate security measures to help protect your personal information from accidental loss and from unauthorized access, use, or disclosure. We store the information about you in a restricted access server with appropriate monitoring, and we use a variety of technical security measures to secure your data. In addition, we use intrusion detection and virus protection software.

**4. EMPLOYEE INFORMATION**

- 4.1 All personal information of our employees that we obtain and process is collected mainly to ensure compliance with legislation and the successful operation of our business.
- 4.2 The type of information we collect will depend on the purpose for which it is collected and used. We will only collect information that we need for the purpose of our operations.
- 4.3 With our employee's consent, we may also supplement the information that they provide to us with information we receive from other companies and or organisations such as the South African Revenue Services (SARS) in order to enable us to comply with legislation.

**5. HOW WE USE OUR CLIENT AND EMPLOYEE INFORMATION**

- 5.1 We will use our clients' and employees' information only for the purposes for which it was collected or agreed to with our clients and employees, for example:
  - 5.1.1 To provide our services to our clients, to carry out the transactions our clients requested and to maintain our relationship;
  - 5.1.2 For audit and record keeping purposes;
  - 5.1.3 In connection with legal proceedings.
- 5.2 We will also use our clients and employee's information to comply with legal and regulatory requirements or industry codes to which we subscribe or which apply to us, or when it is otherwise allowed by law.

**6. INFORMATION SECURITY**

We will not make your personal information available to any unaffiliated parties, except as follows:

- 6.1 When the data is collected from publicly available domains including but not limited to websites, company directories, company registrars, search engines and similar technology.
- 6.2 To agents and/or contractors who may use it on our behalf or in connection with their relationship with us (for example, we may use third parties to assist us with legal agreements).
- 6.3 We are legally obliged to provide adequate protection for the personal information we hold and to stop unauthorised access and use of personal information. We are committed to ensure that all personal information of our clients or their businesses as well as our employees will be kept safe and secure and not be disclosed to any unauthorized third parties.
- 6.4 No employee of the company shall be allowed to disclose any personal information of our clients or our employees to any unauthorised third party. Any breach in this regard may lead to disciplinary action being taken which may include summary dismissal.

**7. ACCESS TO INFORMATION**

- 7.1 Our clients and employees have the right to request a copy of the personal information that we hold about them or their business. Should you wish to obtain any such information, you can lodge such a request with the company. We will take all reasonable steps to confirm your identity before providing details of your personal information.
- 7.2 Any such access request may be subject to a payment of an allowable administration fee.

**8. CORRECT INFORMATION**

- 8.1 Our clients and employees have the right to ask us to update, correct or delete their personal information. They may do this by contacting us at the number below:

**021 914 5881**

- 8.2 We will take all reasonable steps to confirm our client's identity before making changes to personal information we may hold about our client.
- 8.3 We would appreciate it if our clients and employees would keep their personal information accurate.

**9. KEEPING OF RECORDS**

- 9.1 Information and records of a personal nature of our client and our employees shall be stored indefinitely, unless you object.

**10. SECURITY OF PERSONAL DATA**

We will take reasonable precautions to protect Personal Data from loss, misuse, unauthorized access, disclosure, alteration and destruction.

**11. ACCOUNTABILITY**

- 11.1 The Company expects its independent contractors, subcontractors, and suppliers to maintain the trust placed in the Company by those Data Subjects who provide personal information to the Company.
- 11.2 The Company may periodically audit privacy compliance, and where necessary, will extend by contract its privacy policies and data protection practices to the Company' supplier and contractor relationships.

**12. ENFORCEMENT**

The Company uses a self-assessment approach to assure compliance with this Privacy Policy and periodically verifies that the policy is accurate, comprehensive for the information intended to be covered, prominently displayed, completely implemented and accessible and in conformity with the Principles. The Company encourages interested persons to raise any concerns using the contact information provided and we will investigate and attempt to resolve any complaints and disputes regarding use and disclosure of Personal Data in accordance with the Principles.



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### 13. PRIVACY STATEMENT CHANGES

If Noble Property Fund (Pty) Ltd information practices change in a significant way, we will circulate the policy changes to our clients and employees. Noble Property Fund (Pty) Ltd reserves the right to change this Privacy Statement at any time by circulating an updated version here. All previous versions will not be valid.