

**PROTECTION OF PERSONAL INFORMATION POLICY AND PROCEDURE
(INFORMATION PRIVACY)**

Version date: 30 June 2021

1. Definitions

In this policy the following terms and expressions shall have the meanings assigned to it:

- 1.1. "Camstone" means Camstone Asset Managers (Pty) Ltd (Registration number 2009/018007/07).
- 1.2. "Data Subject" means the person to whom the Personal Information relates, including both a natural and juristic person.
- 1.3. "PAIA" means the Promotion of Access to Information Act, No 2 of 2000.
- 1.4. "Personal Information" means information relating to an identifiable Data Subject's:
 - 1.4.1. race, gender, 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;
 - 1.4.2. education, medical, financial, criminal or employment history;
 - 1.4.3. unique identifying numbers including identity/registration/passport numbers and numbers allocated to the Data Subject by companies and institutions, for e.g. bank account, client or member account numbers;
 - 1.4.4. contact particulars including physical address, phone numbers, email and other social media addresses or handles and GPS locations;
 - 1.4.5. private communications and opinions;
 - 1.4.6. any other information connected to a Data Subject that says something about the person, for e.g. biometric information, personal preferences, idiosyncrasies and names on lists like credit black lists.
- 1.5. "POPIA" means the Protection of Personal Information Act, No 4 of 2013.
- 1.6. "Public Record" means information deliberately made publicly available by the Data Subject, or information contained in records freely accessible to the public, for e.g. web pages, sanction lists, court records, police records, etc.

2. Background and applicability

- 2.1. POPIA was enacted to regulate the processing (meaning the collection, use, dissemination, management, storage and protection) of all Personal Information by responsible persons.
- 2.2. Camstone has approved and implemented this policy and procedures to be adhered to when processing Personal Information of a Data Subject.
- 2.3. This policy applies to all employees of Camstone, regardless of seniority or status, and includes those persons on secondment or contracted to Camstone.
- 2.4. This policy must be read with Camstone's PAIA Manual where required.

3. Collection of Personal Information

3.1. The Camstone Data Subjects:

3.1.1. Camstone shall only collect Personal information from the following Data Subjects:

- 3.1.1.1. Employees of Camstone.**
- 3.1.1.2. Clients of Camstone.**
- 3.1.1.3. The clients' investors (including policyholders and banks).**
- 3.1.1.4. Tenants of the clients.**
- 3.1.1.5. Brokers operating in the immovable property market/property brokers.**
- 3.1.1.6. Service Providers to Camstone or its clients.**

3.1.2. No employee of Camstone shall, without the prior consent of the Information Officer collect and/or store any Personal Information from any other person.

3.2. How and from whom Personal Information may be collected:

3.2.1. POPIA identifies the following manners of collection of Personal Information:

- 3.2.1.1. Directly from the Data Subject, and where the Data Subject is a minor, with the permission of the minor's legal guardian.**
- 3.2.1.2. From a person authorised by the Data Subject.**
- 3.2.1.3. From Public Record.**

3.2.2. All Personal Information collected by Camstone on:

- 3.2.2.1. Employees and potential employees are collected directly from the Data Subject, employment brokers and/or Public Record.**
- 3.2.2.2. Clients are collected directly from the Data Subject and/or Public Record.**
- 3.2.2.3. Client investor information is collected directly from the client or the client's appointed agents.**
- 3.2.2.4. Tenants of clients are collected directly form the Data Subject and/or Public Record.**
- 3.2.2.5. Broker information is collected directly from the Data Subject and/or Public Record.**
- 3.2.2.6. Service providers are collected directly from the Data Subject and/or Public Record.**

3.2.3. Camstone must at all times ensure that any third party providing Camstone with Personal Information of a Data Subject, subscribes to the principles of POPIA, has the Data Subject's authority, and has confidentiality measures in place to protect the Personal Information.

3.3. When Personal Information is collected

3.3.1. Personal Information is only collected when it is required to enter into a transaction with the Data Subject, or once a transaction is concluded with the Data Subject. For:

- 3.3.1.1. Employees – During the review process of the potential employee and thereafter during the annual review process by the board and management.**

- 3.3.1.2. Clients – During the negotiation process to enter into a mandate for services to be rendered.
- 3.3.1.3. Client investors – On investment by the client investor and then monthly.
- 3.3.1.4. Tenants of clients – During the application and screening process of potential tenants to the properties of the clients.
- 3.3.1.5. Property brokers – On an ongoing basis in the industry.
- 3.3.1.6. Service providers – Upon review of the service provider for potential appointment, and thereafter in line with Camstone’s service delivery review process.

3.4. What Personal Information is collected

3.4.1. In terms of POPIA Camstone may only collect such Personal Information as may be authorised by the Client and as may be required for the purpose it is collected.

3.4.2. For each of the following Data Subjects the Personal Information required by Camstone is limited to:

3.4.2.1. Employees:

3.4.2.1.1. Full names, race and gender.

3.4.2.1.2. Unique numbers: Date of birth, identity number, bank account number, Income tax numbers and any professional body membership numbers.

3.4.2.1.3. Contact particulars: Physical address, phone numbers and email address.

3.4.2.1.4. Education, medical, financial, criminal and employment history.

3.4.2.2. Clients:

3.4.2.2.1. Full names.

3.4.2.2.2. Unique numbers: Identity/registration number, bank account number and Income tax/VAT numbers.

3.4.2.2.3. Contact particulars: Physical address, phone numbers and email address.

3.4.2.2.4. In the case of incorporated persons information on the contact person.

3.4.2.3. Client investors:

3.4.2.3.1. Full names.

3.4.2.3.2. Unique numbers: Identity/registration number.

3.4.2.3.3. Contact particulars: Physical address, phone numbers and email address.

3.4.2.3.4. Investment value.

3.4.2.3.5. In the case of incorporated persons information on the contact person.

3.4.2.3.6. Information related to invested funds and performance.

3.4.2.4. Tenants of clients

3.4.2.4.1. Full names.

- 3.4.2.4.2. Unique numbers: Identity/registration number, bank account number and Income tax/VAT numbers.
- 3.4.2.4.3. Contact particulars: Physical address, phone numbers and email address.
- 3.4.2.4.4. In the case of incorporated persons information on the contact person.
- 3.4.2.4.5. Financial information to verify ability to pay rental charges.
- 3.4.2.5. Property brokers
 - 3.4.2.5.1. Full names.
 - 3.4.2.5.2. Unique numbers: Identity/registration number.
 - 3.4.2.5.3. Contact particulars: Physical address, phone numbers and email address.
 - 3.4.2.5.4. In the case of incorporated persons information on the contact person.
- 3.4.2.6. Service providers
 - 3.4.2.6.1. Full name.
 - 3.4.2.6.2. Unique numbers: Identity/registration number, bank account number Income tax and VAT numbers, regulatory registration numbers.
 - 3.4.2.6.3. Contact particulars: Physical address, phone numbers and email address.
 - 3.4.2.6.4. Education, financial, criminal and trading history.
 - 3.4.2.6.5. Such additional Personal Information as may be required by the regulators of Camstone's clients.

3.5. Provisions of Section 18 of POPIA

- 3.5.1. Section 18 of POPIA requires that a Data Subject be informed, prior to the collection of Personal Information, or as soon as possible thereafter on:
 - 3.5.1.1. The source from which the Personal Information is collected if not from the Data Subject;
 - 3.5.1.2. What Personal Information is collected;
 - 3.5.1.3. The purpose for which the Personal Information is collected;
 - 3.5.1.4. If the collection is mandatory or voluntarily or required by legislation;
 - 3.5.1.5. If the Personal Information will be used outside the Republic of South Africa; and
 - 3.5.1.6. the Data Subject's right to object to the Information Regulator on any collection of Personal Information.
- 3.5.2. Camstone ensures that all agreements entered into with employees, clients, tenants of clients and service providers include provisions on all the information required in terms of clause 3.5.1 above.
- 3.5.3. The Information Officer shall ensure that a Privacy Notice is sent to the specific Data Subject, recording all the requirements of section 18 of POPIA prior to the collection of the Personal Information if so required.

4. Use and dissemination of Personal Information

4.1. Camstone shall use the Personal Information collected for:

4.1.1. Employees to:

4.1.1.1. Verify the person's suitability for the position of employment.

4.1.1.2. Annual review of the suitability of the person in performing his/her duties to Camstone.

4.1.1.3. Perform its obligations in terms of the employment agreement by the payment of salaries, determining maternity or paternity leave and sick leave.

4.1.1.4. Fulfil its obligations to governmental institutions including the Receiver of Revenue and the Department of Labour.

4.1.1.5. Where applicable meet empowerment requirements.

4.1.2. Clients to:

4.1.2.1. Perform its obligations to the client in accordance with the terms of the mandate.

4.1.2.2. Comply with other regulatory or legislative requirements of the client.

4.1.3. Client investors to:

4.1.3.1. Perform portfolio administration.

4.1.3.2. Determine payments and investment value.

4.1.3.3. Communication.

4.1.4. Tenants of clients to:

4.1.4.1. Verify the suitability of the person as a tenant.

4.1.4.2. Perform credit checks.

4.1.4.3. Lease administration, billing and communication.

4.1.4.4. Fulfil its obligations to governmental institutions including the Receiver of Revenue.

4.1.5. Property brokers to:

4.1.5.1. Share vacancy lists and communicate on possible tenants

4.1.6. Service providers to:

4.1.6.1. Verify the suitability of the service provider for the services to be rendered and credit checks.

4.1.6.2. Review the performance of the service provider of the services to Camstone.

4.1.6.3. Perform its obligations to the services provider in terms of the service level agreement and payment of invoices.

4.1.6.4. Fulfil its and its clients' obligations to regulatory and governmental institutions including the Receiver of Revenue.

- 4.2. In fulfilling the purpose for which the Personal Information is collected, Camstone disseminates the Personal Information for:
 - 4.2.1. Employees to:
 - 4.2.1.1. Appoint an employment broker to perform background checks.
 - 4.2.1.2. Its payroll provider.
 - 4.2.1.3. To governmental departments including the Department of Labour and the Receiver of Revenue.
 - 4.2.2. Clients to:
 - 4.2.2.1. The governmental departments including the Receiver of Revenue.
 - 4.2.3. Client investors to:
 - 4.2.3.1. The appointed agents of the clients.
 - 4.2.4. Tenants of the clients to:
 - 4.2.4.1. The clients' agents.
 - 4.2.4.2. Camstone's clients' regulators, including the Financial Sector Conduct Authority and the Financial Intelligence Centre, as may be applicable.
 - 4.2.5. No information on the property brokers are disseminated.
 - 4.2.6. Service providers to:
 - 4.2.6.1. Camstone's clients.
 - 4.2.6.2. The receiver of Revenue.
- 4.3. All Personal Information collected by Camstone is exclusively used for the purposes specified in clause 4.1 above, and exclusively disseminated in accordance with the provisions of clause 4.2 above; and will not be shared with any other third party for any other function, except if so required by an order of a court of law.
- 4.4. No employee of Camstone shall be allowed to disclose any Personal Information of Data Subjects to any unauthorised third party.

5. Storage and protection of Private Information

- 5.1. Camstone retains Private Information required for the purposes specified in clause 3.1 for a period of 7 years after the relationship between Camstone and the Data Subject has terminated.
- 5.2. All Private Information must be stored in electronic format and originals in hard copy.
- 5.3. All Data Subjects may at any time, in accordance with the provisions of the Camstone PAIA Policy, request that they be informed of their Personal Information being stored.
- 5.4. Camstone must ensure that the Private Information retained is stored in a manner so as to prevent loss or unauthorised access and use thereof.

- 5.5. Camstone store the Personal Information in a restricted access server with appropriate monitoring, and use a variety of technical security measures to secure the data, and hard copies in access controlled filing cabinets.
- 5.6. Where Data Subjects' Personal Information is stored by a third party on behalf of Camstone, such storage facilities must be compliant with the provisions of this policy and POPIA.
- 5.7. No Private Information may be stored outside the Republic of South Africa without the specific authorisation of the Data Subject.

6. Information management and deletion

- 6.1. All Private Information received by Camstone but not required for any purpose must be destroyed/deleted immediately.
- 6.2. In the event of Camstone receiving Private Information in hard copy, such information must be converted to electronic copies for storage, and the hard copies destroyed immediately, except if the original document, in which case it is stored in a lockup filing cabinet.
- 6.3. Private Information may only be converted to hard copies if necessary to fulfil the purpose for which it has been collected, and must be destroyed immediately after such use, except if the original.
- 6.4. Camstone must ensure that the Private Information retained is correct and up to date and has implemented procedures for the Data Subjects to notify Camstone of any changes to their Private Information.
- 6.5. All Private Information must be destroyed/deleted after the 7 year retention period.

7. Regulatory information

7.1. Information Officer

- 7.1.1. In accordance with the terms of POPIA Camstone CEO is the appointed Information Officer for the purposes of POPIA and PAIA:

Information Officer: Jack Barrett

Deputy Information Officer: None

Registration number: 14835/2021-2022/IRRTT

Email: cpif@camstone.co.za

Telephone: +27 21 674 0844

- 7.1.2. The Information Officer may appoint such deputies as he/she may deem appropriate.
- 7.1.3. The Information Officer and any appointed deputies must be registered with the Information Regulator.
- 7.1.4. The functions of the Information Officer are to:
 - 7.1.4.1. Ensure Camstone complies with POPIA and PAIA.

- 7.1.4.2. Deal with all information requests directed at Camstone from the Information Regulator or in terms of Camstone PAIA Manual.
- 7.1.4.3. Undertake a Personal Information risk impact assessment and implementing a management framework.
- 7.1.4.4. In all manners co-operate with the Information Regulator.

7.2. Information Regulator

- 7.2.1. The government has in accordance with the provisions of POPIA established the Information Regulator.

General Email: infoleg@justice.gov.za

Complaints Email: complaints.IR@justice.gov.za

Physical Address: JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

Postal Address: PO Box 31533, Braamfontein, Johannesburg, 2017

- 7.2.2. The functions of the Information Regulator are to:
 - 7.2.2.1. Enforce compliance with the provisions of POPIA and PAIA.
 - 7.2.2.2. Provide education on the lawful processing of Private Information.
 - 7.2.2.3. Monitor the use of Private Information by private and public institutions and their processing activities.
 - 7.2.2.4. Monitor the use of Data Subjects' unique identifier numbers.
 - 7.2.2.5. Consult with and act as mediator between Data Subjects and responsible parties, such as Camstone, on issues of privacy and the protection of Personal Information.
 - 7.2.2.6. Examine proposed legislation and issue Codes of Conduct that has a bearing on the processing of information.
 - 7.2.2.7. Facilitate cross-border co-operation in the enforcement of privacy laws.
 - 7.2.2.8. Receive complaints of non-compliance, instigate pre-investigations, attend to hearings and issue Enforcement Notices.
 - 7.2.2.9. Appoint an Enforcement Committee to assist in its duties.

8. Contravention

- 8.1. Section 22 of POPIA requires Camstone to notify the Information Regulator and the Data Subject, as soon as reasonably possible after any security breach which compromised the Private Information.
- 8.2. Any person may lodge a complaint, in the prescribed form, with the Information Regulator of non-compliance with the provisions of POPIA or an approved Code of Conduct. The Information Regulator may then:
 - 8.2.1. Initiate an investigation;

- 8.2.2. Refer the matter to the Enforcement Committee; or
- 8.2.3. Act as conciliator between the parties.
- 8.3. Responsible parties as Camstone is subject to a fine, imprisonment for a period not exceeding 10 years, or both in instances:
 - 8.3.1. Of obstructing, hindering or unlawfully influencing the Information Regulator.
 - 8.3.2. Knowingly giving false information to the Information Regulator.
 - 8.3.3. Failure to comply with an Enforcement Notice issued by the Information Regulator.
 - 8.3.4. Unlawfully processing account numbers.
 - 8.3.5. Obstructing a person in executing a warrant on behalf of the regulator.
 - 8.3.6. Failure to attend or obstructing a hearing or failure to provide requested information by the Information Regulator.
 - 8.3.7. Failure to notify the Information Regulator of any activity as may be required by legislation.
- 8.4. As a result, failure to observe or comply with any part of this policy will constitute misconduct warranting disciplinary action, which may include dismissal. Furthermore, employees should note that:
 - 8.4.1. The burden of proof rests with the employee to prove compliance with this policy; and
 - 8.4.2. This policy forms part of the terms and conditions of employment.
- 8.5. Camstone may report contraventions to any other professional bodies it feels are appropriate.