



**M&T Holdings (Pty) Ltd
Privacy Notice
MHPN-20210818**

Prepared in accordance with section 18 of the
Protection of Personal Information Act No. 4 of
2013

Updated 18 Aug 2021

Building your future

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1. Company Information

As per section 18(1)(b) within the POPI Act our company details are as follow:

M&T Holdings (Pty) Ltd

2nd Floor, Block C, Building 14
11 Byls Bridge Boulevard
Centurion, 0157
Gauteng, South Africa

This privacy notice pertains to M&T Holdings (Pty) Ltd and all its subsidiaries and/or associated companies from here on out referred to as M&T.

2. Purpose of the Notice

In liaison of The Protection of Personal Information Act No 4 of 2013 ("POPIA") of the Republic of South Africa, M&T will set out the premise on how we collect, use, disclose, retain, and protect your personal information within this privacy notice.

By utilising our products, services, and platforms you are accepting and consenting to the practice described within this notice.

3. Notice Scope

The privacy notice applies to any website, application, platform, form, document, product, record, or service supplied by M&T.

4. Definitions

4.1. Words that are defined in POPIA and used in this privacy notice will bear the same meaning as in POPIA unless the context requires otherwise.

4.2. Reference to "consent" shall include any electronic or physical means by which you convey your acceptance and acknowledgement that you agree to us processing your personal information, whether it be by signing a disclaimer / consent form, the clicking of a button, or through biometric means, subscribing, submitting or sending of a message, updating your profile or clicking "I Agree" button or pressing the "enter" button, or by any other means, to submit/convey any information to us.

5. Introduction

POPIA defines personal information as "information which relates to an identifiable, living, natural person, and where it is applicable an identifiable, existing juristic person". This includes but is not limited to, your name, sex, gender, address, contact details, identity number.

We recognise the importance of protecting your privacy in respect of your personal information collected by us. We are committed to ensure that your personal information is collected and used properly, lawfully, and transparently. In adopting this privacy notice, it is our goal to balance our legitimate business interests and your personal information protection. It is unfeasible to guarantee that your personal information shall be 100% secure. Consequently, we will incorporate appropriate and reasonable steps to prevent unlawful processing, unauthorised access, or unauthorised disclosure of your personal information.

Where there are reasonable grounds to believe that your personal information has been compromised or acquired by any unauthorised person, we will notify you and the Information Officer which is appointed in

terms of POPIA as stipulated with the M&T PAIA Manual. In the event of such a breach, we will provide you with sufficient information to allow you to take protective measures against the potential consequences of the compromise.

6. Implied Consent

Should you continue to use our products, services, and platforms you (a) agree to the terms set out within this privacy notice, and (b) consent that we may process your personal information for the purposes as set out within this privacy notice. Should you disagree with any part of this privacy notice please do not continue to use our products, services, and platforms and follow the proper channels for further communication and/or actions.

If you give us consent to process your personal information you are free to withdraw this consent at any time. Please note that where you have withdrawn your consent, this will not affect the processing that took place prior to such withdrawal, and it will not affect the processing of your personal information where consent is not required.

You may refuse to provide us with your personal information in which case we may not be able to provide you with a relevant product, service, platform or would have to terminate our business relationship. The supply of certain items of personal information, especially those collected to comply with regulation, is legally mandatory.

7. Adaptation

M&T reserves the right to update this privacy notice as we see fit and just. Should our privacy notice change at any time we will notify you and provide you with the opportunity to review the revised notice before you choose to continue to make use of our products, services, and platforms. It is your responsibility to familiarise yourself with the most recent version of this privacy notice each time you access our products, services, and platforms before you elect to continue to make use thereof.

8. Personal Information Types

All personal information that we may process includes information necessary for us to provide you with our products, services, and platforms by means necessary to execute our duties in terms of your engagement with us and to protect and secure our legitimate business interests.

This may include all the listed categories of personal information within the POPIA, and among other includes at least the following:

8.1. Information and content you provide

We collect the consent, communications, and other information you provide when you use our products, services, and platforms. This includes when you sign up for an account, create or share content, and communicate with us via our website or via any other means (including email, phone calls, WhatsApp, SMS, Property 24, Private Property, Facebook, Twitter, Pinterest, Instagram, LinkedIn, Skype, Teams, Zoom or any other manner).

Content is automatically processed by our systems for data analytical purposes. Personal information processed includes but are not limited to your full name, nationality, identity number, marital status, date of birth, email, phone number, physical address, postal address, contact information, race, culture, ethnic or social origin, language, gender, age, biometric information, license information, correspondence, and such other information regarding yourself and/or your views if you choose to share the same with us.

8.2. Financial information

Credit checks are conducted upon application of certain products M&T offer. In addition, you're the financial information you provide us with is used to assist you with your bond's application.

8.3. Consumption

Statistical data are collected on how you utilize our products, services, and platforms. These statistics include feature usage, content engagement, account interaction, activity timestamps, activity frequency, and durations.

8.4. Device / Online information

As an integration part of our platforms, we collect data on the device you use to connect with. This is a service provided by social media platforms for personalised advertisement purposes and statistical purposes. This information includes operating systems, hardware and software versions, battery level, signal strength, available storage space, browser type, plugins, user interactivity with our platforms, device IDs, GPs location, search terms, duration spend on sites, files you deliberately share to our platforms, network connection, mobile operators, language, time zone, IP address, cookies stored on your device.

9. Personal Information Collection

We collect personal information about you and any other person whose details you provide to us in accordance with the relevant laws, either:

- 9.1. Directly from you when you complete a product or service contract / application form, electronically (via email / social media platforms / Property 24 / Private Property / website contact form), telephonically or by way of a hard copy.
- 9.2. Indirectly from you when you interact with us electronically by way of our website, apps, or social media channels, which may include the collection of metadata (data about data).
- 9.3. Where relevant, from third-party sources, such as other entities within the M&T, financial intermediaries that are representatives of M&T or have intermediary agreements with M&T, public databases, data aggregators, other financial institutions, credit bureaus, and fraud prevention agencies.

Where we require personal information to provide you with our products and services, your failure to provide us with the necessary information, will result in M&T being unable to provide you with our products and services. You are responsible for informing M&T if your information changes.

10. Personal Information Processing

You acknowledge that all personal information processed by us may be stored and processed for any of the purposes, but not exclusively listed below.

- 10.1. To support engagement with service providers and subcontractors.
- 10.2. To support recruitment and management of staff.
- 10.3. To support servicing tenant requirements.
- 10.4. To support sales and marketing activities.
- 10.5. To assist you with your bond's application at financial institutions.
- 10.6. To provide you with our products, services, and platforms and to maintain our relationship with you.
- 10.7. To meet our contractual obligations with you or take steps necessary for the conclusion of a contract with you.
- 10.8. To conclude and administer your applications provided by M&T.
- 10.9. For you to visit, browse, register, subscribe and/or apply for and use our products, services, and platforms.
- 10.10. To deliver products and services to you, as requested by you, or in terms of the contractual engagement between us and yourself.
- 10.11. To execute a transaction in accordance with your request.
- 10.12. For you to sign up for any notification from us in respect of our marketing campaigns.
- 10.13. To comply with legislative and regulatory requirements.
- 10.14. To undertake credit reference searches and/or verification.

- 10.15. For the detection and prevention of unlawful activity.
- 10.16. For debt recovery and debt tracing.
- 10.17. Facilitating appointments and meetings.
- 10.18. Contract management.
- 10.19. Correspondence.
- 10.20. For purposes of platform login and authentication.
- 10.21. To maintain the security of our digital channels and systems.
- 10.22. For statistical analysis and research purposes.
- 10.23. For auditory and record-keeping purposes.
- 10.24. For purposes of proof and legal proceedings.
- 10.25. To enhance your experience when interacting with M&T and to assist us to improve our offerings to you.
- 10.26. To share with other entities within M&T, in order to market our products, services, and platforms which we deem similar, with the aim of offering you the opportunity to take up some of the products and services to fulfil your needs, provided that you have not objected to receive such marketing.
- 10.27. To conduct market research and provide you with information about our products, services, and platforms from time to time via email, telephone, or other means of communication.
- 10.28. To process your marketing preferences (where you have unsubscribed from certain direct marketing communications, keeping a record of your information and request to ensure that we do not send such direct marketing to you again.
- 10.29. To facilitate access to M&T's premises.
- 10.30. To facilitate secure supply management.
- 10.31. In accommodation of security investigations.
- 10.32. In the facilitation of construction, development, and purchasing of real estate (both commercial and residential).
- 10.33. For any purpose relating to and compatible with the above.

11. Data Security

We take the security of your personal information to heart and thereby ensure that we adhere to a high level of internationally recognised security policies, procedures, and standards to keep your information secure, accurate, current, and complete.

These standards pertain to the cybersecurity and physical security of your data. It is unrealistic to believe that any network is impenetrable regardless of the security measures in place, therefore we can not guarantee the security of your data. However, multiple measurements are in place should a data breach occur, and we will inform you as swiftly as possible in such an event as stipulated within the POPI Act. By acceptance and consent of this privacy notice any transmission is at your own risk.

12. Transfers and Storage of Data

All information you provide to us are securely stored locally on our internal server network and/or on our cloud-based servers operated, maintained, and protected within the Republic of South Africa (RSA).

In addition, some of our platforms used to fulfil our obligations towards you stores your information outside of the RSA. These platforms securely store the data within the European Union (EU) and the United States of America (USA). The EU has a stricter legislation than POPIA namely the General Data Protection Regulation (GDPR), whereas the USA transfer is covered by the CCPA.

Should it be required that your data should be transferred outside the borders of the RSA, we will ensure that the destination's data protection legislation is similar to POPIA, and if such destination's data protection legislation is not similar to POPIA, then we shall only transfer your personal information with your consent, or if we are required to do so by law or under agreement with the relevant receipt in such destination.

We ensure that adequate safeguards will be taken in such transfers in order to protect the integrity of your personal information as well as your confidentiality.

13. Retention & Secure Destruction of Personal Information

M&T will not retain any personal information for longer than what is necessary for operational / archiving purposes and by means of legislative mandates such as the Income Tax Act, no 58 of 1962 (Section 73 A & B) and the Value Added Tax Act, no 89 of 1991 (Section 55) which mandates a retention period of 5 years. At the conclusion of your retention period, we will ensure that all records being removed are securely destroyed.

14. Sharing of your personal information

We will not disclose any of your personal information to any person, except when we have your consent and/or permission to do so or where we are required to do so in terms of law or if it is in your best interest.

Should the law require that we disclose your personal information to a party, and where we have reason to believe that a disclosure of personal information is necessary to identify, contact or bring legal action against a party who may be in breach of the terms or may be causing injury to or interference with (either intentionally or unintentionally) our rights or property, other tenants, or anyone else that could be harmed by such activities, or where the disclosure of your personal information would be in your best interest.

We will only share your personal information in a secure manner within M&T as required to perform necessary services and only with the minimal required information to do so. We will not disclose your information for any other purpose or external company except for trusted external companies in partnership with us or companies we utilize to perform and or assist in services.

By accepting this privacy notice, you consent that your personal information may be shared with the following parties including but not limited to:

- 14.1. M&T Administrators
- 14.2. Financial Institutions
- 14.3. Credit Bureau
- 14.4. Partners
- 14.5. Suppliers
- 14.6. Subsidiary Companies
- 14.7. Labour department
- 14.8. Organisations, including the police and fraud prevention agencies, to prevent and detect fraud
- 14.9. Regulatory or governmental agencies
- 14.10. Our service providers and sub-contractors
- 14.11. Analytics and search engine providers that assist us in the improvement and optimisation of our website

M&T will not sell, rent, or trade your personal information to any third-party. M&T will only share information about you where it is within M&T's legitimate interest to do so.

15. Right to Access to Information

The Promotion of Access to Information Act No 2 of 2000 ("PAIA") coupled with POPIA offer an individual the right to access information held by a public or private body in certain instances. This right can be exercised in accordance with M&T's PAIA manual.

16. Correction of Your Information

In accordance with POPIA, you have a right to correct any of your personal information held by M&T. This right should be exercised in accordance with the procedure outlined in M&T's PAIA manual.

17. Objection to Processing of Your Information

In accordance with POPIA, you may object to our processing of your personal information on reasonable grounds relating to your situation, unless legislation provides for such processing.

18. Your Prerogative

- 18.1. In accordance with these terms, you have the right to request that M&T corrects, destroy, and delete any of your personal information which might be retained and processed by us on our products, services, and platforms. The personal information which you may request to be corrected, destroyed, or deleted is personal information that has been processed in accordance with these terms that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, obtained unlawfully or which we are no longer authorised to retain.
- 18.2. You have the right to withdraw your consent for us to process your personal information at any time. Such a withdrawal may only be made by you on the following conditions where the withdrawal of your consent does not affect:
 - 18.2.1. The processing of your personal information prior to the withdrawal of your consent.
 - 18.2.2. The processing of your personal information if the processing is in compliance with an obligation imposed by law on us.
 - 18.2.3. The processing of your personal information where such processing is necessary for the proper performance of a public law duty by a public body.
 - 18.2.4. The processing of your personal information as required by law.
 - 18.2.5. The processing of your personal information as required to finalise the performance of a contract in which you are a party.
 - 18.2.6. The processing of your personal information as required to protect your legitimate interests or our own legitimate interests or the legitimate interests of a third-party to whom the information is supplied.
- 18.3. You have the right to object to the processing of your personal information at any time, on reasonable grounds relating to your situation, unless the processing is required by law. You can make the objection if the processing of your personal information is not necessary for the proper performance of a public law duty by a public body or if the processing of your personal information is not necessary to pursue your legitimate interests, our legitimate interests, or the legitimate interests of a third-party the information is supplied to.
- 18.4. You have the right to object to the processing of your personal information, at any time, if the processing is for purposes of direct marketing other than direct marketing by means of unsolicited electronic communications and you have not given your consent for that processing.
- 18.5. You have the right to not have your personal information processed for purposes of direct marketing by means of unsolicited electronic communications from third-parties unknown to you.
- 18.6. You have the right to submit a complaint to the Information Regulator regarding an alleged interference with the protection of personal information processed in accordance with these terms. The Information Regulator's contact details are published by the government from time to time in terms of POPIA.

When they are published POPIA places a duty on us to inform you what those contact details are, and we will do so via our services and platforms. This contact information can be found in this notice under 'The Information Regulator'.

- 18.7. You have the right to institute civil proceedings regarding an alleged interference with the protection of your personal information processed in accordance with these terms.

19. Use of Common Technologies

Cookies are pieces of information our products, services, and our platforms transfers to a user's hard drive for record-keeping purposes. Cookies make surfing the web easier for you by saving your preferences and, tracking your online habits, traffic patterns, and making sure that you do not see the same advertisement too often. The use of cookies is an industry standard. We may place a "cookie" on your browser to store and sometimes track information about you. Each of our platforms that utilizes this functionality will prompt you accordingly.

How do I disable cookies?

If you do not want to receive a cookie from the website, you have the option of setting your browser to notify you when you receive a cookie, so that you may determine whether to accept it or not. However, please be aware that if you do turn off 'cookies' in your browser, you will not be able to fully experience some of the features of the website.

20. Collection of Information by Third Parties

Owners or information system administrators of third parties that have a connection to the M&T website (by affiliation of analytics and/or advertisement), may collect personal information about you when you visit our site. M&T does not control the collection or use of personal information by third parties and this privacy statement does not apply to third parties. M&T does not accept any responsibility or liability for third-party policies or your use of a third-party app, platform, or service.

M&T also uses certain social networking services such as Facebook, WhatsApp, Instagram, Twitter, LinkedIn, Private Property, Property 24, and Pinterest to communicate with the public and M&T's clients. When you communicate with us through these services, that social networking service may collect your personal information for its own purposes. These services may track your use of our digital channels on those pages where the links are displayed. If you are logged into those services (including any Google service) while using our digital channels, their tracking will be associated with your profile with those service providers. These services have their own privacy policies and notices which are independent of M&T's privacy notice and practices. Please ensure that you fully acquaint yourself with the terms of any such third-party privacy policies and practices.

21. Marketing

Where you provide your personal information to M&T in the context of a sale of one of our products, services, and platforms, you agree to such that M&T may send you information on news, trends, services, events and promotions for our own similar products and or services, always subject to your right to opt out of receiving such marketing at the time your information is collected and on each subsequent marketing communication thereafter.

In order to provide you with information regarding our products and services which might be of interest to you, we may process your personal information. You can anticipate that all our marketing campaign email notifications will be sent via our dedicated email address marketing@m-t.co.za and our landing pages will be solely on the m-t.co.za domain. Where you choose to opt out of direct marketing, please allow up to 30 days for M&T to effect that change. You may utilize any of the following methods to unsubscribe from any current and future marketing campaigns / communication:

21.1. Directly

-  Ms. Angelique Burr-Dixon
-  angelique.burr-dixon@m-t.co.za
-  Marketing Administrator
-  012 676 8518
-  2nd Floor, Block C, Building 14, 11 Byls Bridge Boulevard, Centurion, 0157, Gauteng, South Africa

21.2. Built in functionality

An unsubscribe functionality is provided within each communication received and it is free of charge.

If you are already receiving marketing from us, you may utilise one of the following methods to update your personal information with us:

- 21.2.1. Email (info@m-t.co.za)
- 21.2.2. Website (<https://m-t.co.za/contact-us>)
- 21.2.3. Manually
- 21.2.4. Other methods communicated to you by our appointed employees

22. Passwords and login information

Should you utilize M&T's application platform you will receive a secret key to sign up and generate your account by providing a username and password.

Under no circumstances may you provide anyone (including M&T's employees) with your credentials. These credentials should be kept secret in a secure matter, and you solely are responsible thereof. Should any repercussions occur due to the lack of adherence to this matter, you will be held responsible, and you indemnify us against any such damages or third-party claims.

23. Information Officer Contact Information

You may contact our Information Officer should you require any assistance, to acquire any further information, or submit any POPI related requests. Our office hours are Monday to Thursday between 7:30 and 16:45, Fridays from 7:30 - 16:00. Any after hour request can be submitted via email.



Mr. Rupert Fourie



popi@m-t.co.za



012 676 8526



2nd Floor, Block C, Building 14, 11 Byls Bridge Boulevard, Centurion, 0157, Gauteng, South Africa

24. Complaints

Should you have a complaint or concern regarding the processing of your personal information, your complaint may be submitted to popi@m-t.co.za.

25. The Information Regulator

Whereas we would appreciate the opportunity to first address any complaints regarding our processing of your personal information, you have the right to complain to the Information Regulator, whose contact details are:

The Information Regulator (South Africa)

JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

P.O. Box 31533, Braamfontein, Johannesburg, 2017

Complaint's email: **POPIAComplaints.IR@justice.gov.za / PAIAComplaints.IR.@justice.gov.za**

General enquiries email: **infoereg@justice.gov.za**