



REAL³HOLDINGS

Privacy Policy

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VERSION CONTROL

Document Information

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Applies To: THE REAL GROUP OF COMPANIES

“REAL GROUP”

Policy Owner: Compliance Officer

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Version History and Approval

Version	Date Published	Prepared By	Reviewed By	Approved By	Last Review Date	Next Review Date
1.0	01 Nov 2021	Compliance Officer	Compliance Officer	Compliance Officer	01 Nov 2021	01 Nov 2022
1.1	01 Nov 2021	Senior Manager	Senior Manager	Senior Manager	01 Nov 2021	01 Nov 2022

Approval Status

This policy has been prepared, reviewed, and approved in accordance with the organisation’s governance framework.

Details of preparation, review, and approval are recorded in the Version History and Approval table above.

Governance Note

Where segregation of duties is not reasonably practicable due to the size of the organisation, the same role may prepare, review, and approve a policy. This will be reassessed as the organisation grows.

Document Control Notice

This is a controlled document. Unauthorised copies are not valid.

The latest approved version of this policy is maintained in the official document management system.

Confidentiality Classification

Classification: Public Policy

Contact Information

For questions relating to this policy, please contact:


Compliance Officer
info@realhomefinance.co.za

POLICY STATEMENT

The organisation's Governing Body, its employees, volunteers, contractors, suppliers and any other persons acting on behalf of the organisation are required to familiarise themselves with the policy's requirements and undertake to comply with the stated processes and procedures.

POLICY ADOPTION

By signing this document, I authorise the organisation's approval and adoption of the processes and procedures outlined herein.

Name & Surname	Francois Rosslee
Capacity	Managing Director
Signature	
Date	1/11/2021

1. INTRODUCTION

At the REAL Group the safekeeping of and respect for your Personal Information is of primary importance. We respect users' rights to privacy and confidentiality and for this reason we take all reasonable measures, in accordance with this Policy, to protect your personal information and to keep it confidential.

This Privacy Policy governs the manner in which the REAL Group treats your personal information collected electronically when you use our website or apply online for certain products and services, contact us electronically or register for one of the services or products offered on the website.

Our Privacy Policy applies to all current and former visitors and may change from time to time. Please note that your use of the REAL Group website at www.realhomefinance.co.za is subject to our Terms and Conditions. The term "Personal Information" means Personal Information about an identifiable, living, natural person and, where it is applicable, an identifiable, existing juristic person, as defined in the Protection of Personal Information Act, 2013 ("POPIA") from time to time. In short, any information that we know about you will be regarded as your personal information. Personal information refers to information that identifies or relates specifically to you, for example, your name, age and identity number, your assets and liabilities, your income and your payment records.

We also voluntarily subscribe to the principles, outlined in Section 51 of the Electronic Communications and Transactions Act 2002 ('ECT Act'), which govern your right to having your personal information kept private. We briefly outline these principles below:

- We will only collect, disclose, collate, process and store your personal information with your express written permission unless legally required to do so, and will only use such information for the lawful purpose for which it is required.
- We will disclose in writing, the specific purpose for which we use, request and store your personal information. We will also keep a record of that personal information and the specific purpose for which we collect it.
- We will not use your personal information for any other purpose, other than that which we disclosed to you, unless you give us your express written permission to do so, or unless we are permitted to do so by law.

In terms of the provisions of the ECT Act; we will disclose your personal information without your consent:

- If we are required to do so by law or a court order, or
- If disclosure is in the public interest,

subject to compliance with POPIA.

Finally, we are subject to South African data protection laws, including the Constitution of the Republic of South Africa 1996, Protection of Personal Information Act 2013, the Electronic Communications and Transactions Act, 2002, the Regulation of Interception of Communication Act 2002 and the Consumer Protection Act 2008 which we comply with fully and give the greatest respect.

2. PERSONAL INFORMATION AND YOUR CONSENT

By submitting your details and/or using our service you accept this Privacy Policy and expressly provide voluntary, specific and informed consent to the use and disclosure of your personal information in the manner described herein.

You provide us with your Personal Information for the specific purpose of applying for home financing. By submitting such Personal Information, you consent to our processing of such information.

We may use your Personal Information for a number of things including: statistical analysis; to develop and improve our Website or to update your records.

In addition to the Personal Information you submit, we may collect information about your computer including, where available, your IP address, operating system and browser type – for system administration and to report aggregate information to our business partners. We may also collect information about you from outside sources such as credit bureaux and other sources.

You can set your web browser to refuse cookies, but this may affect your browsing experience. We, our staff, and third parties are obliged by contract to maintain the confidentiality and security of your Personal Information in accordance with POPIA.

You are entitled to request access to your information at a prescribed fee and to request that inaccurate, irrelevant, excessive, out dated, misleading or unlawfully obtained information be corrected, deleted or in the case of a dispute, indicate that a correction has been requested, but not made.

We share the data you submit with third parties involved in the process of providing the services you request, such as credit bureaux, customer service providers and collection agencies. You have the right to object to our use of your Personal Information at any time by submitting a request to info@realhomefinance.co.za. You acknowledge that any objection may prevent us from providing you with the required service.

We may transfer your personal information to selected third parties. If at any time you wish to stop receiving such contact from a third party, you will need to follow the instructions about unsubscribing provided at that time by the third party. Please note that we only partner with trusted companies who will respect your right to unsubscribe from any such marketing communications, but we will not be responsible for managing that process or any disputes.

You agree, each time you use the Website, that we may disclose your Personal Information:

- if we sell or buy any business or assets (in which case we may disclose your Personal Information to the prospective seller or buyer of such a business or assets);
- If our business or substantially all of its assets are acquired by a third party (in which case Personal Information held about customers will be one of the transferred assets).

Whenever you use this website, complete an application form, contact us electronically, or use one of the services offered by us, we will collect your personal information.

The following are reasons why we would collect your personal information:

- to identify you;
- in order for us to process your instructions, applications or requests;
- in order for us to ensure that we meet your needs, we may collect and analyse your personal information and combine all the information that we have about you to compile a profile of you in order for us to personalise and tailor our services to meet your specific needs;
- once we have collected and analysed your personal information, we may send you promotional material or details which we think may be of interest to you.

Your privacy is important to us. We will therefore not sell, rent or provide your personal information to unauthorised entities or other third parties, for their independent use, without your consent.

3. SECURITY AND CONFIDENTIALITY

We will take all reasonable steps to protect your Personal Information from loss, misuse or unauthorised alteration. Your Personal Information is stored in databases that have built-in safeguards and firewalls to ensure the privacy and confidentiality of that information.

We recognise the need for protection and management of the Personal Information you share with us. We protect that information using appropriate technology. We store data in safe manner on computers with password protection. We employ firewalls and other security technologies to protect our servers from external attack.

Our security systems meet or exceed industry standards.

4. CHANGES TO PRIVACY POLICY

You understand that we may update, modify or amend this Privacy Policy from time to time with or without notice. You understand that each time you use the Website the then-current Privacy Policy will apply. Save as expressly provided to the contrary in this Privacy Policy, the amended version of the Privacy Policy shall supersede and replace all previous versions thereof.

5. APPLICABLE LAW

The Applicable Law provisions of the Terms and Conditions shall apply.

6. CONTACT

Should you have any queries, please contact us on info@realhomefinance.co.za.

7. CHANGE LOG

Version	Section	Description of Changes	Reason
1.1	Introduction	Policy transferred to new company letterhead with no changes to policy content or intent	Re-branding