

PROTECTION OF PERSONAL INFORMATION POLICY
MONTMEDY MANOR(hereafter referred to as ALBANY)

Preamble

This Policy is formulated in terms of and in accordance with the Protection of Personal Information Act 4 of 2013 ('POPIA'). This policy sets out protocols for processing of personal information as well promoting the awareness of the rights of individuals and juristic persons whose personal information it processes in the course of its business.

1. DEFINITIONS

- 1.1 **"Data Subject"** means the person whose personal information is processed.
- 1.2 **"Information Officers"** means the duly appointed Information Officer/s.
- 1.3 **"Law"** means any law of general application and includes the common law and any statute, constitution, decree, treaty, regulation, directive, ordinance, by-law, order or any other enactment of legislative measure of government (including local and provincial government) statutory or regulatory body which has the force of law;
- 1.4 **"Personal Information"** means information relating to an identifiable person, as defined in section 1 of POPIA.
- 1.5 **"Processing"** means, without limitation, the collection, use, storage, variation, merging, linking, dissemination and destruction of personal information and **Further Processing** shall bear a similar meaning, but will only occur after the initial processing of personal information.
- 1.6 **"Person"** means a natural or juristic person.
- 1.7 **"Special Personal Information"** means Personal Information as referred to in Section 26 of POPIA

- 1.8 When referring to a “**Duly Authorised Representative**”, “**Agent**” or “**Proxy**” in this document, such authorisation shall be in writing, and where applicable, comply with the requirements in line with Chapter 1 of Financial Intelligence Centre Act (FICA) or the Consumer Protection Act (CPA) and accompanying regulations or any other applicable law as the case may be.

2. INTRODUCTION

- 2.1 ALBANY is committed to serve its stakeholders to the best of its abilities and in doing so, to protect their Personal Information. This policy aims to achieve that purpose and to ensure lawful processing of Personal Information.
- 2.2 This policy is applicable to any person who deals, transacts with or is within the employ of ALBANY and to give effect thereto incorporated by reference in any agreement, dealing or transaction between the Data Subject and ALBANY in respect whereof Personal Information is provided to or collected or otherwise processed by ALBANY.
- 2.3 It is important for the Data Subject to familiarize him-,her- or itself with the contents hereof to be adequately informed about why and how their Personal Information is processed and their rights and entitlements under POPIA.
- 2.4 ALBANY has duly appointed Information Officers as prescribed by POPIA. The contact details of the Information Officers are set out in the PAIA manual.

3. CONSENT FOR THE PROCESSING OF PERSONAL INFORMATION

- 3.1 ALBANY will not process Personal Information without the consent of the Data Subject, either personally or on his, her or its behalf by a duly authorised representative or proxy, save where the processing of such personal information is required by Law.
- 3.2 The supply of Personal Information is voluntary unless the supply is required by Law.
- 3.3 ALBANY requires specific Personal Information to be provided by the Data Subject in order to *inter alia* carry out its business functions, to serve the interests of its Stakeholders to perform in terms of contracts.

3.4 ALBANY acknowledges a Data Subject's right to object to the processing of Personal Information.

3.5 Whilst ALBANY acknowledges a Data Subject's right to object to the processing of Personal Information, ALBANY reserves the right to withdraw or refuse its services or products where a Data Subject unreasonably refuses to consent to the processing of Personal Information.

4. SOURCING OF PERSONAL INFORMATION

4.1 ALBANY collects Personal Information:

4.1.1 directly from data subjects, save where –

4.1.2 Personal Information is supplied by a duly authorised proxy or mandated agent of the data subject;

4.1.3 the Data Subject has consented to Personal Information being collected by third parties;

4.1.4 the collection thereof from third parties is required by Law or forms part of a public record.

5. CLASSIFICATION OF PERSONAL INFORMATION PROCESSED

5.1 The following Personal Information is processed by ALBANY:

5.1.1 Information identifying individuals or juristic entities, including but not limited to: names and surnames, identification or registration numbers, passport number, sex, age, marital status, employment information, residential information or business address, nationality, citizenship, home language, preferred communication language. or such other personal information as may be required to enter into a business relationship with the data subject.

5.1.2 Financial information: Including but not limited to the Data Subject's financial institution, bank account number, branch code, salary / income.

5.1.3 Contact information: Including but not limited to physical addresses, electronic mail addresses, fax numbers, telephone numbers, cellphone numbers, postal addresses or such other contact information necessary to maintain the business relationship between ALBANY and the Data Subject.

5.2 ALBANY does not process any Special Personal Information as contemplated by POPIA and will not do so without the prior consent of the data subject unless required by Law.

6. PURPOSE OF PROCESSING OF PERSONAL INFORMATION

6.1 ALBANY processes Personal Information for the following purposes, depending on the nature of the dealings with the Data Subject:

- 6.1.1 Applications for employment;
- 6.1.2 Applications from goods and service providers
- 6.1.3 Assessing B-BBEE status, if applicable;
- 6.1.4 Conclusion of contracts;
- 6.1.5 Creation and maintenance of Stakeholders' databases;
- 6.1.6 Human resource purposes;
- 6.1.7 Legal compliance with statutory laws and regulations;
- 6.1.8 Maintenance of registers;
- 6.1.9 Conclusion of security documents (bonds, suretyships, cessions, levy certificated, etc.); or
- 6.1.10 For any matter necessary or incidental to the effective performance of THE ALBANY to give effect to the above matters.
- 6.1.11 For the purposes of performing the functions and duties necessary for the efficient management of the Body Corporate which includes but is not limited to:
 - Owner records
 - Contact details, telephone numbers, addresses of unit owners
 - Physical and postal addresses
 - Records as required by Management Rule 27 of the Sectional Titles Scheme Management Act
 - Purpose of Processing

- Information necessary for the administration of the Body Corporate
- Levy Account Records
- Compliance with the provisions of Management Rule 27
- Complaints and Dispute Resolution Documentation
- Outcomes in terms of disputes and complaints
- Details of Insurance Claims

7. SHARING OF PERSONAL INFORMATION WITH THIRD PARTIES

- 7.1 THE ALBANY will not share the Personal Information about a Data Subject unless this has been consented to by the Data Subject, save where the sharing of Personal Information is required by Law.
- 7.2 THE ALBANY shall take reasonable measures in ensuring the confidentiality of Personal Information shared with third parties and that third parties are lawfully processing Personal Information as prescribed by POPIA.
- 7.3 Notwithstanding clause 7.2 above and whilst THE ALBANY endeavors to take reasonable steps as contemplated above, it cannot warrant lawful processing of Personal Information by third parties with whom the Data Subject's Personal Information has been shared.

8. WHO RECEIVES PERSONAL INFORMATION

- 8.1 ALBANY shares or otherwise processes personal information of data subjects with various third parties in conducting its operations. ALBANY shares or otherwise processes personal information with: its service providers, suppliers, employees within the scope and course of their employment, regulatory authorities or administrative bodies established by Law, industry bodies or associations where necessary, its auditors, parties to multilateral contracts of which the data subject is a party.

9. TRANSBORDER TRANSFER OF PERSONAL INFORMATION

- 9.1 ALBANY may from time to time transfer or cause to transfer personal information of a data subject across national borders during the scope and course of its operations.

9.2 ALBANY shall endeavor to transfer personal information across national borders only if the recipient third party in a receiving country is subject to laws or otherwise legally binding rules or agreements affording adequate protection measures for reasonable processing of personal information of a similar nature to the conditions for lawful processing contained in POPIA.

9.3 ALBANY shall, where reasonably practicable, obtain the data subject's consent prior to transferring personal information across border.

10. VARIATION, UPDATING AND RECORD KEEPING OF PERSONAL INFORMATION

10.1 ALBANY stores personal information collected from data subjects, either in hard copy or electronic format.

10.2 Personal information may be stored up to a period of 10 years, save in instances where longer storage thereof is required by law.

10.3 Whilst ALBANY takes measures to verify the personal information of data subjects, it is the shared responsibility of the data subject to bring about any change in personal information or error in respect of personal information provided to the attention of ALBANY. This can be done by contacting the relevant Personal Information Officer.

11. PERSONAL INFORMATION SECURITY

11.1 Whereas ALBANY processes personal information both in hard copy and electronic / digital formats, it is committed to have adequate security measures in place for the prevention any compromise to personal information of data subjects under its control.

11.2 Where personal information is processed in hard copy format, ALBANY, in so far as reasonably practicable, stores the personal information in secured office space or building with one, more or all of the following security features, including but not limited to:

11.2.1 Locked buildings / office spaces with other security features

11.2.2 Locked filing cabinets

11.2.3 SABS Type Approved Safes

11.3 Where personal information is processed in electronic format, ALBANY obtains, uses and maintains and actively seeks to improve cyber security measures that protects the integrity of data containing personal information and prevents unauthorised access thereto, including the following:

11.3.1 Employment and contracting of information technology specialists

11.3.2 Specialised software aimed at prevention of hacking, viruses, other forms of malware and cyber threats.

11.3.3 Encryption of programs and data containing personal information

11.4 Whilst ALBANY takes reasonable steps to ensure the security and integrity of personal information, the systems in place are not immune to being compromised. In the event of personal information being compromised, ALBANY undertakes to notify the data subject and Information Regulator in accordance with POPIA.

12. RIGHT OF ACCESS

12.1 The data subject has the right to access personal information held by ALBANY.

12.2 The data subject may exercise his / her / its right of access by following the procedure set out in Promotion of Access to Information Manual which can be found at www.bellbuoy.co.za.

13. COMPLAINTS AND DISPUTE RESOLUTION

13.1 ALBANY takes the interests of its stakeholders and employees seriously and respects their data privacy. Should the data subject have any concerns, issues or complaints in

respect of the processing of personal information, the relevant Personal Information Officer or the Information Regulator can be contacted.

13.2 The contact details of the Personal Information Officer is as contained in the PAIA manual.

14. GENERAL

14.1 This privacy policy is effective immediately.

14.2 ALBANY reserves the right to amend its privacy policy at any time.

Signature Information Officer:



Date: **13 AUGUST 2025**
