SA HOME LOANS GROUP
PRIVACY POLICY ON PROTECTION OF PERSONAL INFORMATION

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1. Who are we?

SA Home Loans Proprietary Limited is a wholly owned subsidiary of SAHL Investment Holdings Proprietary Limited. SAHL Investment Holdings Proprietary Limited and its subsidiaries, managed, consolidated, and related entities shall be referred to herein as "the SA Home Loans Group" or "we".

2. Introduction and Purpose

2.1. This is the Privacy Policy of the SA Home Loans Group. The purpose of this Privacy Policy is to explain how we handle your personal information – including how we collect, use, store, share, update, protect, and, where required, destroy it. It also outlines your rights in relation to your personal information and how the law safeguards your privacy.

2.2. We commit to:

i. the use of Personal Information in a way that is fair, honest and responsible;
ii. provide clear details about how we use Personal Information;
iii. promptly resolve concerns around the use of Personal Information; and
iv. take reasonable steps to protect and secure Personal Information from misuse.

2.3. We recognise that protecting the privacy, confidentiality, and security of your personal information is essential therefore, we have adopted Group-wide policies and procedures designed to ensure that your information is managed responsibly and kept safe.

2.4. This Privacy Policy is incorporated into and forms part of the terms and conditions of use of all SA Home Loans Group websites and microsites ("**Websites**").

3. Regulatory Framework

We will comply with all Applicable Laws in connection with the processing of your Personal Information. For the purposes of this Privacy Policy, "Applicable Laws" shall include but not be limited to the Protection of Personal Information Act, 2013 ("POPIA") and other data processing legislation.

4. What is Personal Information?

4.1. Personal Information refers to any information that identifies you or specifically relates to you. Personal Information includes, but is not limited to, the following information about you:

i. information relating to your race, gender, sex, 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;
ii. information relating to your education or your medical, financial, criminal or employment history;
iii. any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other identifying detail;

iv. your biometric information;
v. your personal opinions, views or preferences;
vi. correspondence sent by you that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
vii. the views or opinions of another individual about you; and
viii. your name if it appears with other Personal Information relating to you or if the disclosure of the name itself would reveal information about you.

4.2. Personal information includes Special Personal Information, as explained below.

5. What is Special Personal Information?

5.1. Special Personal Information is Personal Information about or related to your:

i. religious beliefs;
ii. philosophical beliefs;
iii. race;
iv. ethnic origin;
v. trade union membership;
vi. political beliefs;
vii. health or sex life;
viii. biometric information; and/or
ix. criminal behaviour and alleged commission of an offence and any proceedings in respect thereof.

6. The collection of your personal information

6.1. "**Personal Information**" refers to any information that can identify you as an individual, whether directly or indirectly. Please refer to number 4 which provides the definition of Personal Information. In addition, we may collect Special Personal Information, which is a more sensitive category of information and is subject to stricter protection under the law. This includes information gathered when you use our websites, calculators, applications for our products, or when you request information about products available in SA Home Loans Group.

6.2. We collect and process Personal Information for a variety of purposes, including providing access to our products and services, providing access to products and services offered by our business partners, improving our offerings, assessing creditworthiness, auditing our products and services, complying with legal requirements, and for other specified and lawful purposes.

6.3. Personal Information may be collected directly from you through applications, use of our websites, or interactions with us (such as social media, emails, calls, or surveys). We may also receive Personal Information from third parties, where permitted or required by law, or where you have given consent, including credit bureaus, public databases, government departments, service providers (such as our panel attorney firms), and other parties we engage with to conduct our business (for example, mortgage originators, estate agencies, lead providers, or deed search providers).

6.4. In addition, we collect information about your use of our websites and applications through cookies and similar technologies, which may capture details such as your preferences, location, and IP address. Where required by law, we will request your consent before collecting Personal Information from third parties.

6.5. The third parties from whom we may collect your Personal Information include, but are not limited to, the following:

i. members of the SA Home Loans Group, including any connected companies, subsidiary companies, associates, cessionaries, delegates, assigns, trusted affiliates or successors in title and/or appointed third parties (like our authorised agents, partners, contractors, funders and suppliers) for any of the purposes identified in this Privacy Policy;
ii. your spouse, dependents, partners, employer, bank, a trust or legal entity related to you, a joint applicant or account holder, and other similar sources;
iii. people you have authorised to share your Personal Information, like a medical practitioner or our service providers;
iv. parties providing mortgage origination or estate agency services, lead providers
v. attorneys, tracing agents, debt collectors and other persons that assist with the enforcement of agreements;
vi. payment processing service providers, merchants, banks and other persons that assist with the processing of your payment instructions and card scheme providers (like VISA or MasterCard);
vii. insurers, reinsurers, brokers, other financial institutions, or other organisations that assist with insurance and assurance underwriting, the providing of insurance and assurance policies and products, the assessment of insurance and assurance claims and other related purposes;
viii. law enforcement, fraud prevention agencies, and other persons tasked with the prevention and prosecution of crime;
ix. regulatory authorities, industry ombudsman, governmental departments, local and international tax authorities;
x. credit bureau;
xi. trustees, executors or curators appointed by a Court of law;
xii. verification service providers (to carry out integrity and business conduct checks required for compliance, including due diligence, onboarding, monitoring, assurance reviews, and sanctions screening. This also helps us detect, prevent, and report theft, money laundering, terrorist financing, corruption, or any other illegal or high-risk activity and to meet broader risk management, regulatory, and legislative obligations amongst other things);
xiii. our service providers, agents and sub-contractors like Attorney firms and other persons we use to offer and provide products and services to you;

xiv. Courts of law or tribunals;

xv. Employers, recruitment agencies, and screening providers – we may collect Personal Information such as CVs, qualifications, references, employment history, and background checks during recruitment, onboarding, and employment to assess suitability and meet legal or regulatory requirements;

xvi. Business partners with whom we have established a partnership, collaboration, or joint venture partners, including companies that may in future merge with us; and/or

xvii. marketing list providers.

7. What do we mean by 'Processing of Personal Information'?

7.1. When used in this Privacy Policy, 'Process or processing' means any operation or activity or any set of operations, whether or not by automatic means, concerning personal information, including—

i. the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use

ii. dissemination by means of transmission, distribution or making available in any other form

iii. merging, linking, as well as restriction, degradation, erasure, or destruction of information

8. When will we process your Personal Information?

8.1. We will only process your Personal Information if:

i. you have consented thereto; and/or

ii. a person legally authorised by you, the law or a court, has consented thereto; and/or

iii. it is necessary to conclude or perform under a contract we have with you; and/or

iv. the law requires or permits it; and/or

v. it is required to protect or pursue your, our, or a third party's legitimate interest; and/or

vi. a competent person (like a parent or guardian) has consented to the processing of your information if you are a child.

9. When will we process your Special Personal Information?

9.1. We may process your Special Personal Information if:

i. you have consented to the processing;

ii. the processing is needed to create, use or protect a right or obligation in law;

iii. the processing is for statistical or research purposes and all legal conditions are met;

iv. the processing is required by law;

v. processing is for historical, statistical or research purposes to the extent that the purpose serves a public interest and processing is necessary for that purpose concerned or it

appears to be impossible or would involve disproportionate effort to request consent and sufficient guarantees are provided to ensure the processing does not adversely affect your privacy to a disproportionate extent;

vi. information has been deliberately made public by you;

vii. the processing of racial information is required (i) to comply with laws and other measures designed to protect or advance persons, or categories of persons, disadvantaged by unfair discrimination; or (ii) for identification purposes where it is essential for that purpose;

viii. the processing of health information is to determine your insurance risk, or to comply with an insurance policy and performance or to enforce an insurance right or obligation; and/or

ix. the biometric information has been obtained in accordance with the applicable law or if such processing is necessary to supplement the processing of information on criminal behaviour or biometric information which is permitted under POPIA or other applicable laws.

10. When and how we process the Personal Information of Children?

10.1. A child is a natural person under the age of 18 years who is not legally competent, without the assistance of a competent person, to take any action or decision in respect of any matter concerning him or herself. We process Personal Information of children if the law permits.

10.2. We will only process the Personal Information of children if any one or more of the following applies:

i. a person who can legally agree has consented to the processing, being a parent or guardian;

ii. the processing is needed to create, use or protect a right or obligation in law;

iii. the processing is for statistical, or research purposes and all legal conditions are met; or

iv. the child's Personal Information was made public by the child, with the consent of a person who can legally agree thereto.

11. Your consent

11.1. We will not process Personal Information without your consent save as permitted by applicable laws. We may ask for additional consent if we need to use your Personal Information for purposes not covered by this Privacy Policy. You are not obliged to provide such consent but if you decide not to, then your participation in certain activities may be restricted and your refusal may limit our ability to provide you with our products and/or services. If you provide additional consent, the terms of that consent shall prevail in the event of any conflict with the terms of this Privacy Policy.

11.2. By using our Websites, you are consenting to the processing of your Personal Information by the SA Home Loans Group in accordance with this Privacy Policy.

11.3. If you do not agree to the processing of your Personal Information in this way, you are advised not to:

i. use our websites as your Personal Information will be processed as described in this Privacy Policy, or
ii. provide SA Home Loans Group with your Personal Information.

12. How and why we use your Personal Information

12.1. We will process your Personal Information only for the purposes for which it was collected or agreed to by you and any of the reasons outlined below:

i. to provide you with products, goods and services;
ii. to market our products, goods and services to you, where permitted;
iii. to respond to your enquiries and complaints;
iv. to comply with legislative, regulatory, risk and compliance requirements (including directives, sanctions and rules), voluntary and involuntary codes of conduct, and industry agreements;
v. to conduct credit reference searches, verification and fraud prevention checks, and sharing information relating to the purpose with South African Fraud Prevention Services;
vi. to confirm and verify your identity or to verify that you are an authorised user for security purposes;
vii. for operational purposes, and where applicable, and credit management;
viii. to conduct affordability assessments, credit assessments, and credit scoring;
ix. to develop credit models and credit tools;
x. fulfil reporting requirements and information requests in connection with our reporting obligations in terms of applicable laws;
xi. to detect, prevent and report theft, fraud, money laundering, and other crimes. This may include the processing of Special Personal Information, like alleged criminal behaviour or like the supply of false, misleading, or dishonest information when opening an account with us or avoiding liability by way of deception;
xii. to open, manage, and maintain your account/s or relationship with us;
xiii. to enforce and collect on any agreement when you are in default or breach of the agreement terms and conditions, like tracing you or to institute legal proceedings against you;
xiv. for audit and record keeping purposes;
xv. to conduct market and behavioural research, including scoring and analysis to determine if you qualify for products and services;
xvi. to develop, test, and improve products and services for you;
xvii. for historical, statistical, and research purposes, like market segmentation;
xviii. to maintain your information for quality, risk, vendor management purposes;
xix. to process payment instructions;
xx. to analyse the effectiveness of our advertisements, competitions, and promotions

xxi. to disclose and obtain Personal Information from credit bureaux regarding your credit history;

xxii. to enable us to deliver goods, documents, or notices to you;

xxiii. for security, identity verification and to check the accuracy of your Personal Information;

xxiv. to communicate with you and carry out your instructions and requests;

xxv. for customer satisfaction surveys, promotional, and other competitions;

xxvi. for purposes of insurance and assurance underwriting and administration;

xxvii. to process or consider or assess insurance or assurance claims;

xxviii. to provide insurance and assurance policies and products and related services;

xxix. to inform you of appropriate products, goods and services you may be interested to enable you to take part in and make use of value-added products and services;

xxx. to assess our lending and insurance risks; and/or for any other related purposes;

xxxi. for legitimate business purposes, including but not limited to when required for the purposes of raising funding;

xxxii. to share information with the SA Home Loans Group, our affiliates, trusted third parties that we work with, current and future business partners, collaboration, or current and future joint venture partners, including companies that may in future merge with us. These trusted third parties and business partners include our partners in providing products, goods and services or providing further information regarding products and services which pertain to the products and services you have with us;

xxxiii. to contact you when contractually or legally required to do so, when necessary, about the information, products or services you've requested or any complaints, queries, or feedback you have submitted;

xxxiv. to transmit such information to other countries, when necessary. Where such countries do not have specific data privacy laws, we will take appropriate steps to ensure your information is safeguarded or

xxxv. to enable our systems to access, scan, and transport your Personal Information within SA Home Loans Group or to a hosted third-party site. We may also transmit your Personal Information across a closed network, in various media, and modify or change the format (but not the content) of your Personal Information to comply with technical requirements of connecting networks or devices or computers.

13. How we use your Personal Information for direct marketing

13.1. We may use your personal information to inform you about products, services, competitions, or promotions that may be of interest to you. Direct marketing communications may be sent via email, SMS, telephone, or other channels, - the communication will be sent in accordance with your preferences.

13.2. If you are not a customer with whom we have no prior relationship, we will obtain your express consent before sending any direct marketing communications electronically, in line with applicable data protection laws.

14. Direct Marketing

We will only send you direct marketing communications if we have your consent. You can update your preferences or withdraw consent by contacting us at InformationOfficer@sahomeloans.com or using the opt-out mechanism provided in our communications.

15. Disclosure of information

15.1. We may share your personal information with current and future third parties, auditors, advisers, strategic partners, affiliates, business partners, joint-venture partners, reward programme partners, social media and platform partners, credit bureaus, fraud prevention agencies, financial institutions, data validation and trusted service providers, and government or regulatory authorities, as required by law or to provide, verify, or improve our product offerings and services.

15.2. We will ensure that appropriate agreements are in place with all trusted parties to safeguard your information and uphold your rights under applicable data protection laws.

16. When do we exchange your Personal Information with Credit Bureaus?

16.1. We may obtain your Personal Information from credit bureaus for any one or more of the following reasons:

i. to check and confirm your identity, and to verify information you have provided to us;
ii. to access information at your request or with your consent;
iii. to verify your employment details;
iv. to obtain and verify your marital status;
v. to obtain, verify, or update your contact or address details;
vi. to obtain a credit report about you (which includes your credit history and credit score) when you apply for a credit agreement to prevent reckless lending or over- indebtedness;
vii. for debt recovery;
viii. to trace your whereabouts;
ix. to conduct research, statistical analysis or system testing;
x. to determine information about the source(s) of your income and the nature of your expenses;
xi. to build credit scorecards which are used to evaluate credit applications;
xii. to determine which products and services to promote or to offer to you and/or
xiii. for any other lawful purpose.

17. Sharing Personal Information with the credit bureaus.

17.1. We may share your Personal Information with credit bureaus for any one or more of the following reasons, amongst others:

i. to report the application for a credit agreement;
ii. to report the opening of a credit agreement;
iii. to report the termination of a credit agreement;
iv. to report any characteristic about our products and services which we are required to report; and/or
v. to report the non-compliance with a credit agreement like not paying in full or on time.

18. Safeguarding your Personal Information

18.1. We take all reasonable precautions in line with generally accepted information security practices to keep your Personal Information secure and require any third parties that handle or process your Personal Information on our behalf to adhere to appropriate standards. We are legally obliged to provide adequate protection for the Personal Information we hold and to implement measures to prevent unauthorised access and use of Personal Information. We will, on an ongoing basis, review our security controls and related processes to ensure that your Personal Information is secure.

18.2. We will take appropriate and reasonable technical and organisational steps to protect your Personal Information, including the following:

i. keeping our systems secure (like monitoring access and usage);
ii. storing our records securely;
iii. controlling access to our buildings, systems and/or records; and
iv. safely destroying or deleting records.

18.3. We may need to transfer your Personal Information to another country for processing or storage. We will ensure that anyone with whom we have an agreement for the storage and/or processing of your Personal Information agrees to treat your Personal Information with the same level of protection as we are obliged to.

19. Cross Border Flow of Personal Information

19.1. We will only transfer your Personal Information to third parties in any other country if:

i. your Personal Information will be adequately protected under the other country's laws or an agreement with the third-party recipient;
ii. the transfer is necessary to enter into or perform under a contract with you, or a contract with a third party that is in your interest;
iii. you have consented to the transfer; or
iv. the transfer is in your interest.

19.2. This transfer will happen within the ambit of applicable laws.

20. Retention

20.1. We will keep your Personal Information for as long as:

i. applicable Laws require us to keep it;
ii. a contract between you and us requires us to keep it;
iii. you have consented for us keeping it;
iv. we are required to keep it to achieve the purposes for which it was provided;
v. we require it for statistical or research purposes provided that we have established; appropriate safeguards against the records being used for any other purpose;
vi. required by a code of conduct or applicable laws;
vii. required for lawful business purposes.

20.2. To the extent that we are no longer authorised to retain the record of your personal information, we shall as soon as reasonably practicable (to the extent it is technically possible and practicable, and provided that we are not obligated to retain such record by applicable law), delete, destroy or de-identify the record of your personal information and reasonably endeavour to ensure that anyone to whom such information was supplied shall delete, destroy or de-identify the record of your personal information.

21. Your privacy rights and responsibilities

21.1. You must provide proof of identity when enforcing your information privacy rights. You must inform us when your Personal Information changes.

21.2. You may opt out of marketing communications. If you are a customer, then we may continue providing you with necessary communications in respect of your existing products and services.

21.3. You have the right to request access to your Personal Information in our possession by contacting us. This includes requesting:

i. confirmation that we hold your Personal Information
ii. a copy or description of the record containing your Personal Information and
iii. the categories of third parties who have had access to your Personal Information.

21.4. Please note that the Promotion of Access to Information Act 2 of 2000 may limit your right to access information. The Group PAIA and POPIA Manual are located on the following website, www.sahomeloans.com

21.5. You have the right to request us to correct the Personal Information we have about you if it is inaccurate, irrelevant, excessive, out of date, incomplete or misleading. If information was obtained unlawfully and we are no longer authorised to keep it, you may request us to delete it. Your request must be in writing by using the by using the Request for Correction or Deletion of Personal Information Form which can be found on our website or by sending an email to informationofficer@sahomeloans.com. In order to attend to your request, we may request

documents from you to verify the change. We will keep you updated on the status of your request.

21.6. If you have any specific agreement with us, that relationship may determine how you must update your Personal Information. We will inform you of the requirements to update your information. Please adhere to these requirements.

21.7. You have the right to request that we delete your personal information where appropriate. If the law requires or entitles us to keep a record of any information, we may decline to delete it. The deletion of certain Personal Information could lead to the termination of your business relationship with us.

21.8. You have the right to object to any processing or further processing of your Personal Information and/or Special Personal Information, such objection must be in writing by using the Objection to the Processing of Personal Information Form which can be found on our website or by sending an email to informationofficer@sahomeloans.com . We will not be able to give effect to your objection, if the processing of your Personal Information was and is permitted by law or you have provided consent to the processing, and our processing is done according to your consent, or if the processing is necessary to conclude or perform under a contract with you.

21.9. You have the right to withdraw your consent to the processing of your Personal information at any time. If you withdraw your consent, we will explain the consequences to you. We may proceed to process your Personal Information even if you have withdrawn your consent where such processing is necessary to pursue a lawful or legitimate purpose. We will keep you updated on the status of your request however whilst the request is in progress.

21.10. You have a right to file a complaint with us or any Regulator with jurisdiction about an alleged contravention of the protection of your Personal Information by us. We will address your complaint as far as possible.

21.11. You have a right to institute civil proceedings in a Court having jurisdiction regarding an alleged interference with the protection of your personal information.

22. Cookie Policy

22.1. A cookie is a small piece of data sent from our website or applications to your computer or device's hard drive or Internet browser where it is saved. The cookie contains information to personalize your experience on our website or applications and may improve your experience on the website or applications. The cookie will also identify your computer or device. By using our website or application, you agree that cookies may be forwarded from the relevant website or application to your computer or device. The cookie will enable us to know that you have visited the website or application and will identify you. We may also use the cookie for marketing purposes or to prevent or respond to fraudulent behaviour.

23. Third Party Sites and Social Media

23.1. This Privacy Policy does not apply to third-party websites, platforms, or applications ("**Third-Party Sites**") that we do not control, including those linked from the SA Home Loans Group website or marketing activities we may sponsor or participate in on such sites. Third-Party Sites

have their own privacy policies and terms and conditions, which we encourage you to review before use.

23.2. When you interact with us via social media, your personal information may be processed by the platform owner outside our control and possibly in other countries with different data protection laws. Please review the platform's terms and conditions before sharing any personal information.

24. Complaints Handling

Complaints in respect of the processing of Personal Information may be submitted to SA Home Loans Group by email to informationofficer@sahomeloans.com or may be communicated directly to the Information Regulator.

25. Revision and Approval

This Privacy Policy will be reviewed in line with the SAHL Policy Framework by the Information Officer and Deputy Information Officer on an ongoing basis and will be updated as and when material changes are made to it.