

	PRIVACY POLICY	
	POLICY NUMBER	REVISION NUMBER
		2
		EFFECTIVE DATE

PRIVACY POLICY

This Privacy Policy ("Policy") applies to all current and former employees, directors, contractors, consultants, suppliers, service providers, customers, applicants, visitors to our website, and any other individuals or entities who engage or interact with Greenstreet 1 (Pty) Ltd (the "Company"). The purpose of this Policy is to explain how the Company collects, uses, stores, shares, protects and otherwise processes Personal Information.

The Company is committed to protecting the privacy, confidentiality and security of Personal Information. This Policy describes the categories of Personal Information that we collect, the purposes for which it is processed, the measures implemented to safeguard such information, and the rights available to Data Subjects in respect of their Personal Information.

The Company processes Personal Information for the administration and operation of its business, the performance of its contractual and legal obligations, the management of its relationships with employees, customers, contractors, suppliers, service providers and other stakeholders, the provision of its products and services, and for any other lawful purpose connected with its business activities.

Personal Information is processed in accordance with the provisions of the Protection of Personal Information Act, 2013 ("POPIA") and any other applicable laws. Depending on the circumstances, the Company may process Personal Information on the basis of consent, contractual necessity, compliance with a legal obligation, the legitimate interests of the Company or a third party, or any other lawful basis recognised under POPIA.

By providing Personal Information to the Company or otherwise engaging with the Company, you acknowledge that your Personal Information may be processed in accordance with this Policy. We encourage you to review this Policy carefully and to contact us should you have any questions or concerns regarding the manner in which your Personal Information is collected, used, stored, disclosed or otherwise processed.

The Company is committed to maintaining transparency, accountability and responsible information management practices in all aspects of its business operations.

1. INTERPRETATION AND DEFINITIONS

For the purposes of this Privacy Policy:

- **“Applicable Laws”** means all laws and regulations of the Country that the Company is required to comply with;
- **“Company”, “we”, “us”, or “our”** means Greenstreet 1 (Pty) Ltd, registration no. 2020/103202/07, a private company incorporated in terms of the laws of the Republic of South Africa with principal place of business at Unit F9, The Courtyard, 1 West Park, Century City, Cape Town, 7441;
- **“Country”** refers to the Republic of South Africa;
- **“Data Subject”** means any identifiable natural or juristic person whose Personal Information is collected, held or processed by the Company;
- **“device”** means any device used to access the website or to contact the Company, such as a computer, a cell phone or a digital tablet;
- **“Information Officer”** means the individual designated by the Company to oversee the management and protection of Personal Information, ensuring compliance with applicable data protection laws, such as POPIA;
- **“Personal Information”** is any information relating to an identifiable, living, natural person, and where applicable, an identifiable, existing juristic person, including, but not limited to, the name, race, gender, marital status, address and identifying number of a person, symbol, e-mail address, physical address, telephone number, location information, online identifier or any other particular assignment to the person;
- **“POPIA”** means the Protection of Personal Information Act of 2013;
- **“Service”** refers to the services offered by the Company, including those outlined on its website;
- **“Usage Data”** means information collected automatically through the Company's technology systems and infrastructure, including system logs, device information, access records and other technical data generated through interactions with the Company;
- **“website”** refers to the Company's website www.greenstreetinvestments.co.za; and
- **“you” and “your”** means any individual, contractor, supplier, service provider, applicant, stakeholder or other person who provides Personal Information to the Company, interacts with the Company, or whose Personal Information is processed by the Company, and, where applicable, any juristic person represented by such individual.

2. HOW TO CONTACT US

If you have any comments or questions about this policy, please contact the Assistant Information Officer at:

Information Officer:	Marisa Bester
Assistant Information Officer:	Chloe Pearl
Email address:	Marisa.bester@stanlib.com and chloe@greenstreetmanagement.co.za
Registered address:	17 Melrose Boulevard, Melrose Arch, Johannesburg, Gauteng, 2196
Principal place of business:	Unit F9, The Courtyard, 1 West Park, Century City, Cape Town, 7441
Contact number:	+27 (0)21 795 0126

All information requests, correspondence, notices, and other documentation to be marked for the attention of: Chloe Pearl

3. COLLECTION AND USAGE OF YOUR PERSONAL DATA

3.1 Types of Data Collected

a) Personally identifiable information

We may ask you to provide certain personally identifiable information that can be used to contact or identify you. Personally identifiable information may include, but is not limited to, the following:

- Your names and surname
- Your email address
- Your phone number
- Your physical address (street address, city, province, postal code)

We will retain your information only for as long as necessary to fulfil the purposes for which it was collected, including the administration and management of the Company, communication with contractors, service providers and other stakeholders, the fulfilment of legal, regulatory and contractual obligations, and the protection of the Company's legitimate interests. Personal Information may be retained for longer periods where required or permitted by Applicable Laws, for record-keeping purposes, to resolve disputes, to enforce legal rights and obligations, or to comply with obligations arising under the Company's governing documents.

If you request to unsubscribe from all email communications, we will promptly remove your details from our active databases and archive your information. Please note that certain information may be retained to prevent fraud, resolve issues, assist with investigations, or comply with applicable legal and regulatory requirements.

b) Protection of Minors' Personal Information

The Company is committed to protecting the personal information of minors. The Company will process the personal information of a minor only where such processing is permitted in terms of POPIA and other Applicable Laws, including where the consent of a competent person has been obtained or where another lawful ground for processing applies.

The Company may collect, use, process, and store the personal information of minors only when necessary and lawful, including but not limited to:

- Providing and administering services that directly relate to the Services, the activities of the Company and/or the minor;
- Fulfilling legal and regulatory obligations;
- Fulfilling contractual obligations;
- Communicating with the parent or legal guardian regarding the minor;
- Maintaining records as required by law or business operations.

The Company shall not collect or process a minor's personal information without prior written consent from the parent or legal guardian. Such consent may be withdrawn at any time, subject to legal or contractual obligations.

The Company implements appropriate technical and organisational security measures to protect minors' personal information from unauthorized access, loss, destruction, or disclosure.

The Company will not share a minor's personal information with third parties unless:

- Such disclosure is required by law, court order, or regulatory authority;
- Such disclosure is necessary for the administration and operation of the Company, the fulfilment of legal, regulatory or contractual obligations, or another lawful purpose recognised under POPIA;
- It has obtained the necessary consent from the parent/legal guardian, where required;
- The information is disclosed to service providers, advisers or other third parties engaged by the Company to assist in carrying out its functions, provided that such parties are subject to appropriate confidentiality and data protection obligations.

The parent or legal guardian has the right to:

- Access and review the minor's personal information held by the Company;
- Request corrections or deletions of inaccurate or unnecessary information;
- Withdraw consent for processing the minor's information, subject to legal requirements; and
- Lodge a complaint with the Information Regulator if they believe the minor's privacy rights have been violated.

c) **Emails and related communication**

If you no longer wish to receive correspondence, emails, or other communications from us, you may opt out by contacting our Assistant Information Officer via email. Please clearly indicate your request to unsubscribe and/or specify your communication preferences in your message.

If you no longer wish to receive correspondence, emails, or other communications from third parties, you are responsible for contacting the third party directly.

d) **Usage Data**

Usage Data is collected automatically when you use our website or contact us. This may include:

- Your device's Internet Protocol (IP) address
- Browser type and version
- The time and date of your visit to our website
- Unique device identifiers
- Other diagnostic data

When you access our website or contact us using a mobile device, we may collect additional information, including:

- The type of mobile device you use

- Your mobile device's IP address
- Your mobile operating system
- The type of mobile Internet browser you use
- Unique device identifiers and other diagnostic data

e) **Tracking technologies and cookies**

We use cookies and similar tracking technologies to track activity on our website and store certain information. The technologies we use may include:

- **Cookies or Browser Cookies:** A cookie is a small file placed on your device. You can instruct your browser to refuse all cookies or indicate when a cookie is being sent. Please note that if you do not accept cookies, you may not be able to access some parts of our website. Unless you have adjusted your browser settings to refuse cookies, our website may use cookies.
- **Flash Cookies:** Certain features of our website may use local stored objects (or Flash Cookies) to collect and store information about your preferences or activity. Flash Cookies are not managed by the same browser settings as those used for Browser Cookies.
- **Web Beacons:** Certain sections of our website and our emails may contain small electronic files known as Web Beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs). These allow us to count users who have visited specific pages or opened emails and to gather other related statistics (e.g., recording the popularity of a section or verifying system integrity).

Cookies can be Persistent or Session cookies. Persistent Cookies are cookies that remain on your device when you go offline whereas Session Cookies are deleted as soon as you close your web browser.

We use both Session and Persistent Cookies for the following purposes:

- to provide you with services available through our website and to enable you to use its features;
- to authenticate users and prevent fraudulent use of accounts; and
- to remember your preferences (e.g., login details or language settings) and provide a personalised experience.

3.2 **Use of Your Personal Information**

We collect your Personal Information for the following reasons:

- to identify you;
- to contact you via email, telephone call, SMS, communication-based mobile applications, or other equivalent forms of electronic communication;
- to process your instructions or requests;
- to provide and maintain our website;
- to manage your account or our relationship;
- operational, marketing, auditing, legal and record-keeping requirements;
- verifying your identity or the identity of your beneficial owner;
- for contractual-related matters (negotiations, enforcing performance, etc.);
- to provide you with news, and general information about our Company;

- to evaluate or conduct a merger, divestiture, restructuring, reorganisation, dissolution, or other sale or transfer of some or all of our assets, whereby Personal Data held by us is among the assets transferred;
- for data analysis, identifying usage trends, to evaluate and improve the Company's website or the Company's activities;
- for the prevention and control of any disease;
- for assessing and dealing with complaints and requests;
- for detecting and preventing fraud and money laundering and/or in the interest of security and crime prevention;
- to comply with Applicable Laws, including lawful requests for information received from local or foreign law enforcement, government and tax collection agencies;
- administering the affairs and operations of the Company;
- communicating with contractors, service providers and other stakeholders; and
- administering investments, distributions and related financial arrangements

We may share your Personal Information in the following situations:

- **With service providers and contractors:** To assist the Company in providing the Service, conducting its business operations, and carrying out its lawful activities.
- **With Affiliates:** Including our affiliates, including companies under our control. These affiliates are required to honour this Privacy Policy.

We will not use your Personal Information for any purpose other than those disclosed to you, unless you provide us with express written permission to do so, or we are permitted or required to do so by law.

We may disclose your Personal Information without your consent if it is required by law or a court order, if disclosure is in the public interest, if it is in the Company's legitimate interests, or if you have provided implied consent.

3.3 Retention of Your Personal Data

We will retain your Personal Information only for as long as is necessary to fulfil the purposes set out in this Policy, including the administration of the affairs, activities and operations of the Company, compliance with legal and regulatory obligations, the resolution of disputes, and the protection or enforcement of the Company's rights and obligations.

Usage Data is generally retained for shorter periods, except when it is used to strengthen security, improve functionality, or comply with legal obligations requiring longer retention.

3.4 Transfer of your Personal Information

Your information, including Personal Information, may be processed at our operating offices or other locations where the parties involved in processing are located. This means your information may be

transferred to and maintained on computers located outside your province, country, or jurisdiction, where data protection laws may differ.

We may transfer Personal Information outside South Africa, where permitted by POPIA or other Applicable Laws, including where adequate safeguards exist, the transfer is necessary for the performance of a contract, the Data Subject has consented, or another lawful basis for transfer exists.

We will take all reasonable steps to ensure that your data is treated securely and in accordance with this Policy. We will not transfer your Personal Information to an organisation or country unless adequate controls, including data security measures, are in place.

3.5 Your Rights as a Data Subject

You have the right, subject to Applicable Laws, to request access to your Personal Information, request correction or deletion of inaccurate information, object to certain processing activities, withdraw consent where processing is based on consent, and lodge a complaint with the Information Regulator.

4. DISCLOSURE OF YOUR PERSONAL DATA

If we are involved in a merger, acquisition or sale of our assets, your Personal Information may be transferred. We will provide notice before your Personal Information is transferred and becomes subject to a different Privacy Policy.

Under certain circumstances, we may be required to disclose your Personal Information if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

We may disclose your Personal Information in the good faith belief that such action is necessary to:

- comply with Applicable Laws, a court order, regulatory requirement or other legal obligation;
- protect or enforce the rights, property or legitimate interests of the Company;
- prevent, detect, investigate or address actual or suspected unlawful conduct, fraud, misconduct or security incidents relating to the Services;
- protect the safety, security or wellbeing of employees, contractors, service providers or members of the public; or
- establish, exercise or defend legal rights or claims, or otherwise protect the Company against legal liability.

5. SECURITY OF YOUR PERSONAL DATA

The security of your Personal Information is a top priority for us. It is, however, important to note that no method of transmission over the Internet or electronic storage is entirely safe. While we employ commercially acceptable measures and industry-standard practices to safeguard your Personal Information, we cannot guarantee its absolute security. Despite our best efforts, unauthorised access, hacking, or other security breaches may occur, and we encourage you to take steps to protect your personal information as well.

5.1 Data Protection Impact Assessments

To ensure compliance with regulatory obligations and to proactively manage risks, we conduct annual Data Protection Impact Assessments (DPIAs). These assessments help us identify potential risks associated with the processing of Personal Information and evaluate their impact. Based on the findings, we develop and implement mitigating measures to address these risks effectively. This ongoing process allows us to maintain a robust data protection framework and continuously improve our practices to safeguard your information.

5.2 Data Breaches

In the unfortunate event of a data breach, we have established clear and comprehensive procedures to respond promptly and effectively. Our response plan includes the following:

- **Immediate Containment:** Taking swift action to contain the breach and prevent further unauthorised access or damage to your Personal Information.
- **Assessment and Investigation:** Conducting a thorough investigation to determine the cause, scope, and impact of the breach that has occurred.
- **Notification:** Reporting the breach to the relevant regulatory authorities as required by law and notifying the affected Data Subjects as soon as practically possible.
- **Remediation:** Implementing corrective measures to address vulnerabilities and prevent similar incidents in the future.

We are committed to ensuring that all affected parties are informed and supported throughout the process. If you have any concerns about the security of your Personal Information or would like more information about our data protection practices, please contact our Assistant Information Officer.

6. INFORMATION RECORDS CLASSIFICATION

To ensure compliance with POPIA, the Company categorises its records into specific groups. This classification system enables management to effectively manage the availability and accessibility of documents, both internally and externally, in alignment with our data protection framework.

For any questions or further details regarding the classification of data records, please reach out to the Information Officer.

7. LINKS TO OTHER WEBSITES

Our website may contain links to other websites that are not operated by us. If You click on a third-party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site that you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

8. CHANGES TO THIS PRIVACY POLICY

We may update this Policy from time to time. We will notify you of any changes by uploading the new Policy onto the website.

You are advised to review this Policy periodically for any changes. Changes to this Policy are effective when they are posted on the Company's website.

The contents of this document should only be used for and by the Company and may not be distributed unlawfully. Older versions are not deemed official. Only the latest version is acceptable.

9. COMPLAINTS

Should you believe that we have utilised your personal information contrary to Applicable Laws, you undertake to first attempt to resolve any concerns with us directly. The following contact details can be used to contact us:

Information Officer:	Marisa Bester
Assistant Information Officer:	Chloe Pearl
Email address:	Marisa.bester@stanlib.com and chloe@greenstreetmanagement.co.za
Registered address:	17 Melrose Boulevard, Melrose Arch, Johannesburg, Gauteng, 2196
Principal place of business:	Unit F9, The Courtyard, 1 West Park, Century City, Cape Town, 7441
Contact number:	+27 (0)21 795 0126
All information requests, correspondence, notices, and other documentation to be marked for the attention of: Chloe Pearl	

Any dispute, arbitration, or claim arising out of or relating to the breach of this Policy, the use of the website, or any website-related issues will be governed by the laws of South Africa. Any legal proceedings shall be conducted in Cape Town.

If you are not satisfied with the way your complaint is handled, you have the right to lodge a complaint with the Information Regulator using the email address set out below:

POPIAComplaints@inforegulator.org.za