

## SPRINGFIELD RETAIL CENTRE PRIVACY POLICY

### 1. Introduction

- 1.1 Springfield Retail Centre (**'The Company'**) is an office and shopping centre based at 2 Ilala Avenue, Springfield Park, Durban.
- 1.2 For purposes of this privacy policy (**'Privacy Policy'**) **'we'**, **'us'**, **'our'** refers to The Company, and **'you'**, **'your'**, **'user'** refers to the data subject.
- 1.3 The company is committed to respecting your privacy and to processing all Personal Information lawfully, transparently, securely, and in accordance with the Protection of Personal Information Act 4 of 2013 (**'POPIA'**) and applicable South African legislation.
- 1.4 This Privacy Policy sets out the manner in which the company processes Personal Information, whether provided by you to us, or collected by us through other means in the course of our providing our services or in your accessing our website and social media platforms.
- 1.5 This Privacy Policy applies to all external parties with whom we interact, including but not limited to individual clients, representatives of client organisations, suppliers, visitors to our offices, visitors to our website and social media platforms, for employees, job applicants, and other users of our marketing and related services.
- 1.6 This Privacy Policy must, as is appropriate, be read in conjunction with our website terms of use, and any other documents or agreements between you and the company.
- 1.7 By providing us with your Personal Information you:
  - 1.7.1 agree to this Privacy Policy and authorise us to process such information as set out herein; and
  - 1.7.2 authorise the company and our service providers to process your Personal Information for the purposes stated in this Privacy Policy.
- 1.8 **If you are concerned about any aspect of this Privacy Policy as it relates to your Personal Information, then you must immediately refrain from engaging with us and using our website and/or our services. Alternatively, contact us for clarity on the matter that concerns you at [info@springfieldretailcentre.co.za](mailto:info@springfieldretailcentre.co.za) .**

### 2 What is Personal Information?

- 2.1 **'Personal Information'** is any data relating to an identifiable living or juristic person and includes name, contact details, demographic information, personal history, product preferences, or any other information that can be used to identify a person.
- 2.2 **'Special Personal Information'** is information concerning a child, and personal information concerning the religious or philosophical beliefs, race or ethnic origin, trade union membership, political opinions, health, biometric information, sexual life or criminal behaviour of a data subject.

### 3 Collection of Personal Information

- 3.1 We may collect or obtain Personal Information about you, directly from you;
  - 3.1.1 in the course of our business relationship with you;
  - 3.1.2 in the course of providing advertising and marketing services to you or your organisation;
  - 3.1.3 when you make your Personal Information public;
  - 3.1.4 when you submit a job application;
  - 3.1.5 when you register to use any of our advertising and marketing related services including but not limited to newsletters, seminars and industry updates;
  - 3.1.6 when you participate in a marketing survey;
  - 3.1.7 when you visit and/or interact with our website or our social media platforms;
  - 3.1.8 when you visit our offices.
- 3.2 We may also receive Personal Information from third-parties (e.g. from clients whom we perform marketing and related services for, recruitment agencies and suppliers of background check services).
- 3.3 We use third party services that collect, analyse and monitor log data pertaining to our website.
- 3.4 In addition to the above, we may create Personal Information about you such as records of communications, mailings and interactions with us during the course of our digital marketing campaigns and market research surveys.

#### **4 Collection and Processing of Special Personal Information**

- 4.1 We hereby notify you that, in certain circumstances, by engaging with the company, we may collect Special Personal Information about you.
- 4.2 The processing of Special Personal Information requires higher levels of protection. The company has implemented appropriate policies and safeguards, which we are required by law to maintain, to process Special Personal Information.
- 4.3 Where we need to process your Special Personal Information, we will do so in the ordinary course of our business, for a legitimate purpose and in accordance with POPIA. The situations in which we may process your Special Personal Information include the following:
  - 4.3.1 as part of our recruitment and hiring process, we may process information relating to your ethnicity and your criminal behaviour;
  - 4.3.2 as part of our marketing, advertising or market research services to our clients;
  - 4.3.3 we may process information relating to your health as part of our screening processes when accessing our premises, in order to comply with COVID-19 regulations and protocols.
- 4.4 The company does not knowingly process Personal Information of children.

#### **5 How does Springfield Retail Centre use Personal Information?**

- 5.1 Personal information collected by the company will be used in relation to our professional service, administrative purposes, security purposes, marketing purposes and for the enhancement of our current service offering. Specifically, we will use Personal information for the following purposes:
  - 5.1.1 to operate and manage your agreement with us or correspondence you may have with us;
  - 5.1.2 to provide marketing and advertising services for our clients;
  - 5.1.3 for market research surveys;
  - 5.1.4 for marketing activities in order to establish, maintain and improve our relationship with you;

- 5.1.5 to comply with our regulatory reporting obligations;
  - 5.1.6 to comply with our statutory obligations, including screening of clients and visitors' health when accessing our premises to comply with COVID-19 regulations and protocols;
  - 5.1.7 to conduct the recruitment and hiring processes, which includes but is not limited to conducting criminal record and credit checks (where appropriate), the capturing of applicants details and providing status updates to job applicants;
  - 5.1.8 in relation to supplier information, to create supplier profiles on our systems, to pay suppliers, for general supplier administration and supplier database maintenance;
  - 5.1.9 in relation to client information, to create client profiles on our systems, to invoice clients, for general client administration and client database maintenance;
  - 5.1.10 to carry out any other reasonable business operation considering our business and the relationship between the parties;
  - 5.1.11 to maintain and improve our website performance and functionality, to optimize, improve and audit the services we offer on our website;
  - 5.1.12 to create user profiles about you and your access to our website, including browsing habits, click-patterns, preferences, frequency and times of use, trends and demographic information including recommendations to users, to perform statistical analyses, and to offer you information and content which is more appropriately tailored for you;
  - 5.1.13 to inform you about any changes to our website, this Privacy Policy or other changes that are relevant to you;
  - 5.1.14 For safety and security purposes.
- 5.2 Your Personal Information may also be used for other purposes for which you give your permission or where we are permitted to do so in terms of POPIA.

## 6 What Personal Information is Collected by Springfield Retail Centre?

- 6.1 The Personal Information the company may process will include, without limitation:
- 6.1.1 **identity information**, which includes information concerning your name, marital status, title, occupation, nationality, interests, qualifications, date of birth, gender, race and legal status, as well as copies of your identity documents, photographs, identity number and registration number;
  - 6.1.2 **contact details**, which includes your billing address, delivery address, e-mail address, telephone numbers and details of your public social media profile(s);
  - 6.1.3 **financial information**, which includes bank account details, payment records, payment amounts, payment dates, tax clearance certificates and VAT registration numbers;
  - 6.1.4 **browsing and device information**, which includes your internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access our website or to use our services or engage with us;
  - 6.1.5 **website usage information**, which includes information as to your access to and use of our website, such as what links you went to, what content you accessed, the amount of content viewed and the order of that content, as well as the amount of time spent on specific content and what services you access and use when engaging with the company.
- 6.2 From time-to-time, the company will act as an operator, as defined in POPIA, when it receives data from its client's clients. In this event, the company will:
- 6.2.1 ensure there is a data processing agreement concluded with the client to ensure adequate protection for the Personal Information;
  - 6.2.2 only process Personal Information in accordance with its client's instructions; and will not process Personal Information for any purpose other than those expressly authorised by the client;

- 6.2.3 ensure the client has appropriately secured all consents in relation to the processing of Personal Information;
- 6.2.4 ensure that reasonable steps are taken to ensure the reliability and integrity of all of our employees who have access to Personal Information;
- 6.2.5 take appropriate technical and organisational measures against the unauthorised or unlawful processing of Personal Information; and
- 6.2.6 take reasonable steps to guard against accidental loss or destruction of, or damage to, Personal Information.

## **7 Where is my Personal Information Processed?**

- 7.1 Usually, your Personal Information will be processed within the borders of South Africa on secure the company servers using industry standard norms to manage, secure and process Personal Information.
- 7.2 From time-to-time, given the nature of cloud technology, your Personal Information may, in addition to 7.1 above, be stored outside the borders of South Africa to help us offer more efficient and cost-effective solutions. The company will ensure that your data is only processed on the same or better standards as required in the POPIA, and will request that external suppliers enter into written agreements with us in the event your data needs to be processed outside of South Africa.

## **8 Disclosure of Personal Information to Third Parties**

- 8.1 We will only share your information with third parties that we have trusted relationships with, and selected third parties who perform services on our behalf. All service providers are bound by contract with us to maintain the security of your Personal Information and to use it only as permitted by us, in accordance with this Privacy Policy and in accordance with POPIA and applicable law.
- 8.2 In addition, we may disclose your Personal Information:
  - 8.2.1 to comply with the law or with any legal process or regulatory body;
  - 8.2.2 to protect and defend the rights, property or safety of the company, or our clients, employees, contractors, suppliers, or any third party;
  - 8.2.3 to any relevant third-party provider, where our website uses third party advertising, plugins or content.

## **9 Cookies and Similar Technologies**

- 9.1 Cookies are files with small amounts of data, which may include an anonymous unique identifier. Cookies are sent to your browser from a web site and stored on your computer's hard drive.
- 9.2 Like many sites, we use "cookies" to collect information. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our website. You may ask for a full list of the cookies we collect by sending us an email to [info@springfieldretailcentre.co.za](mailto:info@springfieldretailcentre.co.za).
- 9.3 Our website may contain electronic image requests (sometimes referred to as "web beacon" requests) that allow us to count page views and to access cookies. Any electronic image viewed as part of a web page (including an ad banner) can act as a web beacon. Our web beacons do not collect, gather, monitor or share any of your Personal Information. We merely use them to compile anonymous information about our website and/or the Service.

## **10 Your rights in relation to Personal Information (Access, Deletion and Correction of Personal Information)**

- 10.1 The provision of Personal Information by any data subject to the company is entirely voluntary – you may withdraw your consent at any time, or you may contact us at [info@springfieldretailcentre.co.za](mailto:info@springfieldretailcentre.co.za) to:
- 10.1.1 enquire about what Personal Information we hold of yours; and/or
  - 10.1.2 request us to delete and/or correct your Personal Information.
- 10.2 The company will only retain Personal Information for as long as it is required to serve its primary purpose, or a legitimate interest, or for the period required to comply with an applicable legal requirement, whichever is the longer, and will under the instruction and authority of the Information Officer, ensure that all Personal Information is deleted when it is no longer required (using responsible, appropriate industry-standard methodologies).
- 11 Information Officer and Responsible Party**
- 11.1 If you have any requests or queries regarding the companies use of data in terms of any applicable laws, please contact 031 362 1782 or [info@springfieldretailcentre.co.za](mailto:info@springfieldretailcentre.co.za).
- 11.2 If you feel that the attempts by the company to resolve the matter have been inadequate, you may lodge a complaint with the South African Information Regulator by accessing their website at [www.justice.gov.za/inforeg](http://www.justice.gov.za/inforeg).
- 12 Safeguarding Personal Information**
- 12.1 The company will take all reasonable steps to ensure your Personal Information is accurate, reliable and up-to-date.
- 12.2 The company will ensure that safeguards such as firewalls and data encryption are implemented to protect Personal Information and will enforce physical access controls to our buildings and files.
- 12.3 We authorise access to Personal Information only for employees, consultants and contractors who necessarily require the data to fulfil job responsibilities.
- 12.4 If applicable, the companies hosting company will host any data or service in a secure server environment that uses a firewall and other advanced security measures to prevent interference or access from outside intruders.
- 13 Incident Response**
- 13.1 We have appointed an incident response team to manage any data breach.
- 13.2 In the event any Personal Information is compromised as a result of a cyber-attack or some form of data incident, we will notify you of this as soon as is reasonably possible.
- 14 Other important privacy information**
- 14.1 This Privacy Policy is subject to change, and we will take all reasonable steps to notify users in the event of change hereto.