



# **PRIVACY NOTICE, POLICIES & PROCEDURES**

IN TERMS OF

THE PROTECTION OF PERSONAL INFORMATION ACT

ACT 4 OF 2013

*(POPI Policies & Procedures)*

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## 1. Introduction

- 1.1. Cimak Digital Solutions (Pty) Ltd, the owner and operator of TenantHive, is committed to protecting the privacy and security of its users' personal information. This privacy policy outlines our practices for collecting, using, and safeguarding personal information collected through our services. This policy complements the provisions of the Protection of Personal Information Act 4 of 2013 (POPIA) and other relevant privacy policies and does not supersede them. This privacy policy does not apply to third-party websites linked from our platform. TenantHive is not responsible for the privacy practices of such websites. Please review the privacy policies of any third-party websites before providing personal information.
- 1.2. TenantHive collects personal information from tenants to facilitate the rental application process. This includes credit checks, employment verification, income assessment, and rental history review. This information is used to create comprehensive tenant profiles, which are presented to landlords for consideration. The goal is to streamline the rental process by providing landlords with qualified and reliable tenant candidates.

## 2. Definitions

- 2.1. **Consent** means any voluntary, specific and informed expression of will in terms of which permission is given for the processing of personal information.
- 2.2. **Data Subject** refers to the natural or juristic person to whom personal information relates for instance an applicant, employee, landlord, rental agent or employee of TenantHive.
- 2.3. **FICA** refers to the Financial Intelligence Centre Act 38 of 2001, as amended.
- 2.4. **Information Officer** is the person responsible for ensuring TenantHive's compliance with POPIA.
- 2.5. **Operator** means a person who processes personal information for a responsible party in terms of a contract or mandate, without coming under the direct authority of that party.
- 2.6. **Person** refers to a natural and juristic person, depending on the context;
- 2.7. **Personal information** means any information that relates to an identifiable, living, natural person, and where applicable, an identifiable, existing juristic person and include but is not limited to, information relating to:

- 2.7.1. the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;
  - 2.7.2. information relating to the education or the medical, financial, criminal or employment history of the person; any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person; the biometric information of the person;
  - 2.7.3. the personal opinions, views or preferences of the person;
  - 2.7.4. correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
  - 2.7.5. the views or opinions of another individual about the person; and
  - 2.7.6. the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person.
- 2.8. **POPIA** refers to the Protection of Personal Information Act 4 of 2013, as amended.
- 2.9. **Processing** refers to the act of dealing with personal information and includes any activity or any set of operations, whether or not by automatic means, concerning personal information, including;
- 2.9.1. the collection, receipt, recording, storage, updating or modification, retrieval, alteration, consultation or use;
  - 2.9.2. dissemination by means of transmission, distribution or making available in any other form;
  - 2.9.3. or merging, linking, as well as any restriction, degradation, deletion or destruction of information.
- 2.10. **Record** means any recorded information, regardless of form or medium, including:
- 2.10.1. Writing on any material;

- 2.10.2. Information produced, recorded or stored by means of any tape-recorder, computer equipment, whether hardware or software or both, or other device and any material subsequently derived from information so produced, recorded or stored;
  - 2.10.3. Label, marking or other writing that identifies or describes anything of which it forms part, or to which it is attached by any means;
  - 2.10.4. Book, map, plan, graph or drawing;
  - 2.10.5. Photograph, film, negative, tape or other device in which one or more visual images are embodied to be capable, with or without the aid of some other equipment, of being reproduced.
- 2.11. **Responsible Party** means the entity that determines the purpose of and means for processing personal information. For purposes of this policy, Cimac Digital Solutions (Pty) Ltd is the Responsible Party. Any reference to “TenantHive” in this policy shall, unless the context indicates otherwise, be construed as a reference to Cimac Digital Solutions (Pty) Ltd acting through its TenantHive platform.

### 3. What personal information TenantHive collects

- 3.1. TenantHive may collect and process different categories of personal information during the ordinary course of its operations and provision of services. Such personal information includes:
  - 3.1.1. basic personal details such as a natural person’s name, surname, identification number, age, marital status, nationality and disabilities, or, in the event of a juristic entity, its registered name, trading name, registration number, nationality and beneficial ownership;
  - 3.1.2. contact information such as a person’s telephone number and postal- or email address;
  - 3.1.3. financial information such as payslips, proof of income, bank statements, financial statements, bank account details, credit information, indebtedness, income and expenditure, and any other financial information relevant to assessing a person’s risk profile for purposes of leasing;
  - 3.1.4. employment-related information such as a person’s employment position, employment contract, length of employment, monthly salary and/or commissions, disciplinary record,

employment address, employer name and contact details, and any other information relevant to assessing a person's risk profile for purposes of leasing;

- 3.1.5. demographic information such as a person's physical address, preferences or interests;
  - 3.1.6. personal or professional references or opinions about a person's character and reliability;
  - 3.1.7. website usage and other technical information such as details of a person's visits to our websites or information collected through cookies and other tracking technologies;
  - 3.1.8. personal information provided to TenantHive by a data subject or generated by TenantHive in the course of providing its services, which may, where relevant, include special personal information;
  - 3.1.9. recruitment-related information such as a person's curriculum vitae, education and employment history, details of professional memberships and other information relevant to potential recruitment to TenantHive;
  - 3.1.10. information that a data subject may provide to TenantHive during the ordinary course of business; and
  - 3.1.11. any other personal information relating to such a data subject that it may provide to TenantHive, whether on request or of own accord.
- 3.2. TenantHive may collect and process criminal behaviour and related information, including credit-related adverse listings and other risk indicators, where such processing is necessary for tenant screening, fraud prevention, risk assessment, or the establishment, exercise, or defence of legal rights. Such processing occurs only with the explicit consent of the data subject or where otherwise permitted under sections 26 and 27 of POPIA.
- 3.3. Subject to section 3.2, TenantHive does not generally process special personal information unless permitted under sections 26 and 27 of POPIA. Where such information is processed (for example, disability disclosures or information required for legal compliance), processing occurs only:
- 3.3.1. with the explicit consent of the data subject; or
  - 3.3.2. where necessary for the establishment, exercise or defence of a legal right;

- 3.3.3. for historical, statistical, or research purposes, where the purpose serves a public interest and the processing is necessary for the purpose concerned, or where it appears to be impossible or would involve a disproportionate effort to obtain consent and sufficient guarantees are in place to ensure that the processing does not adversely affect the individual privacy of the data subject to a disproportionate extent;
  - 3.3.4. where otherwise permitted under applicable law.
- 3.4. TenantHive does not knowingly collect or process personal information of children under the age of 18 without the consent of a competent person and only where permitted by law.

#### **4. How TenantHive obtains personal information**

- 4.1. TenantHive may collect or receive personal information a number of different ways:
- 4.1.1. Direct collection – where the data subject provides its personal information directly to TenantHive, either on request or of own accord;
  - 4.1.2. Third-party sources – where TenantHive make necessary enquiries about a data subject or its affairs from third-parties and the information is disclosed;
  - 4.1.3. Publicly available sources – where a data subject’s personal information is in the public domain.
  - 4.1.4. Where personal information is collected from a source other than the data subject, TenantHive relies on one or more of the following legal grounds:
    - 4.1.4.1. the data subject has consented to the collection of the information from another source;
    - 4.1.4.2. the information is contained in or derived from a public record or has deliberately been made public by the data subject;
    - 4.1.4.3. collection from another source would not prejudice a legitimate interest of the data subject;

- 4.1.4.4. collection from another source is necessary to maintain the legitimate interests of TenantHive or of a third party to whom the information is supplied; or
- 4.1.4.5. compliance with direct collection is not reasonably practicable in the circumstances of the particular case.

4.2. At the time of collection, TenantHive notifies data subjects that:

- 4.2.1. The supply of personal information required for rental screening is generally voluntary; however, failure to provide required information may result in TenantHive being unable to process an application or provide services.
- 4.2.2. Certain processing activities are authorised or required by the following legislation:
  - 4.2.2.1. the Protection of Personal Information Act 4 of 2013 (POPIA);
  - 4.2.2.2. the National Credit Act 34 of 2005, insofar as credit information is obtained from registered credit bureaus for tenant screening purposes;
  - 4.2.2.3. the Financial Intelligence Centre Act 38 of 2001 (FICA), where applicable to customer due diligence and anti-money laundering obligations;
  - 4.2.2.4. the Consumer Protection Act 68 of 2008, insofar as it applies to the provision of services to consumers; and
  - 4.2.2.5. any other legislation that authorizes or requires the collection of personal information in the context of TenantHive's services, as may be communicated to the data subject at the time of collection.
- 4.2.3. Personal information may be transferred to third parties and foreign jurisdictions as described in clause 8 of this policy. Where such transfers occur, TenantHive ensures that the receiving jurisdiction or recipient is subject to a law, binding corporate rules, or a binding agreement providing an adequate level of protection substantially similar to POPIA, including protections governing further onward transfers of the information. Information about the level of protection applicable in the relevant jurisdiction or the specific safeguards in place is available from the Information Officer upon request using the contact details in clause 13.

- 4.2.4. Data subjects have the right to access, correct, object to, or lodge a complaint regarding the processing of their personal information.

## 5. How TenantHive use personal information

5.1. TenantHive will only use a data subject's personal information where it is permitted to do so under the auspices of the applicable laws of the Republic of South Africa. In terms of POPIA, the use of personal information must be justified on one or more legal grounds. The principal legal grounds that justify TenantHive's use of a data subject's personal information are:

5.1.1. Contractual Performance: TenantHive uses a data subject's information when necessary to fulfil existing lease agreements, facilitate the leasing application process, or negotiate new rental contracts, either directly with the data subject or on their behalf;

5.1.2. Legal Obligation: TenantHive may use a data subject's information to comply with its legal obligations;

5.1.3. Legitimate Interests: TenantHive may use a data subject's information to pursue its or a data subject's legitimate interests, provided that its reasons for doing so outweigh any potential impact on a person's data protection rights;

5.1.4. Legal Claims: TenantHive may use a data subject's information when it is necessary for defending, pursuing, or making legal claims;

5.1.5. Consent: TenantHive may use a data subject's information based on such a person's consent.

5.2. TenantHive may obtain credit information from registered credit bureaus for purposes of tenant screening, risk assessment, fraud prevention, and profile development. TenantHive does not operate as a credit bureau and does not engage in credit reporting activities as contemplated in the National Credit Act 34 of 2005. Credit information is used solely as an input in TenantHive's screening and assessment processes and is not maintained or distributed as an independent credit reporting database.

5.2.1. To the extent that any of TenantHive's processing activities may constitute processing for the purposes of credit reporting as contemplated in section 57(1)(c) of POPIA, or processing of information on criminal behaviour on behalf of third parties as contemplated

in section 57(1)(b) of POPIA, TenantHive has notified or will notify the Information Regulator in accordance with sections 57 and 58 of POPIA and will not commence or continue such processing until the requisite prior authorisation has been obtained or the applicable statutory timeframes have expired without a contrary determination.

5.2.2. Where the transfer of special personal information or children's personal information to a foreign jurisdiction is contemplated in circumstances where that jurisdiction does not provide an adequate level of protection, TenantHive will obtain prior authorisation from the Information Regulator as required by section 57(1)(d) of POPIA.

5.2.3. To the extent that TenantHive's processing activities may involve the use of unique identifiers of data subjects — including identity numbers, passport numbers, or other individually assigned identifiers — for a purpose other than that for which they were specifically intended at the time of collection, and with the aim of linking such information with information processed by other responsible parties, TenantHive will notify the Information Regulator in accordance with sections 57(1)(a) and 58 of POPIA and will not commence or continue such processing until the requisite prior authorisation has been obtained, or the applicable statutory timeframes have expired without a contrary determination by the Regulator.

5.3. Where consent is relied upon as the lawful basis for processing, TenantHive obtains consent that is voluntary, specific, and informed. TenantHive does not treat a single, undifferentiated expression of agreement to this policy as constituting specific consent for all processing activities described herein. Separate, specific consent is obtained for each of the following categories of processing:

5.3.1. the processing of special personal information, including criminal behaviour information and disability information, as referred to in clauses 3.2 and 3.3 of this policy;

5.3.2. the processing of personal information for the purpose of direct marketing by means of electronic communication, as referred to in clause 6.4;

5.3.3. the transfer of personal information to a third party in a foreign country, where consent is the legal basis relied upon under clause 8.3.4;

5.3.4. the collection of personal information from sources other than the data subject, where consent is the legal basis relied upon under clause 4.1.4(a); and

- 5.3.5. any other processing activity for which consent is the sole lawful basis and which is not necessary for the conclusion or performance of a contract with the data subject.
- 5.4. Each consent request clearly identifies the specific processing activity, the categories of personal information involved, and the purpose of the processing and a data subject may decline to give consent for any processing activity listed in clause 5.3.2 without affecting the processing of personal information for which an alternative lawful basis exists (such as contractual performance, legal obligation, or legitimate interests as set out in clause 5.1).
- 5.5. A data subject may withdraw any consent given under clause 5.3.2 at any time, in accordance with clause 11.3, without affecting the lawfulness of processing carried out prior to withdrawal.

## **6. Further uses of personal information**

### 6.1. To provide services and to conduct its business:

TenantHive collects and uses a data subject's personal information to deliver its services, including processing leasing applications, running credit checks, and fulfilling its responsibilities under any agreements between data subjects and TenantHive.

### 6.2. To facilitate the use of TenantHive's website and to ensure relevant content:

TenantHive collects and uses a data subject's personal information to respond to inquiries from website visitors and to present the most relevant and effective content based on the data subject's preferences and device.

### 6.3. For security purposes:

TenantHive uses a data subject's personal information to verify such data subject's identity during transactions and the provision of services.

### 6.4. For marketing and business development purposes:

6.4.1. TenantHive may process personal information for the purpose of direct marketing by means of electronic communication only where: the data subject has given prior consent to such processing; or the data subject is an existing customer of TenantHive, subject to the conditions in clause 6.4.2.

6.4.2. Where the data subject is an existing customer of TenantHive, TenantHive may process personal information for direct marketing of its own similar products or services, provided that:

6.4.2.1. TenantHive obtained the data subject's contact details in the context of the sale of a product or service to the data subject;

6.4.2.2. the marketing is limited to TenantHive's own similar products or services;

6.4.2.3. the data subject was given a reasonable opportunity to object, free of charge and without unnecessary formality, to such use of their contact details at the time of collection; and

6.4.2.4. the data subject continues to be afforded a reasonable opportunity to object on each subsequent marketing communication, at no charge and without unnecessary formality.

6.4.3. Where a data subject has not previously given or withheld consent, TenantHive may approach the data subject only once in order to request consent for direct marketing.

6.4.4. Every electronic communication sent by TenantHive for the purpose of direct marketing will contain: details of the identity of TenantHive or the person on whose behalf the communication is sent; and an address or other contact details to which the data subject may send a request that such communications cease.

6.4.5. A data subject may unsubscribe or opt out of further marketing communications at any time by following the instructions provided in each electronic marketing communication or by contacting the Information Officer.

6.5. For research and development purposes:

TenantHive analyses personal information to better understand tenant and landlord needs, improve its services, and develop new features that enhance the leasing process.

6.6. For statistical purposes:

TenantHive analyses personal information to identify and track market trends, as well as to understand the needs and behaviour of tenants, landlords, and rental agents.

6.7. For recruitment purposes:

TenantHive collects and uses personal information submitted through its website for employment applications and to assess a person's suitability for any positions available at TenantHive.

6.8. To fulfil legal, regulatory, or risk management obligations:

TenantHive collects and uses personal information to comply with legal obligations, such as customer due diligence, anti-bribery, and sanctions screening. TenantHive may also perform relevant background checks required by law or best practice. Additionally, TenantHive uses personal information to enforce its legal rights, meet regulatory reporting obligations, prevent fraud, and protect the rights of third parties.

6.9. To ensure payment:

TenantHive collects and uses personal information to recover any payments owed to it. If necessary, TenantHive may engage debt collection agencies or take legal action to enforce payment.

6.10. To inform a data subject of changes:

TenantHive uses personal information to notify data subjects about changes to its services, disclaimers, or privacy policies.

6.11. To reorganize or make changes to TenantHive's business:

In the event of a business reorganization, merger, or sale, TenantHive may transfer a data subject's personal information to relevant third parties or advisors during the due diligence process or as part of the transfer. This is done for the same purposes outlined in this privacy notice or for analysing any proposed business changes.

6.12. For profiling, automated processing, analytics and service optimisation purposes

6.12.1. TenantHive may analyse and retain personal information to develop and maintain user profiles for purposes including risk assessment, tenant screening, fraud detection, service improvement, platform security, and the personalisation of user experience. Such profiling may involve the automated analysis of financial information, rental history, behavioural data, and usage patterns.

6.12.2. TenantHive relies on its legitimate interests in improving its services, preventing fraud, and safeguarding platform integrity for this processing, provided that such interests are not overridden by the data subject's rights and freedoms. Where automated tools are used to support screening and risk assessment, no decision producing legal consequences for, or significantly affecting, a data subject is made solely on the basis of automated processing without appropriate human review. In accordance with section 71(3) of POPIA, where a decision is taken on the basis of automated processing in connection with the conclusion or performance of a contract, TenantHive will, without requiring a formal request from the data subject:

6.12.2.1. afford the data subject a reasonable opportunity to make representations regarding any such decision before it is given effect; and

6.12.2.2. proactively provide the data subject with sufficient information about the underlying logic of the automated processing to enable them to make meaningful representations in respect of the decision affecting them.

Data subjects who wish to query or challenge an automated decision may contact the Information Officer using the details provided in clause 13.

6.12.3. TenantHive conducts a legitimate interests assessment for each category of profiling activity, weighing the necessity and proportionality of the processing against the potential impact on the data subject's rights and freedoms. Where a data subject objects to profiling on reasonable grounds relating to their particular situation, TenantHive will evaluate the objection on its merits and cease the relevant processing unless TenantHive demonstrates compelling legitimate grounds for the processing that override the interests, rights, and freedoms of the data subject.

### 6.13. For further processing compatibility

- 6.13.1. Where TenantHive processes personal information for purposes beyond the original purpose for which it was collected, TenantHive assesses whether such further processing is compatible with the original purpose by considering: the relationship between the purpose of the intended further processing and the purpose for which the information was collected; the nature of the information concerned; the consequences of the intended further processing for the data subject; the manner in which the information was collected; and any contractual rights and obligations between TenantHive and the data subject.
- 6.13.2. Where personal information is further processed for historical, statistical, or research purposes as contemplated in clauses 6.5 and 6.6, TenantHive ensures that: the further processing is carried out solely for such historical, statistical, or research purposes; and the personal information will not be published or disclosed in a form in which the data subject may be identified.
- 6.13.3. Where special personal information (as referred to in clause 3.3) is incidentally included in information used for historical, statistical, or research purposes, such processing is carried out only where the purpose serves a public interest and the processing is necessary for the purpose concerned, or where it appears to be impossible or would involve a disproportionate effort to obtain consent and sufficient guarantees are in place to ensure that the processing does not adversely affect the individual privacy of the data subject to a disproportionate extent.

Please note that if a data subject fails to provide personal information required by law or under a contract TenantHive has with such a data subject, TenantHive may not be able to perform the contract or engage in a particular service or engagement. TenantHive will notify such data subject if such circumstances arise.

## **7. Who personal information is shared with**

- 7.1. TenantHive may share and process the personal information with any of the following categories of third parties:
  - 7.1.1. Landlords and Rental Agents: To facilitate the rental process, TenantHive will provide landlords and rental agents with relevant tenant information.

- 7.1.2. Credit Bureaus: For credit checks, TenantHive may share personal information with credit reporting agencies.
- 7.1.3. Service Providers: TenantHive may share personal information with third-party service providers who assist with platform operations, including but not limited to IT infrastructure providers, data storage providers, payment processors, analytics providers, and session replay service providers such as LiveSession. Such service providers act as Operators and process personal information strictly in accordance with contractual mandates and applicable data protection laws.
- 7.1.4. Legal and Regulatory Authorities: As required by law, TenantHive may share information with government agencies for compliance purposes, including fraud prevention and reporting.
- 7.1.5. Debt Collection Agencies: For unpaid debts, TenantHive may share information with debt collection agencies.
- 7.1.6. Business Partners and Professional Advisors: TenantHive may share information with external business partners third parties or their legal-, financial-, business-, and risk management advisors, as well as bankers, and auditors.
- 7.1.7. With Consent: TenantHive may share personal information with third parties in respect of whom the data subject has provided explicit consent.
- 7.1.8. Insurers and Brokers: TenantHive may share personal information with their insurers and brokers for insurance purposes.
- 7.1.9. Third-Party Service Providers and Contractors: TenantHive may outsource any of its functions and, in doing so, share personal information with such relevant third-party service provides and contractors.
- 7.2. TenantHive enters into written operator agreements with all third-party processors, requiring compliance with security safeguards and immediate notification of any security compromise.

## 8. Which countries personal information may be transferred to

- 8.1. TenantHive uses cloud-based software as part of its operations, hence it cannot limit its processing of a data subject's personal information to the country in which that data subject is based. In the course of providing its services, TenantHive will likely need to transfer personal information to locations outside the jurisdiction in which a data subject provides it or where a data subject is viewing TenantHive's website.
- 8.2. Irrespective of where TenantHive processes personal information, it maintains consistent data protection safeguards globally and implements appropriate measures to ensure compliance with applicable data protection laws. Likewise, when TenantHive engage third-party service providers to process personal data on its behalf, TenantHive ensures that adequate measures are in place to protect personal information.
- 8.3. Where personal information is transferred outside the Republic of South Africa, such transfer occurs only:
  - 8.3.1. to jurisdictions where the recipient is subject to a law, binding corporate rules, or a binding agreement that provides an adequate level of protection substantially similar to the conditions for the lawful processing of personal information under POPIA, and which includes protections in respect of any further transfer of the personal information to a third party in another foreign country that are substantially similar to those set out in this clause 8; or
  - 8.3.2. pursuant to binding agreements imposing appropriate safeguards; or
  - 8.3.3. where necessary for contractual performance;
  - 8.3.4. with the consent of the data subject; or
  - 8.3.5. where the transfer is for the benefit of the data subject and it is not reasonably practicable to obtain the data subject's consent to the transfer, provided that if it were reasonably practicable to obtain such consent, the data subject would be likely to give it.
- 8.4. For purposes of clause 8.3.1, "*binding corporate rules*" means personal information processing policies adhered to by TenantHive or an operator within a group of undertakings when transferring personal information to another responsible party or operator within the same group in a foreign country, as contemplated in section 72(2) of POPIA. Prior to any cross-border transfer relying on

binding corporate rules, TenantHive will confirm that the relevant policies adequately govern any further onward transfer from the recipient to third parties in other foreign countries.

## 9. How long personal information will be kept

- 9.1. **Successful Applications:** Personal information of successful applicants will be retained for the duration of the rental relationship and for a reasonable period thereafter to comply with legal, contractual, regulatory, risk management, fraud prevention, and record-keeping obligations.
- 9.2. **Unsuccessful Applications:** Personal information of unsuccessful applicants may be retained for a reasonable period to enable TenantHive to maintain internal records, improve its risk assessment models, prevent fraud, and comply with legal obligations. Where such information is further processed for the purpose of refining tenant profiles or service improvement, TenantHive assesses the compatibility of such further processing with the original purpose of collection in accordance with clause 6.13 and ensures that the information is de-identified where reasonably practicable. Data subjects may request deletion of their personal information or object to continued retention at any time, subject to any legal or contractual obligations requiring continued processing.
- 9.3. Notwithstanding the above, TenantHive will not retain personal information for longer than is necessary for the purposes for which it was collected, unless retention is required or permitted by law.
- 9.4. A data subject may, at any time, request deletion of personal information or object to continued retention, subject to any legal or contractual obligations requiring continued processing.
- 9.5. TenantHive will restrict the processing of personal information (rather than deleting or destroying it) where:
  - 9.5.1. the accuracy of the personal information is contested by the data subject, for a period enabling TenantHive to verify the accuracy of the information;
  - 9.5.2. TenantHive no longer needs the personal information for achieving the purpose for which the information was collected or subsequently processed, but it must be maintained for purposes of proof;
  - 9.5.3. the processing is unlawful and the data subject opposes its destruction or deletion and requests restriction of its use instead;

- 9.5.4. the data subject requests transmission of the personal information into another automated processing system; or
  - 9.5.5. the data subject has requested the transmission of the personal information as part of the cessation of a service relationship with TenantHive and TenantHive requires a reasonable period to facilitate that transmission in an orderly manner before destroying or deleting the information.
- 9.6. Where processing is restricted under clause 9.5.1, TenantHive will not process the personal information (other than storing it) except for purposes of proof, with the data subject's consent, for the protection of the rights of another natural or legal person, or where processing is required in the public interest. TenantHive will inform the data subject before any restriction of processing is lifted and normal processing resumes.

## **10. How personal information will be protected**

- 10.1. TenantHive understands the significance of information security as an essential component of data privacy. While it is impossible to guarantee the absolute security of data transmissions, including those over the internet or any website, TenantHive employs a range of commercially reasonable physical, technical, and procedural measures to safeguard personal information from unauthorized access, use, disclosure, alteration, or destruction, in accordance with the requirements of data protection laws. To this end, TenantHive have the following measures in place:
- 10.1.1. A risk gap audit was performed and potential risks were identified;
  - 10.1.2. The relevant role players have been identified and appointed to safeguard all personal information and manage potential risks;
  - 10.1.3. Data processing activities have been mapped the necessary safeguards implemented;
  - 10.1.4. An Information Officer has been appointed, whose details are available in paragraph 13 herein, who is responsible for compliance with the conditions of the lawful processing of personal information and other provisions of POPIA;
  - 10.1.5. Information provided to TenantHive is stored on secure servers and/or hard drives controlled by TenantHive or its service providers, the access of which is restricted only to persons authorised by TenantHive;

- 10.1.6. All personnel at TenantHive, as well as any third-party service providers engaged by TenantHive for processing personal information on its behalf, are contractually obligated to maintain the confidentiality of such information;
  - 10.1.7. TenantHive offers its personnel regular training and awareness campaigns on lawful processing of personal information.
- 10.2. In addition to TenantHive's responsibilities, please be aware that if TenantHive has provided a person with a password to access specific parts of its online services, it is such a person's responsibility to keep this password confidential and adhere to any other security procedures TenantHive informs such a person of. TenantHive strongly encourages all persons to refrain from sharing a password with anyone.
- 10.3. TenantHive regularly reviews and updates its security safeguards to address new and evolving risks and periodically verifies that such safeguards are effectively implemented.

## **11. Data subjects' rights in relation to personal information**

- 11.1. Any inquiries regarding the use of personal information must be directed to the Information Officer using the details provided in paragraph 13 below. In accordance with the provisions of POPIA a data subject may have the right to request the following from TenantHive:
- 11.1.1. Lawful processing of a data subject's personal information;
  - 11.1.2. Notification when personal information about a data subject is being collected;
  - 11.1.3. Notification if a data subject's personal information has been accessed or acquired by an unauthorized person;
  - 11.1.4. Confirmation of whether a responsible party holds a data subject's personal information and the right to access this information;
  - 11.1.5. Correction, destruction, or deletion of such a data subject's personal information where necessary;
  - 11.1.6. Object, on reasonable grounds relating to their particular situation, to the processing of their personal information where such processing is carried out on the basis of TenantHive's

legitimate interests or the legitimate interests of a third party (as contemplated in section 11(1)(f) of POPIA), the protection of the data subject's own legitimate interests (section 11(1)(d)), or the performance of a public law duty (section 11(1)(e)). A data subject may also object to the processing of their personal information for direct marketing purposes at any time. Upon receipt of a valid objection submitted in the prescribed manner, TenantHive will cease processing the relevant personal information unless TenantHive can demonstrate compelling legitimate grounds for the processing that override the interests, rights, and freedoms of the data subject, or where processing is required for the establishment, exercise, or defence of legal claims. Objections may be directed to the Information Officer using the contact details in clause 13.

- 11.1.7. Prevention of processing of such a data subject's personal information for direct marketing purposes through unsolicited electronic communications;
  - 11.1.8. Avoidance, under certain circumstances, of decisions made solely based on automated processing of such a data subject's personal information that provides a profile of such a data subject;
  - 11.1.9. Submission of a complaint to the Information Regulator regarding alleged interference with the protection of personal information or in respect of a determination made by an adjudicator;
  - 11.1.10. Initiation of civil proceedings regarding alleged interference with the protection of a data subject's personal information.
  - 11.1.11. Object, on reasonable grounds relating to their particular situation, to the processing of personal information for profiling, analytics, or legitimate interest purposes.
- 11.2. A data subject may also instruct TenantHive not to process its personal information for marketing purposes. To exercise its right to prevent such processing, a data subject can unsubscribe at any time using the provided facility.
- 11.3. A data subject may withdraw consent at any time, without affecting the lawfulness of processing prior to withdrawal.
- 11.4. TenantHive maintains records of all consents obtained from data subjects, including the date, time, method, and scope of each consent given. TenantHive bears the burden of demonstrating that valid consent was obtained for any processing activity for which consent is relied upon as the lawful basis.

11.5. TenantHive is committed to taking reasonable steps to ensure the accuracy of a data subject's personal information. A data subject must inform TenantHive of any changes to its personal information.

11.5.1. Where TenantHive corrects, deletes, or destroys personal information in response to a request by a data subject, and where such correction or deletion may affect decisions made or to be made about the data subject, TenantHive will, where reasonably practicable, notify each third party to whom the relevant personal information was previously disclosed of the correction or deletion and the steps taken.

11.5.2. TenantHive will in all instances notify the data subject of the action taken in response to the correction request as soon as reasonably practicable after such action is taken.

11.6. While TenantHive strives to respect the rights of data subjects, please note that the exercise of these rights is subject to certain exemptions that safeguard public interest (e.g., crime prevention or detection), TenantHive's interests (e.g., maintenance of legal privilege), and some limitations imposed by law (e.g., the right to withdraw consent). These limitations may require TenantHive to continue processing a person's personal information to defend its legal rights or fulfil its legal and regulatory obligations.

11.7. If a data subject contacts TenantHive to exercise any of these rights, TenantHive will verify such data subject's identity and entitlement, and respond within thirty (30) days. If a data subject is dissatisfied with TenantHive's use of its personal information or if TenantHive's response to any exercise of these rights, a data subject has the right to lodge a complaint with the Information Regulator at the contact details below:

**Information Regulator (South Africa)**

**Website: [www.justice.gov.za/inforeg](http://www.justice.gov.za/inforeg)**

**Email: [inforeg@justice.gov.za](mailto:inforeg@justice.gov.za)**

**Tel: 010 023 5200**

## **12. Who is the responsible party**

12.1. Cimac Digital Solutions (Pty) Ltd, having its main place of business at 52 Boog Street, Morgenster Heights, Brackenfell, is the responsible party that processes personal information.

12.2. Data subjects may direct all queries and formal correspondence to the Information Officer at the details provided in clause 13 of this policy.

**13. Who is the Information Officer**

<b>Information Officer</b>	Alno Smit
<b>Postal Address</b>	52 Boog Street, Morgenster Heights, Brackenfell, 7560
<b>Telephone Number</b>	082 055 4912
<b>Email Address</b>	alno@tenanthive.co.za
<b>Website</b>	www.tenanthive.co.za

**14. How TenantHive uses cookies and similar technologies**

14.1. The website of TenantHive utilises cookies, which are small data files stored on users' devices. TenantHive uses the following categories of cookies:

- 14.1.1. Essential cookies: cookies that are strictly necessary for the operation of the website, including session management and security functions. These cookies cannot be disabled as the website cannot function properly without them.
- 14.1.2. Analytical cookies: cookies that collect information about how users interact with the website, including pages visited, traffic sources, and browsing patterns. These cookies assist TenantHive in understanding website usage and improving functionality.
- 14.1.3. Marketing cookies: cookies that are used to track users across websites for the purpose of displaying targeted content or advertisements. These cookies are only deployed with the data subject's prior consent.

14.2. Data subjects may manage, disable, or reject non-essential cookies through their browser settings. Instructions for managing cookies are available in the help section of most web browsers. Disabling non-essential cookies may affect certain features or functionality of the website.

14.3. TenantHive will not deploy analytical or marketing cookies until the data subject has been given a clear opportunity to accept or reject them.

- 14.4. In addition to cookies, TenantHive makes use of session replay and behavioural analytics software provided by LiveSession to better understand how users interact with the website and platform.
- 14.5. LiveSession may record user interactions with the website, including mouse movements, clicks, scrolling behaviour, device type, browser information, approximate location, and navigation paths. This assists TenantHive in improving functionality, detecting technical issues, preventing fraud, and enhancing user experience.
- 14.6. TenantHive takes reasonable steps to ensure that sensitive personal information — including identity numbers, financial account details, passwords, and other confidential input fields — are masked or excluded from session replay recording. TenantHive regularly audits and tests masking configurations to verify their effectiveness and promptly remediates any identified deficiencies.
- 14.7. LiveSession processes personal information as an Operator on behalf of TenantHive and does not use such information for its own independent purposes. TenantHive has entered into a written operator agreement with LiveSession in accordance with clause 7.2.
- 14.8. Personal information processed through LiveSession may be transferred to and stored in jurisdictions outside the Republic of South Africa. Such transfers occur in accordance with clause 8.3 of this policy, and TenantHive ensures that appropriate safeguards and contractual protections are in place.
- 14.9. Data subjects may opt out of LiveSession session recording by contacting the Information Officer using the details provided in clause 13.
- 14.10. Further information regarding LiveSession's privacy practices is available at: <https://livesession.io/privacy-policy/>

## **15. Data Breach Protocol**

- 15.1. In the event of a data breach or security compromise involving personal information, TenantHive shall:
- 15.1.1. Notify the Information Regulator as soon as reasonably possible;
  - 15.1.2. Notify affected data subjects in writing via email, registered mail, website notice, or public communication where appropriate;

15.1.3. Provide details of:

15.1.3.1. the nature of the compromise;

15.1.3.2. the possible consequences;

15.1.3.3. measures taken or proposed to address the breach;

15.1.3.4. recommendations to mitigate adverse effects;

15.1.3.5. the identity of the unauthorised person, where known; and

15.1.4. Take immediate steps to contain and remediate the breach.

15.1.5. TenantHive may delay notification to an affected data subject only where a public body responsible for the prevention, detection, or investigation of offences, or the Information Regulator, determines that such notification will impede a criminal investigation.

15.1.6. Notwithstanding the notification methods described in clauses 15.1.1 to 15.1.5, the Information Regulator may, in terms of section 22(6) of POPIA, direct TenantHive to publicise the fact of any security compromise in any manner and form specified by the Regulator, where the Regulator is of the opinion that such publicity would protect an affected data subject. TenantHive will reasonably promptly comply with any such direction and will implement the required publication without delay upon receipt thereof.

## **16. Complaints Procedure**

16.1. Data subjects have the right to complain in instances where any of their rights under POPIA have been infringed upon. TenantHive takes all complaints very seriously and will address all POPIA-related complaints in accordance with the following procedure:

16.1.1. POPIA complaints must be submitted to the Information Officer in writing;

16.1.2. Where the complaint has been received by any person other than the Information Officer, such other person will ensure that the full details of the complaint reach the Information Officer within 2 working days.

- 16.1.3. The Information Officer will provide the complainant with a written acknowledgment of receipt of the complaint within 2 working days.
- 16.1.4. The Information Officer will carefully consider the complaint and amicably address the complainant's concerns. In considering the complaint, the Information Officer will endeavour to resolve the complaint in a fair manner and in accordance with the principles outlined in POPIA.
- 16.1.5. The Information Officer must also determine whether the complaint relates to an error or breach of confidentiality that has occurred and which may have a wider impact on TenantHive's data subjects.
- 16.1.6. Where the Information Officer has reason to believe that the personal information of data subjects has been accessed or acquired by an unauthorized person, the Information Officer will inform the Information Regulator.
- 16.1.7. In all instances, the Information Officer will provide reasons for any decisions taken and communicate any anticipated deviation from the specified timelines.
- 16.1.8. The Information Officer's response to the data subject may suggest a remedy for the complaint, a dismissal of the complaint and the reasons as to why it was dismissed, an apology (if applicable) and any disciplinary action that has been taken against any employees involved.
- 16.1.9. Where the data subject is not satisfied with the Information Officer's suggested remedies, the data subject has the right to complain to the Information Regulator.
- 16.1.10. The Information Officer will review the complaints process to assess the effectiveness of the procedure periodically and to improve the procedure where it is found wanting. The reason for any complaints will also be reviewed to ensure the avoidance of occurrences giving rise to POPIA-related complaints.

## **17. Disciplinary Action**

- 17.1. Where a POPIA complaint or a POPIA infringement investigation has been finalized by the Information Officer, it may recommend any appropriate administrative, legal and/or disciplinary

action to be taken against any employee reasonably suspected of being implicated in any non-compliant activity outlined within this policy.

- 17.2. In the case of ignorance or minor negligence, TenantHive will undertake to provide further awareness training to the employee.
- 17.3. Any gross negligence or the wilful mismanagement of personal information, will be considered a serious form of misconduct for which TenantHive may summarily dismiss the employee. Disciplinary procedures will commence where there is sufficient evidence to support an employee's gross negligence.

## **18. How to contact the Information Officer**

Should the reader have any questions about this privacy notice and policy or how TenantHive processes personal information, please contact the Information Officer, the details of whom are furnished in paragraph 13 above.

## **19. PAIA Manual**

TenantHive maintains a PAIA Manual in terms of section 51 of the Promotion of Access to Information Act, which is available upon request and on its website.

## **20. How TenantHive may update this privacy notice and policy**

- 20.1. TenantHive reserves the right to amend this privacy notice and policy from time to time to reflect changes in its processing activities, legal requirements, or business operations.
- 20.2. Where amendments are made, TenantHive will publish the updated policy on its website with a revised "Last updated" date. Where amendments are material — including changes to the purposes of processing, categories of personal information collected, categories of recipients, cross-border transfer arrangements, or data subject rights — TenantHive will take reasonable steps to notify data subjects of such changes prior to their taking effect, by means of a prominent notice on the website, email communication, or other appropriate means.
- 20.3. Continued use of TenantHive's services following publication of a materially amended policy does not, of itself, constitute consent to new processing activities that were not covered by the data

subject's original consent. Where material amendments require fresh consent, TenantHive will obtain such consent separately.

Last updated: **April 2026**

DULY SIGNED BY ME  
08-04-2026  
THE INFORMATION OFFICER  

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**The Information Officer**