

PRIVACY POLICY

Amber Devco (RF) (PTY) Ltd as well as its authorised companies, agents and third parties, including but not necessarily limited to Amber Glades Care (PTY) Ltd, Glades Care Partners (PTY) Ltd, Glades Facilities Management (PTY) Ltd, Harcourts Ambers, Randles Attorneys, relevant health care providers or ambulances, and authorised contractors where necessary, are committed to protecting your privacy and ensuring your personal information is collected and used properly, lawfully, and transparently in accordance with the Protection of Personal Information Act, 2013 (POPIA).

This Policy explains **how we obtain, use and disclose your personal information**, in accordance with the requirements of POPIA.

For the purposes of this policy a **"data subject"** can be, where applicable, a resident, tenant, visitor, contractor, supplier or employee.

Data Collection

We collect only the minimum personal information necessary to provide services and understand your needs, which may include your name and that of family members, contact details, address, identity card, vehicle identification(s), and financial, medical, medical aid, employment, biometric (including image and voice data) and/or internet usage information.

This data is collected directly from (a) you, (b) third parties (e.g., a next of kin, attorney, medical practitioner or estate agent) as permitted by law, e.g., if it does not prejudice a legitimate interest of yours or is needed to maintain the legitimate interests of Amber Devco or a third party to whom the information is supplied, and/or (c) from your web browser when you visit our website.

Purpose of Processing

Amber Devco and the relevant staff of Amber Devco's authorised companies shall only process your personal information for the purposes of pursuing its legitimate interests and matters ancillary thereto, or as directed by an order of an applicable South African court, including but not necessarily limited to:

- acquiring a Life Right to an Amber Glades Community apartment /car port, securing payment for Amber Devco as required in any agreement of sale, ensuring the well-being of a Life Right Holder and administering the payment of a Life Right into the estate.
- contacting a next of kin, lawyer, and/or executor.
- administering the affairs of residents or tenants relating to their residency such as processing of levy or rental and other payments.

Directors: T. E. M. Gibson, I. A. Mason & G. C. Wolmarans

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amberglades
a caring community

Amber Devco (RF) (Pty) Ltd
Reg. No. 2019/075001/07
Vat No. 4800 285 761

Amber Glades | off D507 | off Karkloof Road
Howick | 3290

- aiding, when requested to do so, with personal matters such as banking or payments using EFT or card, and cell phone usage.
- using images or information for print marketing e.g., brochures, or on social media platforms, as well as internal publications such as the "Glades Glimpses" and "Residents Gallery".
- creating a personalised health care and/ or dietary plan.
- providing services to residents, such as housekeeping and personalised health care.
- looking after the safety and security of our residents, visitors, and those who come to work on-site by using CCTV in shared spaces. These tools are used carefully and respectfully, with video and audio recordings collected only to help protect everyone's wellbeing and handled with strict attention to privacy.
- improving our website's performance and personalizing your experience.

Information Disclosure

Amber Devco (RF) (PTY) Ltd may provide your personal information as necessary to (a) its authorised companies, namely Amber Glades Care (PTY) Ltd, Glades Care Partners (PTY) Ltd, and Glades Facilities Management (PTY) Ltd, as well as (b) third-party service providers under POPIA-compliant agreements, such as Harcourts Ambers, Randles Attorneys, authorised service providers or contractors, (c) relevant health care providers or an ambulance and (d) if legally mandated by South African law.

Data Security

The relevant staff of Amber Devco's authorised companies have all been trained in the principles of protection of personal information and have all acknowledged they are bound to protect and keep secure all personal information of our data subjects. None of those accessing the personal information at any time will sell or share the information to any other party for any gain.

Amber Devco and its authorised companies employ technical and organisational measures to securely store and control access to your personal information both in physical records at the Amber Glades office(s) and electronically on their server or in the cloud using physical security, computer and network security systems.

Amber Devco or its authorised companies will notify you and the Information Regulator should there be reasonable grounds to believe that your personal information has been accessed or acquired by any unauthorised party, e.g., in the case of a data breach.

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AN INITIATIVE MADE POSSIBLE BY
OLD MUTUAL ALTERNATIVE INVESTMENTS



Data Retention

Amber Devco or its authorised companies shall retain your personal information records in accordance with the retention periods provided in Amber Devco's **Data Retention Policy**. Data is retained for only as long as is necessary for achieving the purpose for which the information was collected or subsequently processed, unless the retention of the record is required or authorised by another law. Personal information records shall be destroyed in a secure manner and in a manner which prevents its reconstruction.

Your Rights as a Data Subject

POPIA grants you the right to access, correct, or delete your personal information, object to processing, and lodge complaints with the Information Regulator.

Your rights as a data subject under Section 5 of the Protection of Personal Information Act, 3013 (POPIA), include but are not limited to the right to:

- Request access to your personal information held by Amber Devco (RF) (PTY) Ltd or its authorised companies.
- Request details regarding the identity of any third parties who have received your personal information.
- Request that Amber Devco correct, update, destroy, or delete any of your personal information.
- Lodge a complaint in writing with the Information Regulator if you believe that the processing of your personal information is unlawful, unreasonable, or infringes your rights.

Contact Information

For more information about the Protection of Personal Information Act, 2013 (POPIA), which commenced on 01st July 2020, it is available at the following link: www.popia.co.za

For privacy inquiries or to exercise your rights, contact our Deputy Information Officer:

Deputy Information Officer: Shaun MacGregor

Email: gm@amberglades.co.za

Contact Number: 033 307 0900 (reception)

Directors: T. E. M. Gibson, I. A. Mason & G. C. Wolmarans

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