Privacy Policy

VERSION 1: MARCH 2022

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Betapoint Management Consultants (Pty) Ltd

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1.Betapoint Privacy Policy

1.1. Introduction

1.1.1. Welcome

Welcome to Betapoint. This Privacy Policy ("**Policy**") describes how we collect, process, and share your Personal Data. We also describe Users' rights and choices with respect to how we process your personal data and other important information. Please read this Policy carefully.

For individuals, customers, partners and suppliers based in the Republic of South Africa, please see www.betapoint.co.za/paia-manual for our South African PAIA Manual

1.1.2. Who We Are

This is the Policy of Betapoint (Pty) Ltd. (**"Betapoint," "us," "our,"** or **"we"**), a South African company with offices at 10th Floor, The Firestation Building, 16 Baker Street, Rosebank, 2196, South Africa. Our contact information is below:

Telephone: +27 11 881 5412

Email: info@betapoint.co.za

1.1.3. Applicability

This Privacy Policy applies to our "Services" which include our websites that link to/post this Privacy Policy, (including any subdomains or mobile versions the "Site(s)"), and the services we offer to the market.

Your use of our Services indicates your acknowledgement of practices described in this Policy.

1.1.4. Third Parties and Our Role

Betapoint is a service provider to public and private sector real estate owners, developers, and users (our "Clients"). Our Services enable our Clients to optimise their real estate assets and facilities.

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This Policy only addresses how Betapoint processes Personal Data. This Policy does not apply to our Clients, or describe how our Clients process Personal Data, including the Personal Data we collect or process on their behalf.

1.1.5. Processing of Personal Data

Types of Personal Data We Process

We may process the following categories of data that relate to identified or identifiable individuals ("**Personal Data**")

Note: Specific Personal Data elements listed in each category are only examples and may change):

Identity Data: Personal Data about you and your identity, such as your name, ID/driver's license number, gender, date of birth, photo/avatar, username, persistent user identifiers/ID number, and biographical information.

Contact Data: Personal Data used to contact an individual, e.g. email address(es), physical address(es), phone number(s), or usernames/handles for online services.

Device/Network Data: Personal Data relating to your device, browser, or application, e.g. IP addresses, MAC addresses, application ID/AdID/IDFA, identifiers from cookies, session navigation history and similar browsing metadata, and other data generated through applications and browsers, including cookies and similar technologies.

Audio/Visual Data: Personal Data contained in connection with audio or visual recordings or other audio/video content.

Special Category Data: Personal Data revealing racial, national, or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, health information, or information relating to sex life or sexual orientation.

1.1.6. How We Collect Personal Data

We collect Personal Data in various ways, which vary depending on the context in which we process that Personal Data:

Data we collect from you: We collect Personal Data from you directly, for example, when you complete a registration form or directly interact with our Service.

Data we receive from others: We receive Personal Data from third parties with whom we or a Client have a relationship.

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Data collected automatically: We may collect certain Personal Data automatically, for example, we collect Device/Network Data automatically using cookies and similar technologies when you browse our Site.

1.1.7. How We Process Personal Data: Betapoint

Cookies and Similar Technologies

Data: We, and certain third parties, may process **Device/Network Data** and **Inference Data** when you interact with cookies and similar technologies on our Site. We may receive this data from third parties to the extent allowed by the applicable partner. Please note that the privacy policies of third parties may apply to these technologies and information collected.

Uses: In connection with our legitimate interests in providing and improving the user experience and efficiency of our Services, and understanding information about the devices and demographics of visitors to our Services, we use the Device/Network Data and Inference Data (i) for "essential" or "functional" purposes, such as to enable various features of the Services such as your browser remembering your username or password, maintaining a session, or staying logged in after a session has ended; and (ii) for analytics and site performance purposes, such as tracking how the Services are used or perform, how users engage with and navigate through the Services, what sites users visit before visiting our Services, how often they visit our Services, and other similar information.

Note: Some of these technologies can be used by third parties to identify you across platforms, devices, sites, and services. Clients may also have access to information, such as reports and analytics, generated through these services. See Users' rights and choices for information on how to opt out of the use of these technologies.

1.1.8. Marketing Communications

Data: We may process **Identity Data**, **Device/Network Data** and **Contact Data** in connection with email marketing communications, including, where allowed: (i) when you register for an account, and choose to enroll, or are enrolled by the Client, to receive marketing communications; (ii) when you contact us directly, or express an interest in our products and services; and (iii) when you open or interact with our operational teams or marketing communications.

Uses: We use Identity Data and Contact Data as necessary to provide marketing communications, and consistent with our legitimate business interests, we may send you marketing and promotional communications if you sign up for such communications or purchase services from us. We may also process Device/Network Data and Contact Data when you interact with our communications in connection with our interest in understanding communication response and open rates. See Users' rights and choices for information about how you can limit or opt out of this processing.

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1.1.9. Internal Processes and Service Improvement

Data: We process **Identity Data** (de-identified so that an individual is not personally identifiable), **Device/Network Data**, **Incident Data**, and **Inference Data** in connection with our work improving our internal processes and our Service.

Uses: We may use any Personal Data we process through our Services as necessary in connection with our business interests in improving the design and execution of our Services, or to create a personalized user experience. Additionally, we may use this data to understand what parts of our Services are most relevant to users, how users interact with various aspects of our Services, how our Services perform or fail to perform, etc., or we may analyze use of the Services to determine if there are specific activities that might indicate an information security risk to the Services or our Clients and Authorized Users. We may also use this information in connection with the provision of new services and products. See Users' rights and choices for information about how you can limit or opt out of this processing.

1.1.10. How We Process Personal Data: Other

If we process Personal Data in connection with our Services in a way not described in this Policy, this Policy will still apply generally (e.g. with respect to Users' rights and choices) unless otherwise stated when you provide it.

Note that we may, without your consent or further notice to you, and to the extent required or permitted by law, process any Personal Data subject to the Policy for purposes determined to be in the public interest or otherwise required by law. For example, we may process information as necessary to fulfil our legal obligations, to protect the vital interests of any individuals, or otherwise in the public interest or as required by a public authority. Please see the data sharing section for more information about how we disclose Personal Data in extraordinary circumstances.

1.1.11. Data Sharing

Information we collect may be shared with a variety of parties, depending upon the purpose for and context in which that information was provided. We generally transfer Personal Data to the following categories of recipients:

Business Purposes: In connection with our general business operations, product/service improvements, to enable certain features, and in connection with our other legitimate business interests or other business purposes, we may share your Personal Data with service providers or sub processors who provide certain

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services or process data on our behalf. For example, we may use cloud-based hosting providers to host our services or may disclose information as part of our own internal operations, such as security operations, internal research, etc. When we disclose information for business purposes we may disclose **Identity Data**, **Contact Data**, **Device/Network Data**, **Audio/Visual Data**, **Inference Data**, and **Special Category Data**.

Affiliates: In order to streamline certain business operations, develop products and services that better meet the interests and needs of our customers, and inform our customers about relevant products and services, we may share your Personal Data with any of our current or future affiliated entities, subsidiaries, and parent companies.

Successors: Your Personal Data may be shared if we go through a business transition, such as a merger, acquisition, liquidation, or sale of all or a portion of our assets. For example, Personal Data may be part of the assets transferred, or may be disclosed (subject to confidentiality restrictions) during the due diligence process for a potential transaction.

Lawful Recipients: In limited circumstances, we may, without notice or your consent, access and disclose your Personal Data, any communications sent or received by you, and any other information that we may have about you to the extent we believe such disclosure is legally required, to prevent or respond to a crime, to investigate violations of our Terms of Use, or in the vital interests of us or any person.

1.2. Users' Rights and Choices

1.2.1. Users' Rights

To the extent required under applicable law, and subject to our rights to limit or deny access/disclosure under applicable law, you may have the following rights in your Personal Data. You may exercise your rights by contacting us at the address below.

Access: You may receive a list of your Personal Data that we process to the extent required and permitted by law.

Rectification: You may correct any Personal Data that we hold about you to the extent required and permitted by law. You may be able to make changes to much of the information you provided directly via the Service via your account settings menu.

Erasure: To the extent required by applicable law, you may request that we delete your Personal Data from our systems.

Data Export: To the extent required by applicable law, we will send you a copy of your Personal Data in a common portable format of our choice.

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Regulator Contact: You may have the right to contact or file a complaint with regulators or supervisory authorities about our processing of Personal Data. To do so, please contact your local data protection regulator.

Note: We may require that you provide additional Personal Data to exercise these rights, e.g. information necessary to prove your identity.

1.2.2. Users' Choices

Consent: If you consent to processing, you may withdraw your consent at any time, to the extent required by law.

Direct Marketing: You have the choice to opt-out of or withdraw your consent to processing related to direct marketing communications. You may have a legal right not to receive such messages in certain circumstances, in which case, you will only receive direct marketing communications if you consent. You may exercise your choice via the links in our communications or by contacting us re: direct marketing. To opt-out of the collection of information relating to email opens, configure your email so that it does not load images in our emails.

Cookies and Similar Tech: If you do not want information collected using cookies and similar technologies, you can manage/deny cookies (and certain technologies) using your browser's settings menu, or any menus we may make available to you. You must opt out of third party services directly via the third party. For example, to learn more about or opt-out of Google's analytics services, visit <u>Google Analytics Terms of Use</u>, the <u>Google Privacy Policy</u>, or <u>Google Analytics Opt-out</u>.

1.2.3. Security

We follow and implement reasonable security measures to safeguard the Personal Data we process. However, we sometimes share Personal Data with, or process data on behalf of third parties, as noted above. While we may require our service providers to follow certain security practices, we do not have control over and will not be liable for third parties' security processes.

1.2.4. Data Retention

We retain Personal Data for the periods stated above, or if none, for so long as it remains relevant to its purpose or for so long as is required by law (if longer). We will review retention periods periodically, and if appropriate, we may de-identify or anonymize data held for longer periods.

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1.2.5. Transfer of Your Personal Data

Your information, including Personal Data, is processed at the Company's operating offices and in any other places where the parties involved in the processing are located. It means that this information may be transferred to — and maintained on — computers located outside of your province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction.

The Company will take all steps reasonably necessary to ensure that Your data is treated securely and in accordance with this Privacy Policy and no transfer of Your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of Your data and other personal information.

1.2.6. Changes to Our Privacy Policy

We may change this Privacy Policy from time to time. Changes will be posted on this page with the effective date. Please visit this page regularly so that you are aware of our latest updates. Your acknowledgement of these changes, or use of the Services following notice of any changes (as applicable) indicates your acceptance of any changes.

1.2.7. Contact Us

Feel free to contact us with questions or concerns using the appropriate address below.

General enquiries: info@betapoint.co.za

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