



## ONLINE PRIVACY NOTICE

*Effective 01 August 2019*

We at International Housing Solutions (Pty) Ltd ('IHS'), respect your concerns about privacy. This Online Privacy Notice describes the types of Personal Data we collect on <https://www.ihsinvestments.co.za/>, our careers pages that are accessible through <https://www.ihsinvestments.co.za/>, and other websites or applications that may link to this Privacy Notice (collectively, the "Sites"), how we use the information, with whom we may share it and the choices available to you regarding our use of the information. We also describe the measures we take to protect the security of the information and how you can contact us about our privacy practices. "Personal Data" has the meaning given in the Protection of Personal Information Act, 2013 and includes any information relating to an identifiable data subject (such as name, address, date of birth or economic information).

### 1. INFORMATION WE OBTAIN

- 1.1. The types of information we collect on the Sites includes:
  - 1.1.1. Business and personal contact information (such as name, postal and email addresses, and telephone number); and
  - 1.1.2. Other information you submit to us (such as information provided by registering for email alerts or filling in forms).
- 1.2. In connection with a job inquiry or application on our careers pages, you may provide: login credentials; information regarding your work authorization status, education history, employment history and professional designations; and other information about your background and qualifications. You may also provide information regarding your political contributions for the last two years for legal and compliance purposes. In addition, where legally permissible, you may provide information regarding your gender, race/ethnicity, and your veteran and disability status. International Housing Solutions (Pty) Ltd will not consider either this information or your choice to decline to provide it in evaluating your qualifications for employment with us. This information will be used only for Equal Employment Opportunity reporting and other legal and compliance purposes.

- 1.3. In connection with our Investor Portal at <https://secure.sharefile.com/Authentication/> , you may provide: login credentials; financial information (such as banking information and an account number); taxpayer ID number; jurisdiction of tax residence; date of birth; and certain investment-related information.

## 2. INFORMATION WE OBTAIN BY AUTOMATED MEANS

- 2.1. When you visit our Sites or open our emails, we may collect certain information by automated means (such as by cookies, web server logs, web beacons and JavaScript). The information we collect in this manner includes your IP address, network location, browser characteristics, device characteristics, operating system, referring URLs, information on actions taken on our Sites, and dates and times of website visits. Cookies are files that websites send to your computer or other Internet-connected device to uniquely identify your browser or to store information or settings on your device— please see our Cookie Policy for information about what cookies are and how we use cookies and similar technology. We also may use these and similar technology in emails we send you to collect certain information, such as whether you opened or clicked on links in our email.
- 2.2. Our Sites may use cookies (such as HTTP, HTML5 and Flash cookies) as well as other types of local storage (such as browser-based or plugin-based local storage). Some of these cookies may be placed by third parties such as our service providers. Your browser may tell you how to be notified when you receive certain types of cookies and how to restrict or disable certain cookies. You also may be able to delete your Flash cookies or adjust your Flash cookie settings by visiting the Adobe Flash Website Storage Settings Panel and Global Storage Settings Panel. Please note, however, that without cookies you may not be able to use all of the features of our Sites or other websites and online services.
- 2.3. In conjunction with gathering information through cookies, our web servers may log information such as your device type, operating system type, browser type, domain, and other system settings, as well as the language your system uses and the country and time zone in which your device is located. We also may record information such as the address of the web page that referred you to our Sites and the IP address of the device you used to connect to our Sites. We may log information about your interaction with the Sites, such as which pages you visit. To control which web servers collect information by automated means, we may place tags on our web pages called "web beacons", which are small files that link web pages to particular web servers and their cookies. We also may send instructions to your device using JavaScript or other computer languages to gather the sorts of information described above and other details about your interactions with the Sites.

- 2.4. We may use third-party web analytics services on our Sites, such as those of Google Analytics. These service providers help us analyse how visitors use the Sites. The information obtained for this purpose (including your IP address and other information collected by automated means) may be disclosed to or collected directly by these service providers. To learn about opting out of Google Analytics, please click here <https://tools.google.com/dlpage/gaoptout>.
- 2.5. The providers of third-party plugins and widgets on our Sites, such as embedded videos and social media sharing tools, may use automated means to collect information regarding your use of the Sites and your interactions with the plugins and widgets. This information is subject to the privacy policies or notices of the providers of the plugins and widgets.

### 3. HOW WE USE THE INFORMATION WE OBTAIN

- 3.1. We may use the information described above for the following purposes to:
  - 3.1.1. Operate, evaluate and improve our business (including developing new products and services; enhancing, improving and analysing our products and services; managing our communications; and performing accounting, auditing and other internal functions);
  - 3.1.2. Create and manage your account;
  - 3.1.3. Manage your investments;
  - 3.1.4. Comply with and enforce applicable legal requirements, relevant industry standards and our policies, including our Terms and Conditions of Use;
  - 3.1.5. Protect against, identify and prevent fraud and other unlawful activity;
  - 3.1.6. In some cases, in order to operate, administer and improve the user's experience of the Sites;
  - 3.1.7. Provide our products and services to you, such as market commentary and email alerts;
  - 3.1.8. Send you promotional materials, newsletters and other communications;
  - 3.1.9. Communicate with you about, and administer your participation in, special events, programs, promotions, offers, surveys and market research;
  - 3.1.10. Respond to your inquiries;

- 3.1.11. Manage your employment application, assess your qualifications and manage your employment with us – please contact [info@lhsinvestments.co.za](mailto:info@lhsinvestments.co.za) for full information about how and why we use your Personal Data in this context;
        - 3.1.12. Verify your information; and
        - 3.1.13. Perform data analyses (including market and consumer research, demographic analyses and anonymization and aggregation of information).
- 3.2. In addition, we use information collected through cookies, web beacons, web server logs and other automated means for purposes such as (i) customizing our users' visits to our Sites, (ii) delivering content tailored to our users' interests and the manner in which our users browse our Sites, and (iii) managing our Sites and other aspects of our business.
- 3.3. We also may use the information in other ways for which we provide specific notice at the time of collection.
- 3.4. We will only process your Personal Data as necessary so that we can pursue the purposes described above. Where we process your Personal Data for our legitimate interests as a business, we do so only where we have concluded that our processing does not prejudice you or your privacy in a way that would override our legitimate interest in pursuing those purposes.
- 3.5. When we collect Personal Data from you, unless indicated otherwise, you should assume that, if we ask you for information, we need it for our business or compliance purposes. In limited circumstances, we are required to collect Personal Data to comply with a legal obligation and/or might ask you to provide information which is purely voluntary; in either case, this will be indicated to you.
- 3.6. If you are a former employee, worker, contractor or member of International Housing Solutions (Pty) Ltd, we will continue to process your Personal Data for a reasonable period following the end of your employment or engagement for our legitimate business and / or our legal compliance purposes and / or for the establishment or defence of a legal claim. Further, in some instances, we may process your data to perform our obligations under the contract between us (e.g. to pay you your final salary payment after your termination date). We only carry out such processing where we have concluded that our processing does not prejudice you or your privacy in a way that would override our legitimate interests in pursuing those purposes. Your data will be retained and deleted in accordance with our retention policies and procedures (as discussed further in paragraph 8 below).

#### 4. ONLINE TRACKING AND INTEREST BASED ADVERTISING

- 4.1. We and third parties acting on our behalf (such as Facebook, Twitter and LinkedIn) may collect information about your online activities over time and across third-party websites to provide you with advertising about products and services tailored to your interests. Where required by applicable law, we will obtain your consent for the processing of your Personal Data for direct marketing purposes.
- 4.2. You may see our ads on other websites or mobile apps because we participate in advertising networks. Ad networks allow us to target our messaging to users by considering demographic data, users' inferred interests and browsing context. These networks track users' online activities over time by collecting information through automated means (such as by cookies, web server logs, web beacons and other similar technologies). The networks use this information to show ads that may be tailored to individuals' interests, to track users' browsers or devices across multiple websites or apps, and to build a profile of users' online browsing activities. The information our ad networks may collect includes data about users' visits to websites and apps that participate in the relevant ad networks, such as the pages or ads viewed and the actions taken on the websites or apps. This data collection takes place both on the Sites and on third-party websites and apps that participate in the ad networks. This process also helps us track the effectiveness of our marketing efforts.
- 4.3. The Sites are not designed to respond to "do not track" signals received from browsers. To learn how to opt out of ad network interest-based advertising, please visit [www.aboutads.info/choices](http://www.aboutads.info/choices) , <http://www.networkadvertising.org/choices/> or <http://www.youronlinechoices.eu/> .

#### 5. INFORMATION WE DISCLOSE TO OTHERS

- 5.1. We do not disclose Personal Data we obtain about you through the Sites, except as described in this Online Privacy Notice. We may share your Personal Data with our affiliates and subsidiaries. We may also share Personal Data with service providers who perform services on our behalf based on our instructions. We do not authorize these service providers to use or disclose the information except as necessary to perform services on our behalf or comply with legal requirements.
- 5.2. We also may disclose information about you (i) if we are required to do so by law or legal process, (ii) to law enforcement authorities, regulators and/or other government entities and/or other competent authorities based on a lawful disclosure request, or (iii) when we believe disclosure is necessary or appropriate to prevent harm or financial loss, or in connection with an investigation of suspected or actual fraudulent or illegal activity. We reserve the right to

transfer Personal Data we have about you in the event we sell or transfer all or a portion of our business or assets (including in the event of a reorganization, spin-off, dissolution or liquidation).

5.3. In addition, we may share anonymous / aggregated information with third parties, such as service providers, in order to facilitate our business operations.

5.4. Information collected through third-party plug-ins and widgets on the Sites (such as information relating to your use of a social media sharing tool) is collected directly by the providers of the plug-ins and widgets. This information is subject to the privacy policies of the providers of the plug-ins and widgets, and International Housing Solutions (Pty) Ltd is not responsible for those providers' information practices.

## **6. DATA TRANSFERS**

6.1. We may transfer the Personal Data we collect about you to recipients in countries other than the country in which the information originally was collected. Those countries may not have the same data protection laws as the country in which you initially provided the information. Where we transfer Personal Data to other members of International Housing Solutions (Pty) Ltd group or our service providers, we will ensure that our arrangements with them are governed by data transfer agreements, designed to ensure that your Personal Data is protected (including, where appropriate, under an agreement on terms approved for this purpose).

## **7. RETENTION AND DELETION OF YOUR INFORMATION**

7.1. We intend to keep your Personal Data accurate and up-to-date. We will delete the information that we hold about you when we no longer need it.

7.2. We will retain your information in line with our retention policies and, in any event, for no longer than is necessary given the purpose for which it was collected, after which it will be deleted or anonymized.

7.3. Note that we may retain some limited information about you (even when we know that you have left the organisation that you represent) so that we can maintain a continuous relationship with you if and when we are in contact with you again.

## 8. YOUR RIGHTS AND CHOICES

8.1. We offer you certain choices in connection with the Personal Data we collect from you. To update your preferences or submit a request, please contact us as indicated in the Contact Information section of this Online Privacy Notice. To the extent provided by the law of your jurisdiction, you may request access to the Personal Data we maintain about you or request that we correct, amend, delete or block the information by contacting us as indicated below. Where provided by law, you may withdraw any consent you previously provided to us or object at any time on legitimate grounds to the processing of your Personal Data, and we will apply your preferences going forward. You can also lodge a complaint about our processing of your Personal Data with the body regulating data protection in your country.

8.2. Your specific rights where you are a user in South Africa are as follows:

8.2.1. **Rights of access, correction and deletion.** You have a right of access to the Personal Data that we hold about you under the Protection of Personal Information Act, 2013 and to some related information, including the purpose for processing the Personal Data, the recipients of that Personal Data to the extent it has been transferred internationally, and, where the Personal Data has not been collated directly from you, the source. You can also require any inaccurate Personal Data to be corrected or deleted.

8.2.2. **Right to object.** You can object to our use of your Personal Data for direct marketing purposes at any time and you may have the right to object to our processing of some or all of your Personal Data (and require them to be deleted) in some other circumstances.

If you wish to exercise any of these rights, please Contact us as set out below.

8.2.3. **Complaints.** You can also lodge a complaint about our processing of your Personal Data with the body regulating data protection in your country.

## 9. HOW WE PROTECT PERSONAL DATA

9.1. We maintain administrative, technical and physical safeguards designed to protect Personal Data we obtain through the Sites against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use.

## 10. LINKS TO OTHER WEBSITES

10.1. Our Sites may provide links to other websites for your convenience and information. These websites may operate independently from us. Linked websites may have their own privacy notices or policies, which we strongly suggest you review. To the extent any linked websites are not owned or controlled by us, we are not responsible for their content, any use of the websites, or the privacy practices of the websites.

## 11. UPDATES TO OUR ONLINE PRIVACY NOTICE

11.1. This Online Privacy Notice may be updated periodically and without prior notice to you to reflect changes in our Personal Data practices. We will post the updated version on the Sites and indicate at the top of the Notice when it was most recently updated.

## CONTACT INFORMATION

Contact: Maureen Komakech

Email: [MKomakech@ihsinvestments.co.za](mailto:MKomakech@ihsinvestments.co.za)

T: +27 011 300 8600

### **Physical Address:**

54 Peter Place, Peter Place Office Park

First Floor, Block C, Cardiff House

Bryanston, 2191

Gauteng, South Africa

Website: <https://www.ihsinvestments.co.za/contact-us/>