

PRIVACY POLICY

Mirfin Valuation Services (Pty) Ltd, hereinafter MVS, respects your privacy and is committed to protecting your Personal Data you provide us. This privacy statement explains our policies and practices regarding how we collect, store and process your Personal Data. Please note that we may periodically review and update this Privacy Policy without prior notice. Therefore, you should review the terms of this policy from time to time to make sure that you are aware of how we collect, store and process personal information.

1. Pledge on privacy

The term "Personal Data" as used in this Privacy Policy refers to information such as your name, birth date, email address, mailing address, or telephone number that can be used to identify you. Generally, we will only process your Personal Data as described in this Privacy Policy. However, we reserve the right to conduct additional processing to the extent permitted or required by law, or in support of any legal or criminal investigation.

2. Collection of Personal Data

MVS may collect Personal Data from you in various ways:

- you are able to visit our website without disclosing any Personal Data. In order to submit a quotation request or place an order on our website, you will be obligated to disclose Personal Data as requested on the form. If you choose to withhold any Personal Data requested by us, it may not be possible for you to gain access to certain parts of the site, procure our services, or for us to respond to your enquiries and queries;
- when you engage with us through social media, we will obtain certain Personal Data disclosed to us;
- when requesting information or services from us, we might collect your publicly available Personal Data to execute your instruction, such as your VAT registration number when providing a quote or invoice;
- when you subscribe to our Newsletter, we will request certain Personal Data from you so that we can reach out to you with the latest sectional title news, our blog articles and any promotions or competitions we are running at that time;
- when signing up to take part in an MVS-sponsored competition or MVS-run promotion, we will request certain Personal Data disclosed from you so that we can reach out to you with competition/promotion-related content; or
- when agreeing to receive push notifications from us, we will request certain Personal Data from you so that we can distribute relevant notifications, promotions and news via push notification to you.

MVS may collect your Personal Data directly from you or indirectly through a third party that may hold such information such as an agent, a regulator, government authorities or government registries.

3. Purpose for processing Personal Data

By disclosing Personal Data as requested on the form, you agree to a user profile being created on your behalf. Having a user profile enables us to:

- provide you with products or services you have requested, and to inform you about important changes to these products and services;
- achieve our operational, financial and record keeping requirements;

- conduct market research and market/advertise products and services to you which we think may be of interest to you;
- communicate with you for other purposes which are evident from the circumstances or about which we inform you when we collect Personal Data from you;
- share information about our value-adds, blog articles, relevant sectional title news, promotions, competitions and exclusive membership programs; or
- comply with applicable laws, including lawful requests for personal information received from law enforcement, government and tax collection agencies.

4. Disclosure of Personal Data

We will not sell, share, or otherwise distribute your Personal Data to third parties except as provided for in this Privacy Policy. Personal Data may be disclosed to:

- the employees of MVS to provide you with the information and services you have requested;
- the MVS Group for operational purposes;
- third parties who act for or on our behalf, for further processing of the Personal Data in accordance with the purpose(s) for which the Personal Data were originally collected or may otherwise be lawfully processed, such as services delivery, evaluating the usefulness of this website, marketing, data management or technical support;
- a third party in the event that MVS, or a part thereof, and the customer data connected with it is sold, assigned or transferred, in which case we would require the buyer, assignee or transferee to treat Personal Data in accordance with this Privacy Policy;
- contracted third party vendors who act for or on our behalf, to supply cost proposals for requested Services; or
- a third party if required to do so under law, by a court order or governmental regulation, or if such disclosure is otherwise necessary in support of any criminal or other legal investigation or proceeding in South Africa or abroad.

5. Direct marketing

We may send marketing and promotional communications and materials to you. You may opt-out from receiving such communications by contacting us using the details set out below or by clicking on the opt-out link contained in the relevant communication.

6. Security and confidentiality

To ensure the security and confidentiality of Personal Data that we collect online, we use data networks protected, inter alia, by industry standard firewall and password protection. In the course of handling your Personal Data, we take measures reasonably designed to protect that information from loss, misuse, unauthorized access, disclosure, alteration or destruction.

7. Access to, correction and deletion of your Personal Data

You have the right to access, correct or delete Personal Data held by us. However, in certain circumstances, we may legally refuse or decline such requests. If applicable you may also have a right to object to the processing of your Personal Data or to file a complaint with the Information Regulator. If you wish to exercise these rights, please contact us using the details set out below.

8. Where we store your Personal Data

The Personal Data which we collect from you may be transferred to, and stored at, a destination outside the Republic of South Africa. It may also be processed by staff operating outside the RSA who work for us or for our suppliers. Such staff may be engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your Personal Data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your Personal Data is treated securely and in accordance with this privacy policy.

The Personal Data we collect from you and that we transfer to a third party shall only be to a third party who is subject to a law, binding corporate rules (as defined in POPI) or binding agreement (as defined in POPI) which provides an adequate level of protection that:

- is in accordance with this Privacy Policy; and
- includes provisions that are substantially similar to what is contained in this Privacy Policy to the further transfer of your data.

All Personal Data provided to us when signing up for Mirfin's newsletter, will be stored on a third-party database, Mailchimp.

All Personal Data provided to us when agreeing to receive push notifications from us, will be stored on a third-party database, SendPulse.

All further Personal Data you provide us will be stored on our secure servers. Any payment transactions will be encrypted. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our website, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your Personal Data, we cannot guarantee the security of your Personal Data transmitted to our site, any transmission is at your own risk. Once we have received your Personal Data, we will use strict procedures and security features to try to prevent unauthorised access.

9. "Cookies" and internet tags

In order to improve your experience on our Website and to facilitate your use of the Website, we may collect and process information about your visit to our Website. To do this, we may install cookies and make use of internet tags (action tags, single-pixel GIFs, clear GIFs, invisible GIFs and 1-by-1 GIFs). Cookies are small text files sent to your browser and stored on your electronic device's hard drive. Cookies collect information such as the domain name of the user, your internet service provider, your operating system, and the date and time of access. Internet tags are a small piece of code that is inserted include in each webpage's source code. It allows analytic tools to log connections on its server. We may deploy these cookies and tags through a third party advertising partner or a web analytical service partner. These tags and cookies are placed on online advertisements linked to our Website and on our Website itself.

You may disable or decline cookies from our Website. However, if you do so you may not be able to use all functionality of our Website.

10. Google Analytics

We make use of Google Analytics, a service provided by Google Inc., to optimise traffic to our Website and to integrate and optimise web pages where appropriate. Google Analytics uses the cookies stored on your electronic device to generate detailed statistics about our Website's traffic and traffic sources, and other related statistics. The information generated by the cookies will be de-identified and transmitted to Google servers outside the RSA. Google will process the information generated by the cookies to evaluate the use

of our Website and will then provide us with reports on website activity for us to use for analytical purposes.

You may disable Google Analytics' cookies from your electronic device by downloading and installing the free opt-out browser add-on available at <https://tools.google.com/dlpage/gaoptout?hl=en>. However, if you do so you may not be able to use all functionality of our Website.

11. Personal information and minors

The services available on this website are intended for persons 18 years of age and older. We will not knowingly collect, use or disclose Personal Data from a minor under the age of 18, without obtaining prior consent from a parent or legal guardian through direct off-line contact. We will provide the parent or legal guardian with a notice of the specific types of Personal Data being collected from the minor, and the opportunity to object to any further collection, use, or storage of such information.

12. Links to other sites

This Privacy Policy applies only to this website, and not to websites owned by third parties. We may provide links to other websites which we believe may be of interest to our visitors. We aim to ensure that such websites are of the highest standard. However, due to the nature of the internet, we cannot guarantee the privacy standards of websites to which we link or be responsible for the contents of sites other than this one, and this Privacy Policy is not intended to be applicable to any linked website that does not belong to us.

13. Contact details

If you have any queries or complaints about our compliance with this Privacy Policy, would like to exercise any of your rights mentioned above, or make any recommendations or comments to improve the quality of our Privacy Policy, please contact us using these contact details:

Mirfin Valuation Services (Pty) Ltd
60 Carol Avenue
4 Manor Ridge
Lynnwood Manor
Pretoria 0081
Telephone: (+27) 10 595 3883
Email: privacy@mirfin.co.za

14. Applicable law

Any dispute which may arise out of this Privacy Policy will be governed by the laws of the Republic of South Africa and in the jurisdiction of the South African Courts.

Effective as of 21 July 2021