



POPIA PRIVACY NOTICE

MALDEV PROPERTIES

Protection of Personal Information Act, 2013 (Act No. 4 of 2013)

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CONFIDENTIAL CORPORATE DOCUMENT

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MALDEV PROPERTIES

1. Introduction

MALDEV PROPERTIES (“MALDEV”, “the Company”, “we”, “us” or “our”) respects the privacy of every individual who interacts with us, and is committed to processing personal information lawfully, responsibly and transparently. This Privacy Notice explains how we collect, use, store, share and protect personal information in the course of our business activities, and describes the rights available to individuals whose personal information we process.

This Privacy Notice is issued in terms of the Protection of Personal Information Act, 2013 (Act No. 4 of 2013) (“POPIA”), and has regard to the guidance notes, guidelines and codes of conduct issued from time to time by the Information Regulator of South Africa. It applies to all personal information processed by MALDEV, whether obtained through our website, application forms, lease agreements, supplier registration processes, employment applications, service agreements, or any other interaction with the Company.

MALDEV is committed to protecting personal information as a fundamental part of how we conduct business. We have implemented appropriate organisational and technical measures designed to safeguard personal information against loss, unauthorised access, misuse, alteration or disclosure, and we require our employees, contractors and service providers to observe the same standard of care.

By providing personal information to MALDEV, or by using our website, applying for accommodation, registering as a supplier, applying for employment, or otherwise engaging with our business, individuals acknowledge that they have read and understood this Privacy Notice. Where consent is the applicable legal basis for processing, we will obtain such consent separately and in the manner required by POPIA.

2. Who We Are

MALDEV PROPERTIES is a South African company (Registration Number 2026/595870/07) operating across the property sector. Our business units include the following:

Property Development

MALDEV identifies, plans and develops residential, commercial and mixed-use property projects, working with professional teams, contractors and regulatory authorities from concept through to completion.

Property Management

MALDEV manages residential and commercial properties on behalf of owners and investors, including tenant administration, lease management, rent collection, and day-to-day property oversight.

Facilities Management

MALDEV provides facilities management services, including maintenance coordination, contractor management, health and safety compliance, and building operations support across the properties we manage.

Student Accommodation

MALDEV owns, develops and/or manages student residences, and processes applications, room allocations and residence administration for students, in many cases in coordination with tertiary institutions and, where relevant, the National Student Financial Aid Scheme (NSFAS).

This Privacy Notice applies across all business units of MALDEV. Where a specific business unit processes personal information for purposes not common to the Company as a whole, this is addressed in the relevant sections below, including in relation to student accommodation, supplier management and employment.

3. Information Officer

MALDEV has appointed an Information Officer who is responsible for ensuring compliance with POPIA and for encouraging compliance with the conditions for lawful processing of personal information throughout the Company. The Information Officer and Deputy Information Officer may be contacted using the details below in respect of any privacy-related query, request or complaint.

Information Officer	Director
Deputy Information Officer	-
Privacy Enquiries Email	privacy@maldev.co.za
Registered Address	TBC (please visit www.maldev.co.za) for current address
Telephone	076 168 9513v/ 015 1101 640

The Information Officer and Deputy Information Officer are registered, or will be registered, with the Information Regulator in accordance with section 55 of POPIA, where such registration is required.

4. Personal Information We Collect

The personal information MALDEV collects depends on the nature of the interaction or relationship between the individual and the Company. The categories of personal information we may collect include, without limitation, the following:

Identity Information

Full name, identity number, passport number, date of birth, nationality, gender, and marital status.

Contact Information

Residential and postal address, email address, telephone and cellphone numbers, and emergency contact details.

Financial Information

Banking details, income information, proof of income, credit and affordability information, payment history, and billing information.

Employment Information

Employment history, employer details, salary information, qualifications, curriculum vitae, references, disciplinary records, and performance information.

Academic and Student Information

Student number, institution details, proof of registration, academic transcripts, NSFAS or other funding information, and guardian or parent contact details.

Lease Information

Lease agreements, tenant and co-tenant details, deposit records, lease renewal and termination information, and rental payment history.

Supplier Information

Company registration details, tax and VAT information, banking details, B-BBEE certification, directors' and representatives' details, and procurement history.

Property Information

Property ownership records, unit or site details, maintenance history, inspection reports, and utility consumption information relevant to a property.

Electronic Information

IP address, device identifiers, login credentials, and information submitted through online forms and portals.

Website Usage Information

Browsing behaviour on our website, pages visited, cookies and similar tracking technologies, as further described in the Cookies section of this Privacy Notice.

CCTV Images

Video footage captured by closed-circuit television cameras operated at MALDEV premises and managed properties for security purposes.

Visitor Records

Names, contact details, identity document numbers, vehicle registration numbers, and time of entry and exit recorded at access-controlled premises.

Communication Records

Records of correspondence, telephone calls, emails, and other communications between individuals and MALDEV, including maintenance requests and complaints.

MALDEV collects only the personal information reasonably required for the specific purpose for which it is processed, in accordance with the minimality condition set out in POPIA.

5. How We Collect Information

MALDEV collects personal information directly from individuals in the ordinary course of business, and in limited circumstances from third parties where legally permitted. Personal information may be collected through the following channels:

- Application forms, including tenant, student accommodation, employment and supplier registration applications
- Our website and online forms
- Email correspondence
- Telephonic communication
- Lease agreements and related documentation
- Supplier registration and procurement processes

- Employment applications and recruitment processes
- Student accommodation applications, including information provided by academic institutions where relevant
- Maintenance requests and facilities management interactions
- Direct interactions at our premises or managed properties, including CCTV and visitor registers
- Third parties, such as credit bureaux, referees, background verification providers, or public sources, where legally permitted and necessary for the applicable purpose

Where personal information is collected from a source other than the individual concerned, MALDEV will, where required by POPIA, take reasonable steps to inform the individual of the collection, the source, and the purpose of processing, unless an exception under POPIA applies.

6. Purpose of Processing

MALDEV processes personal information for legitimate business purposes connected to our operations, including the following:

- Property management, including tenant administration and lease compliance
- Lease administration, including drafting, renewal and termination of lease agreements
- Student accommodation administration, including applications, room allocation and residence management
- Maintenance services and facilities management, including scheduling and contractor coordination
- Customer support and responding to queries, complaints and maintenance requests
- Supplier management, including registration, vetting and ongoing vendor administration
- Procurement, including evaluation of tenders, quotations and service providers
- Employment, including recruitment, onboarding, payroll and performance management
- Compliance with applicable legislation, regulatory requirements and industry codes
- Fulfilment of legal obligations, including obligations arising from contracts, tax and other statutory requirements
- Security of our premises, managed properties, employees, tenants, students, visitors and assets
- Marketing communications, where the individual has provided consent in accordance with this Privacy Notice

MALDEV does not process personal information for any purpose incompatible with the purpose for which it was originally collected, save where permitted by POPIA.

7. Legal Basis for Processing

MALDEV processes personal information only where a legal basis recognised under POPIA applies. These include the following grounds:

Consent

Where the individual has given consent to the processing of their personal information for a specific purpose, such as marketing communications.

Contractual Necessity

Where processing is necessary to enter into, or perform in terms of, a contract to which the individual is a party, such as a lease agreement, service agreement or employment contract.

Legal Obligation

Where processing is necessary to comply with an obligation imposed by law, including tax, labour, and property-related legislation.

Legitimate Interests

Where processing is necessary for the legitimate business interests of MALDEV or a third party, provided such interests are not overridden by the interests, rights or freedoms of the individual concerned.

Protection of Vital Interests

Where processing is necessary to protect the life, health or safety of the individual or another person, such as in an emergency at a managed property or student residence.

8. Sharing of Information

MALDEV does not sell personal information. Personal information may, however, be shared with third parties where necessary for the purposes described in this Privacy Notice, and only where such sharing is permitted by law. Recipients may include the following categories of third party:

- Service providers engaged to perform functions on behalf of MALDEV, including maintenance contractors, security service providers, and administrative service providers
- Banks and other financial institutions, for payment processing and related purposes
- Attorneys and legal advisors, for the purposes of legal advice, contract administration and dispute resolution
- Auditors, for the purposes of financial and compliance audits
- Government departments and organs of state, where disclosure is required or permitted by law
- Regulators, including the Information Regulator, in connection with regulatory compliance
- Universities and other academic institutions, in connection with student accommodation administration
- Maintenance contractors, engaged to perform repairs and maintenance at properties we manage
- Professional advisors, including accountants, tax practitioners and consultants engaged by MALDEV

MALDEV requires third parties who process personal information on our behalf to do so only in accordance with our instructions and to apply security measures consistent with the requirements of POPIA. Personal information will not be disclosed to any other third party without a lawful basis for doing so.

9. Cross-Border Transfers

MALDEV primarily processes and stores personal information within the Republic of South Africa. In limited circumstances, personal information may be transferred to, or processed by, service providers located outside South Africa, including where cloud-based systems or software platforms used by MALDEV are hosted in another jurisdiction.

Where a cross-border transfer of personal information occurs, MALDEV will ensure that the transfer complies with section 72 of POPIA, including by satisfying itself that the recipient is subject to a law, binding corporate rules, or a binding agreement that provides an adequate level of protection substantially similar to that afforded under POPIA, or that another applicable ground under POPIA is met, such as the individual's consent or the necessity of the transfer for the performance of a contract.

10. Information Security

MALDEV has implemented appropriate technical and organisational measures to protect the personal information in our possession or under our control from loss, damage, unauthorised destruction, and unlawful access or processing, in accordance with section 19 of POPIA.

Administrative Safeguards

Internal policies, staff training, confidentiality undertakings, and defined roles and responsibilities relating to the handling of personal information.

Technical Safeguards

Secure information technology systems, firewalls, anti-malware software, and regular system updates designed to protect electronic personal information.

Physical Safeguards

Controlled access to premises where personal information is stored, secure storage of physical records, and restricted access to filing areas.

Cybersecurity

Measures to detect, prevent and respond to cybersecurity incidents affecting personal information processed by MALDEV or our service providers.

Access Controls

Access to personal information is restricted to employees, contractors and service providers who require such access to perform their functions, on a need-to-know basis.

Encryption

Where appropriate and feasible, personal information transmitted or stored electronically is protected using encryption or equivalent security technology.

Confidentiality

Employees, contractors and service providers who have access to personal information are subject to confidentiality obligations regarding such information.

In the event of a security compromise that has resulted, or is reasonably believed to have resulted, in unauthorised access to or acquisition of personal information, MALDEV will notify the Information Regulator and the affected individuals in accordance with section 22 of POPIA.

11. Retention of Information

MALDEV retains personal information only for as long as necessary to fulfil the purpose for which it was collected, unless a longer retention period is required or permitted by law. Factors relevant to determining

the applicable retention period include the nature of the personal information, the purpose of processing, any contractual or statutory retention obligations, and any applicable limitation periods.

For example, records relating to lease agreements, employment relationships and supplier contracts are ordinarily retained for the duration of the relevant relationship and for a further period thereafter to address potential legal claims and to comply with statutory record-keeping obligations, including under tax and labour legislation. CCTV footage is retained for a limited period necessary for security purposes, unless required for a longer period in connection with an investigation or legal proceedings.

Once personal information is no longer required for any lawful purpose, MALDEV will securely destroy, delete or de-identify such information in accordance with our internal record retention and disposal practices.

12. Your Rights

In accordance with POPIA, individuals whose personal information is processed by MALDEV have the following rights:

Access

The right to request confirmation of whether MALDEV holds personal information about the individual, and to request access to that personal information.

Correction

The right to request the correction, updating or amendment of personal information that is inaccurate, incomplete, misleading or outdated.

Deletion

The right to request the deletion or destruction of personal information that MALDEV is no longer authorised to retain.

Objection

The right to object, on reasonable grounds, to the processing of personal information, including processing for purposes of direct marketing.

Restriction

The right to request that the processing of personal information be restricted in certain circumstances recognised under POPIA.

Withdrawal of Consent

Where processing is based on consent, the right to withdraw that consent at any time, without affecting the lawfulness of processing carried out prior to withdrawal.

Complaint to the Information Regulator

The right to submit a complaint to the Information Regulator regarding the alleged interference with the protection of an individual's personal information.

Requests to exercise any of these rights may be directed to the Information Officer using the contact details set out in this Privacy Notice. MALDEV will respond to such requests within the timeframes prescribed by POPIA, and may request proof of identity before giving effect to a request.

13. Cookies

The MALDEV website makes use of cookies and similar tracking technologies to enhance user experience, understand website usage, and improve the functionality of our online services.

Website Cookies

Cookies are small text files stored on a user's device that enable the website to recognise the user's browser and remember certain information, such as preferences and session details.

Analytics

MALDEV may use analytics tools to collect information about how visitors use our website, including pages visited, time spent on the website, and navigation patterns, in order to improve our website and services.

Online Services

Where online forms or portals are used to submit applications or requests, information submitted through these platforms is processed in accordance with this Privacy Notice.

Most web browsers allow users to manage cookie preferences, including the ability to block or delete cookies. Users should note that disabling cookies may affect the functionality of the MALDEV website.

14. Marketing Communications

MALDEV may, from time to time, wish to send marketing communications regarding our properties, services and developments.

Consent

Where required by POPIA and the Electronic Communications and Transactions Act, MALDEV will obtain consent prior to sending direct marketing communications by electronic means.

Opt-Out

Individuals may withdraw consent to receive marketing communications at any time, free of charge, by contacting the Information Officer or by using the opt-out mechanism provided in the relevant communication.

Electronic Marketing

MALDEV will not send unsolicited electronic marketing communications other than in circumstances permitted by law, such as where MALDEV has obtained the individual's contact details in the context of a sale of a product or service and markets similar products or services, subject to the individual being given a reasonable opportunity to opt out.

15. Student Accommodation Privacy

Where MALDEV owns, develops or manages student accommodation, additional categories of personal information are processed to administer the residence and to support the wellbeing and safety of students. This section applies specifically to the processing of personal information in connection with student accommodation.

Student Records

MALDEV maintains records relating to a student's application, registration, room allocation, and residence conduct for the duration of their occupation of the residence.

Emergency Contacts

Students are required to provide emergency contact details, which are used solely in the event of an emergency or incident affecting the student's health, safety or wellbeing.

Parents and Guardians

Where a student is a minor, or where a parent or guardian is party to the accommodation agreement, MALDEV may process the personal information of that parent or guardian for purposes connected to the accommodation arrangement.

NSFAS Information

Where a student's accommodation is funded, in whole or in part, through NSFAS, MALDEV may process information relating to the student's funding status, and may liaise with NSFAS or the relevant institution to confirm funding and process related payments.

Residence Administration

Personal information is used to administer residence rules, manage occupancy, coordinate maintenance, and communicate with students regarding residence matters.

Room Allocation

Information provided by students, and where applicable their academic institution, is used to allocate rooms and manage occupancy across the residence.

Access Control

Access control systems at student residences may record entry and exit information for the purposes of student safety and security.

16. Supplier Privacy

MALDEV processes personal information of individuals connected to suppliers, vendors and service providers, including sole proprietors, directors, representatives and contact persons, for the purposes described below.

Supplier Registration

Information submitted as part of the supplier registration process is used to evaluate and onboard suppliers onto the MALDEV vendor database.

Vendor Database

MALDEV maintains a database of registered suppliers, which is used to identify suitable service providers for procurement requirements.

Procurement Information

Information relating to quotations, tenders and contract performance is retained to support procurement decisions and supplier management.

B-BBEE Documentation

Suppliers may be required to submit B-BBEE certificates and supporting documentation, which is used to assess compliance with applicable procurement policies.

Tax Information

Tax registration numbers, VAT registration details and related documentation are collected and retained to comply with applicable tax legislation.

Banking Details

Supplier banking details are collected solely for the purpose of processing payments due to the supplier, and are treated as confidential financial information.

17. Employment Privacy

MALDEV processes personal information of job applicants, employees and, where applicable, former employees, for the purposes described below.

Recruitment

Information submitted by job applicants, including curriculum vitae, qualifications and references, is used to evaluate suitability for employment.

Personnel Files

MALDEV maintains personnel files containing employment contracts, personal particulars, and records relevant to the employment relationship.

Payroll

Salary, banking, tax and benefits information is processed to administer payroll and statutory deductions.

Performance

Performance evaluations, disciplinary records and related information are processed to manage the employment relationship.

Training

Records of training completed, qualifications obtained and development plans are maintained to support employee development.

Medical Information

Where relevant and permitted by law, MALDEV may process medical information of employees, such as in connection with occupational health requirements, incapacity processes, or reasonable accommodation, and such information is treated with heightened confidentiality as special personal information under POPIA.

18. Complaints

Any individual who believes that MALDEV has processed their personal information in a manner inconsistent with POPIA or this Privacy Notice may lodge a complaint with the Information Officer using the contact details set out in this Privacy Notice. MALDEV will investigate all complaints received and respond within a reasonable period.

If an individual is not satisfied with the outcome of a complaint raised with MALDEV, or wishes to raise the matter directly, they may submit a complaint to the Information Regulator of South Africa, whose contact details are as follows:

Physical Address	JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
Postal Address	P.O. Box 31533, Braamfontein, Johannesburg, 2017
Email	complaints.IR@justice.gov.za
Website	www.justice.gov.za/inforeg

19. Changes to this Privacy Notice

MALDEV may update this Privacy Notice from time to time to reflect changes in our processing practices, changes in applicable law, or changes in our business operations. The version number and issue date of this Privacy Notice appear on the cover page and in the header of this document.

Where material changes are made to this Privacy Notice, MALDEV will take reasonable steps to notify affected individuals, which may include publishing the updated Privacy Notice on our website. Individuals are encouraged to review this Privacy Notice periodically to remain informed of how MALDEV processes personal information.

20. Contact Us

Should any individual have questions, requests or concerns regarding this Privacy Notice or the manner in which MALDEV processes personal information, please contact us using the details below:

Company	MALDEV PROPERTIES
Registration Number	2026/595870/07
Privacy Enquiries	privacy@maldev.co.za
General Enquiries	info@maldev.co.za
Telephone	076 168 9513
Website	www.maldev.co.za