



PRIVACY POLICY

*Governing the Collection, Storage, Protection and Processing of Information Across
MALDEV PROPERTIES*

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MALDEV PROPERTIES

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MALDEV PROPERTIES

1. Policy Statement

MALDEV PROPERTIES (Registration Number 2026/595870/07) ("the Company", "MALDEV", "we", "us" or "our") is committed to protecting the privacy, confidentiality and integrity of personal information entrusted to it by employees, tenants, students, suppliers, contractors, website users, visitors and all other stakeholders with whom the Company interacts in the course of its business.

As a diversified property group active in property development, property management, facilities management and student accommodation, the Company collects and processes personal information across a wide range of business functions. The Company regards the responsible management of such information as fundamental to maintaining the trust of its stakeholders and to the sound governance of its operations.

This Privacy Policy sets out the principles, standards and practices that govern the manner in which MALDEV PROPERTIES collects, stores, uses, discloses, retains and disposes of personal information across all business units, digital platforms and physical premises. It reflects the Company's commitment to full compliance with the Protection of Personal Information Act, 2013 (POPIA), the Promotion of Access to Information Act, 2000 (PAIA), the Electronic Communications and Transactions Act, 2002 (ECTA), and the guidance notes and codes of conduct issued by the Information Regulator of South Africa.

This Policy has been approved by the Managing Director and forms part of the Company's broader corporate governance framework. It is binding on all directors, employees, contractors and third parties who process personal information on behalf of MALDEV PROPERTIES.

2. Purpose of this Policy

The purpose of this Policy is to:

- Establish a consistent, Company-wide framework for the lawful, fair and transparent processing of personal information;
- Give practical effect to the eight conditions for lawful processing set out in POPIA across every function of the business;
- Inform employees, tenants, students, suppliers, contractors, website users and other stakeholders of how their personal information is collected, used, stored, shared and protected;
- Set clear standards for information security, retention and disposal that apply consistently across all business units;
- Define the roles and responsibilities of the Information Officer, Deputy Information Officers and staff in relation to information governance;
- Provide a documented basis for demonstrating accountability and compliance to regulators, funders, business partners and other stakeholders; and
- Support the Company's broader commitment to sound corporate governance, risk management and ethical business conduct.

This Policy is intended to operate alongside, and not in substitution for, any PAIA Manual, POPIA Privacy Notices, employment contracts, tenant leases, student accommodation agreements, supplier

agreements or other documentation issued by the Company from time to time that governs specific processing activities in greater detail.

3. Scope

This Policy applies to all personal information processed by or on behalf of MALDEV PROPERTIES, in any format, whether held electronically or in physical form, across all business units and operating divisions, including but not limited to:

- Property Development
- Property Management
- Facilities Management
- Student Accommodation

This Policy applies to the personal information of, and is binding in respect of the Company's dealings with, the following categories of data subjects:

- Employees, including permanent, fixed-term and temporary staff, and job applicants;
- Tenants and prospective tenants of properties owned or managed by the Company;
- Students and prospective students residing in, or applying to reside in, student accommodation managed by the Company;
- Suppliers, vendors and service providers who contract with the Company;
- Contractors, subcontractors and their personnel engaged on Company projects and sites;
- Users of the Company's website and digital platforms; and
- Visitors to the Company's premises, developments, offices and managed properties.

This Policy applies to all directors, officers, employees, contractors, agents and representatives of MALDEV PROPERTIES, and to any third party who processes personal information on the Company's behalf pursuant to a written operator agreement.

4. Definitions

For the purposes of this Policy, the following terms, largely drawn from POPIA, shall bear the meanings assigned to them below:

Term	Meaning
Personal Information	Information relating to an identifiable, living natural person and, where applicable, an identifiable, existing juristic person, including but not limited to information relating to race, gender, sex, marital status, national origin, age, physical or mental health, education, identity number, contact details, employment history, financial history and biometric information.
Processing	Any operation or activity concerning personal information, including collection, receipt, recording, organisation, collation, storage, updating, retrieval, alteration,

Term	Meaning
	consultation, use, dissemination, merging, linking, blocking, degradation, erasure or destruction of information.
Data Subject	The person to whom personal information relates.
Responsible Party	A public or private body, or any other person, which, alone or in conjunction with others, determines the purpose of and means for processing personal information. MALDEV PROPERTIES acts as the Responsible Party in respect of the personal information described in this Policy.
Operator	A person who processes personal information for a Responsible Party in terms of a contract or mandate, without coming under the direct authority of that party.
Special Personal Information	Personal information concerning a data subject's religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life, biometric information, or criminal behaviour, which is subject to additional protections under POPIA.
Consent	Any voluntary, specific and informed expression of will in terms of which permission is given for the processing of personal information.
Information Officer	The person, by default the head of the organisation, responsible for encouraging compliance with POPIA within the Company and for dealing with requests made under PAIA and POPIA.
Information Regulator	The independent statutory body established under POPIA to monitor and enforce compliance with POPIA and PAIA.
Data Breach	Any actual or reasonably suspected unauthorised access to, or acquisition, disclosure, alteration, loss or destruction of, personal information.

5. Privacy Principles

MALDEV PROPERTIES processes personal information in accordance with the following principles, which reflect the eight conditions for lawful processing established by POPIA:

5.1 Lawfulness

Personal information is processed in a lawful manner and only to the extent that such processing does not infringe the privacy rights of the data subject.

5.2 Transparency

Data subjects are informed of what personal information is collected, why it is collected, and how it will be used, through appropriate privacy notices, contractual disclosures and this Policy.

5.3 Accountability

The Company takes responsibility for ensuring that the conditions for lawful processing, and all measures giving effect to those conditions, are complied with throughout the organisation and by any operator acting on its behalf.

5.4 Security

Appropriate, reasonable technical and organisational measures are implemented to safeguard personal information against loss, damage, unauthorised destruction, and unlawful access or processing.

5.5 Accuracy

Reasonable steps are taken to ensure that personal information is complete, accurate, not misleading and updated where necessary.

5.6 Confidentiality

Personal information is treated as confidential and access is restricted to individuals who require such access for the performance of their duties.

5.7 Data Minimisation

Only personal information that is adequate, relevant and not excessive for the purpose for which it is processed is collected and retained.

5.8 Purpose Limitation

Personal information is collected for specific, explicitly defined and legitimate purposes, and is not further processed in a manner incompatible with those purposes.

5.9 Retention Control

Personal information is not retained for longer than is necessary to achieve the purpose for which it was collected, save where retention is required or permitted by law.

6. Information We Collect

The categories of personal information collected by MALDEV PROPERTIES will vary depending on the nature of the relationship between the Company and the data subject. These categories include, without limitation, the following:

6.1 Identity Information

Full names, identity numbers, passport numbers, date of birth, nationality and photographic identification.

6.2 Contact Information

Postal and residential addresses, email addresses, telephone and cellphone numbers, and emergency contact details.

6.3 Financial Information

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

6.4 Employment Records

Curriculum vitae, employment history, qualifications, references, payroll and tax information, performance records and disciplinary records.

6.5 Student Information

Application details, institution and course of study, student numbers, parent or guardian details, and where relevant, NSFAS or other funding information.

6.6 Lease Information

Tenant application details, lease agreements, occupancy records, rental payment history and correspondence relating to tenancy.

6.7 Supplier Information

Company registration details, B-BBEE certificates, tax clearance certificates, banking details and contract documentation.

6.8 Maintenance Requests

Details of maintenance and repair requests logged by tenants, students or facilities users, including contact details and unit or room identifiers.

6.9 Property Records

Records relating to units, buildings, developments and facilities, including occupancy schedules and inspection reports, to the extent these contain personal information.

6.10 Visitor Records

Names, contact details, vehicle registration numbers and time of entry and exit recorded at Company premises and managed properties.

6.11 Website Data

Information submitted through online enquiry forms, together with technical data collected automatically, such as IP address, browser type and device information.

6.12 CCTV Records

Video footage captured by closed-circuit television systems installed for security purposes at Company premises and managed properties.

6.13 Communication Records

Correspondence exchanged with the Company via email, telephone, written letter or online platforms, retained for record-keeping and service purposes.

7. How Information is Collected

MALDEV PROPERTIES collects personal information through a variety of channels, including:

- Website : through enquiry forms, application forms and other interactive features on www.maldev.co.za;
- Applications : including tenant applications, student accommodation applications, supplier registration applications and employment applications;
- Contracts : such as lease agreements, employment contracts, supplier agreements and service level agreements;
- Email : correspondence sent to Company email addresses, including info@maldev.co.za and privacy@maldev.co.za;
- Telephone : calls made to Company contact numbers, including 076 168 9513;
- In Person : interactions at Company offices, developments, managed properties and residences;
- Third Parties : including credit bureaux, background verification providers, referees, letting agents and, where applicable, NSFAS or other funding bodies;
- Online Forms : digital submissions through Company platforms and portals; and
- Cookies : automated technologies used on the Company website, as further described in Section 11.

8. How Information is Used

Personal information collected by MALDEV PROPERTIES is used strictly for the purposes for which it was collected, or for purposes reasonably compatible therewith, including:

- Property Management : administering leases, rent collection, tenant communication and property administration;
- Student Accommodation : processing applications, managing residence placements, and administering student welfare and disciplinary matters;
- Facilities Management : coordinating maintenance, security, cleaning and other facilities services across managed properties;
- Maintenance : logging, assigning and tracking maintenance and repair requests;
- Customer Service : responding to enquiries, complaints and requests from tenants, students, suppliers and members of the public;
- Recruitment : evaluating job applications, conducting interviews and background checks, and administering the employment relationship;
- Procurement : evaluating and onboarding suppliers, and administering ongoing vendor relationships;
- Legal Compliance : meeting statutory, regulatory and contractual obligations, including those arising under tax, labour and property legislation;
- Financial Administration : invoicing, payment processing, credit control and financial reporting; and
- Marketing : where the data subject has provided consent, communicating information about Company developments, services and offerings.

The Company does not use personal information for any purpose incompatible with the purpose for which it was originally collected, unless required or permitted by law, or unless further consent is obtained from the data subject.

9. Information Security

MALDEV PROPERTIES has implemented appropriate technical and organisational measures to protect personal information against loss, unauthorised access, alteration or disclosure. These measures include:

9.1 Administrative Controls

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

9.2 Physical Controls

Restricted access to offices, archives and server rooms, secure storage of physical records, and controlled access to Company premises and managed properties.

9.3 Electronic Controls

Firewalls, antivirus software, secure network configurations and monitoring of information systems used to process personal information.

9.4 Encryption

Encryption of sensitive information, where appropriate, both in transit and at rest, in line with prevailing industry standards.

9.5 Access Management

Role-based access controls that limit access to personal information to those employees and operators who require it for the performance of their duties.

9.6 Cybersecurity

Ongoing monitoring of information systems and networks to identify, prevent and respond to cybersecurity threats and vulnerabilities.

9.7 Password Protection

Enforced password complexity requirements, periodic password changes and multi-factor authentication for systems processing sensitive personal information, where applicable.

9.8 Backups

Regular backup of electronic records to secure, access-controlled environments to safeguard against loss of data.

9.9 Incident Management

Documented procedures for identifying, escalating, investigating and responding to information security incidents, as further described in Section 18.

10. Information Sharing

MALDEV PROPERTIES does not sell or trade personal information. Personal information may, however, be shared with third parties where necessary for the purposes described in this Policy and where such sharing is permitted by law, including with:

- Banks and financial institutions, for the purposes of payment processing, credit assessment and financial administration;
- Government departments and organs of state, where required by law or for regulatory compliance purposes;
- Regulators, including the Information Regulator, the South African Revenue Service and other applicable bodies;
- Universities and higher education institutions, in connection with student accommodation arrangements;
- Contractors and service providers engaged to perform maintenance, security, cleaning or other services on the Company's behalf;
- Service Providers, including information technology, hosting and payment processing providers who act as operators on the Company's behalf; and
- Professional Advisers, including attorneys, auditors and consultants engaged by the Company.

Personal information is shared with third parties only to the extent necessary for the relevant purpose, and, where such third parties act as operators, the Company requires them to implement appropriate security safeguards and to process personal information only in accordance with the Company's instructions and applicable law.

11. Cookies Policy

The Company's website, www.maldev.co.za, makes use of cookies and similar technologies to improve the functionality of the website and the experience of its users. The categories of cookies used include:

- Session Cookies : temporary cookies that enable the website to function correctly during a browsing session and are deleted once the session ends;
- Performance Cookies : cookies that collect information on how visitors use the website, enabling the Company to improve website performance;
- Analytics Cookies : cookies used to gather statistical information regarding website usage and traffic patterns; and
- Marketing Cookies : cookies used, where consent has been given, to deliver relevant marketing content to website users.

Website users may manage or disable cookies through their browser settings. Disabling certain cookies may affect the functionality of the website. Where required by law, the Company will obtain the consent of website users prior to placing non-essential cookies on their devices, and will provide a mechanism for users to manage their cookie preferences.

12. Retention of Records

MALDEV PROPERTIES retains personal information only for as long as necessary to fulfil the purpose for which it was collected, or as required to comply with applicable legal, regulatory, accounting or reporting obligations. Retention periods vary depending on the category of information and the applicable statutory requirements, and are determined with reference to legislation including the Companies Act, the Tax Administration Act, the Labour Relations Act and other applicable laws.

Where personal information is no longer required, it is securely and permanently destroyed or deleted in a manner that prevents its reconstruction in an intelligible form. Physical records are disposed of through secure destruction methods, and electronic records are permanently deleted from Company systems and backups in accordance with the Company's records management practices.

Where personal information is retained for historical, statistical or research purposes, the Company will implement appropriate safeguards to protect the identity of the data subject.

13. Data Subject Rights

In accordance with POPIA, data subjects have the following rights in relation to their personal information held by MALDEV PROPERTIES:

- Access : the right to request confirmation of whether the Company holds personal information about them, and to request access to that information;
- Correction : the right to request that inaccurate, incomplete, misleading or outdated personal information be corrected or updated;
- Deletion : the right to request the deletion or destruction of personal information that the Company is no longer authorised to retain;
- Objection : the right to object, on reasonable grounds, to the processing of their personal information;
- Restriction : the right to request that the processing of their personal information be restricted in certain circumstances;
- Withdrawal of Consent : the right to withdraw consent to processing at any time, where processing is based on consent, without affecting the lawfulness of processing carried out prior to withdrawal; and
- Complaints : the right to submit a complaint to the Company's Information Officer, and thereafter, if unresolved, to the Information Regulator.

Requests to exercise any of these rights may be directed to the Privacy Officer at privacy@maldev.co.za. The Company will respond to all such requests within the timeframes prescribed by POPIA and PAIA.

14. Children's Information

MALDEV PROPERTIES recognises that certain of its student accommodation applicants may be under the age of 18 years. Where the Company processes the personal information of a minor, this is done only where such processing is permitted by law, including where the minor is a student accommodation applicant and processing is carried out with the participation and consent of a competent person, such as a parent or legal guardian.

The Company applies heightened care when processing the personal information of minors, and limits such processing to what is strictly necessary for the assessment of applications, the administration of accommodation arrangements, and matters of health, safety and welfare. Parents and guardians of minor applicants are encouraged to engage directly with the Company's residence management team regarding the handling of their child's personal information.

15. Student Accommodation Privacy

The Company's student accommodation operations involve the processing of personal information across the full residence lifecycle. The following principles apply specifically to this business unit:

15.1 Applications

Personal information submitted as part of a residence application is used solely to assess eligibility, allocate accommodation and administer the application process.

15.2 Emergency Contacts

Emergency contact details are collected and retained strictly for use in the event of a health, safety or welfare emergency involving the student.

15.3 Parents

Where a student is a minor, or where a student has consented to such disclosure, the Company may communicate with parents or guardians regarding accommodation, conduct or welfare matters.

15.4 NSFAS Information

Where a student's accommodation is funded, in whole or in part, through the National Student Financial Aid Scheme (NSFAS), relevant funding information is processed strictly for the purposes of verifying and administering that funding.

15.5 Residence Records

Records relating to room allocation, occupancy and residence conduct are maintained for the duration of the student's residence and for such further period as is required for record-keeping purposes.

15.6 Access Control

Biometric or card-based access control information, where used, is processed solely for the purposes of managing security and access to residences.

15.7 Maintenance Requests

Personal information provided in connection with maintenance requests logged at student residences is used solely to coordinate and complete the relevant repair or maintenance work.

16. Supplier Privacy

MALDEV PROPERTIES processes the personal information of suppliers, vendors and their representatives in connection with the following activities:

16.1 Vendor Registration

Information submitted during supplier registration is used to assess and record suppliers on the Company's approved vendor database.

16.2 B-BBEE Records

B-BBEE certificates and related compliance documentation are collected and retained to verify supplier compliance status for procurement purposes.

16.3 Banking Details

Banking details are collected solely for the purpose of processing payments due to suppliers and are held under strict access controls.

16.4 Contracts

Personal information contained in supplier contracts and service level agreements is processed for the administration and performance of those agreements.

16.5 Tax Information

Tax clearance certificates and related tax information are collected and retained to meet the Company's statutory and regulatory obligations.

17. Employment Privacy

MALDEV PROPERTIES processes the personal information of employees and job applicants throughout the employment lifecycle, including in relation to:

17.1 Recruitment

Curriculum vitae, qualifications, references and background verification information submitted as part of the recruitment and selection process.

17.2 Payroll

Banking, tax and remuneration information processed for the purposes of salary payment and statutory reporting.

17.3 Performance

Information relating to the assessment of employee performance, generated in the ordinary course of performance management processes.

17.4 Personnel Files

Employment contracts, disciplinary records, leave records and other documentation maintained in the ordinary course of the employment relationship.

17.5 Training Records

Records of training, development and qualifications obtained by employees during their employment with the Company.

Access to employee personal information is restricted to Human Resources personnel, line managers and other employees who require such access for the performance of their duties.

18. Data Breach Management

MALDEV PROPERTIES maintains a documented incident management process to respond to any actual or suspected data breach, comprising the following stages:

18.1 Reporting

Employees and operators are required to report any actual or suspected data breach to the Information Officer immediately upon becoming aware of it.

18.2 Containment

Immediate steps are taken to contain the breach and limit any further unauthorised access to, or loss of, personal information.

18.3 Investigation

The nature, extent and cause of the breach are investigated, and the categories of personal information and data subjects affected are identified.

18.4 Notification

Where required by POPIA, the Information Regulator and affected data subjects are notified of the breach as soon as reasonably possible, together with information on the nature of the breach and the measures taken in response.

18.5 Corrective Action

Following investigation, appropriate corrective and preventative measures are implemented to reduce the likelihood of similar incidents occurring in future.

19. Policy Governance

19.1 Information Officer

The Company's Information Officer is responsible for ensuring compliance with this Policy, POPIA and PAIA. The Information Officer may be assisted by one or more Deputy Information Officers appointed from time to time.

19.2 Responsibilities

The Information Officer's responsibilities include encouraging compliance with the conditions for lawful processing, dealing with requests made in terms of PAIA and POPIA, working with the Information Regulator in relation to investigations, and ensuring that internal measures are developed and implemented to give effect to this Policy.

19.3 Monitoring

Compliance with this Policy is monitored on an ongoing basis through internal reviews, audits and reporting to the Company's management.

19.4 Compliance

All employees, contractors and operators are required to comply with this Policy. Failure to do so may result in disciplinary action, in the case of employees, or termination of contract, in the case of contractors and operators.

19.5 Training

The Company provides periodic training to employees regarding their obligations under this Policy and applicable data protection legislation.

19.6 Internal Reviews

The Information Officer conducts periodic internal reviews of the Company's information processing activities to assess ongoing compliance with this Policy and applicable law.

20. Policy Review

20.1 Annual Review

This Policy is reviewed on an annual basis, or sooner where required by changes in legislation, regulatory guidance or the Company's business operations, to ensure that it remains current and effective.

20.2 Revision History

Version	Date	Description of Change	Approved By
1.0	31 July 2026	Initial issue of the Privacy Policy.	Managing Director

20.3 Version Control

This document is version controlled under document number MP-PP-2026-001. The current version supersedes all previous versions of this Policy. Uncontrolled or printed copies of this Policy should be verified against the current published version available on the Company's website.

21. Approval

This Privacy Policy has been reviewed and approved for implementation across all business units of MALDEV PROPERTIES.

Approved By	Managing Director
Signature	_____
Date	31 July 2026

For enquiries regarding this Policy or the exercise of data subject rights, please contact the Privacy Officer at privacy@maldev.co.za or telephone 076 168 9513.