GLOVent Solutions Customer Privacy Notice

Introduction

We respect the privacy of everyone who uses our website as well as the GLOVent software and associated services, referred to as GLOCMS (Community Management System) which is a Software as a Service (SaaS) Solution. As a result we would like to inform you regarding the way we would use your Personal Information. We recommend you to read this Customer Privacy Notice and Consent so that you understand our approach towards the use of your Personal Information. By submitting your Personal Information to us, you will be treated as having given your permission – where necessary and appropriate – for disclosures referred to in this policy. By using the GLOCMS System**,** you acknowledge that you have reviewed the terms of this Customer Privacy Notice and Consent to Use of Personal Information (the "Customer Privacy Notice and Consent") and agree that we may collect, use and transfer your Personal Information in accordance therewith.

If you do not agree with these terms, you may choose not to use our services, and please do not provide any Personal Information through this site or the GLOCMS System. This Customer Privacy Notice and Consent forms part of our Site Terms and Conditions of Use and such shall be governed by and construed in accordance with the laws of South Africa. This Notice explains how we obtain, use and disclose your personal information, as is required by the Protection of Personal Information Act, 2013 (POPI Act). At GLOVent Solutions (Pty) Ltd we are committed to protecting your privacy and to ensure that your Personal Information is collected and used properly, lawfully and openly.

2 Who we are

GLOVent Solutions (Pty) Ltd enhances community lifestyle by providing one integrated state-of-the-art solution, that improves community management efficiency. For over 12 years we have been helping communities of all sizes to run a more efficient community. We offers a range of tools which manages your community in one integrated state-of-the-art solution. You can rest assured that our solutions are designed with your community in mind.

3 The information we collect

Collection of Personal Information

We collect and process your Personal Information mainly to provide you with access to the GLOCMS Portal and or Mobile App, to help us improve our offerings to you and for certain other purposes explained below. The type of information we collect will depend on the purpose for which it is collected and used. We will only collect information that we need for that purpose.

We collect information directly from you where you provide us with your personal details, for example when you sign-up as User on the GLOCMS System or when you submit enquiries to us or contact us. Where possible, we will inform you what information you are required to provide to us and what information is optional.

Examples of information we collect from you are:

- Your name
- Your address
- Your email address
- Your telephone/cell number
- Any user-generated content, posts and other content you submit to our web site
- Supporting documentation and images uploaded to the application are securely stored in AWS S3
- The users Contacts information is used to pre-populate contacts so the user can easily invite visitors

We also collect information about you from other sources as explained below.

With your consent, we may also supplement the information that you provide to us with information we receive from other companies in the community management industry in order to offer you a more integrated community experience.

GLOCMS System

We may collect personal information through our sign-up process, GLO-ID profile or other pages/features in order for you to use the GLOCMS System. These include:

- GLO-Wallet: Each registered GLO-ID user will automatically be allocated an exclusive GLO-Wallet with unique account number on our partner Platform - Sekretpay. The Wallet can be used to transfer funds to friends, family members and or staff. You can also purchase electricity, airtime, data, pay your levies, pay for purchases at merchant stores (e.g. golf pro-shop, clubhouse, restaurant or other facilities). We will require and share the following information:
    - Mobile number and Email address to create your account.
- VMS System: We have partnered with Wyobi Technologies to offer a world-class integrated VMS Solution. We will collect and share the following information to their OpenItem Platform to ensure data is aligned and correct:
    - Full name, mobile number, email address, relevant property information such as stand number, address and security zone.

We may also use personal information to help us administer the GLOCMS System for the following purposes:

- To monitor and maintain the operational aspects of the systems;
- To enable you to access support services;
- To enable us to comply with laws and regulations.

Collection of Non-Personal Information

We may automatically collect non-Personal Information about you such as the type of internet browsers you use or the website from which you linked to our website. We may also aggregate details which you have submitted to the site (for example, the products or services you are interested in). You cannot be identified from this information and it is only used to assist us in providing an effective service on this web site. We may from time to time supply third parties with this non-personal or aggregated data for uses in connection with this website.

4 How we use your information

We will use your Personal and Non-Personal Information only for the purposes for which it was collected or agreed with you, for example:

- To confirm and verify your identity or to verify that you are an authorised customer for security purposes
- To carry out our obligations arising from any contracts entered into between you and us
- To notify you about changes to our products or services
- To assist with business development
- For the detection and prevention of fraud, crime, or other malpractice
- For audit and record keeping purposes
- In connection with legal proceedings
- We will also use your Personal Information to comply with legal and regulatory requirements or industry codes to which we subscribe or which apply to us, or when it is otherwise allowed by law.
- For monitoring and auditing site usage
- Evaluate the use of the site, products and services
- Analyse the effectiveness of our advertisements, competitions and promotions
- Personalise your website experience, as well as to evaluate (anonymously and in the aggregate) statistics on website activity, such as what time you visited it, whether you've visited it before and what site referred you to it
- Make the site easier to use and to better tailor the site and our products to your interests and needs
- Help speed up your future activities and experience on the site. For example, a site can recognise that you have provided your Personal Information and will not request the same information a second time.
- Collect information about the device you are using to view the site, such as your IP address or the type of Internet browser or operating system you are using, and link this to your Personal Information so as to ensure that the site presents the best web experience for you
- To respond to your queries or comments
- Where we collect Personal Information for a specific purpose, we will not keep it for longer than is necessary to fulfil that purpose, unless we have to keep it for legitimate business or legal reasons. In order to protect information from accidental or malicious destruction, when we delete information from our services we may not immediately delete residual copies from our servers or remove information from our backup systems.

5 Disclosure of Personal Information

We may disclose your Personal Information to our service providers who are involved in the delivery of products or services to you. These may include Amazon Web Services and other cloud service providers with whom we have agreements in place to ensure that they comply with these privacy terms. Certain of these services may be hosted outside South Africa in which case we will ensure the Transborder requirements contained in Chapter 9 of the Protection of Personal Information Act of 2013 are met.

We may share your Personal Information with, and obtain information about you from:

- Third parties for the purposes listed above;
- Other companies in the community management industry when we believe it will enhance the services and products we can offer to you, but only where you have not objected to such sharing;

We may also disclose your information:

- Where we have a duty or a right to disclose in terms of law or industry codes;

- Where we believe it is necessary to protect our rights.

6 Personal Information Security

We are legally obliged to provide adequate protection for the Personal Information we hold and to stop unauthorised access and use of personal information. We will, on an on-going basis, continue to review our security controls and related processes to ensure that your Personal Information is secure.

Our security policies and procedures cover:

- Physical security;
- Computer and network security;
- Access to personal information;
- Secure communications;
- Security in contracting out activities or functions;
- Retention and disposal of personal information;
- Acceptable usage of personal information;
- Governance and regulatory issues;
- Investigating and reacting to security incidents.

When we contract with third parties, we impose appropriate security, privacy and confidentiality obligations on them to ensure that Personal Information that we remain responsible for, is kept secure.

We will ensure that anyone to whom we pass your Personal Information agrees to treat your information with the same level of protection as we are obliged to.

7 Access to your Personal Information

You have the right to request a copy of the Personal Information we hold about you. To do this, simply contact us at the numbers/addresses listed on our home page and specify what information you would like. We will take all reasonable steps to confirm your identity before providing details of your personal information.

Please note that any such access request may be subject to a payment of a legally allowable fee, as laid down in our POPI Act Policy.

8 Correction of your Personal Information

You have the right to ask us to update, correct or delete your personal information. We will take all reasonable steps to confirm your identity before making changes to Personal Information we may hold about you. We would appreciate it if you would take the necessary steps to keep your Personal Information accurate and up-to-date by notifying us of any changes we need to be aware of.

9 Definition of Personal Information

According to the POPI Act **''Personal Information''** means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person. The POPI Act, which has more specific examples if you need them, can be found at the following link:

https://www.gov.za/sites/default/files/gcis_document/201409/3706726-11act4of2013protectionofpersonalinforcorrect.pdf

10 Right to object

In terms of the POPI Act (POPIA) section 18. (h) (iv) you have the right to object to the processing of personal information as referred to in section 11(3) of the POPIA.

11 Right to lodge a compliant

In terms of the POPI Act (POPIA) section 18. (h) (v) you have the right to lodge a complaint to the Information Regulator (South Africa) (IRSA). The IRSA contact details are:

https://www.justice.gov.za/inforeg/contact.html

JD House
27 Stiemens Street
Braamfontein
Johannesburg, 2001

Complaints email: **complaints.IR@justice.gov.za**

General enquiries email: **inforeg@justice.gov.za**.

12 Changes to this notice

Please note that we may amend this notice from time to time. Please check our website periodically to inform yourself of any changes.

13 How to contact us

If you have any queries about this notice or believe we have not adhered to it, or need further information about our privacy practices or wish to give or withdraw consent, exercise preferences or access or correct your personal information, please contact us at the numbers/addresses listed on our website https://www.glovent.net/ in the GLOVent Solutions (Pty) Ltd PAIA Manual.