

THE BUILDING COMPANY (PROPRIETARY) LIMITED

REGISTRATION NUMBER 1972/004708/07

(*"The Company"* or *"The Building Company"* or *"TBCO"*)

EXTERNAL PRIVACY STATEMENT

Version 2025.01

Disclaimer: Older versions of this statement are superseded and are not deemed official. Only the latest version is acceptable.

1. Introduction

- 1.1. For purposes of this Statement
 - 1.1.1. **"Applicable Laws"** means all laws and regulations that The Building Company is required to comply with.
 - 1.1.2. **"Customer", "Supplier", "Applicant" or "You"** means any prospective, new or existing customer/supplier/vendor/applicant of TBCO and its subsidiaries; and
 - 1.1.3. **"TBCO", "We", and "Us"** mean **The Building Company (Pty) Limited**, its direct and indirect subsidiaries and business units. To obtain more information on **The Building Company (Pty) Limited** group of companies, please refer to our website, [www.https://thebuildingco.com/](https://thebuildingco.com/).
 - 1.1.4. **"Personal Information"** means information relating to an identifiable, living, natural person, and where applicable, an identifiable, existing juristic person, including, but not limited to, the name, race, gender, marital status, address and identifying number of a person, symbol, e-mail address, physical address, telephone number, location information, online identifier or any other particular assignment to the person.
- 1.2. This Statement sets out how your personal information will be used by us and applies to any information, including personal and special personal information, you give to us or which we may collect from third parties.
- 1.3. It is important that you read this Statement carefully before submitting any personal information to TBCo.
- 1.4. By submitting any personal information to TBCo, you provide consent to the processing of your personal information as set out in this Statement.
- 1.5. The provisions of this Statement are subject to mandatory, unalterable provisions of applicable laws.
- 1.6. Please do not submit any personal information to TBCo if you do not agree to any of the provisions of this Statement. If you do not consent to the provisions of this Statement, or parts of the Statement, TBCo may not be able to provide its products and services to you.

2. How to contact us

If you have any comments or questions about this Statement, please contact the Information Officer.

Name:	The Building Company (Pty) Ltd.
Authorised Information Officer:	The Information Officer
Email address of Information Officer:	popia@thebuildingco.com
Postal address:	PO Box 155 Cape Town International Airport 7525
Physical address:	1 st Floor, Execujet Building Tower Road Matroosfontein 7409
Phone number:	+27 (21) 065 4100

3. Amendment of this Statement

- 3.1. We may amend this Statement from time to time for any of the following reasons:
 - 3.1.1. to provide for the introduction of new systems, methods of operation, services, products, property offerings or facilities;
 - 3.1.2. to comply with changes to any legal or regulatory requirement;
 - 3.1.3. to ensure that our Statement is clearer and more favorable to you;
 - 3.1.4. to rectify any mistake that may be discovered from time to time; and/or
 - 3.1.5. any other reason that TBCo, in its sole discretion, may deem reasonable or necessary.
- 3.2. TBCo will take reasonable steps to notify you of such an amendment, including publication on our website. It is your responsibility to check the website often.

4. Privacy and indemnity

- 4.1. TBCO takes your privacy and the protection of your personal information very seriously, and we will only use your personal information in accordance with this Statement and applicable data protection legislation. It is important that you take all necessary and appropriate steps to protect your personal information yourself (for example, by ensuring that all passwords and access codes are kept secure).
- 4.2. We have implemented reasonable technical and operational measures to keep your personal information secure.
- 4.3. You hereby indemnify and hold TBCo harmless from any loss, damages or injury that you may incur as a result of incorrect or incomplete personal information provided to TBCo.

5. Categories of data subjects and personal information collected by TBCO

- 5.1. You, as the data subject, consent to the collection of the following personal information about you:

Employees

- Name and contact details
- Identity number and identity documents, including passports
- Employment history and references
- Employee number
- Banking and financial details
- Details of payments to third parties (deductions from salary)
- Employment contracts
- Employment equity plans
- Medical aid records
- Pension fund records
- Remuneration/salary records
- Performance appraisals
- Disciplinary records
- Leave records
- Training records
- Qualifications
- Parental status
- Biometrics
- Medical records
- Marital status
- Disability status
- Criminal records
- Date & place of birth
- Tax number

Consumers and prospective consumers (which may include employees)

- Title and name
- Postal
- Street address
- Contact numbers
- e-mail address
- Ethnic group
- Browsing habits and click patterns on TBCO websites
- Age
- Gender
- Marital status
- Nationality
- Language
- Financial information
- Identity or passport number
- Employment History
- Company VAT registration
- Company registration
- Proxy/Company resolution documentation
- Administrators' contact details
- Legal address
- Bank details

Vendors /suppliers /other businesses

- Name and contact details;
- Identity and/or company information and directors' information;
- Banking and financial information;
- Information about products or services;
- Other information not specified that is reasonably required to be processed for business operations.

5.2. Personal information which we may collect about you (All Data Subjects)

5.2.1. Records of correspondence or enquiries from you or anyone acting on your behalf;

5.2.2. Details of transactions you carry out with us;

5.2.3. Details of contracts, sales or leases you carry out with us;

5.2.4. Sensitive or special categories of personal information, including biometric information, such as images, fingerprints and voiceprints;

- 5.2.5. Consumer credit information at any credit bureau or third party, subject to clauses 8.1.2 below.

5.3. **Suppliers and vendors**

- 5.3.1. In the course of our business agreement, we may collect personal information about you as a data subject to ensure that the business agreement and matters relating to the agreement can be fulfilled.
- 5.3.2. We may also do due diligence on you to ensure that you meet the requirements set out in our procurement procedures.
- 5.3.3. If you provide any personal information of other persons to us, such as employees or your directors, you warrant that you are authorised to share their personal information with us for the purposes set out in the Statement.

- 5.4. Where you provide us with the personal information of third parties, you should take steps to inform the third party that you need to disclose their details to us, identifying us. In addition, you should not share their personal information with us unless they have consented to you sharing such information with us and to us processing such information in accordance with this Statement.

6. **Personal information of children**

- 6.1. We do not intend to collect and/or process any personal information of children, unless we make this clear. If you do provide any personal information to us about children, then you warrant that this is done with the consent of the child's parent or legal guardian to use this information as set out in this Statement.

7. **How we collect personal information**

- 7.1. You may provide personal information to us either directly or indirectly (through an agent acting on your behalf, or an introducer), by completing an application form for our products and services or requesting further information about our products and services, whether in writing, through our website and/or mobile applications, over the telephone or any other means.
- 7.2. We may also collect your personal information for lawful purposes from your appointed agent, any regulatory authority, or other third party that may hold such information.
- 7.3. In order to ensure that the content of our websites remains up-to-date, user-friendly and comprehensive, we employ web analytics tools, the predominant one being Google Analytics, which is a web-analysis tool from Google Inc. This service uses cookies that track your preferences during your visits to our websites and allows us to simplify navigation and make our website more user-friendly. The information that is used during this process (which includes your IP Address) is de-identified and makes personal identification impossible.
- 7.4. We might make use of first-party and third-party cookies, as well as web beacons and

similar technologies to deliver measurement services and targeted advertising to visitors. No personal information is shared with any third party outside of TBCo and its subsidiaries when providing these targeted services. Please refer to our Cookie Policy, which is accessible via our corporate website.

8. Use of personal information collected

8.1. We may use, transfer and disclose your personal information for the purposes of:

8.1.1. General Purposes (Applicable to all relevant data subjects):

- a. Providing you with the services, products or offerings you have requested, and notifying you about important changes to these services, products or offerings;
- b. Managing your account or relationship and complying with your instructions or requests;
- c. Detecting and preventing fraud and money laundering, and/or in the interest of security and crime prevention;
- d. Assessing and dealing with complaints and requests;
- e. Operational, marketing, auditing, legal and record-keeping requirements;
- f. Verifying your identity or the identity of your beneficial owner;
- g. Transferring or processing of your personal information outside of the country where your personal information was collected for processing, by such countries that may not offer the same level of data protection, including for cloud storage purposes and the use of any of our digital platforms;
- h. Complying with Applicable Laws, including lawful requests for information received from local or foreign law enforcement, government and tax collection agencies;
- i. Recording and/or monitoring your telephone calls and electronic communications to/with TBCo in order to accurately carry out your instructions and requests, to use as evidence and in the interests of crime prevention;
- j. Disclosing your personal information to third parties for reasons set out in this Statement or where it is not unlawful to do so;
- k. Monitoring, keeping record of and having access to all forms of correspondence or communications received by or sent from TBCo or any of its employees, agents or contractors, including monitoring, recording and using as evidence all telephone communications between you and TBCo;
- l. Improving or evaluating the effectiveness of TBCo's business or products, services or offerings;
- m. Prevention and control of any disease;
- n. To provide you with tailor-made offerings, we will use your information for data analysis, which may include the use of AI technologies;
- o. Determining whether you meet the criteria for inclusion in certain direct marketing campaigns of TBCo products and/or services, where applicable;
- p. To deliver tailored advertising (including via social media);
- q. Carrying out market research, business and statistical analysis;
- r. Performing other administrative and operational purposes, including the

testing of systems;

- s. Any other reasonably required purpose relating to the TBCo business;

8.1.2. For Consumers:

- a. All applicable purposes as described under 'General Purposes', where relevant;
- b. Performing duties in terms of any agreement with consumers;
- c. Make, or assist in making, credit decisions about consumers;
- d. Operate and manage consumers' accounts and manage any application, agreement or correspondence consumers may have with the TBCo;
- e. Communicating (including direct marketing) with consumers by email, SMS, letter, telephone or in any other way about TBCo products and services, unless consumers indicate otherwise;
- f. To form a view of consumers as individuals and to identify, develop or improve products that may be of interest to consumers related to the TBCo business.
- g. Verifying and updating information;
- h. Pre-scoring;
- i. Conducting an affordability assessment in the event that you applied for credit;
- j. Sharing your unique identifiers (such as your telephone number or identity number) with third parties, including other entities in the TBCo Group to do;
- k. data matching for purposes of enriching (improving) our or their personal information, marketing analysis, and other matters that may be in our legitimate or the legitimate interests of third parties;
- l. Tracing you and collecting from you any outstanding debt due in terms of a credit agreement entered into with TBCo.
- m. Any other reasonably required purpose relating to the processing of a prospect's personal information reasonably related to the TBCo.

8.1.3. For Vendors / Suppliers / Other Businesses:

- a. All applicable purposes as described under 'General Purposes', where relevant
- b. Verifying information and performing checks;
- c. Pre-vetting the business before we deal with them;
- d. Purposes relating to the agreement or business relationship or possible agreement or business relationships between the parties;
- e. Payment of invoices;
- f. Complying with regulatory and other obligations;
- g. Any other reasonably required purpose relating to the TBCo business.

8.1.4. For Employees (including Applicants and Post-Employment)

- a. All applicable purposes as described under 'General Purposes' and 'For Consumers', where relevant;
- b. Verification of applicant employees' information during the recruitment process;
- c. General matters relating to employees, including, but not limited to:
 - l. Pension administration;

- II. Medical Aid Administration;
 - III. Payroll processing;
 - IV. Disciplinary actions;
 - V. Training and development;
 - VI. To manage your potential employment as an applicant or post-employment relationship with us;
 - VII. Any other reasonably required purpose relating to the employment or possible employment relationship.
- 8.2. We may from time to time (and at any time) contact you about services, products and offerings available from TBCo or specific subsidiaries which we believe may be of interest to you, by email, telephone, SMS, WhatsApp or other electronic and/or non-electronic means, unless you have unsubscribed from receiving such communications. You can unsubscribe from receiving such communications.
- 8.3. The recipients or categories of recipients to whom the personal information may be supplied:
- a. Any firm, organisation or person that TBCo uses to collect payments and recover debts or to provide a service on its behalf;
 - b. Any firm, organisation or person that/who provides the TBCo with products or services;
 - c. Any person whom TBCo has reason to believe to be a data subject's/consumer's parent, carer or helper where he/she is unable to handle his/her own affairs because of mental incapacity or other similar issues;
 - d. Any payment system TBCo uses;
 - e. Regulatory and governmental authorities or ombudsmen, or other authorities, including tax authorities, where the TBCo has a duty to share information;
 - f. Credit bureau;
 - g. Third parties to whom payments are made on behalf of employees;
 - h. Financial institutions from whom payments are received on behalf of data subjects;
 - i. Any other operator not specified;
 - j. Employees, contractors and temporary staff; and
 - k. Agents.

9. Disclosure of your personal information

- 9.1. Your personal information may be shared with the TBCo group of companies, our agents and sub-contractors, and selected third parties who process the information on our behalf.
- 9.2. We may also disclose your personal information to third parties in the following circumstances:
- 9.2.1. Any of the other TBCo group of companies, subsidiaries, business partners, agents or other third parties to:
- a. Assess and monitor any of your applications for TBCo's products or services;
 - b. Determine which products and services may be of interest to you and/or send you information about such products and services, unless you object

- or choose not to receive such communications;
 - c. Have a better understanding of your circumstances and needs to provide and improve TBCo's products and services;
 - d. Any firm, organisation, or person that TBCO uses to collect payments and recover debts or to provide a service on its behalf;
 - e. Any firm, organisation, or person that/who provides TBCO with products or services;
 - f. Any payment system TBCo uses;
 - g. Financial institutions from whom payments are received on behalf of data subjects;
 - h. Any other operator not specified;
 - i. Employees, contractors, and temporary staff;
 - j. Any relevant person and/or entity for purposes of prevention, detection and reporting of fraud and criminal activities, the identification of the proceeds of unlawful activities and the combating of crime;
- 9.2.2. to any regulator or supervisory authority, including those in foreign jurisdictions, if TBCo is required to do so in terms of Applicable Laws; this includes regulatory and governmental authorities or ombudsmen, or other authorities, including tax authorities, where TBCo has a duty to share information;
- 9.2.3. to a prospective buyer or seller of any of our businesses or assets;
- 9.2.4. to any person if we are under a duty to disclose or share your personal information in order to comply with any Applicable Laws, or to protect the rights, property or safety of TBCo, other Customers or other third parties;
- 9.2.5. to your agent, or any other person acting on your behalf, and/or an introducer, including any person whom TBCo has reason to believe to be a data subject's/consumer's parent, carer, or helper where they are unable to handle their own affairs because of mental incapacity or other similar issues;
- 9.2.6. to credit bureau; and/or
- 9.2.7. to third parties to whom payments are made on behalf of employees.
- 9.3. We may transfer your personal information to another of TBCo's entities, an agent, sub-contractor or third party who carries on business in another country, including one which may not have data privacy laws similar to those of the applicable jurisdictions. If this happens, we will ensure that anyone to whom we pass your personal information agrees to treat your personal information with the same level of protection as if we were dealing with it.
- 9.4. If you do not wish us to disclose this information to third parties, please contact us at the contact details set out above. We may, however, not be able to provide products or services to you if you do not agree with such disclosure.

10. Retention of your personal information

We may retain your personal information indefinitely unless you object, in which case we will only retain it if we are permitted or required to do so in terms of Applicable Laws.

However, as a general rule, we will retain your personal information in accordance with the retention periods set out in Applicable Laws, unless we need to retain it for longer for a lawful purpose. (For example, for the purposes of complaints handling, legal processes and proceedings.)

11. General description of information security measures to be implemented by TBCo

TBCo takes extensive information security measures to ensure the security, confidentiality, integrity and availability of personal information in our possession.

This is supported by appropriate technical and organisational measures designed to ensure that personal data remains confidential and secure against unauthorised or unlawful processing and against accidental loss, destruction or damage.

12. Access to, correction and deletion of your personal information

- 12.1. You may request details of personal information which we hold about you under the applicable legislation in your jurisdiction.
- 12.2. You may opt out of direct marketing communications free of charge by emailing at the contact details set out above.

13. Request Procedure

- 13.1. POPIA provides that a data subject may object, at any time, to the processing of personal information by TBCo, on reasonable grounds relating to his/her particular situation, unless legislation provides for such processing.
- 13.2. A data subject may also request TBCo to correct or delete personal information about the data subject in its possession or under its control that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully; or destroy or delete a record of personal information about the data subject that TBCo is no longer authorised to retain records in terms of POPIA's retention and restriction of records provisions.
- 13.3. A data subject that wishes to request a correction or deletion of personal information or the destruction or deletion of a record of personal information must submit a request to the Information Officer.
- 13.4. The data subject must complete the prescribed form (which is available for download from the Information Regulator's website: www.inforegulator.org.za/popia-forms/) and submit it to the Information Officer, preferably online using any of the brand's

"DATA SUBJECT REQUEST" templates, or at the postal or physical address, or electronic mail address set out above.

- 13.5. Proof of identity is required to authenticate your identity and the request. You will, in addition to this prescribed form, be required to submit acceptable proof of identity such as a certified copy of your identity document or other legal forms of identity.
- 13.6. If TBCo rejects a POPIA request, the data subject can take remedial steps, starting with an optional internal review by TBCo. If still unsatisfied, the main recourse is to lodge a formal complaint with the South African Information Regulator.

14. Complaints

- 14.1. If you believe TBCo has used your personal information unlawfully and you're not satisfied with our internal review, you have the right to lodge a complaint with the relevant regulatory authority in your jurisdiction.

For South Africa: POPIAComplaints@inforegulator.org.za

This complaint must be:

- a. Made in writing.
- b. Submitted using the prescribed POPIA Form 5. Available on the Information Regulator's website: www.inforegulator.org.za/popia-forms/.
- c. Sent via email to: POPIAComplaints@inforegulator.org.za (or by post/physical delivery).
- d. The Regulator will acknowledge the complaint and may then investigate, mediate, or refer the matter, with TBCo committed to full cooperation throughout the process.