

BETTERHOME GROUP LIMITED (“BetterHome”)

And all of its subsidiaries

PRIVACY POLICY



September 2023 | Version2

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We respect your privacy. Callouts like this are a summary of our privacy policy and contain the most important and relevant points for you. Please read the full privacy policy because it applies to you.

1 INTRODUCTION

1.1 Welcome to our privacy policy. We are:

1.1.1 BetterHome Group Limited (registration number: 1992/000443/06),

1.1.2 BetterLife Origination Services (Pty) Limited (registration number: 2001/003522/07), (BetterBond and MortgageMax are divisions of BetterLife Origination Services),

1.1.3 BetterSure Financial Consultants (Pty) Ltd (registration number 2005/024995/07),

1.1.4 BetterSure Insurance Brokers (Pty) Ltd (registration number 2008/011624/07),

1.1.5 Resize Home Loans (Pty) Ltd (registration number 2020 / 270502 / 07), and

1.1.6 Snappy Home (Pty) Ltd t/a Amplify (registration number 2015 / 220464 / 07),

1.2 This is our plan of action when it comes to protecting your privacy. We respect your privacy and take the protection of personal information very seriously. The purpose of this policy is to describe the way that we collect, store, use, and protect information that can be associated with you or another specific natural or juristic person and can be used to identify you or that person (personal information).

The purpose of this policy is to describe the way that we handle your personal information.

1.3 Audience

1.3.1 This policy applies to you if you are:

1.3.1.1 a visitor to our website; or

1.3.1.2 a customer who has requested the services that we provide, or accepts our goods or services.

This policy applies to you under certain circumstances.

2 PERSONAL INFORMATION

2.1 Personal information includes:

2.1.1 certain information that we collect automatically when you visit our website;

2.1.2 certain information collected on registration (see below);

2.1.3 certain information collected on submission; and

2.1.4 optional information that you provide to us voluntarily (see below);

2.2 but excludes:

2.2.1 information that has been made anonymous so that it does not identify a specific person;

2.2.2 permanently de-identified information that does not relate or cannot be traced back to you specifically;

2.2.3 non-personal statistical information collected and compiled by us; and

2.2.4 information that you have provided voluntarily in an open, public environment or forum including any blog, chat room, community, classifieds, or discussion board (because the information has been disclosed in a public forum, it is no longer confidential and does not constitute personal information subject to protection under this policy).

Personal information includes information we collect (i) automatically when you visit our website, (ii) on registration, (iii) on submission, and (iv) from you voluntarily. It excludes (i) anonymous, (ii) de-identified, (iii) non-personal statistical, and (iv) public information.

2.3 Common examples

2.3.1 Common examples of the types of personal information which we may collect and process include your:

2.3.1.1 **identifying information** – such as your name, date of birth, or identification number of any kind;

2.3.1.2 **contact information** – such as your phone number or email address;

2.3.1.3 **address information** – such as your physical or postal address; or

2.3.1.4 **demographic information** – such as your gender or marital status.

2.4 Sensitive personal information

2.4.1 Depending on the services that you require, we may also collect sensitive personal information including your:

2.4.1.1 **financial information** – such as your bank account details;

2.4.1.2 **sensitive demographic information** – such as your race or ethnicity;

2.4.1.3 **medical information** – such as information about your physical or mental health;

2.4.1.4 **sexual information** – such as information about your sex life or sexual orientation;

2.4.1.5 **criminal information** – such as information about your commission or alleged commission of any offence or about any related legal proceedings;

2.4.1.6 **employment information** – including your membership of a trade union; and

2.4.1.7 **beliefs** – including your political or religious beliefs.

2.5 Acceptance

2.5.1 **Acceptance required.**

2.5.2 You must accept all the terms of this policy when you request our services. If you do not agree with anything in this policy, then you may not request our services.

You may not request our services, or transact with us, if you do not accept this policy.

2.6 Legal capacity

2.6.1 You may not access our website or request our services if you are younger than 18 years old or do not have legal capacity to conclude legally binding contracts.

2.7 Deemed acceptance

2.7.1 By accepting this policy, you are deemed to have read, understood, accepted, and agreed to be bound by all of its terms.

2.8 Your obligations

2.8.1 You may only send us your own personal information or the information of another data subject where you have their permission to do so.

2.9 Changes

2.9.1 We may change the terms of this policy at any time by updating this web page. We will notify you of any changes by placing a notice in a prominent place on the website or by sending you an email detailing the changes that we have made and indicating the date that they were last updated. If you do not agree with the changes, then you must stop using the website and our goods or services. If you continue to use the website or our goods or

services following notification of a change to the terms, the changed terms will apply to you and you will be deemed to have accepted those updated terms.

2.10 Collection

2.10.1 On registration

2.10.1.1 Once you register on our website, you will no longer be anonymous to us. You will provide us with certain personal information when you register on our website.

2.10.2 This personal information will include:

2.10.2.1 your name and surname;

2.10.2.2 your email address;

2.10.2.3 your telephone number;

2.10.2.4 your company name, company registration number, and VAT number;

2.10.2.5 your postal address or street address; and

2.10.2.6 your username and password.

2.10.3 We will use this personal information to fulfil your account, provide additional services and information to you as we reasonably think appropriate, and for any other purposes set out in this policy. We will collect and use any and/or all personal information provided with each application notwithstanding the application being done by one or more individuals.

We collect certain information on registration, when you register on our website.

2.11 On request

2.11.1 When you request our services from us, you will be asked to provide us with additional information on a voluntary basis (services information).

We collect certain information when you request our services from us.

2.12 On obtaining a quote

2.12.1 When you obtain a quote for our services, you will be asked to provide us with information. It is noted that co-applicants may receive each others personal information applicable to joint-applications irrespective of on request or upon completion through the website.

We collect certain information when we give you a quote.

2.13 From browser

2.13.1 We automatically receive and record Internet usage information on our server logs from your browser, such as your Internet Protocol address (IP address), browsing habits, click patterns, version of software installed, system type, screen resolutions, colour capabilities, plug-ins, language settings, cookie preferences, search engine keywords, JavaScript enablement, the content and pages that you access on the website, and the dates and times that you visit the website, paths taken, and time spent on sites and pages within the website (usage information). Please note that other websites visited before entering our website might place personal information within your URL during a visit to it, and we have no control over such websites. Accordingly, a subsequent website that collects URL information may log some personal information.

We collect certain information from your web browser, including your Internet usage information when you visit our website.

2.14 Cookies

2.14.1 For information on how we deal with Cookies, please refer to our Cookies Policy.

2.14.2 A cookie policy is a document that provides information about the cookies and trackers utilized on a website. This includes information about the various types of cookies used, their functions, purposes, and how long they are stored on the user's computer.

2.15 **Optional details**

2.15.1 You may also provide additional information to us on a voluntary basis (optional information). This includes content or products that you decide to upload or download from our website or when you enter competitions, take advantage of promotions, respond to surveys, order certain additional goods or services, or otherwise use the optional features and functionality of our website.

We collect certain optional information, that you provide when you upload or download content from our website or when you enter competitions, take advantage of promotions, respond to surveys or register and subscribe for certain additional goods or services.

2.16 **Recording calls**

2.16.1 We may monitor and record any telephone calls that you make to us, unless you specifically request us not to.

2.17 **Purpose for collection**

2.17.1 We may use or process any goods or services information, or optional information that you provide to us for the purposes that you indicated when you agreed to provide it to us. Processing includes gathering your personal information, disclosing it, and combining it with other personal information. We generally collect and process your personal information for various purposes, including:

2.17.1.1 **goods or services purposes** – such as collecting orders or requests for and providing our goods or services;

2.17.1.2 **marketing purposes** – such as pursuing lawful related marketing activities;

2.17.1.3 **business purposes** – such as internal audit, accounting, business planning, and joint ventures, disposals of business, or other proposed and actual transactions; and

2.17.1.4 **legal purposes** – such as handling claims, complying with regulations, or pursuing good governance.

2.17.2 We may use your usage information for the purposes described above and to:

2.17.2.1 remember your information so that you will not have to re-enter it during your visit or the next time you access the website;

2.17.2.2 monitor website usage metrics such as total number of visitors and pages accessed; and

2.17.2.3 track your entries, submissions, and status in any promotions or other activities in connection with your usage of the website.

We may use any of your personal information that you provide to us for the purposes that you indicated when you agreed to provide it to us.

2.18 **Consent to collection**

2.18.1 We will obtain your consent to collect personal information:

2.18.1.1 in accordance with applicable law;

2.18.1.2 when you provide us with any registration information or optional information.

We will get your consent to collect your personal information in accordance with applicable law when you provide us with it.

2.19 **Use**

2.19.1 **Our obligations**

2.19.2 We may use your personal information to fulfil our obligations to you.

2.19.3 Messages and updates

2.19.4 We may send administrative messages and email updates to you about the website. In some cases, we may also send you primarily promotional messages. You can choose to opt-out of promotional messages.

We may use your information to send you administrative messages and email updates to you regarding the website and for marketing purposes where lawful.

2.20 Targeted content

2.20.1 While you are logged into the website, we may display targeted adverts and other relevant information based on your personal information. In a completely automated process, computers process the personal information and match it to adverts or related information. We never share personal information with any advertiser, unless you specifically provide us with your consent to do so. Advertisers receive a record of the total number of impressions and clicks for each advert. They do not receive any personal information. If you click on an advert, we may send a referring URL to the advertiser's website identifying that a customer is visiting from the website. We do not send personal information to advertisers with the referring URL.

2.20.2 Once you are on the advertiser's website however, the advertiser is able to collect your personal information.

We may use your information for targeted content in certain, specified instances.

3 DISCLOSURE

3.1 **Sharing** - We may share your personal information with:

3.1.1 other divisions or companies within the group of companies to which we belong so as to provide joint content and services like registration, for transactions and customer support, to help detect and prevent potentially illegal acts and violations of our policies, and to guide decisions about our products, services, and communications (they will only use this information to send you marketing communications if you have requested their goods or services) in terms of our Binding Corporate Rules;

3.1.2 an affiliate, in which case we will seek to require the affiliates to honour this privacy policy;

3.1.3 our goods or services providers under contract who help provide certain goods or services or help with parts of our business operations, including fraud prevention, bill collection, marketing, technology services (our contracts dictate that these goods or services providers only use your information in connection with the goods or services they supply or services they perform for us and not for their own benefit);

3.1.4 credit bureaus to report account information, as permitted by law;

3.1.5 banking partners as required by credit card association rules for inclusion on their list of terminated merchants (in the event that you utilise the services to receive payments and you meet their criteria); and

3.1.6 other third parties who provide us with relevant services where appropriate;

3.1.7 co-applicants with joint-applications.

3.2 Credit reports

3.2.1 We will obtain your consent when we share your personal information with the credit bureaus to generate a credit report. This report will also help you to managing your credit, challenge the accuracy of information contained on your report and investigate and compare your information held by the credit bureaus.

3.2.2 Should you choose to make use of our services, you consent to a credit check being done as part of the BetterHome services you elect to use. It is noted that you agree to the registered credit bureau's terms being the following:

3.2.2.1 To contact, request and obtain credit information (for the avoidance of doubt this includes any and all information held on my profile by the Credit Bureau including payment profile information) from a registered credit bureau for any purpose including to verify your identity, perform an assessment of your behaviour profile, payment patterns, indebtedness, whereabouts, and creditworthiness, or risk associated with doing business

with me or our business' representative or another related purposes in any format (including in pdf, xml or raw data string) available and to continuously access your information from the credit bureau for as long as you may have a relationship with the BetterHome or any of its subsidiaries and for a period of 24 (twenty-four) months thereafter.

3.2.2.2 make any reasonable enquiries to verify and research any details provided by you or your representative to the BetterHome or any of its subsidiaries;

3.2.2.3 to access the information in any format, including online, batch and raw xml string and you consent that the enquiry should not be displayed on your credit profile if the enquiry was not performed for credit application purposes.

3.3 Account statements from financial institutions

3.3.1 We will obtain your consent when we obtain your account statements from your financial institution.

We may share your personal information with third parties for the purposes of fulfilling our obligations to you among other purposes.

3.4 Regulators

3.4.1 We may disclose your personal information as required by law or governmental audit.

3.5 Law enforcement

3.5.1 We may disclose personal information if required:

3.5.1.1 by a subpoena or court order;

3.5.1.2 to comply with any law;

3.5.1.3 to protect the safety of any individual or the general public; and

3.5.1.4 to prevent violation of our customer relationship terms.

We may disclose personal information to third parties if required for legal reasons.

3.6 No selling

3.6.1 We will not sell personal information. No personal information will be disclosed to anyone except as provided in this privacy policy.

3.7 Marketing purposes

3.7.1 We may disclose aggregate statistics (information about the customer population in general terms) about the personal information to advertisers or business partners. We will obtain your consent to share your information with related third parties for marketing purposes.

3.8 Employees

3.8.1 We may need to disclose personal information to our employees that require the personal information to do their jobs. These include our responsible management, human resources, accounting, audit, compliance, information technology, or other personnel.

3.9 Change of ownership

3.9.1 If we undergo a change in ownership, or a merger with, acquisition by, or sale of assets to, another entity, we may assign our rights to the personal information we process to a successor, purchaser, or separate entity. We will disclose the transfer on the website. If you are concerned about your personal information migrating to a new owner, you may request us to delete your personal information.

4 SECURITY

4.1 We take the security of personal information very seriously and always do our best to comply with applicable data protection laws. Our hosting company will host our website in a secure server environment that uses a firewall

and other advanced security measures to prevent interference or access from outside intruders. We authorize access to personal information only for those employees who require it to fulfil their job responsibilities. We implement disaster recover procedures where appropriate.

Our website is hosted on a secure server and uses security measures to prevent interference by intruders.

4.2 **Accurate and up to date**

4.2.1 We will try to keep the personal information we collect as accurate, complete and up to date as is necessary for the purposes defined in this policy. From time to time we may request you to update your personal information on the website. You are able to review or update any personal information that we hold on you by accessing your account online, emailing us, or phoning us. Please note that in order to better protect you and safeguard your personal information, we take steps to verify your identity before granting you access to your account or making any corrections to your personal information.

Please keep your personal information accurate and up to date by accessing your account online, emailing us, by phoning us.

5 **RETENTION**

5.1 We will only retain your personal information for as long as it is necessary to fulfil the purposes explicitly set out in this policy, unless:

5.1.1 retention of the record is required or authorised by law; or

5.1.2 you have consented to the retention of the record.

5.2 During the period of retention, we will continue to abide by our non-disclosure obligations and will not share or sell your personal information.

5.3 We may retain your personal information in physical or electronic records at our discretion.

5.4 Please refer to our Retention and Archiving of Records Policy.

We will only retain your personal information for as long as is necessary.

5.5 **Transfer to another country**

5.6 We may transmit or transfer personal information outside of the country in which it was collected to a foreign country and process it in that country. Personal information may be stored on servers located outside the country in which it was collected in a foreign country whose laws protecting personal information may not be as stringent as the laws in the country in which it was collected. You consent to us processing your personal information in a foreign country whose laws regarding processing of personal information may be less stringent.

We may transfer your personal information outside the country in which it was collected to a foreign country.

5.7 **Updating or removing**

5.8 You may choose to correct or update the personal information you have submitted to us, by contacting us email.

You may choose to update or remove the personal information you have submitted to us.

5.9 **Limitation**

5.10 We are not responsible for, give no warranties, nor make any representations in respect of the privacy policies or practices of linked or any third party websites.

5.11 **Enquiries**

5.12 If you have any questions or concerns arising from this privacy policy or the way in which we handle personal information, please contact us.

6 POPIA COMPLAINTS PROCEDURE

- 6.1 You may lodge a complaint should you believe that any of your rights under Protection of Personal Information Act, 4 of 2013 have been violated and would like to inform us of any of your concerns.
- 6.2 The Company treats these complaints as confidential and will follow our internal POPIA complaints framework to address any and all complaints related to POPIA.
- 6.3 To lodge a complaint, please email the relevant business unit within the group to below:
 - 6.3.1 BetterHome Group: complaintsandqueries@betterhome.co.za
 - 6.3.2 BetterLife Origination Services: complaintsandqueries@betterhome.co.za
 - 6.3.3 BetterSure Financial Consultants: complaints@bettersure.co.za
- 6.4 As alternative, please reach out to the relevant Information Officer or Deputy Information Officer as per the below Annexure "A".
 - 6.4.1 Annexure A may be updated from time to time as required.

7 UNSUBSCRIBE / OPT-OUT

- 7.1 At any time, may you opt out of such communications by informing your consultant that you intend to opt-out in writing.
- 7.2 Please note that it may take up to thirty (30) days for us to process opt-out requests. If you opt out of receiving marketing and advertising emails from BetterHome, we will still send you emails about your home loan progress and any Services that you have requested or received from us.

Company	Information Officer	Deputy Information Officer
BetterHome Group Limited	Sugen Naidoo	James Gregory
BetterSure Financial Consultants (Pty) Ltd	Sugen Naidoo	Christo Stoman
BetterSure Insurance Brokers (Pty) Ltd	Sugen Naidoo	Christo Stoman
BetterLife Origination Services (Pty) Ltd	Sugen Naidoo	James Gregory
Business Venture Investments (Pty) Ltd	Sugen Naidoo	James Gregory
BetterLife Training Academy (Pty) Ltd	Beryl Sevell	James Gregory
PA Group Mortgage Alliance Fund (Ltd)	Sugen Naidoo	Ilze Koch
Resize Home Loans (Pty) Ltd	Sugen Naidoo	James Gregory
BlueDoor Investments (Pty) Ltd	Sugen Naidoo	Ilze Koch
Snappy Home (Pty) Ltd	Sugen Naidoo	James Gregory