



ORANGE REALTY (PTY) LTD

POPIA PRIVACY NOTICE

Orange Realty (Pty) Ltd ("Orange Realty", "we", "us" or "our") respects the privacy of the personal information entrusted to us by our clients, prospective clients, employees, property owners, buyers, sellers, landlords, tenants and other persons with whom we interact.

This Privacy Notice explains how Orange Realty collects, uses, stores, protects and shares personal information in accordance with the **Protection of Personal Information Act 4 of 2013 ("POPIA")**.

1. WHO WE ARE

Orange Realty (Pty) Ltd

Address:

64 Rae Frankel Street, Brackenhurst, South Africa

Information Officer

Estelle von Berg

Email: estelle@orangerealty.co.za

Telephone: 011 867 4272 **Cell:** 073 334 7142

Our Information Officer is responsible for overseeing Orange Realty's compliance with POPIA and dealing with privacy-related enquiries and requests.

2. WHAT PERSONAL INFORMATION DO WE COLLECT?

Depending on the services we provide and our relationship with you, we may collect information including:

- full names and surnames;
- identity or passport numbers;
- contact details;
- telephone and WhatsApp numbers;
- email addresses;
- physical and postal addresses;
- marital status where relevant to a transaction;
- employment information;
- financial information;
- banking details where legitimately required;
- FICA documentation;
- proof of address;
- property ownership information;
- property information;
- buyer or tenant application information;
- rental information;
- information contained in offers to purchase, leases and other agreements;
- correspondence and communications;

- photographs where relevant;
- information provided through property portals;
- information provided through our website;
- information relating to marketing preferences; and
- other information reasonably required to provide our services or comply with legal obligations.

We endeavour to collect only personal information that is reasonably necessary for the relevant purpose.

3. HOW DO WE COLLECT PERSONAL INFORMATION?

We may collect personal information directly from you or from legitimate sources, including:

- directly from you;
- telephone conversations;
- email;
- WhatsApp;
- our website;
- property portals such as Property24 and Private Property;
- property enquiries;
- buyer and tenant applications;
- sellers and property owners;
- referrals;
- estate agency transactions;
- contracts and agreements;
- transferring attorneys;
- bond originators;
- other authorised professional service providers; and
- publicly available information where lawfully permitted.

4. WHY DO WE COLLECT YOUR INFORMATION?

We may process personal information for legitimate purposes including:

Property sales

- marketing properties;
- arranging viewings;
- communicating with buyers and sellers;
- preparing offers to purchase;
- facilitating transactions;
- communicating with transferring attorneys;
- facilitating bond applications where authorised; and
- complying with legal requirements.

Rentals

- processing rental enquiries and applications;
- communicating with landlords and tenants;
- arranging viewings;
- preparing or facilitating lease agreements;
- conducting required verification; and
- managing the rental process.

FICA and legal compliance

We may collect and process personal information to comply with applicable legal and regulatory obligations, including FICA and other legislation applicable to estate agency activities.

General business purposes

We may also process personal information for:

- administration;
- accounting;
- payroll;
- auditing;
- record keeping;
- responding to enquiries;
- resolving disputes;
- maintaining business records;
- protecting our legitimate business interests; and
- complying with legal obligations.

5. PROPERTY PORTALS AND ONLINE ENQUIRIES

When you submit an enquiry through a property portal such as **Property24** or **Private Property**, the information you provide may be made available to Orange Realty for the purpose of responding to your enquiry and providing the requested property-related services.

Orange Realty will process such information in accordance with POPIA.

Where information is provided for a specific property enquiry, it will not automatically be treated as consent for unrelated marketing.

6. DIRECT MARKETING

Orange Realty may communicate with clients and prospective clients regarding properties, services, market information and other legitimate business communications.

Where POPIA requires consent for direct marketing, we will obtain the appropriate consent.

You may request that Orange Realty stop sending you direct marketing communications.

If you no longer wish to receive marketing communications, contact:

Estelle von Berg

Email: estelle@orangerealty.co.za

Telephone: **011 867 4272**

We will record your request and take reasonable steps to ensure that you are not contacted for the same marketing purpose again where required by law.

7. FICA INFORMATION

Where required by law, Orange Realty may collect and process information necessary for FICA and other compliance obligations.

This may include:

- identity documents;
- proof of address;
- company documents;
- trust documents;
- beneficial ownership information;
- financial information; and
- other information required for compliance purposes.

FICA information will be treated as confidential and will only be used or disclosed for lawful and legitimate purposes.

8. SHARING YOUR PERSONAL INFORMATION

Orange Realty may share personal information where reasonably necessary for the transaction, our services or legal compliance.

Depending on the circumstances, this may include sharing information with:

- transferring attorneys;
- bond originators;
- banks and financial institutions;
- landlords or property owners;
- buyers or sellers where legitimately required;
- tenants;
- property managers;
- body corporates;
- homeowners' associations;
- municipalities;
- SARS;
- auditors and accountants;
- payroll providers;
- IT and website service providers;
- CRM providers;
- regulatory authorities;
- professional advisers; and
- other authorised service providers.

We will take reasonable steps to ensure that personal information is only shared where there is a lawful basis for doing so.

9. SERVICE PROVIDERS AND OPERATORS

Orange Realty may appoint third-party service providers to assist us with our business operations.

These may include:

- auditors and accountants;
- payroll providers;
- transferring attorneys;
- bond originators;
- CRM providers;
- website providers;
- IT service providers;
- cloud-storage providers; and
- other professional or technical service providers.

Where a service provider processes personal information on behalf of Orange Realty, we will take reasonable steps to ensure that appropriate confidentiality and security obligations are in place.

10. INFORMATION SECURITY

Orange Realty takes reasonable technical and organisational measures to protect personal information against:

- loss;
- theft;
- unauthorised access;
- unauthorised disclosure;
- unlawful processing;

- accidental destruction; and
- other reasonably foreseeable risks.

Access to personal information is restricted to persons who require the information for legitimate business or legal purposes.

11. DATA SECURITY COMPROMISES

If Orange Realty becomes aware of a security compromise involving personal information, we will take reasonable steps to:

1. investigate the incident;
 2. contain and minimise the impact;
 3. assess the information affected;
 4. take appropriate remedial action; and
 5. comply with applicable POPIA notification requirements.
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12. RETENTION OF PERSONAL INFORMATION

Orange Realty will retain personal information only for as long as reasonably necessary for the purpose for which it was collected or where retention is required or permitted by law.

Our retention periods may differ depending on the type of information and the legal or business requirements applicable to it.

When personal information is no longer required and may lawfully be destroyed, Orange Realty will take reasonable steps to securely delete or destroy it.

13. YOUR RIGHTS

Subject to the provisions and limitations of applicable law, you may have the right to:

- request access to personal information held about you;
- request correction of inaccurate or incomplete information;
- request deletion of information where legally permissible;
- object to certain processing;
- object to direct marketing;
- withdraw consent where processing is based on consent; and
- lodge a complaint concerning the processing of your personal information.

Requests should be directed to our Information Officer.

14. REQUESTS FOR ACCESS OR CORRECTION

Requests relating to personal information should be submitted to:

Information Officer

Estelle von Berg

Email: estelle@orangerealty.co.za

Telephone: 011 867 4272

Cell: 073 334 7142

We may require reasonable proof of identity before processing certain requests in order to protect personal information from unauthorised disclosure.

Requests may also be subject to applicable legal limitations and requirements.

15. ACCURACY OF INFORMATION

Orange Realty takes reasonable steps to ensure that personal information in our possession is accurate, complete and not misleading.

We ask that you inform us if your personal information changes or if you become aware that information we hold about you is incorrect.

16. CHILDREN'S INFORMATION

Orange Realty does not intentionally collect personal information from children unless such processing is permitted by law and appropriate authorisation has been obtained where required.

17. CROSS-BORDER PROCESSING

Certain technology or service providers used by Orange Realty may store or process information outside South Africa.

Where personal information is transferred outside South Africa, Orange Realty will take reasonable steps to ensure that the transfer complies with the applicable requirements of POPIA.

18. CHANGES TO THIS PRIVACY NOTICE

Orange Realty may update this Privacy Notice from time to time to reflect:

- changes in legislation;
- changes to our business practices;
- changes to our technology or service providers; or
- guidance issued by the Information Regulator.

The latest version will be made available through the appropriate Orange Realty channels.

19. COMPLAINTS

If you believe that Orange Realty has processed your personal information unlawfully or has not adequately addressed a privacy concern, you should first contact our Information Officer:

Estelle von Berg

Email: estelle@orangerealty.co.za

Telephone: 011 867 4272 **Cell:** 073 334 7142

You may also lodge a complaint with the **Information Regulator** where appropriate.

20. ACKNOWLEDGEMENT

By providing personal information to Orange Realty, you acknowledge that you have had an opportunity to read this Privacy Notice and understand how Orange Realty may process your personal information.

Nothing in this Privacy Notice limits any rights or obligations provided for under POPIA or other applicable legislation.

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Effective Date: 27/07/2022

Last Review Date: 18/08/2026