PRIVACY POLICY

GUY GILLESPIE PROPERTIES (PTY) LTD

Effective date: 26 November 2026 | Last updated: 26 November 2026

1. Introduction

Guy Gillespie Properties (Pty) Ltd ("GGP", "we", "us" or "our") respects your privacy and is committed to protecting personal information. This policy explains how we collect, use, store, disclose and protect personal information in accordance with the Protection of Personal Information Act 4 of 2013 (POPIA) and other applicable South African laws. It applies to website visitors, buyers, sellers, landlords, tenants, rental applicants, prospective clients and other people interacting with our business.

2. Responsible Party and Information Officer

Responsible party: Guy Gillespie Properties (Pty) Ltd

Company registration number: 2014/037099/07

Information Officer: Guy Gillespie, Principal Director

Email: guy@ggproperties.co.za

Telephone: 083 740 3619

Website: www.ggproperties.co.za

Business address: 19 Empire Avenue, Hout Bay, Cape Town, Western Cape, South Africa.

Direct privacy enquiries to the Information Officer.

3. Personal Information We Collect

Depending on the relationship, we may collect names and contact details; identity numbers, passports and identification documents; residential and business addresses; employment and income details; bank statements, payslips and financial information; credit information and affordability assessments; property ownership and transaction information; company, trust and beneficial ownership details; information required for FICA verification; and information submitted by website, email, phone or WhatsApp. We seek to collect only information reasonably necessary for the stated purposes.

Sources of Personal Information

Guy Gillespie Properties generally collects personal information directly from the individuals concerned. Where reasonably necessary and permitted by law, we may also obtain personal information from third parties, including TPN and other credit or tenant screening providers, landlords, sellers, employers, conveyancing attorneys and other estate agencies or property practitioners.

Information obtained from these sources may include identity verification results, credit and affordability information, employment and income verification, property transaction details and information required for regulatory compliance.

Such information is processed only for lawful property-related, contractual, verification and regulatory purposes, in accordance with POPIA.

4. Purposes for Processing

Property sales: marketing properties, communicating with buyers and sellers, preparing offers and transaction records, verifying identities, meeting FICA duties and facilitating conveyancing.

Property rentals: processing applications, screening and credit checks, verifying income and affordability, preparing and managing leases, rent, deposits and arrears, and communicating with landlords and tenants.

Regulatory compliance: identity verification, sanctions and politically exposed person screening, beneficial ownership checks, legally required records and responses to lawful regulators.

General business: responding to enquiries, providing services, accounting, administration, website operations and lawful marketing.

5. Lawful Grounds for Processing

We process information where POPIA permits it, including where consent has been given, processing is necessary for a contract, required by law, protects a legitimate interest of the person concerned, or is necessary for a lawful legitimate interest of GGP or a third party. Consent is not required for every activity. Failure to supply information needed for FICA or a contract may prevent us from providing a service.

6. Tenant Screening and Verification

GGP uses third-party service providers, including TPN, for tenant screening, credit assessments, identity verification and regulatory checks. Depending on the application, checks may include credit bureau enquiries, identity and address verification, affordability, employment and income checks, and sanctions/PEP screening. Where required, appropriate consent or another lawful authorisation will be obtained.

7. Sharing Personal Information

Where reasonably necessary and lawful, we may share relevant information with parties to property transactions, conveyancers, legal representatives, TPN and other screening providers, credit bureaus, financial institutions, payment providers, accountants, auditors, regulators (including the Financial Intelligence Centre), and technology or storage providers. We do not sell personal information. We take reasonable steps to ensure operators processing data for us apply appropriate confidentiality and security safeguards.

8. Storage and Security

Guy Gillespie Properties maintains electronic client, FICA and property transaction records using Dropbox.

Computers and Dropbox accounts used to access these records are password-protected.

Authorised property practitioners have access to designated Dropbox folders where they upload and maintain client and transaction documents. Access permissions are restricted so that individual agents cannot access the confidential records of other agents.

The Principal Director and authorised administrative personnel have access to client records as required for operational management, regulatory compliance and oversight.

GGP takes reasonable technical and organisational measures to protect personal information against loss, unauthorised access, disclosure, alteration or destruction. Access permissions are managed according to operational requirements.

9. International Transfers

Guy Gillespie Properties uses Dropbox as its cloud storage provider for client, FICA and property transaction records.

Personal information stored through Dropbox may be transferred to, stored or processed in countries outside South Africa.

GGP takes reasonable steps to ensure that international transfers comply with Section 72 of POPIA, including ensuring that appropriate contractual or other lawful safeguards apply to the protection of personal information.

10. Retention of Information

We retain information for as long as necessary for the original purpose, or as required or permitted by law. Certain FICA records must generally be retained for at least five years from the applicable statutory starting date. Other records may be subject to different contractual, tax, accounting or regulatory periods. When retention is no longer justified, records will be securely destroyed, deleted or de-identified where legally permissible.

11. Marketing Communications

GGP may contact clients and prospective clients about properties and related services where lawful. We will obtain consent for unsolicited electronic direct marketing where required by POPIA. The existing-customer exception applies only where its legal conditions are met. Recipients can opt out at any time by contacting us or using an available unsubscribe method.

12. Website and Cookies

Our website may collect IP addresses, browser and device information, website usage data, cookies and details submitted through forms. We use this information to operate the website, respond to enquiries and improve functionality. Where consent is required for tracking, we will obtain it. Visitors can manage some cookies through browser settings.

13. Your POPIA Rights

Subject to applicable law, you may request confirmation of processing, access to information, correction of inaccurate information, deletion where permitted, or object to certain processing. You may withdraw consent where consent is the basis, object to direct marketing and complain to the Information Regulator. Requests should be sent to our Information Officer. We may verify identity before disclosing records. Legal retention obligations may limit deletion requests.

14. Security Compromises

Where we have reasonable grounds to believe personal information was accessed or acquired unlawfully, we will investigate and take appropriate action. Where POPIA requires it, we will notify the Information Regulator and affected individuals as soon as reasonably possible, subject to applicable legal provisions.

15. Access to Information — PAIA

GGP maintains a manual under the Promotion of Access to Information Act 2 of 2000 (PAIA), describing its records and how to request access. The manual is available through our website or from the Information Officer on request.

16. Complaints and Contact

Guy Gillespie, Information Officer

Guy Gillespie Properties (Pty) Ltd

Email: guy@ggproperties.co.za

Telephone: 083 740 3619

Information Regulator (South Africa)
POPIA complaints: POPIAComplaints@inforegulator.org.za
Website: www.inforegulator.org.za

17. Updates to This Policy

GGP may update this policy to reflect legal, operational or processing changes. The latest version will be published on our website.