

ENTRY PRO APP PRIVACY NOTICE

1. Introduction

This Privacy Notice explains how Entry Pro ("the Company", "we", "us" or "our") collects, uses, stores, shares and otherwise processes personal information in the course of providing access-control, visitor-management, estate security and related technology services.

The Company is committed to protecting personal information and processing such information lawfully, fairly and transparently in accordance with applicable data protection laws, including the Protection of Personal Information Act, 4 of 2013 ("POPIA"), and any other applicable privacy legislation.

2. Who We Are

Entry Pro (PTY) LTD

Registration Number: 2017/667340/07

Physical Address: Solutions House, 42 Gazelle Close, Corporate Park South

Email: support@entrypro.co.za

Telephone: 011 267 0720

Information Officer: Dave Adams & Elize van der Merwe

Information Officer Contact Details: dave@entrypro.co.za & elize@entrypro.co.za

3. Scope of this Notice

This Notice applies to:

- Residents of estates using our platform;
- Visitors to estates using our platform;
- Contractors and service providers accessing estates;
- Estate management personnel;
- Security personnel;
- Employees and prospective employees;
- Website users;
- Mobile application users; and
- Other individuals whose personal information is processed by the Company.

4. Personal Information We Collect

Depending on the services used, we may collect:

Identification Information

- Name and surname;
- Identity or passport number;
- Date of birth;
- Nationality;
- Resident or tenant information;
- Visitor information.

Contact Information

- Telephone number;
- Mobile number;
- Email address;

- Physical address.

Estate Access Information

- Visitor booking information;
- Access authorisations;
- Entry and exit records;
- Vehicle registration details;
- Estate access logs;
- Security event records.

Technical Information

- IP address;
- Device identifiers;
- Browser information;
- Application usage information;
- System logs.

Employment and Contractor Information

- Employment-related information;
- Contractor registration details;
- Service provider information.

CCTV and Security Information (Only related to LPR services)

Where applicable, CCTV footage, images, security incident reports and related security information may be processed for security, safety and incident-management purposes.

Special Personal Information

Where authorised by law and necessary for security, access-control or identity-verification purposes, we may process special personal information, including biometric information, where such systems are deployed and lawfully authorised.

5. Sources of Personal Information

We may obtain personal information directly from:

- Data subjects;
- Residents;
- Estate management;
- Security personnel;
- Visitors;
- Contractors;
- Service providers;
- Mobile applications;
- Websites;
- Access-control systems;
- CCTV systems (only related to LPR services); and
- Other lawful sources.

6. Purposes for Processing Personal Information

We process personal information for purposes that include:

- Visitor management;
- Access control;
- Estate security;

- Identity verification;
- Resident administration;
- Contractor management;
- Security monitoring;
- Incident investigation;
- Customer support;
- Service delivery;
- System administration;
- Fraud prevention;
- Cybersecurity;
- Legal and regulatory compliance;
- Contract management;
- Billing and administration;
- Business continuity and disaster recovery.

7. Lawful Grounds for Processing

Personal information is processed where:

- The data subject has consented;
- Processing is necessary to conclude or perform a contract;
- Processing complies with a legal obligation;
- Processing protects a legitimate interest of the data subject;
- Processing is necessary for the proper performance of a public-law duty; or
- Processing is necessary for our legitimate interests or those of our clients, provided such interests do not unreasonably override the rights of the data subject.

8. Disclosure of Personal Information

We may disclose personal information to:

- Residential estates;
- Homeowners' associations;
- Body corporates;
- Security service providers;
- Technology service providers;
- Cloud hosting providers;
- Professional advisers;
- Auditors;
- Insurers;
- Law-enforcement authorities;
- Regulators; and
- Other parties where disclosure is authorised or required by law.

We do not sell personal information or disclose any information to non-authorised entities/persons.

9. International Transfers of Personal Information

The Company operates cloud-based systems that may store or process personal information outside South Africa. Personal information may be transferred to, stored in or processed in the United States of America and other jurisdictions where authorised service providers operate.

The Company takes reasonable steps to ensure that appropriate contractual, technical and organisational safeguards are implemented to protect personal information and that any international transfer complies with applicable data

protection laws, including section 72 of POPIA and any applicable Botswana data protection requirements.

10. Security Safeguards

The Company implements reasonable technical and organisational measures designed to protect personal information against:

- Loss;
- Misuse;
- Unauthorised access;
- Unauthorised disclosure;
- Alteration; and
- Destruction.

Security measures may include access controls, authentication mechanisms, encryption, monitoring, logging, network security controls and staff confidentiality obligations.

11. Retention of Personal Information

Personal information is retained only for as long as reasonably necessary to:

- Fulfil the purposes for which it was collected;
- Comply with legal obligations;
- Resolve disputes;
- Enforce agreements;
- Meet operational and security requirements.

When information is no longer required, it will be securely deleted, destroyed, anonymised or de-identified where appropriate.

12. Rights of Data Subjects

Subject to applicable law, data subjects may have the right to:

- Request access to personal information;
- Request correction of inaccurate information;
- Request deletion where legally permissible;
- Object to certain processing activities;
- Withdraw consent where processing is based on consent;
- Lodge complaints with the relevant supervisory authority.

13. Cookies and Similar Technologies

Our websites and applications may use cookies, analytics technologies and similar tools to improve functionality, security and user experience.

Users may manage cookie preferences through their browser settings, where applicable.

14. Children's Information

Where personal information relating to minors is processed, such processing will occur only where authorised by law, by a competent person, or otherwise permitted under applicable legislation.

15. Complaints

Questions, requests or complaints relating to privacy may be directed to the Information Officer using the contact details provided above.

South African data subjects may also lodge a complaint with the Information Regulator.

16. Changes to this Notice

The Company may amend this Privacy Notice from time to time. Updated versions will be published on the Company's website and will become effective upon publication unless otherwise stated.

17. Contact Details

Telephone: 011 267 0720

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