



POPIA POLICY MANUAL AND COMPLIANCE FRAMEWORK
(Prepared in terms of Chapter 3 - Part A of the Protection of Personal Information Act, 2013 - POPIA)

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- 1. Introduction**

MANSHO is a short term bridging finance solutions Company. We provide a professional service with specific reference to the bridging finance market.

We assist with:

Short-term bridging finance for property buyers, sellers, agents and owners on property transactions. As the Responsible Party, MANSHO is committed to comply with The Protection of Personal Information (POPI) Act which requires us to:

- 1.1. Sufficiently inform applicants, hereafter referred to as applicants, the purpose for which we will process their personal information;
- 1.2. Protect our Information assets from threats, whether internal or external, deliberate or accidental, to ensure business continuation, minimize business damage and maximize business opportunities.

This policy and compliance framework establishes measures and standards for the protection and lawful processing of personal information within the Company and provides principles regarding the right of an individual to privacy and the reasonable safeguarding of their personal information.

All employees, subsidiaries, business units, departments and individuals directly associated with MANSHO are responsible for adhering to this policy and for reporting any security breaches or incidents to the Information Officer.

Any Service Provider that provides Information Technology services, including data storage facilities, to our organization must adhere to the requirements of the POPI Act to ensure Adequate protection of personal information held by them on our behalf. Written confirmation to this effect must be obtained from relevant service providers.

2. Purpose

The purpose of this policy is to inform applicants and enable MANSHO to:

- 2.1. Comply with the laws in respect of all personal information it holds about applicants;
- 2.2. Follow good practice;
- 2.3. Protect MANSHO's reputation;
- 2.4. Protect MANSHO from the consequences of a breach of its responsibilities;
- 2.5. Protect the applicants against loss or breach of their personal information.

3. Policy Principles

3.1. Accountability

- MANSHO will take reasonable steps to ensure that all personal information obtained from applicants is stored safely and securely.

- This includes all personal information that may be obtained for the purpose of applicant representation.

3.2. Processing Limitation

- MANSHO will collect personal information directly from applicants.
- MANSHO will obtain personal information from its website where applicants register and apply for our services.
- Once in our possession, MANSHO will only process or release applicant information with an applicant's consent, except where we are required to do so by law. In the latter case MANSHO will always inform the applicant.

3.3. Specific Purpose

- MANSHO collect personal information from applicants for validation and assessment purposes for the purpose of bridging finance services.

3.4. Limitation on Further Processing

- Personal information may not be processed further in a way that is incompatible with the purpose for which the information was collected initially. MANSHO collect personal information for assessment and validation purposes. It will only be used for this purpose.

3.5. Information Quality

- MANSHO is responsible for ensuring that applicant information is complete, up to date and accurate before use. This means that it may be necessary to request applicants, from time to time, to update their information and confirm that it is still relevant. If we are unable to reach a applicant for this purpose their information will be deleted from our records.

3.6. Transparency/Openness

- Where personal information is collected from a source other than directly from a applicant (EG Social media, etc.) MANSHO is responsible for ensuring that the applicant is aware:
 - That their information is being collected;

- Who is collecting their information by giving them our details;
- Of the specific reason for the collection of their information.

3.7. Security Safeguards

- MANSHO will ensure technical and organisational measures to secure the integrity of personal information.
- Guard against the risk of loss, damage or destruction thereof. Personal information must also be protected against any unauthorised or unlawful access or processing.
- MANSHO is committed to ensuring that information collected is only used for legitimate purposes with applicant consent and only by authorised employees of our agency.

3.8. Participation of Individuals

- Applicants are entitled to know the particulars of their personal information held by MANSHO, as well as the identity of any authorised employee of our Company that has access thereto.
- Applicants are entitled to correct any information at any time.
- Applicants are entitled to request MANSHO to remove their information from its records at any time.

4. Operational Considerations

4.1. Monitoring

- Management and the Information Officer are responsible for administering and overseeing the implementation of this policy and, as applicable, supporting guidelines, standard operating procedures, notices, consents and appropriate related documents and processes.
- All employees, subsidiaries, business units, departments and individuals directly associated with MANSHO are to be trained, according to their functions, in the regulatory requirements, policies and guidelines that govern the protection of personal information.
- MANSHO will conduct periodic reviews and audits, where appropriate, to ensure compliance with this policy and guidelines.

4.2. Operating controls

MANSHO will establish appropriate standard operating procedures that are consistent with this policy and regulatory requirements. This will include:

- Allocation of information security responsibilities.
- Incident reporting and management.
- User ID addition or removal.
- Information security training and education.
- Data backup.

5. Storage of Information

MANSHO makes use of a cloud storage service and the server which holds our information is based in the USA. In terms of Section 72 of the POPIA, MANSHO must adhere to the following conditions:

- The recipient of the information (cloud service) is subject to a law which regulates trans-border information flow and personal information in a way which is substantially similar to POPIA;
- MANSHO must obtain a applicant's consent;
- MANSHO must inform a applicant where his/her information is stored.

The cloud services utilized by MANSHO is fully compliant with The General Data Protection Regulation (GDPR) which is globally recognized. The GDPR is a unified framework of data privacy rules which is similar to that of the POPIA and it imposes strict regulations on how organizations collect, store and manage personal information.

The cloud service has a dedicated team of security experts who constantly monitors and improves its security policies to help protect data in line with the provisions of the GDPR. MANSHO's data is stored on their USA servers for as long as we need and we have the ability to the complete removal of information at any moment in time.

6. Company and Information Officer Details

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The Information Officer is responsible for:

- Conducting a preliminary assessment;
- The development, implementation and monitoring of this policy and compliance framework;
- Ensuring that this policy is supported by appropriate documentation;
- Ensuring that documentation is relevant and kept up to date;
- Ensuring this policy and subsequent updates are communicated to relevant consultants, representatives and associates, where applicable.

7. Policy Compliance

Any breach of this policy may result in disciplinary action and possible termination of employment.