



Privacy Policy for Service Index SA

Effective Date: 29th October 2025

Review Date: 28th October 2026

Service Index SA is a registered property managing agent, facilities management and consulting services business committed to protecting personal information as governed by the Protection of Personal Information Act, No. 4 of 2013 ("POPIA"), the Promotion of Access to Information Act, No. 2 of 2000 ("PAIA"), and the POPIA Code of Conduct for housing associations and community schemes.

This Privacy Policy explains how we collect, use, protect, and disclose personal information and your rights regarding such information. It also incorporates any relevant elements of the POPIA code of conduct that governed by the Residential Communities Council (RCC) and the Residential Communities Industry (RCI) which forms part of our core service provision.

1. Scope of the Privacy Policy

This Privacy Policy applies to all personal information processed by Service Index SA during the normal course of business, including their property management services provided to private clients, commercial clients, body corporates, homeowners' associations (HOAs), housing associations, and community schemes. It also includes all other business services such as Facilities Management Services, Consulting or Coaching services, Resources Supply, Conference, Tours and Events Services.

This Privacy Policy applies to:

- All personal information processed by Service Index SA, including data related to our clients, suppliers, employees, homeowners' associations (HOAs), body corporates, and community schemes.
- Information collected through our website, emails, forms, and other interactions with clients, suppliers, residents, and other stakeholders.

2. Details of Personal Information Processed

We adhere to POPIA code of conduct and the requirements related to RCC and RCI which govern community schemes and associations. When dealing working on behalf of any Body Corporates or HOA or Schemes we establish agreements or contracts to work as a third-party service provider or operator to their scheme. We have implemented complaints processes and procedures to comply. We do not hold special information unless related to working or employment industry related medical requirements and this is requested by consent and is not automatically collected. We do not request or hold information on children unless a business need required this and we will request explicit consent for this.

Consent is implied through virtue of our contracts and client or stakeholders' engagement with our organisation. Consent may be withdrawn by emailing the information officer whose details are in this document. As part of our services, we work with 3rd party suppliers and on behalf of organisations and community schemes whereby we property owners, visitors and contractors' information may be shared as necessary and in conjunction with the scheme or organisation rules and regulations. Biometrics may also be part of the schemes rules which form part of the personal information collected by consent. We ensure quality through our processes and procedures and



comply with POPIA code conduct steps to address privacy requirements and safeguarding. Any information that is to be used for any other purpose than that of our course of our business will only be done with prior consent of the individual or consent from the regulatory authority. Where transborder of information is required, we will ensure the other parties have appropriate privacy and POPIA cultures.

We may collect and process the following personal information:

- Names and surnames, including family members and children.
- Address details, including residential addresses and postal addresses.
- Contact information, including email addresses and telephone numbers.
- Vehicle identification or medical or educational details.
- Bank details and financial transaction records.
- **Identification details**, such as ID numbers, passport numbers, or tax identification numbers.
- **Financial Information**: Banking details, transaction histories, and payment records.
- **HOA/Community Scheme Data**: Records of property ownership, participation in community schemes, and contributions to levies.
- **Regulatory Information**: Identification or tax numbers required for compliance with legal obligations.
- **Communication Data**: Emails, correspondence, and meeting minutes related to property management.

3. Purpose for Processing Personal Information

We process personal information for the following purposes:

- Verifying identification, credit worthiness, education for security and vetting purposes.
- Carrying out contractual obligations between contractors, clients, HOAs, and data subjects.
- Notifying data subjects of changes to services.
- Detecting and preventing and reporting fraud, crime, terrorism financing or proliferation, money laundering or malpractices.
- Conducting satisfaction surveys for statistical and analytical purposes.
- Facilitating audit and record-keeping requirements.
- Managing legal proceedings and complying with legal and regulatory obligations.
- Disclosing personal information in the normal course of business to third-party service providers involved in delivering products and services to us or our clients. Agreements will be in place to ensure such parties comply as operators under POPIA.
- Protecting the rights of the business and HOA/Body Corporate Schemes and clients as required.



4. Parties to Whom Personal Information May Be Disclosed

We may disclose your personal information to:

- HOA boards, trustees, or representatives.
- Contractors and service providers performing work on behalf of HOAs or data subjects.
- Legal and regulatory bodies to comply with statutory requirements.
- Auditors, accountants, and professional advisors.
- Security personnel or third parties for fraud detection and prevention.
- Employees of the company in line with company levels of authorities and delegations.

5. Securing Personal Information

- We take appropriate technical and organisational measures to protect personal information. This includes

including:

- Storing physical records in locked cupboards as secure files.
- Utilising Microsoft's secure software as our primary data storage provider, with access controlled through passwords and authentication mechanisms.
- Restricting access to personal information to authorised personnel only.
- Conducting regular reviews and audits to ensure compliance with data security best practices.
- Employing secure communication channels to transmit sensitive data.

6. Retention and Disposal of Personal Information

We retain personal information only as long as necessary to fulfil the purposes outlined in this Privacy Policy or to comply with legal obligations. Retention periods vary depending on applicable legislation, as detailed in our Record Retention Schedule. See Annexure 'A'.

When no longer required, information will be securely destroyed through physical shredding or permanent deletion.

7. Access to Personal Information

To access your personal information or report a security compromise please any queries as a written request to our Information Officer whose details are below. Access will be granted through secure communication channels after verifying your identity. Any security concerns will be promptly dealt with.

8. Response to Incidents



We have processes in place to investigate and respond to data breaches or incidents involving personal information. If a breach occurs, affected data subjects and regulatory bodies will be notified as required under POPIA.

9. Records Retention Schedule

Our retention periods align with applicable legal and regulatory requirements. A schedule detailing these periods is available upon request, covering time frames for keeping records related to personal, financial, and contractual information. See attached Annexure 'A'

10. Your Rights

Under POPIA, you have the following rights:

- Access: Request access to the personal information we hold.
- Correction: Request corrections to inaccurate information.
- Deletion: Request deletion of information no longer required.
- Objection: Object to processing based on legitimate grounds.

To exercise these rights, contact the Information Officer using the details provided below.

11. Contact Information

Information Officer

Service Index SA

Luanne Hall

Email: info@serviceindex.co.za


Phone: 021 300 8271

12. Updates to This Privacy Policy

By engaging with Service Index SA, you acknowledge that you have read and understood this Privacy Policy and agree to the processing of your personal information as outlined.

Note: This policy will be reviewed from time to time and adapted to include specific procedural references from our existing policy and procedures to ensure complete alignment with legislation and regulation. We may update this policy periodically. Any changes will be communicated through our website and will include an updated effective date.

Signed at Blouberg on 29th Date of October 2025

Signature  Name Luanne Hall

Record Retention Schedule

Record Category	Record Type	Retention Period	Retention Justification	Storage Format	Responsible Party
Corporate Governance	Company registration documents, bylaws, BEE certificate, Board meeting minutes, resolutions	Permanent	Legal and operational compliance	Digital & Physical	Company Secretary
	Company records and returns CIPC	7 years	Legal requirement and historical reference	Digital & Physical	Company Secretary
Financial Records	Annual financial statements	7 years	South African Revenue Service (SARS) regulations	Digital & Physical	Finance Department
	Tax returns, VAT records	7 years	SARS compliance	Digital & Physical	Finance Department
	Payroll records, employee tax certificates	5 years	SARS and Department of Labour requirements	Digital & Physical	HR Department
Property Management	Client property ownership, tenant and contractors information	Duration of contract + 5 years	Legal and operational needs	Digital & Physical	Property Management Team
	Maintenance logs, contractor agreements	Duration of contract + 5 years	Legal and client obligations	Digital & Physical	Facilities Manager
Homeowners & Residents Records	Client information such levies and property ownership information required by schemes	Use + 6 years	Guided by Sectional Title Scheme Management Act (STSMa)	Digital & Physical	Portfolio Manager
	Communication Records	Use + 6	STSMa	Digital & Physical	Portfolio Manager
Client Records	Client agreements, contact details	Duration of relationship + 7 years	Compliance with POPIA*	Digital & Physical	Client Services Team
	Client complaints and resolutions	3 years	Legal risk management	Digital & Physical	Client Services Team
Human Resources	Employee contracts, performance reviews	Duration of employment + 5 years	CCMA** and Labour Law compliance	Digital & Physical	HR Department
	Training records, certifications	Duration of employment + 2 years	Operational and compliance	Digital & Physical	HR Department
Marketing & Communications	Marketing materials, campaigns	3 years	Operational needs	Digital & Physical	Marketing Team
	Client feedback, surveys	2 years	Trend analysis and service improvement	Digital & Physical	Marketing Team
Events & Tours	Event contracts, itineraries	Duration of event + 5 years	Legal and operational requirements	Digital & Physical	Events Team
	Vendor agreements	Duration of contract + 5 years	Contractual compliance	Digital & Physical	Events Team
Legal Records	Contracts, agreements	Duration of contract + 7 years	Legal obligations	Digital & Physical	Legal Team
	Litigation files	Until case closed + years	Legal and risk mitigation	Digital & Physical	Legal Team

This table ensures Service Index SA complies with South African legal and operational standards while safeguarding its business integrity.