

PRIVACY POLICY

1. IN2ASSETS GROUP OF COMPANIES

1.1. The In2assets Group of Companies (“**In2assets Group**”) includes:

- 1.1.1. In2assets Properties (Pty) Ltd (2001/018431/07);
- 1.1.2. In2assets Marketing (Pty) Ltd (2019/420813/07) t/a Capx2; and
- 1.1.3. In2assets Legal (Pty) Ltd (2011/000231/07).

2. INTRODUCTION AND SCOPE

- 2.1. In2assets Group (“**we**”, “**us**”, “**our**”) strives to ensure that our use of the Personal Information of data subjects is lawful, reasonable, and relevant to our business activities, with the ultimate goal of improving your experience.
- 2.2. In2assets Group have appointed an Information Officer(s) responsible for overseeing questions in relation to this Privacy Policy. You may contact our Information Officer(s) at popia@in2assets.com to discuss this Privacy Policy, your rights under data protection laws applicable to you, and to raise any complaints with us. Further contact information and contact forms are available in our PAIA Manual.
- 2.3. We collect Personal Information about you when you:
 - 2.3.1. contract with us for our services (including property sales, auctioneering services, marketing services and legal services); and/or
 - 2.3.2. access our Website, applications or related online portals (including the Capx2 commercial property portal); and/or
 - 2.3.3. contact us, or otherwise interact with us; and/or
 - 2.3.4. join In2assets Group as a broker, sales associate, or employee.

(collectively "**our Services**").

- 2.4. This Privacy Policy explains how we will treat your Personal Information whether provided by you to us or collected by us through other means in your ordinary use of our Services, and our Website. This Privacy Policy describes our approach and practices in respect of your Personal Information and our treatment thereof.
- 2.5. By using this Website, you are subject to the terms and conditions of this Privacy Policy.
- 2.6. By using this Website and/or providing us with your Personal Information, you:
 - 2.6.1. agree to this Privacy Policy and authorise us to process such information as set out herein; and
 - 2.6.2. authorise In2assets Group, its Associates our Service Providers and other third parties to Process your Personal Information for the purposes stated in this Privacy Policy.
- 2.7. This Privacy Policy must be read together with our Website terms and conditions and any other documents, agreements or privacy notices that describe the manner in which we, in specific circumstances, collect or process Personal Information about you. This will enable you to understand how In2assets Group will process your Personal Information.
- 2.8. This Privacy Policy supplements such other documents and agreements, but shall not supersede them and in the event of a conflict, the terms of the particular document or agreement will prevail.

3. WHAT PERSONAL INFORMATION DO WE COLLECT?

- 3.1. In2assets Group may collect, acquire, receive, record, organise, collate, store, update, change, retrieve, read, process, analyse, use and share your Personal Information in the manner as set out in this Privacy Policy. When we perform one or more of these actions, we are "**Processing**" your Personal Information.

- 3.2. **"Personal Information"** refers to private information about an identifiable natural or juristic person. Personal Information does not include information that does not identify a person or anonymized information.
- 3.3. The Personal Information we collect may differ according to the Services you receive from In2assets Group. We may process various categories of Personal Information as follows:
- 3.3.1. **Identity Information**, which includes information concerning your name, company name, marital status, title, date of birth, gender, race and legal status, education background, languages, copies of your identity documents or passport, photographs, identity number, and professional registration number;
 - 3.3.2. **Contact Information**, which includes your billing address, delivery addresses, physical address, email address and telephone numbers;
 - 3.3.3. **Credit Information** including credit history;
 - 3.3.4. **Financial Information**, which includes bank account details, insurance information, financial statements, VAT registration numbers;
 - 3.3.5. **Instruction/mandate Information**, which includes details of individuals instructing In2assets Group, Personal Information included in correspondence, documents or evidence materials that we process in the course of providing our Services;
 - 3.3.6. **Location Information**, which includes data identifying the actual location of your physical address using GPS data and geocodes, information regarding features of immovable property only to the extent that an identifiable person can be linked to such features, seller's name, physical address, email address and telephone number;
 - 3.3.7. **Technical Information**, which includes your internet protocol (IP) address, your login data, browser type and version, time zone setting and location,

browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access our Website.

3.3.8. **Usage Information**, which includes information as to your access to and use of our Website, products and services;

3.3.9. **Marketing and Communications Information**, which includes your preferences in respect of receiving marketing information from us and your communication preferences.

3.4. In2assets Group also processes, collects, stores and/or uses aggregated data, which may include historical or statistical data ("**Aggregated Data**") for any purpose. Aggregated Data is not considered Personal Information as this data does not directly or indirectly reveal your identity. However, if we combine or connect Aggregated Data with your Personal Information in a manner that can identify you, we will treat the combined data as Personal Information, which will be managed in accordance with this Privacy Policy.

4. SPECIAL PERSONAL INFORMATION

4.1. Where we need to process your Special Personal Information, we will do so in the ordinary course of our business, for a legitimate purpose, and in accordance with applicable laws.

5. HOW WE COLLECT PERSONAL INFORMATION?

5.1. You directly provide In2assets Group with most of the Personal Information we process. We collect and process Personal Information in the following ways, namely:

5.1.1. through direct or active interactions with you;

5.1.2. in the course of providing our Services to you or your organisation;

5.1.3. when you register to use any of our Services including but not limited to newsletters, seminars and property sale updates;

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- 5.1.4. through automated or passive interactions with you; and
- 5.1.5. from third parties.

5.2. Direct or active collection

- 5.2.1. We may require that you submit certain information to enable you to access portions of our Website, to make use of our services, to facilitate the negotiation and conclusion of an agreement with us, or that is necessary for our compliance with our statutory or regulatory obligations.
- 5.2.2. We also collect Personal Information when you communicate directly with us. For example:
 - (a) Via email, meetings and telephone calls;
 - (b) When you fill in forms or registers, or register online or place a purchase order for any of our products or services;
 - (c) When you voluntarily complete a customer survey, provide feedback or ask for marketing information to be sent to you.
- 5.2.3. If you contact us, we reserve the right to retain a record of that correspondence, which may include Personal Information.
- 5.2.4. The Personal Information we collect from you may include any of the categories listed in paragraph 3 above.

5.3. Passive (automated) collection

- 5.3.1. In2assets Group may passively collect certain categories of your Personal Information from the devices that you use to access and navigate our Website or to make use of our services (“Access Devices”) using server logs and your browser’s cookies.
- 5.3.2. The categories of Personal Information we passively collect from your Access Device may include your:

- a) Technical Information;
- b) Usage Information;
- c) Marketing and Communications Information; and/or
- d) Any other Personal Information which you expressly permit us, from time-to-time, to passively collect from your Access Device.

5.4. Indirect collection (from third parties)

5.4.1. In2assets Group may also receive your personal information indirectly from, among others, the following sources (including public parties):

- a) our information technology suppliers;
- b) from other Responsible Parties where we act as outsourced processors (“**Operators**”) in performing our Services;
- c) our subsidiaries within the In2assets Group for legitimate business purposes, in accordance with applicable laws;
- d) law enforcement;
- e) Credit bureaus (with your consent, where required by law).

5.4.2. When we collect your Personal Information from third parties it is either because you have given us express consent to do so, your consent was implied by your actions, or

5.4.3. because you provided consent, either explicit or implicit, to the third party that provided this information to us.

6. HOW WE USE YOUR PERSONAL INFORMATION

6.1. We Process your Personal Information in the ordinary course of the business of providing our Services.

- 6.2. We use the Personal Information we collect to maintain and improve our Website and to improve the experience of its users, and to facilitate the provision of our Services to you, and to comply with our statutory and regulatory obligations.
- 6.3. We use your Personal Information only for the purpose for which it was originally collected. We only use your Personal Information for a secondary purpose only if such purpose constitutes a legitimate interest and is closely related to the original purpose for which the Personal Information was collected
- 6.4. In2assets Group collects and processes your Personal Information so that we can:
- 6.4.1. provide products and services you request (such as sales & auctioneering services, digital services, marketing services, agency and brokerage services, property management and procurement services, secretarial services, and related services);
 - 6.4.2. process and collect payment for services rendered;
 - 6.4.3. provide customer support and respond to and communicate with you about your requests, questions and comments, including to connect you with a In2assets Group brokerage, letting or sales associate;
 - 6.4.4. With your consent (where required by law), to personalise your experience on our Website, applications and online portals, and to deliver our content, products and our service offerings relevant to your interests, including
 - 6.4.5. targeted offers on new properties for sale or rent, marketing and advertisements through our Website, third-party sites, and via email or texts;
 - 6.4.6. establish, manage, customise and secure your account with In2assets Group;
 - 6.4.7. process claims we receive in connection with our services;
 - 6.4.8. communicate with you and retain a record of our communications with you and your communications with us;

- 6.4.9. detect, prevent, manage and protect against actual or alleged fraud, security breaches, misuse, and other prohibited or illegal activity, claims and other liabilities;
- 6.4.10. protect our rights in any litigation that may involve you;
- 6.4.11. comply with our regulatory reporting obligations, including submissions to the Financial Intelligence Centre, Estate Agency Affairs Board, Financial Sector Conduct Authority and/or the Prudential Authority and/or the South African Reserve Bank and/or local municipal authorities;
- 6.4.12. analyse and compare the types of Access Devices that you and other users make use of when visiting our Website;
- 6.4.13. for other lawful and legitimate purposes that are relevant to our business activities or regulatory functions.
- 6.4.14. conduct In2assets Group's recruitment and hiring process, which includes conducting criminal record and credit checks, referrals, capturing job applicant's details and providing status updates to job applicants.
- 6.4.15. operate, evaluate and improve our business units, including:
- (a) developing new products and services;
 - (b) managing our communications;
 - (c) determining the effectiveness of our sales, marketing and advertising;
 - (d) analysing and enhancing our products, Services, websites and apps;
 - (e) maintaining the safety, security and integrity of our Website, products and services, databases, networks and other technology assets, and business;
 - (f) performing accounting, auditing, invoicing, procurement, reconciliation and collection activities; and
 - (g) improving and maintaining the quality of our customer service;
- 6.4.16. for the purpose otherwise described to you when collecting your Personal Information, or as otherwise outlined in POPIA.

6.5. In2assets Group will not collect additional categories of Personal Information or use the Personal Information we collected for materially different, unrelated, or incompatible purposes without providing you notice

7. LEGAL BASIS FOR COLLECTING AND PROCESSING INFORMATION

7.1. We will only collect and process your Personal Information where:

- 7.1.1. You have provided us with your consent (as permitted by law);
- 7.1.2. To perform in terms of a contract with you;
- 7.1.3. To protect your legitimate interests;
- 7.1.4. To pursue In2assets Group's legitimate interests, including:
 - (a) providing services to and managing our relationship with existing customers;
 - (b) fraud and financial crime detection and prevention
 - (c) information, system, network, and cybersecurity;
 - (d) general corporate operations and due diligence;
 - (e) complying with a legal obligation and/or defending against legal claims.

8. COMPULSORY PERSONAL INFORMATION AND CONSEQUENCES OF NOT SHARING WITH US

8.1. Where In2assets Group is required to process certain Personal Information by law, or in terms of a contract that we have entered into with you, and you fail to provide such Personal Information when requested to do so, In2assets Group may be unable to perform in terms of the contract in place or are trying to enter into with you. In such a case, In2assets Group may be required to terminate the contract and/or relationship with you, upon due notification to you, which termination shall be done in accordance with the terms of that contract and any applicable legislation.

9. SHARING OR DISCLOSURE OF PERSONAL INFORMATION

- 9.1. We will not intentionally disclose your Personal Information, whether for commercial gain or otherwise, other than with your permission or in accordance with this Privacy Policy.
- 9.2. We may disclose your Personal Information to our Service Providers and Associates for legitimate business purposes, in accordance with applicable law and subject to applicable professional and regulatory requirements regarding confidentiality.
- 9.3. In addition, may disclose your Personal Information:
- 9.3.1. where it is necessary for the purposes of, or in connection with, actual or threatened legal proceedings or establishment, exercise or defence of legal rights;
 - 9.3.2. affiliated In2assets Group real estate brokers and, sales and letting associates;
 - 9.3.3. With our contracted agents, advisers, consultants, Service Providers, suppliers, banking partners and other Operators who process Personal Information on our behalf and whose assistance we require to conduct our business operations and that:
 - (a) have agreed to be bound by this Privacy Policy and our Data Protection Policy or by similar terms offering a similar level of protection;
 - (b) where such Personal Information is necessary for the performance of their obligations to or on behalf of In2assets Group (i.e., records storage, or legal advice); and
 - (c) based on our instructions, are not authorised by us to use or disclose the information except as strictly necessary to perform the services on our behalf as instructed or to comply with legal requirements.

- 9.3.4. With third party Operators to the extent that they require such specific Personal Information in the provision of services for or to us, which include hosting, development and administration, technical support and other support services relating to our Website and/or the operation of In2assets Group's business divisions. We will only authorise the processing of any Personal Information by a third party Operator on our behalf by, among others, entering into agreements with those third parties governing our relationship with them and highlighting confidentiality, security and non-disclosure obligations;
- 9.3.5. If required by law;
- 9.3.6. to enable us to enforce, implement, or apply any other contract between you and us, or any contract where we act as an agent of the principal contracted with you (i.e. a seller or body corporate);
- 9.3.7. to mitigate any actual or reasonably perceived risk to us, our customers, employees, contractors, agents, brokers or any other third party;
- 9.3.8. to any relevant third party acquirer(s), in the event that we sell or transfer all or any portion of our business or assets (including, but not limited to, in the event of a reorganization, dissolution or liquidation);
- 9.3.9. With governmental agencies, exchanges and other regulatory or self-regulatory bodies, if required to do so by law or there is a reasonable belief that such is necessary for:
- (a) compliance with the law or with any legal process;
 - (b) the protection and defence of the rights, property or safety of In2assets Group, our customers, employees, contractors, suppliers, services providers, agents, brokers or any third party;
 - (c) the detection, prevention and management of actual or alleged fraud, security breaches, technical issues, or the misuse or unauthorized use of the Website and any other contravention of this Privacy Policy;

- (d) the protection of the rights, property or safety of members of the public (if you provide false or deceptive information or make misrepresentations, we may proactively disclose such information to appropriate regulatory bodies);

9.3.10. With the credit bureaux for certain specified information, as allowed in terms of the law.

9.4. While providing sales, letting, agency, brokerage, auctioneering, marketing, property management, procurement, legal and/or related services we may obtain, use, and disclose Personal Information about our customer's customers. In these instances, we process the Personal Information in accordance with this Privacy Policy unless specifically agreed otherwise with our customer.

10. STORAGE AND TRANSFER OF PERSONAL INFORMATION

10.1. We store your Personal Information on our servers and on the servers of the cloud-based database management services we engage. These servers and cloud storage run in secure data centres located in South Africa.

10.2. We reserve the right to transfer to and/or store your Personal Information on servers in a jurisdiction other than where it was collected, or outside of South Africa in a jurisdiction that may not have comparable data protection legislation; Provided that if the location does not have substantially similar laws to those of South Africa, we will take reasonably practicable steps, including the imposing of suitable contractual terms to ensure that your Personal Information is adequately protected in that jurisdiction.

11. SECURITY AND INTEGRITY

11.1. We take all reasonable technical and organisational measures to secure the integrity of retained information and protect it from misuse, loss, alteration, and destruction through the use of accepted technological standards that prevent unauthorised access to or disclosure of your Personal Information. **Unfortunately, despite our best efforts, no data transmission or storage can be guaranteed to be 100%**

secure. Therefore, we do not make any warranties or guarantees that content shall be entirely 100% secure nor do we accept any liability of whatsoever nature for any unauthorised or unlawful disclosure and/or use of your personal information, either by employees and/or agents and/or made by third parties (including third-party service providers) who are not subject to our control, unless such disclosure and/or use is as a result of our gross negligence. However, we are subject to the Protection of Personal Information Act 4 of 2013, which we comply with.

- 11.2. Access to our servers and the servers of the cloud-based database management services is restricted to authorised personnel. These servers and cloud storage
- 11.3. implement best security practices and are ISO 27001 certified for information security management.
- 11.4. Personal Information including banking details, name and addresses are encrypted as it is transmitted over the internet using SSL. In2assets Group's internet servers are also protected by firewalls and access to personal information is limited to minimal authorised personnel of In2assets Group. The security of the In2assets Group's Website and systems is also tested on a regular basis, and every effort is made to ensure that security is at an optimum level at all times.
- 11.5. When processing payment card details, In2assets Group complies with the applicable Payment Card Industry Data Security Standard (PCI-DSS standard).
- 11.6. We periodically review our Personal Information collection, storage and processing practices, including physical and digital security measures.
- 11.7. In2assets Group has established and implemented data breach management procedures to address actual and suspected data breaches and will notify you and the relevant regulatory authorities of breaches where In2assets Group is legally required to do so and within the period in which such notification is necessary.

12. RETENTION AND DELETION

12.1. In2assets Group may retain and process some or all of your Personal Information if and for as long as:

12.1.1. we are required or permitted by law, or contract with you, to do so;

12.1.2. it is for lawful purposes that are related to our performance of our obligations and activities; or

12.1.3. you agree to us retaining it for a specified further period.

12.2. Unless there is a lawful purpose for In2assets Group to continue processing or storing your Personal Information, we will delete your Personal Information in the following circumstances:

12.2.1. the Personal Information is no longer necessary for the purpose for which it was collected or processed; or

12.2.2. you withdraw your consent to the processing of your Personal Information; or

12.2.3. you object to the processing of your Personal Information; and

12.2.4. there are no other lawful grounds for us to continue processing your Personal Information.

12.3. We determine the appropriate retention period for Personal Information by considering, among other things, the nature and sensitivity of the Personal Information, the potential risks or harm that may result from its unauthorised use or disclosure, the purposes for which we process it and whether those purposes may be achieved through other means. In2assets Group will always comply with applicable legal, regulatory, tax, accounting, labour, or other requirements as they apply to the retention of Personal Information.

12.4. We will delete your data using effective methods including, among others, shredding.

13. MAINTENANCE, CORRECTIONS AND ACCESS

13.1. We are required to take all necessary steps to ensure that your Personal Information is accurate, complete, not misleading and up to date.

13.2. Anyone about whom we maintain Personal Information may request to inspect and, if appropriate, correct the Personal Information held by us. It is your responsibility to inform us, or the persons responsible for the maintenance of your Personal

13.3. Information, should your Personal Information be incorrect, incomplete, misleading or out-of-date by notifying us at contact details in paragraph 2.2 above. We may require additional information from the requesting party to assure itself of the legitimate basis for the request and the identity and authority of the requestor. Upon receipt and verification of the corrected Personal Information, we will adjust our data or records accordingly.

13.4. A request for correction/deletion of Personal Information or destruction/deletion of a record of Personal Information must be submitted using the prescribed Form 2 which is available in our Promotion of Access to Information Manual and the Information Regulator's website.

14. YOUR DATA PROTECTION RIGHTS

14.1. Data protection laws may grant you with, among others, the following rights:

14.1.1. **Request access to your Personal Information** – enabling you to receive a copy of the Personal Information retained about you;

14.1.2. **Request the correction of your Personal Information** – to ensure any incomplete or inaccurate Personal Information is corrected;

14.1.3. **Request erasure of your Personal Information** – where there is no lawful basis for the retention or continued processing of your Personal Information;

- 14.1.4. **Object to the processing of your Personal Information for a legitimate interest (or those of a third party)** - under certain conditions where you feel it impacts your fundamental rights and freedoms;
- 14.1.5. **Request restriction of processing of your Personal Information** – to restrict or suspend the processing of your Personal Information to limited circumstances;
- 14.1.6. **Withdraw consent given in respect of the processing of your Personal Information at any time** – withdrawal of consent will not affect the lawfulness of any processing carried out prior to your withdrawal notice. But may not affect the continued processing of your Personal Information in instances where your consent is not required.

14.2. If an above request/objection is to be made, please use the contact information at paragraph 2.2 above and we will revert within 30 calendar days.

15. **DIRECT MARKETING**

- 15.1. In2assets Group would like to send you information about In2assets Group's product and service offerings we believe may be of interest to you.
- 15.2. If you have agreed to receive direct marketing, you may opt-out at any stage.
- 15.3. You have the right to, at any time, to stop In2assets Group or any of its member entities from contacting you for direct marketing purposes or sharing your Personal Information to other members of our In2assets Group of Companies.
- 15.4. If you no longer wish to be contacted for direct marketing purposes, please email optout@in2assets.com
- 15.5. Once you have chosen to opt-out, we may send you written confirmation of receipt of your opt-out request (which may be in electronic form), and we will thereafter not send any further direct marketing communication to you. However, you may continue to receive communication from In2assets Group on matters of a regulatory nature, which are not marketing related.

16. CHILDREN

16.1. Our Website and In2assets Group's services are not targeted at people under the age of 18. We will not knowingly collect Personal Information in respect of persons in this age group without express permission to do so.

17. THIRD-PARTY SUB-PROCESSORS/OPERATORS

17.1. In2assets Group uses external processors ("**Operators**") for certain processing activities and to assist in the delivery of Services. We reserve the right to change our Operators at any time without further notice to you, but we will ensure our Operators are bound by this Privacy Policy and our Data Protection Policy or similar terms providing the same or higher level of protection. Such external processing activities include, but are not limited to:

- 17.1.1. IT systems and infrastructure;
- 17.1.2. Debt collection services;
- 17.1.3. Human resources;
- 17.1.4. Payroll;
- 17.1.5. Hosting and email infrastructure;
- 17.1.6. Credit reference agencies;
- 17.1.7. Direct marketing / mailing services.

17.2. We conduct strict due diligence and Know Your Customer procedures in respect of our external Operators before forming a business relationship. We obtain company documents and references to ensure the Operator is adequate, appropriate and effective for the task we employ them for.

18. COOKIES

18.1. We may place small text files called "cookies" on your device when you visit our Website. Cookies do not contain Personal Information, but they do contain a personal

18.2. identifier allowing us to associate your personal data with a certain device. Cookies serve useful purposes for you, including:

- 18.2.1. tailoring our Website's functionality to you by letting us remember your preferences;
 - 18.2.2. improving our Website's performance;
 - 18.2.3. allowing third parties to provide services to our Website; and
 - 18.2.4. helping us deliver targeted advertising where appropriate in compliance with the applicable laws.
- 18.3. Your internet browser may accept cookies automatically and you can delete cookies manually. However, no longer accepting cookies or deleting them may prevent you from accessing certain aspects of our Website where cookies are necessary. Many websites use cookies and more information is available at: www.allaboutcookies.org.

19. THIRD PARTY COOKIES

- 19.1. Some of our business partners use their own cookies or widgets on our website. We have no access to or control over them. Information collected by such cookies is governed by the privacy policy of that company which created it, and not by us.

20. PRIVACY POLICIES OF OTHER WEBSITES

- 20.1. Our Website, applications and online portals may contain links to other websites, apps, tools, widgets and plug-ins that are run by third parties. If you visit a third-party website or social media site, you should read that website/ social media's privacy notice, terms and conditions, and their other policies. We are not responsible for the policies and practices of third parties and social media sites. Any personal information you give to those organizations is dealt with under their privacy notice, terms and conditions, and other policies.

- 20.2. If **YOU** disclose your personal information directly to any third party other than In2assets Group, **IN2ASSETS GROUP SHALL NOT BE LIABLE FOR ANY LOSS OR DAMAGE, HOWSOEVER ARISING, SUFFERED BY YOU AS A RESULT OF**

YOUR DISCLOSURE OF YOUR PERSONAL INFORMATION TO SUCH THIRD PARTIES.

21. GOVERNING LAW

21.1. This Privacy Policy is governed by South African law.

21.2. If any provision of this Privacy Policy is determined to be illegal, void or unenforceable due to applicable law or by order of a court, it shall be deemed to be deleted and the continuation in full force and effect of the remaining provisions shall not be prejudiced.

22. CHANGES TO THIS POLICY

22.1. We may amend this Privacy Policy from time-to-time and we will take reasonably practicable steps to inform you when changes are made. Without limiting the manner in which we may inform you, we may notify you by email, “pop-up” notification on our Website, or notification when you access our Website.

23. QUERIES, COMPLAINTS AND INFORMATION REGULATOR

23.1. If you have any questions or complaints about your privacy rights or this Privacy Policy, please address your concerns to our Information Officer at popia@In2assets.com. If you feel our attempts at resolving the matter have been inadequate, you may lodge a complaint with the South African Information Regulator through their website , www.justice.gov.za/inforeg.

23.2. If you are located outside of South Africa, you may contact the appropriate regulator in your country of domicile.

ANNEXURE – DEFINITIONS

"**Associates**" means In2asset Group's subsidiaries and the directors, employees and consultants of In2asset Group's or of any of its subsidiaries;

"**Operator**" means any person or entity that Processes Personal Information on behalf of a Responsible Party;

"**Personal Information**" means information or data relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to information relating to -

- race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;
- education or the medical, financial, criminal or employment history of the person;
- any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
- the biometric information of the person;

"**Responsible Party**" means the entity that decides how and why Personal Information is Processed;

"**Service Provider**" means third party providers of various services with whom In2asset Group engages, including, but not limited to, providers of information technology, communication, file storage, data storage, copying, printing, distribution/logistics, accounting or auditing services, counsel, experts, investigators, correspondent attorneys, translators, taxation consultants and our insurers and professional advisors;

"**Special Personal Information**" means Personal Information about race or ethnicity, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health, sexual life, any actual or alleged criminal offences or penalties, national identification number, or any other information that may be deemed to be sensitive under applicable law.