



PRIVACY POLICY

V03- July 2025

1. Introduction

- 1.1. LOOM PROPERTY INSIGHTS ("LOOM") is a data analytics and solutions service provider.
- 1.2. This document sets out our privacy policy (our "Privacy Policy") and describes how we collect, use, share, process and store your Personal Information (as described in our Terms).
- 1.3. The expressions or words defined in the Terms shall, where used in our Privacy Policy in their capitalised form, bear a similar or corresponding meaning.
 - 1.3.1. For the purposes of this Privacy Policy, "you" refers to any individual or entity who accesses, uses, or interacts with LOOM's services, including but not limited to visitors to the LOOM Website, registered users, and recipients of property reports.
- 1.4. If you use our Website (as described in our Terms), you consent to the collection, use, sharing, processing and storage of your Personal Information in terms of our Privacy Policy and, furthermore, you agree to our Terms.
- 1.5. We provide you with the choice of closing your LOOM account and to no longer use our Website as provide for in the Terms.
- 1.6. We take great care (and follow best worldwide industry practices) in protecting your Personal Information and keeping it confidential.
- 1.7. LOOM acts as a *Responsible Party* in terms of the Protection of Personal Information Act, No. 4 of 2013 ("POPIA") when collecting and processing personal information directly. However, once a property report is shared with a user of LOOM's services, LOOM assumes the role of an *Operator*, and the user becomes the *Responsible Party*. As such, the user is accountable for ensuring that any further processing of personal information complies with the conditions for lawful processing under POPIA.

2. Our services

- 2.1. We obtain from you such of your Personal Information as is necessary to provide the services to you.
- 2.2. We process your Personal Information and enter it into a secure information repository – we do all this in a completely automated/electronic environment.
- 2.3. Once you have subscribed to our services, your own service providers may request your Personal Information from us for the purpose of providing/rendering (or wishing to provide/render) their products and/or services to you.
- 2.4. A User refers to any individual or entity that accesses or uses LOOM's services, including those who request, view, or download property reports. Once a property report is accessed, the User becomes the Responsible Party for any further processing of the personal information contained therein.
- 2.5. A Data Subject is the individual to whom the personal information in the property report relates. This includes property owners or individuals whose personal details are lawfully included in the report for the purpose of maintaining accurate property records and supporting financial assessments.

3. How we collect your personal information

LOOM PROPERTY INSIGHTS (Pty) Ltd | Reg No. 2020/780/82/07.

The information contained in this document is confidential, privileged and only for the information of the intended recipient and may not be used, published or redistributed without the prior written consent of Loom Property Insights (Pty) Ltd



- 3.1. To create your account with us and register, you need to provide us with the following Personal Information:
 - 3.1.1. Your full names, surname, email address, telephone/ cell phone number as well as the Estate Agency details if you are employed by one.
- 3.2. This information is used by us to open your LOOM account and allows us to contact you. If you have accepted the Terms, you are prompted to verify your details and to then create your secure login and password details. Once you have done this, you will be prompted to upload the remainder of your Personal Information (you may choose which aspects of your Personal Information you upload).
- 3.3. You should change your secure password at least quarterly as an additional measure to keep your account as secure as possible. We also provide additional security measures such as Two-Factor Authentication.
- 3.4. Where property photos or listings contain identifiable personal information or features, such as visible addresses, individuals, or other recognisable elements, LOOM processes such data in accordance with applicable privacy laws, including POPIA and ECTA. Users are responsible for ensuring that any submitted content does not infringe upon the privacy rights of others. LOOM reserves the right to remove or restrict access to any content that may violate these rights or applicable legislation.
- 3.5. Should there be changes to your security information (such as your login information), we will send you a verification alert via our service (or through e-mail, mobile phone or otherwise) to confirm that you want to make the changes. If you did not request to make the changes, please contact us by sending an email to support@loom.co.za
- 3.6. We provide you with the opportunity to provide feedback on features and to rate your experience when visiting the Website. We will track and keep record of any feedback given by you.
- 4. How we use your personal information**
 - 4.1. We use your Personal Information to enable us to render our services to you and to fulfil our contractual obligations to you under the Terms, including confirming and verifying your identity/information with third party service providers.
 - 4.2. We may contact you through our service or through e-mail, mobile phone, notices posted on the Website, messages to your account, push notifications or any other effective way.
 - 4.3. We may send you newsletters and surveys for marketing purposes.
 - 4.4. Support requests and user feedback is stored by us for record-keeping and quality assurance purposes. Should you wish to provide feedback, lodge a complaint or query, request technical support or opt-out of marketing related communications please contact our support by sending an email to support@loom.co.za. This information also facilitates the resolution of similar issues and allows us to improve our overall service to our subscribers and customers.
 - 4.5. We confirm that your information will only be retained for as long as you remain subscribed for the LOOM Services.
 - 4.6. LOOM obtains and processes personal information in accordance with the Electronic Communications and Transactions Act, 2002 (as amended) ("ECTA"). By using LOOM's services and providing personal information electronically, users consent to the collection, use, and processing of their data for the purposes outlined in our privacy policy. This consent is valid and binding as per the provisions of ECTA, and all processing is conducted in line with the lawful processing conditions under POPIA.
 - 4.7. According to POPIA and ECTA should you wish your information to be removed from our servers, you must terminate your access to the LOOM Website as contained in the Terms whereafter LOOM will close your account and delete all Personal Information as soon as reasonably practicable to do so.
 - 4.8. According to Section 51(7) of ECTA, LOOM is required for as long as the Personal Information is being used and for a period



of at least one year thereafter keep record of any third party to whom the Personal Information was disclosed and of the date on which and the purpose for which it was disclosed.

5. How we share your personal information

- 5.1. Any Personal Information that you include on your account will be shared with your own service providers if you approve a request by such service provider for your Personal Information (via our service).
- 5.2. We might make use of third party service providers to, amongst other things, verify the authenticity and validity of information supplied by you. The relationships between us and all third party service providers are strictly protected and regulated by contracts. All the data protection policies of third party service providers are reviewed by us regularly.
- 5.3. We do not share any more information than what is required by third party service providers to validate and verify your information. We maintain these requirements to meet the criteria of POPIA and similar Personal Information protection legislation.
 - 5.3.1. By using our services or accepting these terms electronically, you expressly consent to the collection, processing, and sharing of your personal information, such as data subjects contact details and other identifying data, with registered credit bureaus. This processing is conducted for the purpose of obtaining up-to-date personal information to facilitate communication and service delivery, and not for credit verification or assessment purposes.
 - 5.3.2. This consent is granted in accordance with the POPIA and Section 70 of the National Credit Act ("NCA"), which permits the lawful processing and release of consumer credit information under specified conditions. The consent remains valid for the duration of the client's engagement with LOOM PROPERTY INSIGHTS, unless revoked in writing.
 - 5.3.3. This clause is provided for reference purposes only and does not constitute legal advice. It is your sole responsibility to consult with your own legal advisor to ensure full compliance with applicable laws and regulations.

6. How we process and store your personal information

- 6.1. We will not process your Personal Information for any purpose other than what is required to provide our services.
- 6.2. We store your Personal Information in our information repository while your LOOM account is in existence or as needed to provide you with our services.
- 6.3. The LOOM servers where we store your Personal Information may also be based in territories outside of South Africa, meaning that your Personal Information may be transferred across borders to countries that may have personal information protection laws that differ from those of South Africa. By using our services, you agree to the transfer of your Personal Information across borders if applicable.
- 6.4. All personal information contained in LOOM reports as part of its Services offered, is obtained from publicly available records, such as the deeds registries and other Service Providers that is processed under legitimate interest of maintaining accurate property reports, ensuring transparency and proper financial assessments. This approach ensures compliance with POPIA. Once a property report is shared with a user of LOOM's services, LOOM acts as the Operator in terms of POPIA. The user receiving the report becomes the Responsible Party and assumes full accountability for the lawful processing of any personal information contained therein.
- 6.5. It is the responsibility of the Responsible Party to ensure compliance with all applicable conditions for lawful processing under POPIA, including but not limited to purpose specification, further processing limitation, and data subject participation. LOOM does not authorise the use of personal information for any purpose beyond the scope of the property report and its intended use in property-related assessments.



- 6.6. Any Data Subject has the right to object and may restrict usage of personal information that aligns with LOOM's contractual obligations.

7. How you control your personal information

- 7.1. In terms of POPIA, you have the right to have your personal information processed in accordance with the conditions for the lawful processing of personal information. Amongst other things, you may object to your personal information being processed pursuant to section 11(3) of the POPIA. To do so, please lodge your request in the prescribed manner using the prescribed form, which you may submit to the email address support@loom.co.za.
- 7.2. Pursuant to section 23 of the POPIA, you may request us to confirm, free of charge, whether we hold any of your personal information. You may also, against payment of the prescribed fee, request the record or a description of the personal information about you held by us, including information about the identity of all third parties, or categories of third parties who have access to this information. You are required to provide adequate proof of identity in order to exercise these rights. To do so please send an email to support@loom.co.za.
- 7.3. You are also advised of your rights pursuant to section 24 of the POPIA to request us to:
- 7.3.1. correct or delete your personal information in our possession or under our control that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading or obtained unlawfully; or
- 7.3.2. destroy or delete a record of your personal information if we are no longer authorised to retain it in terms of section 14 of the POPIA. To do so, please send an email to support@loom.co.za

8. How you can close your LOOM account

- 8.1. If you terminate your access to the LOOM Website as set out in Terms we will, as soon as reasonably possible thereafter, destroy your Personal Information contained in our secure information repository. You do acknowledge and agree, however, that your own service providers, whom you have shared your Personal Information with, will continue to have your Personal Information in their possession and that LOOM is not responsible for ensuring that they destroy the applicable Personal Information.
- 8.2. We may retain your Personal Information even after you have closed your LOOM Account if it is reasonably necessary to comply with our legal obligations, for dispute resolution purposes or to be able to confirm previous verifications of your identity.

9. How we protect your personal information

- 9.1. The security of your Personal Information is of utmost importance to us. To ensure the security of your Personal Information we implement strict security safeguards designed to protect your Personal Information.
- 9.2. We regularly monitor our systems for possible vulnerabilities and attacks. We use secure socket layer (SSL) technology to encrypt the Personal Information that you send to us.
- 9.3. We cannot, however, warrant the security of any information that we store in our secure information repository. There is no guarantee that your Personal Information will not be accessed, disclosed, altered, or destroyed by breach of any of our physical or technical barriers/safeguards.

10. Legal disclosures

- 10.1. It is possible that we will need to disclose your Personal Information when required by law, subpoena, or other legal process, or if the Information Regulator is satisfied that:



- 10.1.1. the public interest in the disclosure outweighs, to a substantial degree, the interference that the disclosure will cause to your privacy; or
- 10.1.2. the disclosure involves a clear benefit to you that outweighs, to a substantial degree, any interference that the disclosure will cause to your privacy.
- 10.2. We may also need to disclose your Personal Information to:
 - 10.2.1. enforce the Terms,
 - 10.2.2. investigate and defend ourselves against any third party claims or allegations,
 - 10.2.3. protect the security or integrity of our service; or
 - 10.2.4. exercise or protect the rights and safety of LOOM, our customers and/or third party service providers.
- 10.3. We will attempt to notify you about any legal demands for the disclosure of your Personal Information when appropriate, unless it is prohibited by law or court order, or when the request is an emergency. We may dispute legal demands when we believe, in our sole discretion, that the requests are vague or lack authenticity and/or proper authority. However, we do not promise to challenge every demand.

11. Disclaimer

- 11.1. Whilst we will take all reasonable measures to protect your Personal Information, we cannot guarantee or accept any liability whatsoever for any unauthorised or unlawful disclosures of your Personal Information, whilst in our possession, made by third parties who are not subject to our control. This includes, but is not limited to, any use of Personal Information for direct marketing purposes by third parties, where such use is beyond the scope of LOOM's intended processing and contrary to our policies. LOOM expressly prohibits the use of Personal Information obtained through its services for direct marketing and does not endorse or authorise such activities. However, unless such disclosure or misuse occurs as a result of our gross negligence, LOOM shall not be held liable for any third-party actions that contravene this restriction. If you disclose your Personal Information to a third party, such as an entity which operates a website or app linked to the LOOM Website, or anyone other than us, we will not be liable for any loss or damage suffered by you as a result of the disclosure of such information to the third party concerned. You should always ensure that you read the privacy policy of any third party (such privacy policy will not be accessible on the Website).

12. Changes to our privacy policy

- 12.1. We can amend/change our Privacy Policy at any time.
- 12.2. If we make material changes to our Privacy Policy, we will provide notice thereof to you through our service (or by e-mail, mobile phone or by any other effective means) to provide you with the opportunity to review the amendment/change before it becomes effective. If we change/modify this Privacy Policy, the Terms or our Cookie Policy, we will prompt you to accept the updated Privacy Policy before you can continue the use of our Services.
- 12.3. If you object to any change, you may close your LOOM Account. You acknowledge that your continued use of our Website and services after we publish or send a notice about the amendment/change to our Privacy Policy means that the collection, use, sharing, processing and storage of your Personal Information is and will be subject to our updated Privacy Policy.

13. Cookies

A computer cookie is a small piece of data stored on your device by our Website when you use or access the Website. The purpose of a cookie is to identify specific users and improve your web browsing experience. Our Website uses cookies to give



you a personalised experience that suits your online behaviour, which include personalising content and advertisements, providing social media features and to analyse our traffic. We may also from time to time share information about your use of our Website with our social media, advertising and analytics partners.

14. Links to other websites

- 14.1. We recommend that you read through the privacy policy of any website you visit via a link on the Website, as sharing your Personal Information on any other sites will be governed by their privacy policies (not ours).
- 14.2. We are not responsible for the privacy policies of other entities. Our Privacy Policy applies solely to your Personal Information collected via the LOOM Website and processed and stored by us.

15. Contact information

- 15.1. If you have any questions, complaints or objections regarding this Privacy Policy, please contact us at:
 - 15.1.1. Full name: LOOM PROPERTY INSIGHTS (Pty) Ltd
 - 15.1.2. Registration number: 2020/780782/07
 - 15.1.3. Physical address & Registered Address: The Club, 2nd Floor, Cnr Pinaster Ave & 18th Str, Hazelwood, Pretoria, 0081.
 - 15.1.4. Telephone number: 011 516 5500
 - 15.1.5. Website address: www.loom.co.za
 - 15.1.6. E-mail address: support@loom.co.za
- 15.2. If you want to send us notices, please use our e-mail address (see clause 15.1.6 above).
- 15.3. If you want to serve process on us, please use our physical address (see clause 15.1.3 above).
- 15.4. We will provide notices to you:
 - 15.4.1. within our System, or
 - 15.4.2. by sending it to your contact information provided to us (e.g., e-mail, mobile number, physical address, etc.).