

Develop Hotels Inc

Privacy Policy

Prepared in accordance with the Protection of Personal Information Act 4 of 2013 (POPIA)

Effective date: Thursday, 10 September 2026

Entity: Develop Hotels Pty Ltd, Registration No. 2022 / 722591 / 07

Registered address: 2nd Floor, The Harrington, 50 Harrington Street, Cape Town, 8001

This Privacy Policy explains how Develop Hotels Inc ("DHI", "we", "us", or "our") collects, uses, stores, and protects the personal information of visitors to our website, and of individuals and organisations who contact us about hotel development, investment, and advisory matters, whether based in South Africa or elsewhere. It is written to comply with the Protection of Personal Information Act 4 of 2013 (POPIA).

We work with clients, investors, and partners both within South Africa and internationally. Where we process personal information of individuals located outside South Africa, we aim to apply the protections in this policy consistently, in addition to any further protections that may apply under the data protection laws of the country where that individual is based.

By submitting personal information to us through our website, you acknowledge that you have read and understood this policy.

1. Who We Are

We are the "responsible party" under POPIA for the personal information described in this policy.

Legal name	Develop Hotels Inc
Registration number	2022 / 722591 / 07
Physical address	2nd Floor, The Harrington, 50 Harrington Street, Cape Town, 8001
General contact email	andrew@develophotels.co.za
General contact phone	+27 82 313 0503

2. What Personal Information We Collect

As an owner-side hospitality development advisory firm working with owners, investors, developers, and family offices in South Africa and internationally, we mainly collect personal information when someone submits an enquiry through our website, or engages with us about a potential hotel development, acquisition, or investment opportunity. Depending on which forms are live on the site and the nature of the engagement, this may include:

- Full name, job title, and the organisation you represent
- Email address and telephone number, including international dialling codes
- Country and city of residence or business operation
- Details of the enquiry, such as the type of project (new hotel development, acquisition or disposal, repositioning, brand or operator selection, capital raising, or land/site opportunity), proposed location, and indicative scale or budget
- Documents you choose to attach or share with us, such as proposals, site information, or company profiles
- For prospective clients, investors, or partners, identity and due diligence information reasonably required to assess and progress a potential relationship
- Any other information you choose to include in a free-text enquiry or message field

We do not intentionally collect special personal information (such as health information, biometric information, or criminal history) through our website forms. Where a specific engagement requires this, for example background checks required for a particular project, this will be handled under separate, specific consent and is outside the scope of this general policy.

3. How We Collect It

- Directly from you, when you complete an enquiry or contact form on our website
- Directly from you, when you email, call, or message us following a website enquiry, or when we meet at industry events, site visits, or meetings
- From publicly available business sources, such as company registries or professional networking platforms, where reasonably necessary to assess a potential project, partnership, or investment opportunity
- Automatically, through standard web server logs (such as IP address, approximate location, and browser type) generated when you visit our website

4. Why We Process It

We process your personal information only for the purpose it was collected for, which is generally to:

- Respond to your enquiry and assess potential hotel development, acquisition, or investment opportunities
- Communicate with you about a project, proposal, or partnership you have raised with us
- Prepare proposals, investment viability assessments, and mandate documentation
- Conduct reasonable due diligence, including know-your-client and anti-money laundering checks, particularly where international investment or funding is involved
- Maintain records of our business relationships, including for invoicing, accounting, and contractual purposes
- Comply with our legal, tax, and regulatory obligations in South Africa and, where applicable, in other jurisdictions where we operate

We do not use the personal information collected through our website forms for any purpose other than the one it was collected for, unless you have separately consented to that further use.

5. Who We Share It With

We may share your personal information with trusted third parties who process it on our behalf ("operators" under POPIA), as well as with parties directly involved in progressing a project. Using an operator does not remove your information from the protection of POPIA, we remain accountable for it. Depending on which parties and tools we actually use, this may include:

Recipient	What it is used for
Webflow	Hosts our website and stores form submissions
Microsoft 365	Receives enquiry notifications sent from the website form
Professional advisors (legal, tax, financial, design, and technical)	Engaged as reasonably necessary to progress a specific project or transaction
Hotel brands, operators, lenders, and co-investors approached on your behalf	Only where you have engaged us to do so, and limited to what is reasonably necessary for that mandate

We may also disclose personal information where required by law, to comply with a legal or regulatory process, or to protect our rights or the safety of others. We do not sell personal information to third parties.

6. Cross-Border Transfers

Because we work with clients, investors, and partners outside South Africa, personal information may regularly be transferred to, or accessed from, other countries in the ordinary course of assessing and progressing international projects, in addition to any transfers made by the operators referred to in Section 5.

Where we transfer personal information outside South Africa, we take reasonable steps to ensure that the recipient is subject to a law, binding corporate rules, or contractual terms that provide a level of protection substantially similar to POPIA, or that another basis recognised under section 72 of POPIA applies, for example your consent, or the transfer being necessary to perform a contract with you or to take steps at your request before entering into one.

If you are located outside South Africa, the processing of your personal information may also be subject to the data protection laws that apply where you are based, in addition to POPIA. We recommend obtaining local legal advice if you have questions about how those laws apply to your information.

7. How Long We Keep It

We keep personal information for as long as necessary to fulfil the purpose it was collected for, or as required by applicable law, whichever is longer. As a general guide:

- Enquiry records that do not progress to a signed agreement are generally retained for 24 months before being deleted or anonymised
- Records relating to an active client, investor, or partner relationship, including contractual and financial records, are retained for the duration of the relationship and thereafter for as long as required by tax, corporate, and other applicable legislation
- Records relating to advisory mandates may be retained for a longer period after the mandate ends, given professional indemnity and contractual claim periods

8. How We Protect It

We take appropriate technical and organisational measures to protect personal information against loss, damage, unauthorised access, alteration, or disclosure. These measures include restricting access to personal information to staff and advisors who need it to do their jobs, using reputable, access-controlled platforms to store and manage enquiry and project data, and requiring our operators and project partners to apply appropriate security measures of their own. No method of transmission or storage is completely secure, and we cannot guarantee absolute security, but we work to keep your information appropriately protected at all times.

9. Your Rights As A Data Subject

Under POPIA, you have the right to:

- Be notified that your personal information is being collected
- Access the personal information we hold about you
- Request that we correct, delete, or destroy personal information that is inaccurate, irrelevant, excessive, out of date, or unlawfully obtained
- Object to the processing of your personal information, including for direct marketing purposes
- Not be subject to a decision based solely on automated processing that significantly affects you

- Submit a complaint to the Information Regulator regarding the processing of your personal information
- Institute civil proceedings for damages arising from a breach of POPIA

If you are located outside South Africa, you may also have equivalent rights, and a right to complain to a data protection authority, under the law that applies where you are based.

To exercise any of these rights, contact us using the details in Section 12 below.

10. Cookies

Our website may use cookies and similar technologies, such as analytics tools, to understand how visitors use the site and to improve its performance. Strictly necessary cookies that are required for the website to function do not require your consent. Any non-essential cookies, such as analytics or marketing cookies, will only be used with your consent, obtained through a cookie banner or similar mechanism where applicable.

11. Children's Information

Our website and services are directed at businesses, professionals, and adults, and we do not knowingly collect personal information from children. If we become aware that we have inadvertently collected personal information from a child without the necessary consent, we will take reasonable steps to delete it.

12. How To Contact Us / Lodge A Complaint

Our Information Officer

Name	Andrew McLachlan
Email	andrew@develophotels.co.za
Phone	+27 82 313 0503

The Information Regulator (South Africa)

If you are not satisfied with our response, you may lodge a complaint with the Information Regulator:

Physical address	JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
Postal address	P.O. Box 31533, Braamfontein, Johannesburg, 2017
General enquiries	enquiries@inforegulator.org.za
Telephone	010 023 5200
POPIA complaints	POPIAComplaints@inforegulator.org.za
Website	inforegulator.org.za

If you are located outside South Africa, you may also be able to lodge a complaint with your own local data protection authority, in addition to, or instead of, the Information Regulator.

13. Changes To This Policy

We may update this Privacy Policy from time to time to reflect changes in our practices, the countries we operate in, or applicable law. The updated version will be published on our website with a revised effective date. We encourage you to review this policy periodically.

This policy was last updated on Thursday, 10 September 2026.