



This is the Privacy Statement of QuoinOnline (we or us). It applies to the personal information of visitors to our website, available at <https://www.quoincommercialproperty.co.za> and all our clients and potential clients who engage with us in any manner (collectively, you).

Use of the Website is also subject to our terms and conditions available [on our website](#). Relationship with us as a client is subject to any separate terms between us.

We may need to change or update this Privacy Statement from time to time. Any updated versions will be posted on the Website and will be effective from the date of posting. Where practical, we may notify you of the changes.

1. What personal information do we collect?

- 1.1. We respect your privacy rights and comply with all applicable laws in handling personal information. When used in this Privacy Statement, the term "personal information" has the meaning given to it in the *Protection of Personal Information Act, 2013 (POPIA)*, applicable in the Republic of South Africa. Generally speaking, personal information is any information that can be used to personally identify a natural or juristic person. If any information that we collect personally identifies you, or you are reasonably identifiable from it, we will treat it as personal information. Quoin Online requests for your Financial Intelligence Centre Act (FICA) information upon submission of an offer. Such information may include but is not limited to the following: Company CK registration / Individual ID, Proxy/ User certified ID documents, Certified Utility Bill, Company Resolution Mandate, Ultimate Beneficial Ownership Structure, Source of Funds, Trust Deed/Will, Letter of Authority, VAT certificate and the company BRNC document.
- 1.2. All registrations are conducted via the Quoin Online website. When registering as a new client, the website will prompt you for certain mandatory personal information, whereafter you will be given access to our transactional website. If purchasing or leasing property in a Company or Trust, you will be prompted to enter your company registration information and will be asked to upload. Should there be a case whereby insufficient documentation had been provided, you will receive communication via telephone and email requesting for the outstanding documentation, once this is provided to us, you will be deemed FICA compliant, bidding access to our auction website will be provided.
- 1.3. Quoin Online currently conducts verification checks on your personal Information using third-party verification systems such as LexisNexis Windeed and Verified. Sanction screening on client profiles will be done through WhoYou.

2. Use of cookies

The Quoin Online Website uses "cookies" to help you personalize your online experience. A cookie is a text file that is placed on your hard disk by a Web page server. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you and can only be read by a web server in the domain that issued the cookie to you.

- 2.1. One of the primary purposes of cookies is to provide a convenience feature to save you time. The purpose of a cookie is to tell the Web server that you have returned to a specific page. For example, if you register with **Quoin Online**, a cookie helps **Quoin Online** to recall your specific information on subsequent visits. This simplifies the process of recording your personal



information, such as billing addresses, shipping addresses, and so on. When you return to the same **Quoin Online** website, the information you previously provided can be retrieved, so you can easily use the **Quoin Online features** that you customized.

- 2.2. You have the ability to accept or decline cookies. Most Web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. If you choose to decline cookies, you may not be able to fully experience the interactive features of the **Quoin Online** services or websites you visit.
- 2.3. If you provide us with personal information of third parties, please make sure that you are authorised to do so.

3. Why do we collect personal information?

- 3.1. to respond to general enquiries submitted through our “contact us” page;
- 3.2. to conduct verification checks;
- 3.3. to communicate with you via automated emails and provide you with access to our information;
- 3.4. to gain insight into how our visitors use the website and to improve our website service;
- 3.5. We may handle anonymized information for research or analytics purposes or include it in our publications which we share with third parties. You will not be identifiable from this information

4. What happens if you don't provide the personal information we require?

- 4.1. We may not be able to supply the products and/or services you require from us;
- 4.2. We may not be able to respond to your enquiry as submitted to us through the “contact us” page;
- 4.3. You will not be able to provide an account.

5. Do we disclose personal information to third parties?

- 5.1. We may disclose your personal information to third parties as required by law, where it is necessary to give effect to a contract with you, or where we have a legitimate interest in doing so. We may disclose your personal information to:
 - 5.1.1. The personal information provided here is subject to third party internal and external auditors, our employees, contractors or third-party service providers in connection with the Website, and our business operators;
 - 5.1.2. our insurers, underwriters and professional advisors, including our accountants, lawyers, business advisors and consultants;
 - 5.1.3. employees and/or the managers of any entities through which they operate if we merge, combine or divest a part of our business;



5.1.4. law enforcement or regulatory bodies as required by law; and

5.1.5. any other juristic or natural person for any authorised purpose with your express consent.

5.2. We will never sell your personal information.

6. Do we send personal information to outside of South Africa?

7. We do currently send personal information outside of South Africa in accordance with POPIA, any other applicable laws and rules.

8. Marketing

8.1. We may, with your prior consent, use your contact details to send you details of new products or services which may interest you. These communications may be sent in various forms (including by mobile phone and by email) in accordance with applicable marketing laws. If you indicate a preference for a method of communication, we will endeavor to use that method.

8.2. All of these communications will set out how to unsubscribe from (or opt out of) receiving future communications if you no longer wish to receive promotional material.

9. Security

9.1. As the Website is accessible via the internet, and the internet is inherently insecure, we cannot guarantee the security of information you send to us online (including that it will not be intercepted). You send information to us online at your own risk.

9.2. We may keep your personal information in either electronic or hard copy form. In both cases, we take reasonable and appropriate steps to ensure that the personal information is protected from misuse and loss and from unauthorised access, modification, or disclosure.

9.3. Personal information is destroyed or de-identified when no longer needed or when we are no longer required by law to retain it (whichever is the later).

10. How can you access and correct your personal information?

10.1. You have the right to contact us at any time requesting:

10.1.1. confirmation that we have your personal information;

10.1.2. access to the records containing your personal information or a description of the personal information that we hold about you; and

10.1.3. the identity or categories of third parties who have had, or currently have, access to your personal information.

10.2. Details on how to make a request are available [here](#). When making a request, we will require adequate proof of your identity. We will try to provide you with suitable means of accessing information, where you are entitled to it, by for example, posting or emailing it to you.



There may be instances where we cannot grant access to your personal information. For example, if access would interfere with the privacy of others or would result in a breach of confidentiality, we may need to refuse access. If we refuse access, we will give written reasons for the refusal.

10.3. If you believe that any personal information that we hold about you is inaccurate, irrelevant, outdated, incomplete or misleading, you may ask us to correct it. If you believe that any personal information that we hold about you is excessive or have been unlawfully obtained or that we are no longer authorised to retain it, you may ask us to destroy or delete it. If we do not agree that there are grounds for action, you may ask us to add a note to the personal information stating that you disagree with it.

10.4 We may charge a reasonable fee to cover our administrative and other costs in providing information to you. We will not charge for simply making a request or for making any corrections to personal information.



11. Complaints

- 11.1. If you believe that your personal information has been unlawfully accessed or acquired, you can contact us ([please add your contact page address on website](#)) and provide details of the incident so that we can investigate it.
- 11.2. We will treat your complaints confidential (unless otherwise required by law), investigate those complaints and aim to ensure that they are resolved within a reasonable time, in order to provide you with feedback.

12. Changes to your personal information

13. If your personal information changes, please let us know and provide us with all changes as soon as reasonably possible to enable us to update it.

14. Third party websites

- 14.1. This Privacy Statement does not apply to any third party websites which may be accessible through links on the Website. We do not make any representations or warranties about the privacy practices of any third party and do not accept any responsibility for them. Third party website providers are responsible for informing users about their own privacy practices and we suggest that you review the privacy policies of any third party providers whose sites you access.

15. Contact information

- 15.1. If users have any questions about this Privacy Statement, any general concerns or would like to lay a complaint regarding the treatment of your personal information or to access and correct your personal information, you can contact us ([please add your contact page address on website](#))