

PRIVACY POLICY

1. IMPORTANT INFORMATION AND WHO WE ARE

The Housing Hub, and/or its affiliates and related companies ("The Housing Hub", "we", or "us") operate the www.thehousinghub.co.zw website and other related websites (collectively our "Site"). This Privacy Policy sets out our firm commitment to the privacy of our users ("users" or "you") and how we collect and use your personal data.

Please read this Privacy Policy carefully. By accessing our Site, using our services and, where relevant, expressly accepting this policy, you acknowledge that you have read and agree to the terms of this Privacy Policy. If you do not agree to this Privacy Policy please do not use our Site.

We respect your right to privacy and will only process personal information you provide to us in accordance with the applicable privacy legislation in the jurisdictions in which we operate, including the implementing laws, regulations and secondary legislation, as amended or updated from time to time.

Controller

Our Site is operated by The Housing Hub Private Limited, acting as a data controller, ("We" or "The Housing Hub"). Our office is located at 194 Baines Avenue Harare, Zimbabwe .

Contact details

If you have any questions about how we collect, store and use personal information, or if you have any other privacy-related questions, please contact us by any of the following means:

- phone us at: +263712078590
- e-mail us at: admin@tehousinghub.co.zw ; or
- write to us at our office address above.

Changes to the privacy policy and your duty to inform us of changes

We may from time to time, make changes to this Privacy Policy. We will set out any important changes at the end of the Privacy Policy and you should check back regularly to check to see if there have been any changes to this Privacy Policy.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes your relationship with us.

Third-party links

Our Site may contain links to third party sites, including sites with which we have affiliate agreements. We are not responsible for the privacy practices or the content of such third party websites. This Privacy Policy extends only to personal data we collect from you either via our Site, or in our dealings with you. We recommend that you check the privacy and security policies and procedures of each and every other website that you visit.

2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- Identity Data includes first name, last name, username or similar identifier, date of birth, gender, passport or national ID card data.
- Contact Data includes postal address, email address, telephone numbers and instant messaging account details.
- Financial Data includes bank account and payment card details.
- Transaction Data includes details about payments processed via our Site.
- Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, locale, UTM parameters, attribution parameters, browser plug-in types and versions, and operating system, platform and other technology on the devices you use to access our Site.
- Profile Data includes your username and password, bookings made by you, your interests, the city or property you are interested in, your study course and destination, preferences (e.g. roommate, dates, budget), guarantor information, feedback and survey responses.
- Usage Data includes information about how you use our Site.
- Marketing and Communications Data includes your preferences in receiving marketing from us and third parties and your communication preferences.
- We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Policy.
- We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data), unless specifically provided by you as part of your use of our service. We do not collect any information about criminal convictions and offences.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

We may collect information about you in a number of ways, including:

Direct interactions. Most of the personal data we collect about you will be personal data you provide to us. For example, you may give us your Identity, Contact and Financial Data by filling in a form on our Site or if you correspond with us via phone, email, instant messaging service, speak to us at an event or otherwise. This includes personal data you provide when you:

- enquire about our products or services;
- create an account on our Site;
- make a booking via our Site;
- request marketing to be sent to you;
- enter a competition, promotion or survey; or
- give us feedback.

Automated technologies or interactions. As you interact with our Site, we may automatically collect Technical Data such as information about your browser, what areas of our Site you visit and what links you click on, browsing actions and patterns. This helps us to provide you with a good experience when you browse our Site and also allows us to improve our Site. We collect this personal data by using cookies and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies and other similar technologies. For detailed information on the cookies we use and the purposes for which we use them see our Cookie Policy.

Third parties or publicly available sources. We may receive personal data about you from various third parties and public sources as set out below:

- Technical Data from analytics and search information providers;
- Identity and Contact Data from affiliates, referral partners or advertisers on our Site;
- If you log in using social media depending on how you log in we may collect Contact, Identity and Technical Data, including: your profile name/username, profile picture, email address and date of birth. The social media information you consent to share with us will be combined with the other information you provide to us or that we collect about you. We will also collect information about your comments, posts and 'likes' to allow us to administer our Site and improve the user experience.
- We will also keep a record of our conversations with you, whether by phone, skype, IM or in person

4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Purposes for which we will use your personal data

We have set out below a description of the ways we will use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

Purpose/Activity	Lawful basis for processing including basis of
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	legitimate interest
To register you as a new user	Performance of a contract with you
To process and complete your booking	Performance of a contract with you
To manage our relationship with you, which will include: (a) Notifying you about changes to our terms or Privacy Policy (b) Asking you to leave a review or take a survey	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our services)
To enable you to partake in a prize draw, competition or complete a survey	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our services, to develop them and grow our business)
To administer and protect our business and the Site (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganization or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant Site content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	Necessary for our legitimate interests (to study how customers use our services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our Site, services, marketing, customer relationships and experiences	Necessary for our legitimate interests (to define types of customers for our services, to keep our Site updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	Necessary for our legitimate interests (to develop our services and grow our business)

Payments

Where you make a payment via our Site we will use one of our payment providers, such as Paynow or Paypal, to process your payment. In connection with the processing of such payments, we do not retain your payment information (including Financial Data). Rather, all such information related to your transaction is provided directly to the payment provider, whose use of your personal data is governed by their privacy policy. You can find out more about how Paynow collects and uses your personal data by reviewing their privacy policy before completing a transaction on our Site. By using our services and making payments via our Site, you are agreeing to Paynows use of your personal data in accordance with their privacy policies.

Marketing

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you for marketing purposes.

You will receive marketing communications from us if you have requested information from us or purchased services from us or if you provided us with details when you entered a competition or registered for a promotion and, in each case, you have not opted-out of receiving that marketing.

We will obtain your express opt-in consent before we share your personal data with any company outside The Housing Hub group of companies for marketing purposes.

If at any time after providing us with your personal data you no longer want to receive such marketing from us or third parties you can contact us at admin@thehousinghub.co.zw.

When you opt-out of receiving these marketing messages, this will not apply to personal data provided to us by you as part of a transaction with us.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to receive an explanation as to how the processing for the new purpose is compatible with the original purpose please contact us at admin@thehousinghub.co.zw.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. DISCLOSURES OF YOUR PERSONAL DATA

In some instances, we may need to share your personal data with the parties set out below:

- Internal Third Parties as set out in the Glossary.
- External Third Parties as set out in the Glossary.

Specific third parties such as property advertisers and affiliate third parties so that they can get in touch about your booking or help answer your query. Equally, an advertiser may share your personal data with us in order to facilitate a booking made via our Sites.

Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Privacy Policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. INTERNATIONAL TRANSFERS

In order to provide you with our products and services, we may need to store or transfer your personal data to countries inside and outside Zimbabwe, some of which do not protect privacy rights as extensively as in Zimbabwe. In some instances your personal data will be transferred to our partner companies based outside of the Zimbabwe to allow them to contact you about our products and services. By submitting your personal data, you agree to this transfer, storing and/or processing.

You agree that we may also transfer your personal data, including Financial Data, to individual advertisers or banks located outside Zimbabwe (and reciprocally, the bank details of advertisers to students), in order to facilitate the execution of the tenancy agreement between students and advertisers. THH does not store your Financial Data after it has been transferred.

7. DATA SECURITY

We take appropriate security measures (including physical, electronic and procedural measures) to help safeguard your personal data from unauthorized access and disclosure. When transmitting your personal information to a third party (such as an advertiser) in order to complete a request made by you on our Site, we will use commercially reasonable means to secure your personal data. Notwithstanding the foregoing, we assume no liability for interception, alteration or misuse of information transmitted over the internet, except for losses incurred as a result of our gross negligence or default.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. DATA RETENTION

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical or accounting purposes in which case we may use this information indefinitely without further notice to you.

9. YOUR LEGAL RIGHTS

In certain circumstances, you have rights under data protection laws in relation to your personal data, including:

- the right to request access to your personal data;
- the right to request correction of your personal data;
- the right to request erasure of your personal data;

- the right to object to the processing of your personal data;
- the right to request restriction of processing your personal data;
- the right to request transfer of your personal data; and
- the right to withdraw consent.

If you wish to exercise any of the above rights, please write to us (either by post or by e-mail) at the address specified above.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that your personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. GLOSSARY

Lawful basis

Legitimate Interest means our interest in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us at admin@thehousinghub.co.zw.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

Third parties

Internal Third Parties

Other companies in The Housing Hub group acting as joint controllers or processors and who are based in South Africa, Zambia, Botswana, Kenya and which provide services to THH.

External Third Parties

Service providers acting as processors or joint controllers based worldwide who provide IT, infrastructure, data processing, and system administration services.

Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based worldwide who provide consultancy, banking, legal, insurance and accounting services.

Revenue and taxation regulators and other government authorities acting as processors or joint controllers based in the countries in which we operate who require reporting of processing activities in certain circumstances.

Your legal rights

You have the right to:

- Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it

to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

11. CHANGES TO THIS PRIVACY POLICY

This policy was last updated on 14 April 2019 to include more detail about the data we collect, the ways we use your data and your rights with regard to that data.