

LEASY LINK

PRIVACY POLICY

CONSOLIDATED – PARTS A-L

Regional privacy framework for Leasy Link

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IMPORTANT NOTICE

This Privacy Policy explains how Leasy Link handles personal data. It does not replace any consent notice, tenant privacy notice, data-processing agreement, subscription terms or other notice that may be required for a specific processing activity.

1. Introduction

Leasy Link provides digital rental-management tools that enable landlords and other authorised property-management users to organise information relating to rental properties, rental units, tenants, leases, rent and utility records, receipts, statements, occupancy and supporting documents.

This Privacy Policy explains how Leasy Link collects, receives, records, organises, stores, uses, accesses, shares, transfers, secures, retains, corrects, restricts and deletes Personal Data when a person uses or interacts with the Leasy Link mobile application, website, customer-support channels, social-media pages or any related service that links to this Privacy Policy.

Leasy Link is presently designed as a landlord-facing platform. Tenants do not ordinarily create or operate Leasy Link accounts at launch. A landlord or other authorised user may nevertheless enter and manage a tenant's Personal Data in the platform. This distinction is addressed throughout this Privacy Policy.

For account and business-administration information collected directly from a Leasy Link user, Leasy Link generally determines why and how that information is processed. For tenant information entered by a landlord or authorised property manager, the landlord or property manager generally determines the purpose for which the information is entered and remains responsible for establishing a lawful basis for collecting and using it. The precise legal roles may vary according to the applicable law and the particular processing activity.

The legal entity responsible for the Services is Leasy Link Proprietary Limited a company incorporated in Botswana under company registration number BW00009740829, with its registered address at Gaborone, Botswana (referred to in this Privacy Policy as "Leasy Link", "we", "us" or "our").

2. Definitions

In this Privacy Policy, the following terms have the meanings set out below. Where an applicable law uses a different term for the same or a substantially similar concept, the relevant statutory term will apply.

Account: a registered Leasy Link user profile through which an authorised user accesses the Services.

Account Owner: the person or organisation in whose name an Account is registered and who is responsible for its use.

Applicable Data Protection Laws: the privacy, data-protection, cybersecurity, electronic-transactions, consumer-protection and related laws that apply to a processing activity, including laws in Botswana, South Africa, Namibia, Zambia, Zimbabwe, Eswatini and Lesotho, as amended, replaced or brought into force from time to time.

App: the Leasy Link mobile application, including authorised updates and replacement versions.

Authorised User: a person lawfully permitted by an Account Owner to access or use all or part of an Account or the Services.

Consent: a freely given, specific, informed and unambiguous indication of a person's wishes, expressed through a statement or clear affirmative action, where consent is the lawful basis relied upon.

Data Controller / Responsible Party: the person or organisation that determines the purpose and means of processing Personal Data, or the equivalent role recognised under the Applicable Data Protection Laws.

Data Processor / Operator: the person or organisation that processes Personal Data on behalf of a Data Controller or Responsible Party, or the equivalent role recognised under the Applicable Data Protection Laws.

Data Subject: an identified or identifiable natural person to whom Personal Data relates, including a landlord, tenant, prospective customer, Trusted Contact, support requester or website visitor.

Landlord: an individual or organisation that owns, leases, manages or administers rental property and uses the Services for legitimate rental-management purposes.

National Identification Information: a national identity number, national identity card number, passport number or a copy or image of an identity or passport document.

Personal Data: information relating to an identified or identifiable natural person. It includes information that can identify a person directly or indirectly, including a name, identification number, contact detail, location identifier, online identifier, financial record or information concerning the person's physical, economic, cultural or social identity.

Processing: any operation performed on Personal Data, whether by automated or non-automated means, including collecting, recording, organising, structuring, storing, adapting, retrieving, consulting, using, sharing, transmitting, restricting, erasing or destroying it.

Property Data: information relating to a rental property or unit, including its address, name, unit number, rental amount, utility allocation, occupancy, lease and supporting records. Property Data may constitute Personal Data where it identifies or can be linked to a natural person.

Sensitive or Special Personal Data: Personal Data afforded additional protection under Applicable Data Protection Laws. Depending on the relevant jurisdiction, this may include financial information, information relating to children, biometric or genetic data, health information, criminal information and other protected categories. National Identification Information will be treated by Leasy Link as high-risk confidential data even where a particular law classifies it differently.

Services: the App, website and related rental-management, subscription, support and administrative services made available by Leasy Link.

Site: the official Leasy Link website at <https://www.leasy-link.com> and any replacement or authorised subdomain that links to this Privacy Policy.

Tenant: a person whose tenancy, lease, occupancy, contact, identification, payment, utility or related information is entered into or otherwise processed through the Services.

Trusted Contact: a person invited by an Account Owner to receive limited Account access or perform limited functions, subject to the permissions made available by Leasy Link and the Account Owner.

3. Purpose of this Privacy Policy

The purposes of this Privacy Policy are to:

- explain what categories of Personal Data Leasy Link may process and where that information may come from;
- explain why Personal Data is processed and the lawful grounds that may be relied upon;
- clarify the respective responsibilities of Leasy Link, Account Owners, landlords, property managers, Authorised Users and service providers;
- explain when Personal Data may be shared with service providers, regulators, courts, law-enforcement authorities or other lawful recipients;
- describe how cross-border transfers, information security, retention, deletion and data-subject requests are handled;
- provide clear notice regarding the processing of tenant data, National Identification Information, passport information, lease records, rent records and uploaded documents; and
- support compliance with Applicable Data Protection Laws in the countries in which the Services are offered.

This Privacy Policy should be read together with the Leasy Link Terms and Conditions, End User Licence Agreement, Subscription and Billing Policy, Refund Policy, Cookie Policy, Acceptable Use Policy and any specific privacy or consent notice presented at the point where Personal Data is collected.

4. Applicability and Scope

4.1 Persons covered

This Privacy Policy applies to Personal Data processed in connection with:

- prospective, trial, free and paid Leasy Link users;
- individual landlords and representatives of organisational landlords or property managers;
- tenants and former tenants whose information is entered by an Account Owner or Authorised User;
- Trusted Contacts and persons invited to access an Account;
- visitors to the Site and users who communicate with Leasy Link through email, telephone, SMS, WhatsApp, social media or customer support;
- suppliers, contractors and business contacts where their Personal Data is processed through Leasy Link's operational systems.

4.2 Services and channels covered

This Privacy Policy applies to the App, the Site, account registration, one-time-password authentication, subscription administration, customer support, service notifications, authorised marketing, surveys, product testing and any other Leasy Link service or communication that expressly links to this Privacy Policy.

4.3 Countries covered

This Privacy Policy is intended to support the operation of Leasy Link in Botswana, South Africa, Namibia, Zambia, Zimbabwe, Eswatini and Lesotho. It also applies to another country where Leasy Link lawfully makes the Services available, subject to any additional or overriding notice required by the law of that country.

Where the law of a Data Subject's country grants stronger or additional rights than this Privacy Policy, Leasy Link will apply those rights to the extent required by law. Where a country has not yet brought a comprehensive data-protection statute into force, Leasy Link will apply this Privacy Policy, contractual duties, applicable constitutional or sector-specific privacy requirements and reasonable data-protection standards.

4.4 Matters not covered

This Privacy Policy does not govern the independent privacy practices of a landlord, property manager, payment provider, telecommunications provider, app store, cloud service, social-media platform or other third party. Those parties may process Personal Data under their own legal responsibilities and privacy notices.

The Services are not a substitute for a landlord's legal obligations to provide a tenant privacy notice, obtain valid consent where consent is required, rely on another lawful ground where appropriate, keep information accurate, respect tenant rights and use Personal Data only for legitimate rental-management purposes.

5. Acknowledgement, Acceptance and Lawful Use

5.1 Privacy notice, not blanket consent

By creating an Account or using the Services, a user acknowledges that this Privacy Policy has been made available and explains Leasy Link's processing practices. Acceptance of this Privacy Policy does not create consent for every processing activity. Where Applicable Data Protection Laws require consent, Leasy Link or the relevant landlord must obtain consent separately and in a clear, specific and lawful manner.

5.2 Account-holder confirmation

An Account Owner or Authorised User who enters another person's Personal Data confirms that the information is entered for a lawful and legitimate purpose and that the person has the authority, permission or other lawful basis required to collect, use, upload and manage that information.

This obligation applies particularly to tenant names, telephone numbers, email addresses, National Identification Information, passport numbers, identity or passport documents, lease agreements, proof of payment, rent and utility records, receipts, statements, emergency-contact details and any other document containing Personal Data.

5.3 Required and optional information

Some Personal Data is required to create or secure an Account, provide a requested feature, generate a record, meet a legal requirement or verify a request. Other information is optional. Where required information is not provided, Leasy Link may be unable to create an Account, provide the relevant feature, verify identity, process a request or comply with a legal obligation.

5.4 Age and legal capacity

The Services are intended for persons who are at least 18 years old and have legal capacity to enter into a binding agreement. Leasy Link does not knowingly permit a child to register as an Account Owner. A landlord must not upload a child's Personal Data unless the processing is lawful, necessary for a legitimate tenancy-related purpose and supported by any consent or authorisation required by Applicable Data Protection Laws.

5.5 No transfer of property rights through Trusted Contact access

Accepting a Trusted Contact invitation or receiving Account access does not create ownership, partnership, agency, fiduciary, inheritance, succession, matrimonial or other legal rights in relation to the Account Owner's properties, leases, rent records, finances, documents or other assets. Trusted Contact access is limited to the permissions made available through the Services and remains subject to applicable law and the Leasy Link Terms and Conditions.

6. Changes to this Privacy Policy

Leasy Link may update this Privacy Policy where necessary to reflect changes in the Services, processing activities, security practices, service providers, corporate structure, legal obligations or the countries in which the Services are made available.

The current version will identify its effective date and version number. Material changes will be communicated by an appropriate method, which may include an in-app notice, email, SMS, website notice or a request for renewed consent where renewed consent is legally required.

A change will not retrospectively make unlawful processing lawful, reduce a Data Subject's accrued rights or authorise a materially different use of Personal Data without the notice, lawful basis or consent required by Applicable Data Protection Laws.

Users should review the Privacy Policy periodically. Continued use of the Services after an updated policy becomes effective constitutes acknowledgement of the updated notice, but does not replace any consent that must be obtained separately by law.

- Insert the full registered legal name, CIPA company number and registered address of the Leasy Link operating entity.
- Confirm the official privacy contact email and, if appointed or required, the Data Protection Officer or Information Officer details.
- Confirm whether Leasy Link will launch simultaneously in all seven named countries or use staged country-specific effective dates.
- Confirm the final Trusted Contact permissions and whether the feature is included at launch.

- Confirm whether landlords can upload copies of identity documents or only record identification and passport numbers.
- Confirm all production hosting, backup and analytics locations and the contractual identity of every data processor or operator.
- Confirm whether the website uses analytics, advertising cookies, pixels, heatmaps or session-recording technology.
- Obtain country-specific legal review before publication, particularly for registration, licensing, local-representative and cross-border transfer obligations.

7. Collection of Personal Data

Leasy Link collects Personal Data directly from users, automatically through the Services, and in limited circumstances from trusted third-party service providers where necessary to provide the Services, comply with legal obligations, maintain security, improve functionality and support users.

The categories of Personal Data collected depend on how the Services are used and the features accessed.

Leasy Link is committed to collecting only the Personal Data that is reasonably necessary for legitimate business purposes and in accordance with Applicable Data Protection Laws.

7.1 Information Provided Directly by Account Owners

When creating or managing an Account, we may collect:

Identity Information

- Full name
- National Identification Number
- Passport Number
- Date of Birth (where required)
- Company or Business Name
- Company Registration Number (where applicable)

Contact Information

- Mobile telephone number
- Email address
- Physical address
- Postal address

Account Information

- Username
- Authentication and verification information (including OTP verification records and session/security data)
- One-Time Authentication credentials (OTP) verification records
- Login history
- Account preferences
- Subscription plan

- Billing history
-

7.2 Rental Property Information

Users may enter information relating to rental properties including:

- Property name
 - Property address
 - Property description
 - Property category
 - Number of units
 - Rental amount
 - Deposit requirements
 - Utility allocation method
 - Occupancy status
 - Property photographs (where uploaded)
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7.3 Rental Unit Information

For each rental unit:

- Unit number
 - Rental amount
 - Deposit
 - Occupancy status
 - Lease commencement
 - Lease expiry
 - Vacancy history
 - Notes added by the landlord
-

7.4 Tenant Information Entered by Landlords

Leasy Link does not ordinarily collect tenant information directly from tenants.

Instead, landlords or authorised users may enter tenant information into the Services.

This information may include:

Identity

- Full name
- National Identification Number
- Passport Number
- Date of Birth (where applicable)

Contact Details

- Mobile number

- Email address
- Residential address
- Emergency contact

Lease Information

- Lease start date
- Lease expiry date
- Rental amount
- Deposit
- Utility allocation
- Payment frequency
- Occupancy status

Financial Records

- Rent payments
- Utility payments
- Outstanding balances
- Receipts
- Statements
- Credits
- Adjustments

Documents

- Lease agreements
- Proof of payment
- Identity documents
- Passport copies
- Other supporting documents uploaded by the landlord

7.5 Trusted Contact Information

Where the Trusted Contact feature is used, Leasy Link may process:

- Name
- Mobile number
- Email address
- Relationship to the Account Owner
- Permissions granted
- Invitation status
- Acceptance history
- Activity relating to delegated access

Acceptance of a Trusted Contact invitation does not create any ownership, succession, inheritance, agency or other legal entitlement to the Account or the assets managed through it.

7.6 Subscription and Billing Information

Leasy Link may process information relating to subscriptions including:

- Subscription plan
- Billing frequency
- Payment status
- Invoice history
- Renewal dates
- Promotional credits
- Trial eligibility

At launch, Leasy Link processes subscription payments for access to the platform. Rent payments between landlords and tenants are not processed by Leasy Link.

7.7 Technical Information

To maintain security and improve the Services, Leasy Link may automatically collect:

- Device model
 - Operating system
 - Browser type
 - App version
 - Device identifiers
 - IP address
 - Language settings
 - Login timestamps
 - Session identifiers
 - Security logs
 - Crash reports
 - Performance diagnostics
-

7.8 Information Received from Third Parties

Leasy Link may receive limited information from authorised third-party providers including:

- Apple App Store
- Google Play
- Payment processors
- SMS providers
- Cloud hosting providers

- Customer support platforms
- Analytics providers

Only the information necessary to provide or improve the Services is collected.

7.9 Sensitive Personal Information

Because Leasy Link manages rental records, we may process sensitive or high-risk personal information including:

- National Identification Numbers
- Passport Numbers
- Identity documents
- Lease agreements
- Financial records
- Rent payment histories
- Utility payment records
- Proofs of payment
- Supporting legal documents

This information is protected using appropriate technical and organisational safeguards, including encryption where appropriate, access controls, audit logging and secure storage.

7.10 Information We Do Not Routinely Collect

Unless specifically required for an optional feature that a user chooses to enable, Leasy Link does not routinely collect:

- Live GPS location
 - Microphone recordings
 - Camera recordings
 - Contact lists
 - SMS content
 - Telephone call recordings
 - Facial recognition data
 - Biometric identifiers
 - Health information
 - Political opinions
 - Religious beliefs
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7.11 Accuracy of Information

Account Owners are responsible for ensuring that the Personal Data they enter into the Services is accurate, complete, current and lawfully obtained.

Leasy Link does not independently verify user-entered information and relies on Account Owners to maintain accurate records.

7.12 Data Minimisation

Leasy Link collects and processes only the Personal Data reasonably necessary to:

- establish and maintain user accounts;
- provide the Services;
- manage rental records;
- generate receipts and statements;
- administer subscriptions;
- maintain security;
- comply with legal obligations; and
- improve the Services.

We do not knowingly collect excessive or irrelevant Personal Data.

8. How We Collect Personal Data

Leasy Link collects Personal Data through several lawful methods to provide, secure and improve the Services. The method of collection depends on how you interact with the Services, the features you use, and your relationship with Leasy Link.

We collect Personal Data only where there is a lawful basis to do so and only for purposes consistent with this Privacy Policy and Applicable Data Protection Laws.

8.1 Information You Provide Directly

We collect Personal Data that you voluntarily provide when you:

- create a Leasy Link account;
- verify your identity using a One-Time Authentication credentials (OTP);
- subscribe to a paid plan;
- add rental properties or units;
- create or manage tenant records;
- upload lease agreements or other documents;
- record rent or utility payments;
- generate receipts or statements;
- invite a Trusted Contact;
- contact customer support;
- complete surveys or feedback forms;
- communicate with us by email, telephone, WhatsApp or social media; or
- otherwise interact with the Services.

You remain responsible for ensuring that the information you provide is accurate, current and lawfully obtained.

8.2 Information Entered About Other Individuals

Leasy Link allows Account Owners and Authorised Users to enter Personal Data relating to other individuals, including tenants and Trusted Contacts.

Examples include:

- tenant names;
- National Identification Numbers;
- Passport Numbers;
- telephone numbers;
- lease information;
- rent records;
- utility allocations;
- receipts;
- statements;
- proof of payment; and
- supporting documentation.

The Account Owner confirms that they have the legal authority or other lawful basis required by applicable law to collect and upload such information.

Leasy Link does not independently verify that authority.

8.3 Information Collected Automatically

When you access the Services, certain technical information may be collected automatically to help us operate, secure and improve the platform.

This may include:

- IP address;
- device identifiers;
- operating system;
- browser type;
- application version;
- language settings;
- login timestamps;
- session identifiers;
- security events;
- crash reports;
- performance diagnostics;
- error logs; and
- usage statistics.

This information helps us:

- maintain security;
- detect fraud;
- investigate technical issues;
- improve application performance;
- troubleshoot errors; and
- monitor service reliability.

Where technically feasible, this information is minimised and retained only for as long as reasonably necessary.

8.4 Cookies and Similar Technologies

Our website may use cookies and similar technologies to:

- remember user preferences;
- maintain secure login sessions;
- improve website performance;
- analyse website traffic;
- understand user interactions;
- prevent fraudulent activity; and
- enhance user experience.

Where required by applicable law, users will be given the opportunity to manage cookie preferences.

Detailed information is contained in the Leasy Link Cookie Policy.

8.5 Mobile Device Permissions

Depending on the features used, the App may request permission to access certain functions of your mobile device.

These permissions may include:

- camera access for uploading supporting documents;
- photo library access for selecting images;
- file storage access for uploading documents;
- notification permissions for reminders and service alerts; and
- internet connectivity required for synchronisation and secure communication.

Leasy Link only accesses these permissions after they have been granted by the user through the device's operating system.

Users may withdraw permissions at any time through their device settings, although doing so may limit certain functionality.

8.6 Information from Third-Party Service Providers

Leasy Link may receive limited Personal Data from trusted third-party service providers where necessary to provide the Services.

These providers may include:

- Apple App Store;
- Google Play;
- payment processors;
- SMS and OTP providers;
- cloud hosting providers;
- analytics providers;
- customer support platforms; and
- identity verification providers, where such functionality is introduced.

We only receive the information reasonably necessary to provide the Services or comply with legal obligations.

8.7 Information from Communications

Where you communicate with Leasy Link, we may collect information contained in those communications.

This may include:

- emails;
- customer support requests;
- WhatsApp messages;
- online chat enquiries;
- telephone enquiries;
- survey responses;
- product feedback; and
- feature requests.

These communications may be used to:

- respond to enquiries;
 - resolve technical issues;
 - investigate complaints;
 - improve the Services; and
 - maintain records of customer interactions.
-

8.8 Information Generated Through Your Use of the Services

As you use the platform, Leasy Link generates operational records that support the functionality of the Services.

These records may include:

- tenant creation history;
- lease history;
- payment history;
- utility allocation history;
- occupancy history;

- receipt generation history;
- statement generation history;
- subscription history;
- login history; and
- audit logs.

These records form part of the operational history of your Account and help ensure accuracy, accountability and business continuity.

8.9 Trusted Contact Invitations

When an Account Owner invites a Trusted Contact, Leasy Link processes the information necessary to:

- send the invitation;
- verify acceptance;
- record permissions granted;
- manage delegated access; and
- maintain an audit trail.

Acceptance of an invitation does not create ownership or legal rights in respect of the Account, rental properties or any associated assets.

8.10 Information We Do Not Intentionally Collect

Unless a user explicitly enables a feature requiring it, Leasy Link does not intentionally collect:

- continuous location tracking;
- audio recordings;
- video recordings;
- contact lists;
- SMS content;
- telephone call recordings;
- biometric information;
- health records;
- political opinions;
- religious beliefs; or
- information unrelated to providing the Services.

Should future features require additional categories of Personal Data, Leasy Link will update this Privacy Policy and, where required by law, obtain any necessary consent before collecting such information.

8.11 Accuracy and User Responsibility

Users are responsible for ensuring that all Personal Data submitted through the Services is:

- accurate;

- complete;
- current; and
- lawfully obtained.

Where information changes, users should update their records as soon as reasonably practicable.

Leasy Link provides tools to update and maintain records but does not guarantee the accuracy of information entered by users.

8.12 Data Collection Principles

In collecting Personal Data, Leasy Link is guided by the following principles:

- lawfulness;
- fairness;
- transparency;
- purpose limitation;
- data minimisation;
- accuracy;
- storage limitation;
- integrity and confidentiality; and
- accountability.

These principles apply to all Personal Data processed through the Services, regardless of the country in which the Services are used, subject to any additional requirements imposed by applicable local law.

9. Purposes of Processing Personal Data

Leasy Link processes Personal Data only where there is a legitimate business purpose and a lawful basis under the Applicable Data Protection Laws.

We do not process Personal Data for purposes that are incompatible with those described in this Privacy Policy unless we obtain any additional consent required by law or another lawful basis applies.

The categories of Personal Data processed and the lawful basis relied upon may vary depending on the Services used and the jurisdiction in which the processing occurs.

9.1 Account Registration and Administration

Leasy Link processes Personal Data to:

- create user accounts;
- verify user identity through One-Time Authentication credentials (OTP) authentication;

- maintain account security;
- manage subscriptions;
- administer user preferences;
- verify account ownership;
- manage account settings; and
- provide access to authorised features.

Lawful Basis

- Performance of a contract.
 - Legitimate interests in operating a secure platform.
 - Compliance with legal obligations where applicable.
-

9.2 Provision of Rental Management Services

Leasy Link processes Personal Data to provide the core functionality of the Services, including:

- creating and managing rental properties;
- recording rental units;
- managing tenant information;
- generating lease records;
- recording rent and utility information;
- generating receipts;
- generating account statements;
- maintaining occupancy records;
- storing supporting documents; and
- preserving historical rental records.

Lawful Basis

- Performance of a contract.
 - Legitimate interests in providing the Services requested by users.
-

9.3 Processing Tenant Information

Leasy Link processes tenant information solely for the purpose of enabling landlords and authorised users to administer rental relationships through the Services.

Leasy Link does not use tenant information for independent marketing or unrelated commercial purposes.

The landlord or other authorised user remains responsible for ensuring that there is a lawful basis under applicable law to collect, upload and process tenant information.

Lawful Basis

- Performance of a contract with the Account Owner.

- Legitimate interests in providing the Services.
 - Compliance with legal obligations where applicable.
-

9.4 Subscription and Billing

We process Personal Data to:

- administer subscriptions;
- process subscription payments;
- issue invoices;
- maintain billing records;
- manage renewals;
- provide payment confirmations;
- administer free trials;
- detect billing fraud; and
- manage subscription changes.

At launch, Leasy Link does **not** process rent payments between landlords and tenants.

Lawful Basis

- Performance of a contract.
 - Compliance with financial and tax obligations.
-

9.5 Customer Support

Leasy Link processes Personal Data to:

- respond to enquiries;
- investigate technical issues;
- resolve complaints;
- verify user identity before disclosing account information;
- provide product assistance;
- improve customer experience; and
- maintain records of support interactions.

Lawful Basis

- Performance of a contract.
 - Legitimate interests in providing customer support.
-

9.6 Security and Fraud Prevention

We process Personal Data to:

- detect unauthorised access;
- prevent fraud;
- monitor suspicious activity;
- investigate security incidents;
- maintain audit trails;
- protect the integrity of the Services;
- safeguard user accounts; and
- comply with security obligations.

Lawful Basis

- Legitimate interests.
 - Compliance with legal obligations.
 - Protection of vital interests where applicable.
-

9.7 Product Improvement

Leasy Link may use technical and usage information to:

- improve application performance;
- correct software defects;
- develop new features;
- enhance usability;
- improve security;
- optimise system performance; and
- conduct internal analytics.

Where possible, aggregated or de-identified information will be used.

Lawful Basis

- Legitimate interests.
-

9.8 Communications

We process Personal Data to send:

- service notifications;
- security alerts;
- OTP messages;
- subscription notices;

- billing notifications;
- maintenance notices;
- product updates;
- customer support communications; and
- other communications necessary for the operation of the Services.

Marketing communications will be sent only where permitted by applicable law and, where required, with the user's consent.

Lawful Basis

- Performance of a contract.
- Legitimate interests.
- Consent where legally required.

9.9 Legal and Regulatory Compliance

Leasy Link may process Personal Data to:

- comply with court orders;
- respond to lawful requests from competent authorities;
- comply with applicable legislation;
- meet tax and accounting obligations;
- resolve disputes;
- enforce legal rights; and
- protect Leasy Link, its users and third parties.

Lawful Basis

- Compliance with legal obligations.
- Legitimate interests.

9.10 Business Operations

Leasy Link may process Personal Data for legitimate internal operational purposes including:

- financial reporting;
- audit requirements;
- governance;
- risk management;
- business continuity;
- disaster recovery;
- system administration; and
- corporate record keeping.

Lawful Basis

Leasy Link Privacy Policy

- Legitimate interests.
 - Compliance with legal obligations.
-

9.11 Trusted Contact Functionality

Where an Account Owner chooses to use the Trusted Contact feature, Leasy Link processes Personal Data to:

- send invitations;
- verify acceptance;
- manage delegated permissions;
- maintain security;
- record audit logs; and
- administer authorised access.

Trusted Contact information is processed only for the purpose of providing this functionality.

Lawful Basis

- Performance of a contract.
 - Legitimate interests.
 - Consent where required by law.
-

9.12 Data Analytics and Reporting

Leasy Link may analyse technical and operational information to:

- understand platform usage;
- measure system performance;
- identify trends;
- improve reliability;
- generate aggregated statistical reports; and
- support strategic planning.

Where practicable, reports will be produced using aggregated or anonymised information that does not identify individual users.

Lawful Basis

- Legitimate interests.
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10. Lawful Bases for Processing

Depending on the processing activity and the applicable jurisdiction, Leasy Link relies on one or more of the following lawful bases:

10.1 Performance of a Contract

Processing necessary to provide the Services requested by the user or to perform obligations under the Terms and Conditions.

10.2 Compliance with Legal Obligations

Processing necessary to comply with applicable laws, lawful requests from competent authorities, tax obligations, accounting requirements or court orders.

10.3 Legitimate Interests

Processing necessary for Leasy Link's legitimate interests, provided those interests are not overridden by the rights and freedoms of the Data Subject. These interests include:

- maintaining platform security;
 - preventing fraud;
 - improving the Services;
 - supporting customers;
 - ensuring system reliability;
 - conducting internal administration; and
 - protecting legal rights.
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10.4 Consent

Where consent is required by law, Leasy Link will obtain consent before processing Personal Data.

Users may withdraw consent at any time. Withdrawal of consent does not affect the lawfulness of processing carried out before the withdrawal.

10.5 Protection of Vital Interests

Where necessary, Personal Data may be processed to protect the vital interests of an individual or another natural person, where permitted by applicable law.

10.6 Public Interest

Where applicable legislation permits or requires processing in the public interest or in the exercise of official authority, Leasy Link may process Personal Data accordingly.

Disclosure and Sharing of Personal Data

11. General Principle

Leasy Link respects the confidentiality of Personal Data entrusted to us.

We will not sell, rent, trade, license or otherwise commercially exploit Personal Data.

Personal Data will only be disclosed where:

- it is necessary to provide the Services;
- the user has authorised the disclosure;
- disclosure is required by law;
- disclosure is necessary to protect legal rights or safety; or
- another lawful basis exists under the Applicable Data Protection Laws.

Every disclosure is limited to the minimum amount of information reasonably necessary for its intended purpose.

11.1 Disclosure to Service Providers

Leasy Link may engage carefully selected third-party service providers to assist in delivering the Services.

These providers may include:

- cloud hosting providers;
- data storage providers;
- backup and disaster recovery providers;
- SMS and One-Time Authentication credentials (OTP) providers;
- email delivery providers;
- payment processors;
- customer support platforms;
- analytics providers;
- security monitoring providers;
- software maintenance providers; and
- other technology providers reasonably required to operate the Services.

These providers may only process Personal Data on documented instructions from Leasy Link and only for the purposes of providing the contracted services.

Appropriate contractual safeguards will be implemented to protect Personal Data.

11.2 Disclosure to Payment Providers

Where subscription payments are processed by third-party payment providers, limited Personal Data may be shared to:

- process payments;
- prevent fraud;
- issue invoices;
- verify payment status;
- administer refunds where applicable; and
- comply with financial regulations.

Leasy Link does not store full payment card information unless specifically required and lawfully permitted.

Payment providers remain responsible for processing payment information in accordance with their own privacy obligations.

11.3 Disclosure to SMS and Communication Providers

Leasy Link may disclose limited Personal Data to providers responsible for:

- OTP authentication;
- security verification;
- service notifications;
- billing reminders;
- account communications; and
- customer support messaging.

Only the information necessary to deliver the communication will be shared.

11.4 Disclosure to Cloud Hosting Providers

Leasy Link stores and processes information using reputable cloud infrastructure providers.

These providers may process Personal Data solely for the purposes of:

- secure hosting;
- database management;

- backups;
- disaster recovery;
- system monitoring;
- infrastructure security; and
- business continuity.

Cloud providers are required to maintain appropriate security measures and confidentiality obligations.

11.5 Disclosure to Professional Advisers

Where reasonably necessary, Leasy Link may disclose Personal Data to:

- external legal advisers;
- auditors;
- accountants;
- insurers;
- cybersecurity consultants;
- compliance advisers; and
- other professional advisers.

Such disclosures will occur only where necessary for legitimate business, legal or regulatory purposes and, where appropriate, under confidentiality obligations.

11.6 Disclosure to Regulatory Authorities

Leasy Link may disclose Personal Data where required to:

- comply with applicable legislation;
- comply with lawful regulatory requests;
- comply with court orders;
- comply with subpoenas;
- respond to lawful investigations;
- satisfy reporting obligations; or
- comply with legally binding directives.

Where legally permitted, Leasy Link will seek to ensure that requests are valid, proportionate and limited in scope before disclosing Personal Data.

11.7 Disclosure to Law Enforcement Agencies

Where required by applicable law, Leasy Link may disclose Personal Data to competent law enforcement authorities.

Such disclosure will occur only where:

- required by law;
 - authorised by a court;
 - necessary to investigate criminal activity;
 - necessary to prevent fraud;
 - necessary to protect users or third parties; or
 - otherwise permitted under Applicable Data Protection Laws.
-

11.8 Disclosure During Business Transactions

If Leasy Link undergoes:

- a merger;
- acquisition;
- corporate restructuring;
- investment transaction;
- sale of assets; or
- similar corporate transaction,

Personal Data may be transferred as part of that transaction, subject to appropriate confidentiality obligations and applicable legal requirements.

Users will be notified where required by law.

11.9 Disclosure With User Consent

Leasy Link may disclose Personal Data where the user has expressly authorised or instructed us to do so.

Consent may be withdrawn at any time, subject to legal and contractual limitations.

Withdrawal of consent does not affect disclosures already lawfully made before withdrawal.

11.10 Disclosure to Trusted Contacts

Where an Account Owner invites a Trusted Contact, Leasy Link may disclose only the information necessary to:

- send the invitation;
- verify acceptance;
- administer delegated permissions;
- maintain security; and
- operate the Trusted Contact feature.

Trusted Contacts receive access only to the information and functions authorised by the Account Owner.

Acceptance of a Trusted Contact invitation does not create any ownership, partnership, succession, inheritance, agency or other legal rights in relation to the Account, rental properties, tenant records, leases, payments or other assets.

11.11 International Transfers

Personal Data may be transferred to or accessed from countries outside the jurisdiction in which it was collected where necessary to provide the Services.

Where cross-border transfers occur, Leasy Link will implement appropriate safeguards, which may include:

- contractual safeguards;
 - recognised transfer mechanisms;
 - technical security measures;
 - encryption;
 - access controls; and
 - any additional safeguards required under Applicable Data Protection Laws.
-

11.12 Aggregated and De-identified Information

Leasy Link may create aggregated or de-identified information for purposes such as:

- statistical reporting;
- product development;
- service improvement;
- business planning;
- research; and
- operational analytics.

Reasonable measures will be taken to ensure that such information cannot reasonably be used to identify an individual.

11.13 Marketing Partners

Leasy Link does not sell Personal Data to advertisers or marketing companies.

Where we work with marketing service providers, they may process Personal Data only:

- on Leasy Link's instructions;
- for authorised marketing activities;
- in accordance with applicable law; and

- under contractual confidentiality obligations.

Users will be provided with the opportunity to opt out of direct marketing communications where required by law.

11.14 No Sale of Personal Data

Leasy Link does not sell Personal Data.

We do not exchange Personal Data for monetary consideration or otherwise make Personal Data available for commercial exploitation.

This commitment applies across all jurisdictions in which Leasy Link operates, subject only to disclosures expressly permitted or required under Applicable Data Protection Laws.

11.15 Data Sharing Principles

Whenever Personal Data is disclosed, Leasy Link applies the following principles:

- lawfulness;
- fairness;
- transparency;
- purpose limitation;
- data minimisation;
- confidentiality;
- integrity;
- accountability; and
- proportionality.

Only the minimum Personal Data reasonably necessary for the relevant purpose will be disclosed.

Information Security and Protection of Personal Data

12. Our Commitment to Information Security

Leasy Link recognises that Personal Data is a valuable and confidential asset. We are committed to protecting the confidentiality, integrity, availability and resilience of the Personal Data entrusted to us.

We implement appropriate technical, organisational and administrative measures designed to safeguard Personal Data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, unauthorised access or any other unlawful form of processing.

Our security programme is reviewed periodically and updated as technology, legal requirements and operational risks evolve.

12.1 Security Principles

Leasy Link's information security programme is guided by the following principles:

- Confidentiality
- Integrity
- Availability
- Accountability
- Data minimisation
- Privacy by Design
- Privacy by Default
- Least Privilege Access
- Defence in Depth
- Continuous Improvement

These principles apply to all Personal Data processed through the Services.

12.2 Technical Security Measures

Leasy Link implements technical safeguards that may include:

- encryption of Personal Data during transmission using secure communication protocols;
- encryption of sensitive information at rest where appropriate;
- secure authentication mechanisms;
- One-Time Authentication credentials (OTP) verification;
- role-based access controls;
- secure password management;
- session management;
- audit logging;
- intrusion detection and monitoring;
- malware protection;
- vulnerability management;
- software security updates;
- secure cloud infrastructure; and
- regular system backups.

Security measures are reviewed and enhanced as technology and risks evolve.

12.3 Organisational Security Measures

Leasy Link maintains organisational safeguards including:

- access controls based on business need;

- confidentiality obligations for personnel and contractors;
 - documented security procedures;
 - incident response procedures;
 - secure change management practices;
 - controlled access to production systems;
 - periodic review of privileged access;
 - security awareness activities; and
 - supplier security assessments where appropriate.
-

12.4 Access Control

Access to Personal Data is restricted to persons who require access to perform authorised business functions.

Access permissions are granted according to the principle of least privilege.

Administrative access is monitored and reviewed periodically.

Access rights may be modified or revoked whenever operational or security requirements change.

12.5 Authentication credentials Security

Users remain responsible for maintaining the confidentiality of their account credentials.

Users should:

- choose strong passwords;
- avoid sharing passwords;
- protect their devices;
- promptly report suspected compromise; and
- update passwords where necessary.

Leasy Link will never request a user's password by email, SMS or telephone.

12.6 One-Time Authentication credentials Authentication

Leasy Link uses One-Time Authentication credentials (OTP) authentication to help verify user identity.

OTP messages are intended solely for authentication purposes and must not be shared with any other person.

Repeated failed verification attempts may result in temporary security restrictions to protect user accounts.

12.7 Encryption

Where appropriate, Leasy Link uses industry-recognised encryption technologies to protect Personal Data:

- while transmitted across public networks;
- while stored within supported infrastructure;
- during backups; and
- during communication between system components.

Encryption standards may be updated periodically to reflect recognised security practices.

12.8 Secure Cloud Infrastructure

Leasy Link uses professionally managed cloud infrastructure to support the Services.

Cloud infrastructure providers are selected based on factors including:

- security capabilities;
- reliability;
- operational resilience;
- contractual safeguards;
- regulatory compliance; and
- data protection commitments.

Appropriate contractual obligations are maintained with cloud providers where required.

12.9 Security Monitoring

Leasy Link may monitor system activity for purposes including:

- fraud detection;
- unauthorised access detection;
- intrusion monitoring;
- malware detection;
- system performance;
- security investigations;
- service availability; and
- operational reliability.

Monitoring is conducted only to the extent reasonably necessary for legitimate operational and security purposes.

12.10 Security Incident Management

Leasy Link maintains procedures for responding to suspected security incidents.

These procedures may include:

- identifying affected systems;
 - containing the incident;
 - investigating the cause;
 - restoring services;
 - assessing risks;
 - notifying affected parties where required by law;
 - notifying competent authorities where legally required; and
 - implementing corrective measures.
-

12.11 User Responsibilities

Users also play an important role in protecting Personal Data.

Users should:

- keep login credentials confidential;
- protect devices from unauthorised access;
- install software updates;
- avoid sharing accounts;
- verify recipient details before sharing information;
- report suspected security incidents promptly; and
- maintain appropriate security over documents downloaded from the Services.

Leasy Link cannot be responsible for security incidents resulting solely from a user's failure to protect their own credentials or devices.

12.12 Third-Party Security

Where third-party service providers process Personal Data on behalf of Leasy Link, we require them to implement appropriate security measures consistent with the nature of the services they provide and the Personal Data they process.

Leasy Link undertakes reasonable due diligence before engaging such providers and periodically reviews them where appropriate.

12.13 Data Breach Notification

If Leasy Link becomes aware of a Personal Data breach that is likely to result in a risk to the rights or freedoms of affected individuals, we will assess the incident promptly and, where required by Applicable Data Protection Laws, notify:

- the relevant supervisory or regulatory authority;
- affected individuals; and/or
- other competent authorities,

within the applicable legal timeframes.

Notifications will include the information required by applicable law, to the extent reasonably available.

12.14 Business Continuity and Disaster Recovery

Leasy Link maintains measures designed to support the continuity of the Services and recovery from significant operational disruptions.

These measures may include:

- secure backups;
- infrastructure redundancy where appropriate;
- disaster recovery procedures;
- recovery testing; and
- restoration planning.

While we take reasonable steps to ensure service availability, no system can guarantee uninterrupted operation.

12.15 Continuous Security Improvement

Information security is an ongoing process.

Leasy Link regularly evaluates:

- emerging cyber threats;
- technological developments;
- legal requirements;
- user feedback;
- security incidents;
- independent assessments; and
- operational experience,

to improve the security of the Services.

12.16 Security Limitations

Although Leasy Link applies reasonable technical and organisational safeguards, no method of electronic transmission, internet communication or electronic storage can be guaranteed to be completely secure.

Accordingly, while we strive to protect Personal Data, we cannot guarantee absolute security.

Retention, Archiving and Secure Deletion of Personal Data

13. General Principle

Leasy Link retains Personal Data only for as long as it is reasonably necessary to:

- provide the Services;
- fulfil the purposes described in this Privacy Policy;
- comply with applicable legal and regulatory obligations;
- maintain accurate rental records;
- resolve disputes;
- establish, exercise or defend legal claims;
- protect users and the integrity of the Services; and
- satisfy legitimate business and operational requirements.

When Personal Data is no longer required for these purposes, it will be securely deleted, anonymised or otherwise disposed of in accordance with applicable law and Leasy Link's internal data retention procedures.

13.1 Factors Determining Retention

The length of time Personal Data is retained depends on several factors, including:

- the type of Personal Data;
- the purpose for which it was collected;
- contractual obligations;
- statutory retention requirements;
- accounting and taxation obligations;
- audit requirements;
- dispute resolution needs;
- fraud prevention;
- information security requirements; and
- legitimate operational needs.

Retention periods may therefore differ depending on the nature of the information.

13.2 Account Information

Leasy Link retains Account information for as long as the Account remains active.

Following closure of an Account, certain information may continue to be retained where necessary to:

- comply with legal obligations;
 - maintain financial records;
 - resolve disputes;
 - investigate fraud;
 - enforce contractual rights;
 - preserve audit records; or
 - comply with regulatory requirements.
-

13.3 Tenant Records

Tenant records entered by landlords may include:

- identification information;
- contact details;
- lease information;
- payment history;
- utility records;
- occupancy history;
- receipts;
- statements; and
- supporting documentation.

These records may be retained after a tenancy has ended where reasonably necessary to:

- preserve historical rental records;
- support financial reporting;
- resolve disputes;
- comply with legal obligations;
- establish legal rights; or
- maintain complete account histories.

Historical records may be archived rather than permanently deleted where appropriate.

13.4 Financial Records

Financial records may be retained for periods required by:

- taxation legislation;
- accounting standards;
- financial reporting obligations;

- audit requirements;
- anti-fraud measures; and
- other applicable legal obligations.

Leasy Link will not delete financial records where doing so would conflict with applicable law.

13.5 Uploaded Documents

Documents uploaded to the Services, including lease agreements, proof of payment and identity documents, may be retained while they remain relevant to:

- the Services;
- legal obligations;
- dispute resolution;
- audit requirements; or
- the Account Owner's legitimate record-keeping purposes.

Users remain responsible for determining whether uploaded documents continue to be required.

13.6 Customer Support Records

Customer support records may be retained to:

- improve customer service;
 - investigate recurring issues;
 - resolve complaints;
 - verify previous communications;
 - train support personnel; and
 - comply with legal obligations.
-

13.7 Security Logs and Audit Records

Security logs, authentication records, system logs and audit trails may be retained for purposes including:

- cybersecurity;
- fraud prevention;
- system integrity;
- incident investigations;
- regulatory compliance; and
- operational security.

Retention periods for these records may differ from those applicable to ordinary account information.

13.8 Backups

Personal Data may continue to exist within encrypted backup systems for a limited period after deletion from active systems.

Backup information:

- is protected using appropriate security measures;
 - is not routinely accessed;
 - is retained only for legitimate operational and disaster recovery purposes; and
 - is overwritten or securely destroyed in accordance with Leasy Link's backup procedures.
-

13.9 Deletion Requests

Where a user requests deletion of Personal Data, Leasy Link will assess the request in accordance with:

- Applicable Data Protection Laws;
- contractual obligations;
- legal retention requirements;
- regulatory obligations; and
- legitimate business interests.

Certain information may need to be retained notwithstanding a deletion request where retention is required or permitted by law.

13.10 Secure Disposal

When Personal Data reaches the end of its retention period, Leasy Link will take reasonable steps to ensure that it is:

- permanently deleted;
- securely destroyed;
- anonymised; or
- otherwise rendered incapable of identifying an individual,

unless continued retention is required by law.

Secure disposal methods may vary depending on the type of information and storage medium.

13.11 Legal Holds

Leasy Link may suspend the routine deletion of Personal Data where the information is reasonably required for:

- ongoing litigation;
- arbitration;
- regulatory investigations;
- law enforcement requests;
- insurance claims;
- internal investigations; or
- anticipated legal proceedings.

Routine deletion will resume once the legal hold is no longer required.

13.12 Historical Records

Leasy Link is designed to preserve an accurate history of rental management activities.

Accordingly, certain historical information may be retained after a tenant vacates a property, including:

- lease history;
- rent payment history;
- occupancy history;
- receipt history;
- statement history; and
- audit records.

The retention of historical records supports:

- accurate financial reporting;
 - dispute resolution;
 - fraud prevention;
 - continuity of account records; and
 - compliance with applicable legal obligations.
-

13.13 Continuous Review

Leasy Link periodically reviews its retention practices to ensure they remain:

- lawful;
- proportionate;
- operationally appropriate;
- commercially reasonable; and
- aligned with evolving legal and regulatory requirements.

Retention schedules may therefore be updated from time to time without changing the principles set out in this Privacy Policy.

Users should also take reasonable precautions to protect their own information and devices.

Your Privacy Rights and How to Exercise Them

14. Our Commitment to Your Privacy Rights

Leasy Link respects the rights of individuals whose Personal Data we process.

Subject to Applicable Data Protection Laws, users may request access to, correction of, restriction of, objection to, portability of or deletion of their Personal Data, or withdraw consent where consent is the lawful basis for processing.

These rights are not absolute and may be limited where Leasy Link is required or permitted by law to retain or continue processing certain information.

Leasy Link will assess every request fairly, lawfully and within any applicable statutory timeframes.

14.1 Right to Be Informed

Individuals have the right to understand:

- what Personal Data Leasy Link collects;
- why it is collected;
- how it is used;
- who it may be shared with;
- how long it is retained;
- how it is protected; and
- how privacy rights may be exercised.

This Privacy Policy forms part of that commitment to transparency.

14.2 Right of Access

Subject to applicable law, you may request confirmation as to whether Leasy Link processes your Personal Data.

Where applicable, you may request access to:

- the categories of Personal Data held;
- the purposes of processing;
- categories of recipients;

- the source of the information where it was not obtained directly from you;
- applicable retention principles; and
- other information required by law.

Leasy Link may verify your identity before releasing Personal Data.

14.3 Right to Correction

You may request that inaccurate, incomplete or outdated Personal Data be corrected.

Where reasonably practicable, corrections will be made promptly.

Users are encouraged to keep their account information current using the self-service features available within the Services.

14.4 Right to Update Information

Users may update information such as:

- contact details;
- email address;
- telephone number;
- password;
- property information;
- tenant records;
- lease information; and
- subscription preferences,

subject to the functionality available within the Services.

14.5 Right to Request Deletion

You may request deletion of your Personal Data.

Leasy Link will consider such requests in accordance with:

- Applicable Data Protection Laws;
- contractual obligations;
- financial reporting requirements;
- taxation legislation;
- legal claims;
- fraud prevention;
- audit requirements; and

- legitimate business interests.

Certain information may need to be retained notwithstanding a deletion request.

14.6 Right to Restrict Processing

Where permitted by law, you may request that Leasy Link temporarily restrict the processing of certain Personal Data where:

- its accuracy is contested;
- processing is believed to be unlawful;
- the information is required for legal claims; or
- an objection to processing is being considered.

Restriction may not apply where continued processing is required by law.

14.7 Right to Object

Where processing is based on legitimate interests or another lawful basis permitting objection, you may object to certain processing activities.

Leasy Link will consider such objections in accordance with Applicable Data Protection Laws.

Processing may continue where compelling legitimate grounds exist or where processing is otherwise required by law.

14.8 Right to Withdraw Consent

Where Personal Data is processed based on consent, you may withdraw that consent at any time.

Withdrawal of consent:

- does not affect processing already carried out lawfully before withdrawal;
 - does not affect processing based on another lawful basis; and
 - may affect Leasy Link's ability to provide certain Services where consent is essential.
-

14.9 Right to Data Portability

Where applicable law provides such a right and it is technically feasible, you may request a copy of certain Personal Data that you have provided to Leasy Link in a structured, commonly used and machine-readable format.

This right applies only where required by Applicable Data Protection Laws and where it does not adversely affect the rights of others or compromise the security or integrity of the Services.

14.10 Rights Relating to Tenant Information

Leasy Link provides the platform through which landlords manage tenant records.

Accordingly:

- requests relating to tenant information should generally be directed first to the landlord or property manager responsible for collecting and maintaining that information;
 - Leasy Link may assist the landlord in responding to lawful requests where appropriate; and
 - Leasy Link may communicate directly with a tenant where required by law or where necessary to fulfil our own legal obligations.
-

14.11 Verification of Identity

Before responding to certain requests, Leasy Link may require reasonable evidence to verify the identity of the requester.

This helps protect Personal Data against unauthorised disclosure.

Where identity cannot reasonably be verified, Leasy Link may decline or delay the request until sufficient verification has been obtained.

14.12 Timeframes for Responding

Leasy Link aims to respond to privacy requests without undue delay.

Response times will depend on:

- the complexity of the request;
- the volume of information involved;
- legal requirements;
- verification of identity; and
- operational circumstances.

Where an extension is permitted by law, the requester will be informed of the reason for the delay.

14.13 Refusal of Requests

Leasy Link may refuse or partially refuse a request where permitted by law, including where:

- disclosure would adversely affect the rights of another individual;
- the request is manifestly unfounded or excessive;
- legal professional privilege applies;
- the information must be retained by law;
- disclosure would prejudice legal proceedings, regulatory investigations or fraud prevention; or
- another lawful exemption applies.

Where reasonably practicable, Leasy Link will explain the reason for the refusal and advise the requester of any available review or complaint mechanisms.

14.14 Exercising Your Rights

Privacy requests may be submitted using the contact details published by Leasy Link.

To assist us in processing your request efficiently, please include:

- your full name;
- the email address or telephone number associated with your account;
- sufficient information to identify the records concerned; and
- a clear description of the request.

Leasy Link may request additional information where reasonably necessary to verify identity or clarify the request.

14.15 No Discrimination

Leasy Link will not unfairly discriminate against any individual for exercising a lawful privacy right.

However, where certain Personal Data is essential to provide the Services, the exercise of a particular right (such as deletion or withdrawal of consent) may affect the availability or functionality of those Services.

14.16 Complaints and Escalation

If you believe that Leasy Link has not handled your Personal Data in accordance with Applicable Data Protection Laws, you may lodge a complaint with us using the contact details provided in this Privacy Policy.

If the matter cannot be resolved satisfactorily, you may have the right to refer your complaint to the relevant supervisory authority, regulator or other competent body in the jurisdiction applicable to your request.

Cross-Border Processing and International Data Transfers

15. Our Commitment to Responsible Cross-Border Processing

Leasy Link is committed to protecting Personal Data regardless of where it is collected, stored, accessed or processed.

Because Leasy Link operates through modern cloud-based technology and intends to provide Services across multiple jurisdictions, Personal Data may be processed in countries other than the country in which it was originally collected.

Whenever Personal Data is transferred across borders, Leasy Link will take reasonable steps to ensure that the information continues to receive an appropriate level of protection consistent with Applicable Data Protection Laws.

15.1 Countries of Operation

At launch, Leasy Link intends to offer its Services in:

- Botswana
- South Africa
- Zambia
- Namibia
- Zimbabwe

As the business expands, the Services may become available in additional countries.

This Privacy Policy applies to all jurisdictions in which Leasy Link lawfully provides its Services unless a country-specific privacy notice or legal requirement provides otherwise.

15.2 International Data Transfers

Personal Data may be transferred between countries where necessary to:

- provide the Services;
- host systems and databases;
- maintain backups;
- provide technical support;
- investigate security incidents;
- process subscription payments;
- deliver One-Time Authentication credentials (OTP) authentication;
- operate customer support platforms;
- comply with legal obligations; or

- support legitimate business operations.

Such transfers may occur even where the receiving country has different privacy legislation from the country in which the information was originally collected.

15.3 Safeguards for International Transfers

Before transferring Personal Data internationally, Leasy Link will implement safeguards appropriate to the nature of the information and the risks involved.

These safeguards may include:

- contractual obligations requiring confidentiality and appropriate security;
 - encryption during transmission and, where appropriate, at rest;
 - access controls and authentication measures;
 - due diligence on service providers;
 - secure hosting arrangements;
 - technical and organisational security controls;
 - internal governance procedures; and
 - any additional safeguards required by Applicable Data Protection Laws.
-

15.4 Cloud Infrastructure

Leasy Link uses professionally managed cloud infrastructure to support the Services.

Depending on operational requirements, cloud infrastructure providers may process Personal Data in one or more jurisdictions.

Leasy Link selects cloud providers based on considerations including:

- security;
- reliability;
- operational resilience;
- contractual commitments;
- privacy practices; and
- legal compliance.

Leasy Link does not transfer Personal Data to a third-party cloud provider without appropriate contractual and security safeguards.

15.5 Access from Multiple Countries

Authorised personnel and authorised service providers may access Personal Data from different countries where necessary to:

- provide customer support;
- investigate incidents;
- maintain infrastructure;
- perform authorised maintenance;
- administer subscriptions;
- provide technical assistance; or
- fulfil legal obligations.

Access is limited to persons with a legitimate business need and is subject to confidentiality and security requirements.

15.6 Cross-Border Rights

Where Personal Data is transferred internationally, Leasy Link will endeavour to ensure that individuals continue to enjoy privacy protections substantially equivalent to those required by the Applicable Data Protection Laws governing the original collection of the information, unless local law requires a higher standard.

Nothing in this Privacy Policy limits any mandatory rights granted under the law of the jurisdiction that applies to a particular processing activity.

15.7 International Service Providers

Leasy Link may engage international service providers to assist with:

- cloud hosting;
- cybersecurity;
- payment processing;
- messaging and notification services;
- customer support;
- analytics;
- software maintenance; and
- other operational functions.

Such providers are required to process Personal Data only for authorised purposes and under appropriate contractual obligations.

15.8 Business Expansion

As Leasy Link expands into additional countries, Personal Data may be processed in new jurisdictions.

Before expanding into a new jurisdiction, Leasy Link will assess:

- applicable privacy legislation;
- regulatory requirements;
- localisation obligations;
- security considerations;
- contractual safeguards;
- operational risks; and
- any additional measures reasonably necessary to protect Personal Data.

Where material changes to processing arise, this Privacy Policy will be updated as required.

15.9 Government and Regulatory Requests

Where a foreign government, regulator or public authority requests access to Personal Data, Leasy Link will:

- assess the legal validity of the request;
 - verify the authority of the requesting body;
 - disclose only the minimum information required by law;
 - protect the rights of affected individuals where legally permitted; and
 - challenge or refuse requests that are unlawful, disproportionate or exceed applicable legal authority, where appropriate.
-

15.10 Data Localisation

Where a country requires certain categories of Personal Data to be stored, processed or retained within its borders, Leasy Link will take reasonable steps to comply with those legal requirements.

Nothing in this Privacy Policy prevents Leasy Link from implementing country-specific data storage arrangements where required by law or where operationally appropriate.

15.11 International Business Transactions

If Leasy Link enters into:

- strategic partnerships;
- mergers;
- acquisitions;
- investment transactions;

- corporate restructures; or
- cross-border business arrangements,

Personal Data may be transferred as part of those transactions, provided appropriate confidentiality obligations, contractual safeguards and applicable legal requirements are observed.

15.12 Continuous Review

International privacy legislation continues to evolve.

Accordingly, Leasy Link will periodically review:

- international transfer mechanisms;
- service provider arrangements;
- contractual safeguards;
- regulatory developments;
- operational risks; and
- technological developments,

to ensure that cross-border processing remains lawful, secure and appropriate.

15.13 Commitment to Responsible International Operations

Leasy Link recognises that trust is fundamental to the Services.

Accordingly, we are committed to ensuring that Personal Data remains protected regardless of where it is processed and to applying consistent privacy and security standards across all jurisdictions in which we operate.

Where local law imposes additional obligations, Leasy Link will comply with those obligations to the extent applicable.

Governance, Contact Information and Final Provisions

16. Privacy Governance

Leasy Link is committed to maintaining an effective privacy governance programme that supports responsible data management, accountability and continuous compliance with Applicable Data Protection Laws.

Privacy governance forms part of Leasy Link's overall corporate governance framework and includes:

- documented privacy policies;
- information security controls;

- records management practices;
 - incident response procedures;
 - third-party oversight;
 - employee and contractor confidentiality obligations;
 - periodic compliance reviews; and
 - continuous improvement of privacy practices.
-

16.1 Accountability

Leasy Link accepts responsibility for implementing and maintaining reasonable measures designed to protect Personal Data processed through the Services.

Management is responsible for ensuring that appropriate governance, operational procedures and internal controls are maintained.

Employees, contractors and authorised representatives who process Personal Data on behalf of Leasy Link are required to comply with applicable confidentiality obligations and internal privacy requirements.

16.2 Privacy by Design and Privacy by Default

Leasy Link seeks to incorporate privacy considerations into the design, development and operation of its Services.

Where reasonably practicable, new products, features and business processes will be designed to:

- collect only the Personal Data reasonably necessary;
- minimise privacy risks;
- implement appropriate security controls;
- provide users with meaningful choices where required by law; and
- support compliance with Applicable Data Protection Laws.

Default settings will, where reasonably practicable, favour the protection of Personal Data.

16.3 Third-Party Websites and Services

The Services may contain links to third-party websites, applications or services.

Leasy Link is not responsible for the privacy practices, content or security of third-party platforms that are not owned or controlled by Leasy Link.

Users should review the privacy policies of those third parties before providing Personal Data.

16.4 Changes to this Privacy Policy

Leasy Link may revise this Privacy Policy from time to time to reflect:

- changes in legislation;
- regulatory guidance;
- operational requirements;
- technological developments;
- new products or services;
- security enhancements; or
- changes to business practices.

Where required by law, users will be notified of material changes before they become effective.

The latest version of this Privacy Policy will always be made available through the Services or the official Leasy Link website.

16.5 Contacting Leasy Link

Questions, requests or concerns regarding this Privacy Policy or the processing of Personal Data may be directed to Leasy Link using the contact details published on our official website or within the Services.

At the time of publication, the contact details should include:

- Legal Entity Name
- Registered Office Address
- Customer Support Email
- Privacy Email Address
- Telephone Number
- Website
- Company Registration Number

Where required by law, details of the designated Data Protection Officer, Information Officer or other privacy contact will also be published.

16.6 Complaints

Leasy Link encourages individuals to contact us first if they have a concern regarding the handling of their Personal Data.

We will investigate complaints fairly, impartially and within a reasonable time.

Where an individual remains dissatisfied after our internal process has been completed, they may have the right to refer the matter to the competent supervisory authority, regulator or other body responsible for privacy or data protection matters in the relevant jurisdiction.

Nothing in this Privacy Policy limits any statutory right to seek an appropriate legal remedy.

16.7 Severability

If any provision of this Privacy Policy is found by a court or other competent authority to be unlawful, invalid or unenforceable, that provision will be interpreted or modified to the minimum extent necessary to make it lawful and enforceable.

If modification is not possible, the affected provision will be severed without affecting the validity or enforceability of the remaining provisions.

16.8 Governing Law

This Privacy Policy is governed by the laws applicable to the Leasy Link operating entity that provides the Services, together with any mandatory data protection, consumer protection and other applicable legislation governing the processing of Personal Data in the relevant jurisdiction.

Where the Services are provided across multiple jurisdictions, mandatory local legal requirements will apply to the extent required by law.

16.9 Entire Privacy Policy

This Privacy Policy constitutes Leasy Link's primary public statement regarding the collection, use, disclosure, protection and retention of Personal Data.

It should be read together with the following Leasy Link documents, where applicable:

- Terms and Conditions;
 - End User Licence Agreement (EULA);
 - Subscription and Billing Policy;
 - Refund Policy;
 - Cookie Policy;
 - Acceptable Use Policy;
 - Data Processing Agreement (where applicable); and
 - any additional notices presented when Personal Data is collected.
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16.10 Version Control

Document Information	Details
Document Title	Leasy Link Privacy Policy
Version	1.0
Status	Draft for Legal Review
Owner	Leasy Link Legal & Compliance
Approved By	Board of Directors
Effective Date	23 August 2026
Next Review Date	Twelve months after the Effective Date or earlier if required by law or material operational changes
Classification	Public

16.11 Revision History

Version	Date	Description	Approved By
1.0	23 August 2026	Initial Privacy Policy	Management

16.12 Final Statement

Leasy Link is committed to protecting the privacy, dignity and trust of every individual whose Personal Data is processed through our Services.

We recognise that responsible data stewardship is fundamental to our relationship with landlords, property managers, tenants, business partners and regulators.

As Leasy Link expands across Botswana, South Africa, Namibia, Zambia, Zimbabwe, Eswatini and Lesotho and other jurisdictions, we will continue to review and strengthen our privacy programme to ensure that it remains transparent, secure and aligned with evolving legal and regulatory requirements.

COUNTRY-SPECIFIC PRIVACY RIGHTS AND REGULATORY COMPLIANCE

17. Country-Specific Privacy Rights

Leasy Link is committed to protecting Personal Data in every jurisdiction where it lawfully operates. While this Privacy Policy establishes a consistent privacy framework across all Leasy Link Services, different countries may

grant individuals additional privacy rights or impose additional obligations on organisations that process Personal Data.

Where the laws of a particular jurisdiction provide greater protection than this Privacy Policy, Leasy Link will comply with those legal requirements to the extent that they apply.

Nothing contained in this Privacy Policy limits, excludes or restricts any mandatory rights or obligations arising under Applicable Data Protection Laws.

17.1 Botswana

For users located in Botswana, Leasy Link processes Personal Data in accordance with Botswana's applicable Data Protection Act 2024, and any other relevant laws governing the processing of Personal Data.

Subject to applicable law, individuals may have the right to:

- be informed about the collection and processing of Personal Data;
- request access to Personal Data;
- request correction of inaccurate or incomplete information;
- request deletion where legally permissible;
- request restriction of processing;
- withdraw consent where consent is the lawful basis for processing;
- object to certain processing activities; and
- lodge complaints with the competent regulatory authority.

Leasy Link will cooperate with the relevant supervisory authority where required by law.

17.2 South Africa

For users located in South Africa, Leasy Link processes Personal Data in accordance with the **Protection of Personal Information Act, 2013 (POPIA)** and other applicable legislation.

Users may exercise the rights recognised under POPIA, including the right to:

- be informed;
- access Personal Information;
- request correction;
- request deletion where applicable;
- object to processing;
- withdraw consent where applicable;
- submit complaints to the Information Regulator; and
- pursue any other remedies available under South African law.

Leasy Link will cooperate with the South African Information Regulator where legally required.

17.3 Zambia

For users located in Zambia, Leasy Link processes Personal Data in accordance with the **Data Protection Act, 2021** and other applicable laws.

Subject to applicable law, users may exercise rights relating to:

- access;
- correction;
- deletion;
- restriction of processing;
- objection to processing;
- withdrawal of consent; and
- complaints to the competent authority.

Leasy Link will comply with any additional legal obligations imposed under Zambian law.

17.4 Zimbabwe

For users located in Zimbabwe, Leasy Link processes Personal Data in accordance with the **Cyber and Data Protection Act** and other applicable legislation.

Individuals may exercise rights relating to:

- lawful processing;
- access;
- correction;
- deletion;
- restriction;
- objection;
- withdrawal of consent where applicable; and
- complaints to the appropriate authority.

Leasy Link will cooperate with the competent authorities where required by law.

17.5 Namibia

For users located in Namibia, Leasy Link will process Personal Data in accordance with the privacy and data protection laws applicable in Namibia from time to time.

Where new privacy legislation or regulatory requirements become effective after publication of this Privacy Policy, Leasy Link will implement the necessary measures to comply with those legal requirements.

Users will continue to enjoy the protections described in this Privacy Policy together with any additional statutory rights available under Namibian law.

17.6 Eswatini

For users located in the Kingdom of Eswatini, Leasy Link will process Personal Data in accordance with the applicable data protection, electronic communications, cybersecurity and other relevant legislation in force from time to time.

Subject to applicable law, users may have the right to:

- receive information regarding the processing of their Personal Data;
- access Personal Data;
- request correction of inaccurate or incomplete information;
- request deletion where legally permissible;
- request restriction of processing;
- object to certain processing activities;
- withdraw consent where consent forms the lawful basis of processing; and
- lodge complaints with the competent authority.

Leasy Link will comply with any additional obligations imposed by Eswatini law and any future supervisory authority responsible for data protection.

17.7 Lesotho

For users located in the Kingdom of Lesotho, Leasy Link processes Personal Data in accordance with the applicable privacy and data protection legislation in force from time to time.

Subject to applicable law, users may have the right to:

- be informed regarding the processing of Personal Data;
- request access;
- request correction;
- request deletion where legally permissible;
- request restriction of processing;
- object to processing;
- withdraw consent where consent applies; and
- pursue available complaint mechanisms.

Where additional regulatory obligations become effective, Leasy Link will implement appropriate measures to comply with those requirements.

17.8 Future Countries

As Leasy Link expands into additional jurisdictions throughout Africa and internationally, this Privacy Policy shall continue to apply together with any supplementary country-specific privacy notices issued by Leasy Link.

Country-specific notices may address matters including:

- additional statutory rights;
 - local regulatory requirements;
 - data localisation obligations;
 - appointment of local representatives;
 - mandatory contractual clauses;
 - supervisory authorities; and
 - any other jurisdiction-specific legal obligations.
-

17.9 Conflicts Between Laws

Where there is any inconsistency between this Privacy Policy and a mandatory provision of Applicable Data Protection Laws, the applicable law shall prevail to the extent of the inconsistency.

The remaining provisions of this Privacy Policy shall remain valid and enforceable.

17.10 Language

The official version of this Privacy Policy is the English language version.

Where translations are prepared for convenience, the English version shall prevail in the event of inconsistency unless mandatory law requires otherwise.

17.11 Local Representatives

Where Applicable Data Protection Laws require Leasy Link to appoint:

- a Data Protection Officer;
- an Information Officer;
- a local representative;
- a privacy representative; or
- any similar statutory office,

Leasy Link will publish the relevant contact details on its official website and within the Services.

17.12 Regulatory Cooperation

Leasy Link is committed to maintaining constructive relationships with supervisory authorities responsible for privacy and data protection.

Where legally required, Leasy Link will:

- cooperate with investigations;
- respond to lawful requests;
- maintain appropriate compliance records;
- implement corrective measures where necessary;
- report notifiable data breaches where required by law; and
- comply with lawful directions issued by competent authorities.

ANNEXURE A

Supervisory Authorities (To Be Verified Prior to Publication)

Country	Supervisory Authority	Status
BW Botswana	Information and Data Protection www.idpc.org.bw	The Data Protection Act 2024/2025 is fully operational.
ZA South Africa	Information Regulator (South Africa) Email: enquiries@inforegulator.org.za Web: inforegulator.org.za	Fully Operational
ZM Zambia	Office of the Data Protection Commissioner Phone: +260 750 799 801 Web: dataprotection.gov.zm	Fully Operational-
ZW Zimbabwe	Postal and Telecommunications Regulatory Authority of Zimbabwe (POTRAZ) Email: the.regulator@potraz.gov.zw Web: potraz.gov.zw	Fully Operational
NA Namibia	Ministry of Information and Communication Technology handles drafting Phone: +264 61 203 9111 Web: mict.gov.na	Pending Framework
SZ Eswatini	Eswatini Data Protection Authority (ESPA) Email: dataprotection@esccom.org.sz Web: edpa.org.sz	Fully Operational
LS Lesotho	Data Protection Commission Email: contact.centre@gov.ls Web: gov.ls	Partial Framework

ANNEXURE B

Leasy Link Launch Jurisdictions

As at the Effective Date of this Privacy Policy, Leasy Link intends to launch its Services in the following jurisdictions:

Leasy Link Privacy Policy

1. Botswana
2. South Africa
3. Zambia
4. Zimbabwe
5. Namibia
6. Eswatini
7. Lesotho

Additional countries may be added from time to time without affecting the validity of this Privacy Policy. Where required by law, Leasy Link will publish supplementary country-specific privacy notices before commencing operations in those jurisdictions.

Data Ethics, Artificial Intelligence and Future Technologies

18. Responsible Innovation

Leasy Link is committed to developing and using technology responsibly.

As the Services evolve, Leasy Link may introduce new digital tools, automation technologies, machine learning capabilities and Artificial Intelligence ("AI") features designed to improve the user experience and assist landlords in managing rental properties more efficiently.

Any such technologies will be implemented in a manner that respects privacy, fairness, transparency and applicable law.

18.1 Human Oversight

Leasy Link believes that important decisions affecting individuals should remain subject to appropriate human oversight.

Where automated tools are used to assist users, those tools are intended to support decision-making and should not be regarded as legal, financial or professional advice.

Users remain responsible for reviewing and verifying information before relying upon it.

18.2 Artificial Intelligence

Leasy Link may, from time to time, introduce AI-powered functionality including, for example:

- document summaries;
- lease analysis;
- rental trend analysis;
- payment forecasting;

- automated customer support;
- fraud detection;
- data quality checks;
- predictive analytics; and
- other intelligent features.

Where AI functionality processes Personal Data, Leasy Link will implement appropriate safeguards consistent with Applicable Data Protection Laws.

18.3 Automated Processing

Where automated processing or automated recommendations are used, Leasy Link will endeavour to ensure that:

- the processing serves a legitimate purpose;
 - appropriate security safeguards are maintained;
 - human review is available where appropriate;
 - users receive sufficient information about the functionality; and
 - the processing complies with applicable legal requirements.
-

18.4 Ethical Use of Data

Leasy Link is committed to processing Personal Data in a manner that is:

- lawful;
- fair;
- transparent;
- accountable;
- proportionate;
- respectful of individual dignity; and
- consistent with good governance practices.

Leasy Link will not knowingly use Personal Data in a manner that is discriminatory, deceptive or inconsistent with the purposes described in this Privacy Policy.

18.5 Product Improvement

Leasy Link may analyse aggregated or de-identified information to:

- improve the Services;
- identify software defects;
- enhance user experience;
- improve security;

- develop new functionality;
- understand usage trends; and
- improve operational efficiency.

Where reasonably practicable, Personal Data will be anonymised or aggregated before being used for these purposes.

18.6 Future Technologies

As technology evolves, Leasy Link may adopt new methods of providing the Services, including:

- enhanced authentication technologies;
- electronic identity verification;
- digital document verification;
- cloud innovations;
- automation tools;
- cybersecurity technologies;
- secure digital signatures; and
- other technologies reasonably necessary for the continued operation of the Services.

Where such technologies materially affect the processing of Personal Data, Leasy Link will update this Privacy Policy or provide additional notices where required by law.

18.7 Research and Development

Leasy Link may use aggregated, anonymised or de-identified information for:

- product research;
- service development;
- quality assurance;
- statistical analysis;
- business planning; and
- innovation initiatives.

Reasonable measures will be taken to ensure that such information cannot reasonably be linked back to an identifiable individual.

18.8 No Sale of Personal Data for Artificial Intelligence Training

Leasy Link does not sell Personal Data for the purpose of training third-party Artificial Intelligence models.

Where AI technologies are used within the Services, they will be implemented in accordance with this Privacy Policy, applicable contractual obligations and Applicable Data Protection Laws.

18.9 Continuous Privacy Review

Technology and privacy laws continue to evolve.

Leasy Link will periodically review:

- technological developments;
- privacy legislation;
- regulatory guidance;
- cybersecurity risks;
- international best practices; and
- user expectations,

to ensure that the Services continue to meet appropriate standards of privacy protection and responsible innovation.

18.10 Commitment to Trust

Trust is fundamental to Leasy Link's relationship with its users.

Leasy Link is committed to maintaining a privacy programme that promotes transparency, accountability and responsible stewardship of Personal Data while supporting innovation across the rental management sector.

FINAL DECLARATION

Leasy Link believes that privacy is not merely a legal obligation but a core business value.

By embedding privacy, security, accountability and ethical governance into the design and operation of our Services, we aim to build lasting trust with landlords, tenants, business partners, regulators and the communities we serve.

As Leasy Link expands throughout Botswana, South Africa, Namibia, Zambia, Zimbabwe, Eswatini, Lesotho and beyond, we remain committed to protecting Personal Data in a manner that reflects both the letter and the spirit of applicable law.

STATUTORY AND REGULATORY FRAMEWORK

LEGAL REVIEW NOTE: The legislation listed below is included as a compliance framework for legal review. It does not state that every Act applies to every transaction or feature. Application depends on the country, the User, the processing activity, the payment route and the functionality actually offered. Mandatory local law prevails where it cannot lawfully be excluded or varied by contract.

Botswana

Data Protection Act, 2024 and other applicable privacy, cybersecurity, electronic-transactions and communications requirements.

South Africa

Protection of Personal Information Act, 2013 (POPIA), together with applicable electronic communications and direct-marketing requirements.

Zambia

Data Protection Act, 2021 and other applicable cybersecurity and electronic-communications requirements.

Zimbabwe

Cyber and Data Protection Act and other applicable privacy and cybersecurity requirements.

Namibia

Privacy, constitutional, sector-specific and data-protection requirements applicable in Namibia from time to time.

Eswatini

Applicable data-protection, electronic communications, cybersecurity and privacy legislation in force from time to time.

Lesotho

Applicable data-protection and privacy legislation in force from time to time.