

PROPERLEE

Privacy Policy

Effective date: 09 June 2026 · Version 2.0

Responsible party	Properlee (Pty) Ltd
Information Officer	Elan Hoffman
Privacy contact	privacy@properlee.co.za
Standard alignment	POPIA 4 of 2013 ISO/IEC 27701:2022 (PIMS) ISO/IEC 27001:2022
Supersedes	Version 1.0 dated 2 April 2026

Properlee (Pty) Ltd ("Properlee", "we", "us", or "our") is committed to protecting your personal information in accordance with the Protection of Personal Information Act 4 of 2013 ("POPIA") and all other applicable South African privacy legislation. This Privacy Policy explains how we collect, use, store, protect, and share your personal information when you use the Properlee platform ("Platform").

By accessing or using the Platform, you acknowledge that you have read and understood this Privacy Policy. If you do not agree with this policy, please do not use the Platform.

1. Who we are

Properlee (Pty) Ltd is the responsible party (PII Controller) for personal information processed through the Platform in respect of all user account data. Where we process personal information on behalf of Managing Agents and body corporates in the course of providing our services, we also act as an operator (PII Processor) under their instruction.

This dual role is recognised under POPIA and ISO/IEC 27701:2022. In both roles, Properlee is accountable for applying appropriate technical and organisational measures to protect the personal information entrusted to us.

Role	Description
PII Controller	Properlee determines the purpose and means of processing platform user account data (MAs, trustees, owners, tenants). We decide what data is collected, why, and how.
PII Processor	Properlee processes scheme data (levy records, financial transactions, governance documents) on behalf of Managing Agents and body corporates, who direct what is processed and for what purpose.

2. What personal information we collect

We collect personal information that is necessary to provide the Platform services, no more. The following categories of personal information are processed on the Platform:

2.1 Owners and trustees

- Full name and contact details (email address, phone number)

- Unit and scheme information
- Identity number — encrypted at rest, collected only with explicit consent (see section 5)
- Levy account records, payment history, and financial statements
- Portal access credentials via Supabase Auth (email/password or Google OAuth)
- Voting and attendance records for AGMs and trustee meetings

2.2 Tenants

- Full name and contact details (email address, phone number)
- Tenancy dates and rental information
- Identity number — encrypted at rest, collected only with explicit consent (see section 5)
- Rental invoice and payment records
- Portal access credentials (where portal access is granted)

2.3 Managing agent staff

- Full name and work email address
- Role and access permissions within the Platform
- Portal access credentials via Supabase Auth

2.4 Scheme staff and contractors

- Full name, role/position, and contact details
- Employment or engagement start and end dates

2.5 Pet register data

- Owner or tenant name and unit number
- Pet name, type, and breed
- Vaccine certificate (uploaded document, stored securely)
- Trustee approval status

2.6 Usage and technical data

- Login timestamps and session data
- Audit log entries for all platform actions (access, edits, downloads)
- Device type and IP address where required for security purposes

3. Why we process your personal information

We process personal information for the following purposes only:

- To provide and operate the Platform services
- To enable Managing Agents to administer body corporate schemes
- To generate and deliver levy statements, rental invoices, and billing communications
- To maintain audit trails as required by the STSMA and POPIA
- To verify identity and manage platform access
- To comply with legal obligations under the STSMA and related legislation
- To communicate platform updates, maintenance notices, and support information
- To provide the Lea AI assistant feature (see section 8)
- To maintain the security and integrity of the Platform

4. Legal basis for processing

We process personal information on the following legal grounds under POPIA. Each ground applies to specific data categories as documented in our Privacy Information Asset Register (available on request):

Legal basis	What it covers	POPIA condition
Contractual necessity	Processing required to provide Platform services under our agreement with the Managing Agent; levy billing; rental invoicing; user authentication.	Condition 3 — Purpose specification; Condition 4 — Further processing limitation
Legal obligation	Compliance with the Sectional Titles Schemes Management Act 8 of 2011 (STSMA); financial record-keeping; governance records; FICA compliance.	Condition 3 — Purpose specification; Condition 5 — Information quality
Legitimate interests	Maintaining security, audit logs, and Platform integrity; scheme management obligations under the STSMA; Lea AI assistant feature delivery.	Condition 3 — Purpose specification; Condition 7 — Security safeguards
Consent	Storage of identity numbers (explicit consent checkbox at onboarding); optional features where consent is specifically requested.	Condition 2 — Processing limitation; Condition 8 — Data subject participation

5. Identity number processing

Identity numbers are special personal information under POPIA and receive the highest level of protection on our Platform.

Where identity numbers are collected on the Platform:

- They are encrypted at rest using strong symmetric encryption via the pgcrypto extension on our Supabase database
- Encryption keys are stored separately from the data and are never committed to our source code repository
- Access is restricted to authorised personnel only, enforced via row-level security policies
- Explicit, informed consent is obtained and recorded before storing any identity number
- Identity numbers are never transmitted to any third-party service provider
- You may withdraw consent and request deletion of your identity number at any time by contacting us at privacy@properlee.co.za

Providing your identity number is entirely voluntary. The Platform remains fully functional without it.

6. How we share your information

We do not sell your personal information. We do not share it with third parties for marketing purposes. We may share it in the following limited, documented circumstances only:

- With the Managing Agent responsible for your scheme, who acts as an operator under our data processing framework

- With our third-party service providers listed in section 7, each bound by data processing agreements
- With legal or regulatory authorities where required by law, court order, or by the Information Regulator of South Africa
- With the Community Schemes Ombud Service (CSOS) where required by the STSMA

7. Third-party service providers

Properlee engages the following third-party processors. Each is bound by a data processing agreement or equivalent and may only process your information for the purposes described:

Provider	Role	Data involved	Safeguards
Supabase Inc.	Database, authentication, file storage, and server-side functions	All personal information categories	ISO 27001 certified; SOC 2 Type II; data stored in af-south-1 (Cape Town, South Africa)
Vercel Inc.	Frontend hosting and content delivery	Transient session data only; no personal information stored at rest	SOC 2 Type II; GDPR data processing addendum available
SendGrid (Twilio Inc.)	Transactional email delivery (levy statements, notifications, invoices)	Email addresses; document content of levy statements and invoices	SOC 2 Type II; send-only API key; MFA enabled on account
Google LLC	Optional OAuth authentication (Google Sign-In)	Email address and Google account ID only; no password transmitted to Properlee	ISO 27001; SOC 2; consent revocable at any time via Google Account settings
Anthropic PBC	Lea AI assistant — AI inference only (see section 8)	Scheme name; financial summary context; user query text. No owner or tenant personal information included.	Prompts engineered to exclude personal information; no conversation retained by Properlee post-session; Anthropic API data policy reviewed annually
PayFast (DPO Group)	Online payment processing (levy payments)	Payment amount and reference only; card data held by PayFast, never by Properlee	PCI DSS Level 1 certified; South African provider; ITN webhook verification

8. Lea AI assistant

Properlee's Lea assistant uses the Anthropic API to provide AI-powered scheme management assistance. This section explains exactly what data is and is not shared with this service.

The Lea assistant is an optional feature available to Managing Agents and trustees. When you use Lea:

- Your query and relevant scheme context (scheme name, financial summary data) are sent to the Anthropic API for processing
- No owner or tenant personal information (names, contact details, identity numbers, financial account details) is included in any prompt sent to Anthropic
- Properlee does not retain any Lea conversation content after your session ends
- Anthropic processes your query solely to generate a response; their data use is governed by the Anthropic API data use policy
- You may choose not to use Lea without any loss of Platform functionality

We review Anthropic's data processing practices annually and will update this section if our approach changes.

9. Data retention

We retain personal information only for as long as is necessary for the purposes for which it was collected, or as required by law. The following retention periods apply:

Data category	Retention period	Legal basis for retention
Active user account data (all roles)	Duration of account + 3 years post-closure	Contractual and legitimate interests
Levy and financial records (owners)	7 years from financial year end	STSMA and general accounting obligations
Rental invoice records (tenants)	7 years from financial year end	Accounting obligations
Governance and AGM records	Permanent (life of scheme); 7 years minimum	STSMA governance requirements
Identity numbers (where consented)	Retained while required; deleted on verified request	Consent basis; FICA compliance where applicable
Audit logs and security events	3 years (security investigation window)	Legitimate interests; POPIA accountability
Scheme staff and contractor records	5 years post-employment/engagement	Labour Relations Act obligations
Pet register records	Duration of registration + 1 year	Legitimate interests (conduct rule compliance)
Lea AI conversation context	Not retained post-session by Properlee	Minimal collection principle (POPIA Condition 2)

10. Your rights under POPIA

As a data subject, you have the following rights in respect of your personal information held by Properlee. To exercise any of these rights, please contact privacy@properlee.co.za. We will acknowledge your request within 3 business days and respond fully within 30 days.

Right	What it means	How to exercise
Right of access	Request a copy of all personal information we hold about you.	Email privacy@properlee.co.za with subject 'Access request'. Identity verification required before disclosure.
Right to correction	Request correction of inaccurate, misleading, or incomplete personal information.	Email privacy@properlee.co.za with correction details and supporting evidence. We will notify third parties where data has been shared.
Right to deletion	Request deletion of your personal information, subject to legal retention obligations.	Email privacy@properlee.co.za . We will assess against STSMA and other legal retention requirements and confirm what can be deleted.
Right to object	Object to the processing of your personal information where processing is based on legitimate interests.	Email privacy@properlee.co.za stating your grounds. We will cease processing unless there are compelling legitimate grounds that override your objection.

Right to withdraw consent	Where processing is based on consent (e.g. identity number storage), you may withdraw consent at any time. Withdrawal does not affect prior lawful processing.	Email privacy@properlee.co.za or use the withdrawal option in your account settings.
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11. Security

We implement appropriate technical and organisational measures to protect your personal information in accordance with ISO/IEC 27001:2022 and POPIA Condition 7 (Security safeguards). These measures include:

- Row-level security (RLS) on all database tables, ensuring users can only access data relevant to their scheme and role
- Strong encryption at rest for sensitive fields including identity numbers (pgcrypto symmetric encryption)
- All data transmitted over HTTPS/TLS — no unencrypted transmission of personal information
- Supabase Auth with email verification, session management, and optional Google OAuth
- Regular security audits and access reviews aligned to our ISO 27001 risk register
- Comprehensive audit logging of all data access, modifications, and security events
- Cross-scheme isolation via role-based access controls — no user can access another scheme's data
- Development and production environment separation — changes are tested before reaching live data

We maintain an Information Security Risk Register and Privacy Information Asset Register as part of our ISO 27001 and ISO 27701 compliance programme. These are available to Managing Agents and body corporates on written request.

12. Cookies and tracking

The Platform uses only essential session cookies required for authentication and security. We do not use:

- Tracking or advertising cookies
- Third-party analytics that collect personal information
- Cross-site tracking or behavioural profiling

Essential session cookies are deleted when you close your browser or log out of the Platform.

13. Minors

The Platform is not intended for use by persons under the age of 18. We do not knowingly collect personal information from minors. If you believe a minor's personal information has been submitted to the Platform, please contact us at privacy@properlee.co.za and we will promptly delete it.

14. Changes to this policy

We may update this Privacy Policy from time to time to reflect changes to our services, data practices, or legal obligations. We will notify users of material changes by email or through an in-platform notification at least 14 days before changes take effect. The effective date at the top of this document reflects the most recent update.

We maintain a version history of this policy. Previous versions are available on request from privacy@properlee.co.za.

15. Complaints

If you believe we have not handled your personal information in accordance with POPIA, you have the right to lodge a complaint with the Information Regulator of South Africa:

- Website: www.justice.gov.za/inforeg
- Email: inforeg@justice.gov.za
- Address: JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

We encourage you to contact us first at privacy@properlee.co.za — we will make every effort to resolve your concern directly and promptly.

16. Contact us

For any privacy-related queries, to exercise your rights, or to request a copy of our Privacy Information Asset Register, please contact:

Organisation	Properlee (Pty) Ltd
Information Officer	Elan Hoffman
Privacy email	privacy@properlee.co.za
General support	support@properlee.co.za
Website	www.properlee.co.za

This Privacy Policy is governed by the laws of the Republic of South Africa. Version 2.0 — effective 09 June 2026. Supersedes Version 1.0 dated 2 April 2026.