



Fourie Stott

Attorneys, Notaries & Conveyancers

FOURIE STOTT INC.

PRIVACY POLICY

Last updated: 22 March 2022

1. INTRODUCTION

- 1.1. Fourie Stott Inc. ("**the Company**", "**we**", "**us**", "**our**") is a private company incorporated in the Republic of South Africa. Our company registration number is 2014/124171/21 and our registered office is 9 Church Place, Westville, 3629.
- 1.2. We acknowledge that you care about how information about you is used and shared. Accordingly, we have a firm policy to ensure that our use of the Personal Information of data subjects is lawful, reasonable, and relevant to our business activities, with the ultimate goal of improving your experience as a prospective or existing client, Service Provider or employee of the Company.

2. CONTACT US

Our Information Officer handles questions concerning this Privacy Policy, your data protection rights, access to information rights and any complaints.

- Information Officer: Stuart Fourie
- Email Address: stuart@fouriestott.co.za

Further contact information and forms are available in our PAIA Manual.

3. DEFINITIONS

- 3.1. "**Associates**" means our subsidiaries and the directors, employees and consultants of our correspondent attorneys or any of their subsidiaries;
- 3.2. "**FICA**" means the Financial Intelligence Centre Act 38 of 2001 as occasionally amended;
- 3.3. "**Operator**" means any person or entity that Processes Personal Information on behalf of a Responsible Party.

- 3.4. **“Personal Information”** means information or data relating to an identifiable, living, natural person, and where applicable, an identifiable, existing juristic person, including, but not limited to information relating to -
- (a) race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;
 - (b) education or the medical, financial, criminal or employment history of the person;
 - (c) any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
 - (d) the biometric information of the person;
- 3.5. **“POPIA”** means the Protection of Personal Information Act, 4 of 2013, as amended from time to time.
- 3.6. **“Responsible Party”** means the entity that decides how and why Personal Information is Processed. Responsible Parties may instruct Operators to process Personal Information on their behalf.
- 3.7. **“Service Provider”** means third party providers of various services with whom we engage, including, but not limited to, software licensors, developers and suppliers of software, providers of information technology, communication, file storage, data storage, copying, printing, distribution/logistics, accounting or auditing services, counsel, investigators, attorneys, and employee provident/pension fund administrators, and our insurers and professional advisors;
- 3.8. **“Special Personal Information”** means Personal Information about race or ethnicity, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health, sexual life, any actual or alleged criminal offences or penalties, national identification number, or any other information that may be deemed to be sensitive under applicable law.

4. OUR SERVICES

- 4.1. We offer (among others) the following services (**“our Services”**):
- (a) Advice;
 - (b) Wills and estates;
 - (c) Notarial services;
 - (d) Litigation;
 - (e) Labour law;
 - (f) Family law;
 - (g) Drafting of contracts; and
 - (h) Conveyancing.

- 4.2. We collect Personal Information about you when you:
- (a) contract with us for our Services;
 - (b) book or inquire about any of our Services;
 - (c) access our website, mobile applications or related software systems;
or
 - (d) contact us, or otherwise interact with us.

5. WHO DOES THIS PRIVACY POLICY COVER

- 5.1. This Privacy Policy explains how we will treat your Personal Information whether provided by you to us or collected by us through other means in your ordinary use of our Services, and our website. This Privacy Policy describes our approach and practices in respect of your Personal Information and our treatment thereof.
- 5.2. This Policy applies to all external parties with whom we interact, including but not limited to:
- (a) applicants, individual clients, potential clients and recipients of our Services (including individuals who instruct us or enquire about our Services or who are the recipients of any Services rendered by or through us);
 - (b) representatives of client organisations;
 - (c) our suppliers and service providers;
 - (d) visitors to our offices or our website;
 - (e) other users of our Services.
- 5.3. This Policy must be read with our website terms and conditions which we may occasionally update as well as and any other documents, agreements or “just-in-time-notices” that describe how we, in specific circumstances, process Personal Information about you.
- 5.4. If there is any conflict, the terms of the specific document will supersede and prevail over this Policy.

6. YOUR ACCEPTANCE

By providing us with your Personal Information, you:

- 6.1. agree to this Privacy Policy and authorise us to process such information as set out herein; and
- 6.2. authorise our Associates, our Service Providers and other third parties to Process your Personal Information for the purposes stated in this Privacy Policy.

7. WHAT PERSONAL INFORMATION WE COLLECT, AND HOW WE COLLECT IT?

- We may collect, acquire, receive, record, organise, collate, store, update,

change, retrieve, read, process, analyse, use and share your Personal Information in the manner as set out in this Privacy Policy. When we perform one or more of these actions, we are "**Processing**" your Personal Information.

- We are obliged to limit the collection and use of non-public Personal Information to the minimum we believe is necessary to deliver superior service to you.
- We obtain Personal Information about you through the means discussed below when you use the Services. We need certain types of information to provide the Services to you. If you do not provide us with such information, or ask us to delete it, you may no longer be able to access or use part or all of our Services.

7.1. **Information you provide directly to us**

We collect a variety of Personal Information that you provide directly to us. For example, we collect information from you when:

- (a) You complete our Client onboarding form and provide us with your information and documents to comply with FICA, including your:
 - Identity information, document or passport;
 - Incorporation documents and registration numbers;
 - Citizenship / residential status and Nationality;
 - Physical and postal addresses;
 - Proof of address and banking details;
 - Contact information;
 - Tax registration numbers;
 - Source of income and funds;
 - Occupation and employer information;
 - Relationship to any politically exposed persons, including family members and relatives.
- (b) You choose to provide us with Personal Information concerning your legal matter when instructing or consulting with us to perform the Services, including your correspondence, preferences, objectives and views.
- (c) We process your orders, requests and payments for our Services.
- (d) You ask us questions, communicate with us, or give us feedback when submitting via forms, email or WhatsApp.
- (e) You participate in research and surveys.
- (f) You provide us with manually or electronically signed legal documents, we will process the documentation to provide our Services and to comply with directives issued by the Legal Practice Council concerning retention of records.

7.2. **Information we collect through passive (automated) means**

We collect certain data about your use of our website and the devices you use to access the website. We and our service providers such as YouTube and Google may use a variety of technologies, including cookies and similar tools, to help in collecting this data.

- (a) When you use our website:

- We collect certain data about how you use our Site and the device that you use to access them. This includes your IP address, geographical location, device information (such as your hardware model, mobile network information, unique device identifiers) browser type, referral source, length of visit to the Site, number of page reviews, the search queries you make on the Site and similar information. This data is collected by Google Analytics and YouTube on our behalf and by some of our Site applications using cookies.
- To opt out of being tracked by Google Analytics across all websites, visit .
- Our Site may include links to third party websites (like chang.org and YouTube), plug-ins and applications. By clicking on those links or enabling these connections you may allow third parties to collect or share data about you. We do not control these websites and are not responsible for their privacy notices. Please ensure that you read the privacy notices on any such external websites.

7.3. **Information we collect from social media**

When you “like” or “follow” us on Facebook, Instagram, TikTok, Twitter, or other social media sites, we may collect some data from you including your name, email address, handle and any comments or content you post relevant to us. We also collect your data if you sign up for one of our promotions or submit data to us through social media sites.

7.4. **Information we collect from other third parties**

We may also receive Personal Information about you from the following sources (including public parties):

- (a) The United Nations Money Laundering and Financing of Terrorism Sanctions list to ascertain your international criminal status;
- (b) our information technology, cookie management, marketing and analytics providers, such as Google Analytics;
- (c) other Responsible Parties where we act as Operators or joint Responsible Parties in performing our Services, including:
 - banks, financial institutions and payment processors in connection with payments.
 - press, newspapers and journalist publications in connection with our FICA obligations and to perform our Services.
 - Our Associates where you have asked for or authorised them to refer you to us.
 - Government authorities (e.g. Deeds Office) and law enforcement.

When we collect your Personal Information from third parties it is either because:

- (a) you have given us express consent to do so, your consent was implied by your actions, or because you provided consent, either explicit or implicit, to the third party that provided this information to us;
- (b) it is required by law; or
- (c) it is strictly necessary for us to do so to protect our or your legitimate interests.

7.5. We also process, collect, store and/or use aggregated data, which may include historical or statistical data (“Aggregated Data”) for any purpose. Aggregated Data is not considered Personal Information as this data does not directly or indirectly reveal your identity. However, if we combine or connect Aggregated Data with your Personal Information in a manner that can identify you, we will treat the combined data as Personal Information, which will be managed in accordance with this Privacy Policy.

8. SPECIAL PERSONAL INFORMATION

Where we need to process your Special Personal Information, we will do so with your consent, for a legitimate purpose in the ordinary course of our business, or per applicable laws. We will explain why we are collecting it at the time of collection.

9. HOW AND WHY WE USE YOUR PERSONAL INFORMATION

9.1. Consent

- (a) Where required by law, we will obtain your consent to process your name and email address to send you emails containing marketing materials, legal updates and other materials we believe you may be interested in.
- (b) look at the way you use our website, so that we can improve the Services that we offer (for example, by personalising our communications with you) and to make sure you have the best experience on our Sites;
- (c) make use of cookies on our website to distinguish users and improve your experience on our website.

You may withdraw your consent at any time after giving it – please refer to **Section 19 Your** Data Protection Rights on how to withdraw your consent.

9.2. Contract

- (a) We process your personal data if it is necessary to enter into or perform under a contract that we have with you as a customer, or to provide a solution to you. This includes:
 - to provide customers a with our Services, and solutions they have requested;

- processing, collecting and administering payments for our Services rendered;
- to communicate with you about the Services, your use of the Services, or your inquiries related to the Services and send you communications on behalf of our Service Providers or suppliers we use to carry out the Services to meet your needs;
- to respond to customer enquiries and complaints (this typically requires the use of certain contact data and data regarding the reason for your enquiry (e.g. matter status, technical issue, service or product question, or complaint));
- to meet our record-keeping and reasonable archiving obligations;
- to enforce and collect on any agreement when a customer or supplier is in default or breach of the terms and conditions of an agreement, such as to institute legal proceedings against a customer or supplier;
- transferring limited and necessary personal data to our contracted service providers (such as local data centres) in performing our obligations to you;
- for security and identity verification, and to check the accuracy of customer, supporter or supplier personal data; and
- for any other related and lawful purposes brought to your attention.

9.3. **By law**

- (a) We process customer and supplier personal data if the law requires or permits it. This includes:
- verifying your identity and status to comply with legislative, regulatory, professional, risk and compliance requirements such as our recording and reporting obligations to the:
 - Financial Intelligence Centre;
 - South African Reserve Bank;
 - Information Regulator; and
 - Other public authorities.
 - Performing internal accounting and auditing activities;
 - to process data subject access requests;
 - to meet our record-keeping obligations; and
 - for any other related and lawful purposes brought to your attention.

9.4. **Legitimate interests**

- (a) We process personal data when it is necessary to pursue your legitimate interests or our legitimate interests. This includes to:
- answer any requests or questions you might have;
 - manage customer relationships and market our services to you;
 - determine the effectiveness of our sales, marketing and advertising;
 - use secure and effective third party technology platforms to administer and manage our email marketing, servers and communications;
 - detect, prevent, manage and protect against fraud, security breaches, misuse, and other prohibited or illegal activity, claims and other liabilities;
 - maintain the safety, security and integrity of our website, our Services, products, databases, networks and other technology assets;
 - protect our rights in any litigation that may involve you;
 - do general due diligence and risk assessments;
 - enforce and defend other legal claims;
 - manage business continuity incidents and emergencies;
 - analyse and gather metrics to better understand how customers and supporters use our Services and website, and to evaluate and improve our Services (such as content creation, product offerings and quality management); and
 - achieve purposes otherwise described to you when collecting your data.
- (b) We will not collect additional categories of Personal Information or use the Personal Information we collected for materially different, unrelated, or incompatible purposes without providing you notice and obtaining your consent.

9.5. **Third-party collection**

- (a) When we collect your personal data from third parties it is because such third parties have:
- authorised or instructed us to do so; and
 - have represented to us (either express or implied) that:
 - their instructions are lawful;
 - they are allowed to disclose such personal data to us; and
 - they have obtained your consent or justified the legitimate interest pursued, and have provided all privacy notices to you as a data subject.

- (b) We use your personal data only for the purpose for which it was originally collected by the relevant Responsible Party and strictly following their instructions and authorisation.

9.6. Combined data

For the purposes discussed in this Policy, we may combine the data that we collect through the Services with data that we receive from other sources, and use and share such combined data in compliance with this Policy.

9.7. Further processing limitation

We will not collect additional categories of personal data or use the data we collected for materially different, unrelated, or incompatible purposes without providing you notice.

10. DISCLOSURE OF PERSONAL INFORMATION

10.1. We may provide access to and disclose your personal data for legitimate purposes, following applicable law and subject to applicable regulatory requirements regarding confidentiality and appropriate data protection measures. **We do not sell personal data for commercial gain.**

10.2. We may disclose your personal data in the following ways:

- **Our Service Providers**

- We provide access to or share your data with Service Providers who use the data to perform services on our behalf, and whose help we require to conduct our business operations and that:
 - (a) have agreed to be bound by this Privacy Policy and our Data Protection standards or by similar terms offering a similar or higher level of protection;
 - (b) where this personal data is necessary for the performance of their obligations to or on our behalf of (e.g., file storage, payroll, server hosts, email marketing management platform, videoconferencing, and cybersecurity); and
 - (c) based on our instructions, are not authorised by us to use or disclose the data except as strictly necessary to perform the services on our behalf as instructed or to comply with legal or professional requirements.
- We will only authorise the processing of any personal data by a third party acting as a subcontractor (Operator) on our behalf by, among others, entering into agreements with those third parties governing our relationship with them and highlighting instructions, confidentiality, security and non-disclosure obligations.

- **Protection of Fourie Stott, Inc.**

- By accepting our Privacy Policy, you acknowledge and agree that we may access, retain and disclose the data we collect and maintain about you if required to do so by law or, in good faith, believe that such access, retention or disclosure is reasonably necessary to:
 - (a) comply with legal process (e.g. a subpoena or court order);
 - (b) enforce our applicable terms and conditions, this Privacy Policy, or other contracts with you, including investigating any potential violations to such terms and policies;
 - (c) respond to claims that any content violates the rights of third parties or laws;
 - (d) respond to your requests for customer service; and/or
 - (e) to mitigate any actual or perceived risk, or to protect the rights, property or personal safety of Fourie Stott Inc, customers, users, employees, service providers, and the public. This includes exchanging data with other companies and organizations for fraud protection, and similar purposes.

- **Business transfers**

We may buy, merge, partner with or be acquired by other companies. In such transactions, (including in contemplation of such transactions) Customer and supplier data may be among the transferred assets. If a portion or all of our assets are sold or transferred to a third party, such data (including your email address and case file) would likely be one of the transferred business assets. If such transfer is subject to mandatory restrictions under applicable laws, we will comply with such restrictions.

- **Consent**

We may also disclose your data in other ways you direct us to and when we have your consent.

- **Public forums, social media, testimonials and reviews**

Certain features of our website, social media pages or Google Reviews make it possible for you to share comments publicly with other users online. Any data that you submit through such features is not confidential, and we may use it for any purpose (including in testimonials or other marketing materials). For example, if you publicly submit a review or post your opinion on our website, on Google, or a social media platform, we may display your review or opinion (along with the name provided, if any) on our website and on third-party websites, including social media platforms. Any data you post openly in this way will be available to the public at large and potentially accessible through third-party search engines. **Therefore, please take care when using these features.**

- **By law with government departments and regulatory bodies**

With governmental agencies, and other regulatory or self-regulatory bodies, if required to do so by law or there is a reasonable belief that such is necessary for:

- compliance with the law or with any legal process; or
- the protection and defence of the rights, property or safety of Fourie Stott Inc, our customers, users, employees, contractors, suppliers, service providers, or any third party.

11. COMPULSORY INFORMATION AND CONSEQUENCES OF NOT SHARING

Where we must process certain personal data by law, or in terms of a contract that we have entered with you, and you fail to provide such personal data when requested to do so, we may be unable to perform in terms of the contract in place or are trying to enter into with you. In such a case, we may have to terminate the contract and/or relationship with you, upon due notice to you, which termination shall be done in accordance with the terms of that contract and any applicable legislation.

12. WILL WE USE YOUR DATA TO MAKE AN AUTOMATED DECISION ABOUT YOU?

We do not use your personal data to make any automated decisions about you. If we use excel formulas to assess your risk profile in terms of FICA, a human being will always input, review and assess the information manually before making any decisions.

13. STORAGE AND TRANSFER OF PERSONAL INFORMATION

- 13.1. We have engaged reputable and trusted organisations as outsourced processors (Operators), and in some cases, as sub-processors to provide data storage and cloud services to securely store your information. Our servers and cloud storage run in secure premises located in South Africa.
- 13.2. We reserve the right to generally transfer to and/or store your Personal Information on servers in a jurisdiction other than where it was collected, or outside of South Africa in a jurisdiction that may not have comparable data protection legislation; Provided that if the location does not have substantially similar laws to those of South Africa, we will take reasonably practicable steps, including the imposing of suitable contractual terms to ensure that your Personal Information is adequately protected in that jurisdiction.

14. SECURITY AND INTEGRITY

- 14.1. We will take appropriate and reasonable technical and organisational steps to protect all personal data held by us in line with industry practices, including protection against accidental or unlawful destruction, accidental loss or

alteration, and unauthorised disclosure or access. This includes the following:

- keeping systems secure (such as monitoring access and usage);
- storing records securely;
- controlling the access to our premises, systems and records;
- safely destroying or deleting records;
- encrypting and/or password protecting sensitive data;
- protecting our servers using firewalls and limiting access to information on a strictly need to know basis;
- testing the security of our website and IT systems;
- when processing payment card details, our payment gateways comply with the applicable Payment Card Industry Data Security Standard (PCI-DSS standard); and
- periodically reviewing our collection, storage and processing practices, including physical and digital security measures

14.2. However, **no data transmission over the internet or electronic storage can be guaranteed to be 100% secure. As such, you acknowledge and accept that we cannot guarantee the security of your data transmitted to, through, or on our website or via the internet and that any such transmission is at your own risk.** However, we are subject to POPIA which we comply with.

14.3. We will let you and the relevant regulatory authorities know of any data breaches where we are legally required to do so and within the prescribed time.

15. RETENTION AND DELETION

15.1. We will only retain your personal data for as long as it is necessary to fulfil the purposes explicitly set out in this policy.

15.2. The length of time for which we retain data depends on the purposes for which we collect and use it or as required to comply with applicable laws.

15.3. If there are no other lawful grounds for us to continue processing your personal data, we will destroy such data using secure methods.

15.4. We determine the appropriate retention period for Personal Information by considering, among other things, the nature and sensitivity of the Personal Information, the potential risks or harm that may result from its unauthorised use or disclosure, the purposes for which we process it and whether those purposes may be achieved through other means. We will always comply with applicable legal, regulatory, tax, accounting, labour, or other requirements as they apply to the retention of Personal Information.

16. MAINTENANCE, CORRECTIONS AND ACCESS

16.1. Where we act as a Responsible Party, we are required to take all necessary steps to ensure that your personal data is accurate, complete, not misleading and up to date.

16.2. Anyone about whom we maintain personal data may request to inspect and, if appropriate, correct the personal data held by us. **It is your responsibility to**

inform us should your personal data be incorrect, incomplete, misleading or out-of-date by contacting us. We may require additional data from the requesting party to confirm the legitimate basis for the request and your identity and authority to do so. Upon receipt and verification of the corrected personal data, we will adjust our data or records accordingly.

- 16.3. A request for correction/deletion of personal data or destruction/deletion of a record of personal data must be submitted using the prescribed Form 2 which is available [here](#) on the Information Regulator's website or in our Access to Information Manual.

17. DATA MINIMISATION

- 17.1. We have service level agreements with third parties who send us Personal Information (either in our capacity as a Responsible Party or Operator). These state that only relevant and necessary information is to be provided as it relates to the processing activity we are carrying out.
- 17.2. We have destruction procedures in place where a data subject or third party provides us with Personal Information that is surplus to our requirements.

18. DIRECT MARKETING (ELECTRONIC)

- 18.1. We may wish to send you information about our product and service offerings we believe may be of interest to you.
- 18.2. We may send marketing materials to our clients' email addresses (including individuals who enquire about our Services with or through us or who are the recipients of any Services rendered by or through us) as permitted by POPIA, provided that:
- (a) your name and contact details were obtained in the context of the sale of our products or Services (including any enquiries concerning our products and Services);
 - (b) we contact you to market our similar products or Services.
 - (c) you may opt-out at any time and free of charge on any of our marketing communications or by emailing admin@fouriestott.co.za.
- 18.3. If you are not our client, we may send marketing materials to where you give us your express "opt-in" consent (either digitally or in-person) to send you marketing materials through your preferred electronic channels of communication, provided that we shall keep a record of your consent and you may opt-out any time and free of charge on any of our subsequent marketing communications.
- 18.4. Once you have chosen to opt-out, we may send you written confirmation of receipt of your opt-out request (which may be in electronic form), and we will thereafter not send any further direct marketing communication to you. However, you may continue to receive communication from us on matters of a regulatory nature, which are not marketing related.

19. YOUR DATA PROTECTION RIGHTS

- 19.1. Data protection laws grant you with, among others, the following rights:
- **Request access to your personal data** – You may ask us free of charge to confirm that we hold your personal data, or ask us to provide you with details, at a fee, how we have processed your data, which can be done by submitting [PAIA Form 2](#) to us;
 - **Request the correction of your personal data** – to ensure any incomplete or inaccurate personal data is corrected by submitting [POPI Form 2 to us](#);
 - **Request erasure of your personal data** – where there is no lawful basis for the retention or continued processing of your personal data by submitting [POPI Form 2 to us](#);
 - **Object to the processing of your personal data for a legitimate interest (or those of a third party)** – under certain conditions where you feel it impacts your fundamental rights and freedoms by submitting [POPI Form 1](#) to us;
 - **Request restriction of processing of your personal data** – to restrict or suspend the processing of your personal data to limited circumstances submitting [POPI Form 1](#) to us;
 - **Withdraw consent given in respect of the processing of your personal data at any time** – withdrawal of consent will not affect the lawfulness of any processing carried out before your withdrawal notice. It may also not affect the continued processing of your personal data in instances where your consent is not required. To withdraw your consent –
 - For email communications – by clicking unsubscribe on the email communication sent by us.
 - For other purposes – by emailing our Information Officer stating that you “*withdraw your consent for Fourie Stott Inc to process your or your child’s personal data.*”
- 19.2. Parents can exercise the above rights on behalf of their children.
- 19.3. If an above request/objection is to be made, please use the contact data at paragraph 2 above and we will revert within 30 calendar days. The relevant forms to be completed in exercising your rights are also available on the [Information Regulator’s website](#) or in our PAIA Manual.

20. CHILDREN

Our website and our Services are not targeted at people under the age of 18. We will not knowingly collect Personal Information in respect of persons in this age group without express permission to do so, unless permitted by law.

21. THIRD PARTY SUB-PROCESSORS / OPERATORS

- 21.1. We use Operators for certain processing activities and to assist in the delivery of Services. We reserve the right to change our Operators at any time without further notice to you, but we will ensure our Operators are bound by this Privacy Policy and our Data Protection Policy or similar terms providing the same or higher level of protection. Such external processing activities include, but are not limited to:
- (a) IT systems and infrastructure;
 - (b) Couriers, agents, and correspondent attorneys;
 - (c) Debt collection services;
 - (d) Human resources;
 - (e) Payroll;
 - (f) Hosting and email infrastructure;
 - (g) Credit reference agencies;
 - (h) Direct marketing / mailing services.
- 21.2. We conduct strict due diligence in respect of our external Operators before forming a business relationship. We obtain company documents and references to ensure the Operator is adequate, appropriate and effective for the task we employ them for.

22. WHEN YOU PROVIDE US WITH INFORMATION ABOUT OTHERS

If you provide us with personal data about someone else, you are responsible for ensuring that you comply with any obligation and consent obligations under applicable data protection laws in relation to such disclosure. You must ensure that you have provided the required notices and have obtained the individual's consent to provide us with this personal data and that you explain to them how we collect, use, disclose and retain their personal data, or otherwise direct them to read this Policy.

23. COOKIES AND SIMILAR TECHNOLOGIES

- 23.1. We may place small text files called "cookies" on your device when you visit our website. Cookies do not contain Personal Information, but they do contain a personal identifier allowing us to associate your Personal Information with a certain device. Cookies serve useful purposes for you, including:
- (a) Remembering who you are as a user of our website to remember any preferences you may have selected on our website, such as saving your username and password, or settings ("**functional cookies**");
 - (b) allowing our website to perform its essential functions. Without these cookies, some parts of our website would stop working ("**essential cookies**"). For example, information on error messages displayed to users will be collected and the developer team will assess and solve it.

- (c) monitoring how our website is performing, and how you interact with it to understand how to improve our website or Services (“**site analytics**”).
- 23.2. Your internet browser may accept cookies automatically and you can delete cookies manually. However, no longer accepting cookies or deleting them may prevent you from accessing certain aspects of our website where cookies are necessary.
- 23.3. As cookies are stored in the web browser used to access our website, to disable cookies users need to change the settings pertaining to that browser in particular.
- 23.4. Many websites use cookies and more information is available at: www.allaboutcookies.org.

24. PRIVACY POLICIES OF OTHER WEBSITES

- 24.1. Our website may contain links to other websites, apps, tools, widgets and plug-ins that are run by third parties. If you visit a third-party website or social media site, you should read that website / social media’s privacy notice, terms and conditions, and their other policies. We are not responsible for the policies and practices of third parties and social media sites. Any Personal Information you give to those organizations is dealt with under their privacy notice, terms and conditions, and other policies.
- 24.2. If you disclose your Personal Information directly to any third party other than us, we shall not be liable for any loss or damage, howsoever arising, suffered by you as a result of your disclosure of your Personal Information to such third parties.

25. GOVERNING LAW

- 25.1. This Privacy Policy is governed by South African law.
- 25.2. If any provision of this Privacy Policy is determined to be illegal, void or unenforceable due to applicable law or by order of a court, the offending provision shall be deemed to be deleted and the continuation in full force and effect of the remaining provisions shall not be prejudiced.

26. CHANGES TO THIS POLICY

We may amend this Privacy Policy from time to time and we will take reasonably practicable steps to inform you when changes are made. Without limiting how we may inform you, we may notify you by email, “pop-up” notification on our website, or notification when you access our website. We encourage you to periodically review our Privacy Policy for the latest information on our privacy practices.

27. QUERIES, COMPLAINTS, AND INFORMATION REGULATOR

- 27.1. If you have any questions or complaints about your privacy rights or this Privacy Policy, please address your concerns to our Information Officer. If you feel our attempts at resolving the matter have been inadequate, you may lodge a complaint with the South African Information Regulator through their website,

<https://www.justice.gov.za/inforeg/>.

- 27.2. If you are located outside of South Africa, you may contact the appropriate regulatory authority in your country of domicile.