

## DENEYS ZEEDERBERG ATTORNEYS PRIVACY POLICY

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### Introduction

The purpose of this policy is to explain how we use and protect personal information we collect from visitors to our website and/or the information you provide us with. We understand and recognise the importance of safeguarding and ensuring transparency when it comes to the processing of personal information.

By providing us with your personal information, via our website, by email, phone or any other means, you consent to this policy and the processing of your information as set out herein. Please note that we may review and update this policy from time to time and therefore encourage you to continuously review the policy when you visit the website.

### Personal information we collect about you

We may collect and process the following personal information about you:

1. Personal details including your full name and passport or identity number;
2. Contact details such as your telephone number, email address, correspondence address (physical and/or postal) and social media profiles;
3. Demographic information such as your age, gender, date of birth, nationality and preferences or interests;
4. Financial details such as your bank account details and payment related information including invoice and payment records;
5. Website usage including details of your visits to our websites and information collected through cookies and other tracking technology;
6. Identification and background verification information such as utility bills, bank statements, tenancy agreements, evidence of beneficial ownership or source of funds to comply with the obligations imposed in terms of the *Financial Intelligence Centre Act 38 of 2001*;
7. Information you provide us in the course of registering for and attending events or meetings;
8. Recruitment data such as your education and employment history, curriculum vitae, details of professional membership and any other information relevant to potential recruitment;
9. *If attorney – instruction details such as details of instructing individual and personal information included in correspondence, evidence, documents or any other materials received in the course of providing legal services;*
10. Where we need to process sensitive personal information, it will be done in accordance with the applicable law, in the ordinary course of business and for a legitimate purpose;
11. Any other personal information which you may provide us with.

### Collection of your personal information

We may collect or obtain your personal information in a variety of ways, including but not limited to:

1. Where you provide it directly to us, for example where you correspond with us via email, in the course of a relationship with you *or in the course of providing legal services to you or your organisation (if attorney)*;

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2. Where you make such information public;
3. When you register to use our (legal and related) services such as newsletters, seminars or webinars;
4. Third party sources or where we monitor use of our website, any marketing we may send to you or email communications sent from or received by us.

## **Processing of your personal information**

We will process your personal information for as long as necessary and in accordance with the applicable law. Under the Protection of Personal Information Act, we may only process your personal data under one of the legally justified grounds. These legal grounds include:

1. With your consent, which consent may be withdrawn at any time;
2. Where processing is necessary to carry out actions for the conclusion or performance of a contract;
3. Where processing complies with the legal obligations imposed on us;
4. Where processing protects one of your legitimate interests;
5. Where processing is necessary for the proper performance of a public law duty; or
6. Where processing is necessary for pursuing of our legitimate interests.

We may therefore use your information in the following ways:

1. in the ordinary course of *business (of providing legal and related services – if attorneys)* and primarily use your information for the purpose for which it was collected.
2. to achieve a legitimate interest and our reason for using it outweighs any prejudice to your data protection rights.
3. To facilitate use of our websites as well as marketing and business related purposes
4. To fulfil our legal, regulatory or risk management obligations in performing customer due diligence, know your client, anti-money laundering in terms of the *Financial Intelligence Centre Act*, preventing fraud and enforcing our legal rights and protecting those of third parties.
5. To facilitate recruitment and reorganisation or making changes to our business.

## **Disclosure of personal information to third parties**

We, in accordance with applicable law, may disclose any information provided to us to our associates and service providers. This includes the following categories of third parties:

1. Our professional advisors, bankers and auditors;
2. Third party service providers and other third party external advisors or experts, (*such as advocates, expert witnesses etc*) who are engaged in the course of our services, only with their prior consent; and
3. Our insurers or insurance brokers.

We may further process your information in order to comply with our regulatory requirements, alternatively our statutory obligations, which may include requests made by regulatory and legal authorities, such as the Financial Intelligence Centre, to comply with our reporting obligations and in the event of any actual or threatened breach of such law or regulation, alternatively the Legal Practice Act which requires us to keep your records for a period of 7 years from the termination of our business relationship.

## Use of cookies and similar technologies

When you visit our website we may, where required, send cookies to your device or alternatively read cookies already on your device, with your prior consent. This is a small piece of data stored on your computer by the web browser while browsing a website, used to keep track of your visits and activity on such website. You may decide to accept or decline to use the cookies, by using the setting on your browser. Disabling or refusing the cookies, the functionality of our website may be affected and you may be unable to access certain parts and/or features.

## Your rights

You may have rights under South African and other laws to have access to your personal information and request that your information be corrected, destroyed or deleted. You are entitled to withdraw your consent to us processing your information and notify us, in the prescribed manner, of such withdrawal should you wish to exercise this right. Should we wish to disclose your information to a third party service provider we will inform you of such and you may exercise your right to prevent such disclosure.

## Contact Details

If you wish to exercise any of your rights you may contact us at:

The Information Officer: **Deneys Zeederberg**  
Telephone: **012 110 4245**  
Email: **deneys@dzalaw.co.za**

In this document references to **us**, **we** and **our** mean **Deneys Zeederberg Attorneys**.

**Personal information** and **processing** have the meanings as set out in the *Protection of Personal Information Act 4 of 2013*

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