

PRIVACY NOTICE

Strauss Daly Inc

and



Strauss Daly (Western Cape) Inc

(Collectively referred to as “the Firm”, “we”, “us” and “our”)

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Version	Date	Revision Author	Summary of Changes
1	29 March 2021	L Visagie	Creation of Policy
2	29 July 2023	L Visagie	Disclosure of specific legal basis, practices about children’s information, and specific planned transfer and use of third party verification service. Employees excluded from scope for separate notice.

Approval

Name	Position	Signature	Date
HJR Barnard	Head of Organisation (Chairperson)		19/08/2024

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1. INTRODUCTION

- 1.1. Strauss Daly Inc. and Strauss Daly (Western Cape) Inc are personal liability companies incorporated in the Republic of South Africa. Our Firm registration numbers are 1992/006281/21 and 1996/004988/21, respectively.
- 1.2. This Privacy Notice doesn't govern all the information we may process.
- 1.3. This Notice applies to external parties we interact with, including:
- (a) our potential and existing clients;
 - (b) recipients of our Services;
 - (c) our suppliers and contractors;
 - (d) visitors to our offices; and
 - (e) users of our website;
- 1.4. Our commitments to our employees and personnel are governed by separate privacy notices.

2. CONTACT US

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

Information Officer	Lisa Visagie
E-mail Address	LVisagie@straussdaly.co.za

Further contact information and forms attached to our PAIA Manual and available on our website at: <https://www.straussdaly.co.za/>

3. DEFINITIONS

"Associates"	the directors, employees and consultants of our correspondent attorneys, and other legal practitioners whom we have your instructions to brief.
"FICA "	the Financial Intelligence Centre Act 38 of 2001, including guidelines and directives issued in terms of such legislation.
"Operator"	any person or entity that Processes personal information on behalf of a Responsible Party.
"personal information"	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 – <ul style="list-style-type: none"> a) race, gender, sex, pregnancy, marital status, national, ethnic or social origin, colour, sexual orientation, age, physical or mental health, wellbeing, disability, religion, conscience, belief, culture, language and birth of the person;

	<p>b) education or the medical, financial, criminal or employment history of the person;</p> <p>c) any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;</p> <p>d) the biometric information of the person;</p>
“POPIA”	the Protection of Personal Information Act, 4 of 2013
“Process”	collect, acquire, receive, record, organise, collate, store, update, change, retrieve, read, process, analyse, use and share personal information.
“Responsible Party”	the entity that decides how and why personal information is Processed. Responsible Parties may instruct Operators to process personal information on their behalf.
“Service Provider”	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.
“Special personal information”	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) Collections;
- (c) Conveyancing
- (d) Drafting of contracts
- (e) Family law;
- (f) Forensic services and investigations;
- (g) Insolvency and business rescue;
- (h) Labour law;;
- (i) Litigation;
- (j) Notarial services;
- (k) Trusts; and
- (l) Wills and estates.

- 4.2. We collect personal information about you when you:
- (a) contract with us for our Services;
 - (b) make an appointment or inquire about any of our Services;
 - (c) access our website, mobile applications or related software systems;
 - (d) contact us, or otherwise interact with us;
 - (e) visit our offices.

5. YOUR ACKNOWLEDGEMENT

- 5.1. By providing us with your personal information, you acknowledge and confirm that you have read and understood this Privacy Notice.

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

6.1. Information you provide directly to us

- (a) We collect a variety of personal information that you provide directly to us. For example, we collect information from you when:
- (b) You complete our digital or physical Client onboarding forms 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, relatives and beneficiaries.
- (c) 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.
- (d) We process your orders, requests and payments for our Services.
- (e) You ask us questions, communicate with us, or give us feedback when submitting via forms, email or WhatsApp.
- (f) You participate in research and surveys.

- (g) 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.

6.2. Information we collect through passive (automated) means

- (a) We may passively collect certain categories of your technical and usage information from the devices that you use to access and navigate our Website (“**Access Devices**”) using your browser’s cookies.
- (b) For example, when you view our Website, we can see:
- what you click,
 - what you view,
 - how long you spend on pages,
 - your device and internet connection details such as: type of device you are using, IP address and details about your internet connection, technical details such as your screen size and the software you are using, such as your web browser,
 - your country or region (not exactly where you are unless we ask permission), and
 - your unique advertising or other identification numbers allocated to your browser or device.
- (c) We don’t often know exactly who you are from this data. But sometimes we may connect this data with other information we hold about you, for example, when you submit a form

6.3. Information Collected from Third Parties

- (a) We may also receive your personal information indirectly from, among others, the following sources (including public parties):
- the United Nations Money Laundering and Financing of Terrorism Sanctions list and other equivalent sanctions lists to ascertain your international criminal status and risk profile;
 - press, newspapers and journalist publications in connection with our FICA obligations and to perform our Services;
 - Government authorities (e.g. Deeds Office) and law enforcement;
 - our Associates where you have asked them to refer you to us, or where you have instructed us to brief them on your matter;
 - our clients may supply us with their customers’, contractors’ or employees’ personal information to allow us to render our Services to them on their matter;
 - Credit bureaux where permitted;
 - from other responsible parties where we act as contracted outsourced processors (“Operators”) or co-responsible parties in performing our Services, including:
 - banks and financial institutions in connection with matters they have instructed us on to collect outstanding debts due to them; and
 - payment gateways and processors to process your payments.
 - Cookies and similar technologies, these are set on your device by us and our trusted partners, such as Google Analytics;

To opt out of being tracked by Google Analytics across all websites, visit: <http://tools.google.com/dlpage/gaoptout>.

- third party social networks (such as Facebook and Google) if you interact with us through them; and
 - advertising interactions (if you interact with on one of our ads on a third party website, we may receive information about that interaction).
- (b) When we collect your personal information from third parties it is either because:
- 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;
 - it is required by law; or
 - it is strictly necessary for us to do so to protect the legitimate interests of:
 - our client;
 - the Firm; or
 - the data subject.

6.4. When you provide us with information about others

- (a) If you provide us with personal information 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 information and that you explain to them how we collect, use, disclose and retain their personal information, or otherwise direct them to read this Notice.

7. SPECIAL PERSONAL INFORMATION

- 7.1. Where we need to process your Special personal information, we will do so with your consent, for a lawful 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.

8. CHILDREN

- 8.1. Our Firm recognizes that there may be instances where it is necessary to process information about children (under the age of 18) to provide services under a written mandate, such as in divorce or domestic violence cases. In such situations, we will ensure compliance with applicable data protection laws.
- (a) **Consent:** When processing personal information about children, we will rely on the consent of a competent person, such as a legal guardian, who has the authority to provide consent on behalf of the child.
- (b) **Legal Obligations:** Additionally, we may process information about children if it is necessary for the establishment, exercise, or defence of a right or obligation in law. For example, if there is a legal requirement to investigate and protect a child's welfare in cases of child abuse or neglect, we may process relevant information as mandated by law.

- 8.2. In all instances, we will handle information about children with utmost care and take appropriate measures to ensure their privacy and protection. Safeguarding the rights and well-being of children is of paramount importance to our Firm.
- 8.3. Please note that this privacy statement is subject to any specific legal requirements and regulations governing the processing of personal information about children, and we will comply with such obligations as applicable.

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) below on how to withdraw your consent.

9.2. Contract

- (a) We process your personal information if it is necessary to enter into or perform under a contract that we have with you as a client, 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, updates on your matters 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 information 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 information to our contracted service providers and court officials as needed to perform our obligations to you (for example, couriers, messengers, correspondent attorneys, and the sheriff's office.
 - for security and identity verification, and to check the accuracy of customer, supporter or supplier personal information; and
 - for any other related and lawful purposes brought to your attention.

9.3. By law

- (a) We process customer and supplier personal information 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 information when it is necessary to pursue your legitimate interests, our interests or those of our client. 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 client verification processes, 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;
 - trace debtors;
 - manage business continuity incidents and emergencies;
 - analyse and gather metrics to better understand how customers and potential clients 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 information.

9.5. Third-party collection

- (a) When we collect your personal information from third parties it is because we are required to do so by law or 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 information 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 information 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**

- (a) 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 Notice.

9.7. **Further processing limitation**

- (a) 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.

10. **DISCLOSURE OF PERSONAL INFORMATION**

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

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

Our Service Providers

- (a) We provide access to or share your information with Service Providers who use it to perform services on our behalf, and whose help we require to conduct our business operations and that:
- 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;
 - where this personal information 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
 - based on our instructions, are not authorised by us to use or disclose the information except as strictly necessary to perform the services on our behalf as instructed or to comply with legal or professional requirements.
- (b) We will only authorise the processing of any personal information 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 nondisclosure obligations.

Protection of our Firm

10.3. You acknowledge that we may access, retain and disclose the information 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 Notice, 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 the Firm, 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

- 10.4. 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

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

By law with government departments and regulatory bodies

- 10.6. 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:
- (a) compliance with the law or with any legal process; or
 - (b) the protection and defence of the rights, property or safety of the Firm, our customers, users, employees, contractors, suppliers, service providers, or any third party.

11. COMPULSORY INFORMATION AND CONSEQUENCES OF NOT SHARING

- 11.1. Where we must process certain personal information by law, or in terms of a contract that we have entered with you, and you fail to provide such personal information when requested to do so (for example, identification verification documents), 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?

- 12.1. We do not use your personal information to make any automated decisions about you. If we use formulas or algorithms 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.
- 13.2. Our servers and cloud storage run in secure premises located in South Africa.
- 13.3. We use a trusted and secure third party Know-Your-Client (KYC) technology partner to assist us in collecting and verifying your personal information so that we can comply with our legal obligations under FICA. This KYC partner stores your personal information in secure data centres in the Republic of Ireland which are subject to adequate data protection laws including Ireland's Data Protection Act and EU General Data Protection Regulation (among others).
- 13.4. We reserve the right to transfer to and/or store any other personal information on servers in a jurisdiction other than where it was collected, or outside of South Africa. If we do, we will always take reasonably practicable steps, which may include a transfer impact assessment, encryption and suitable contractual terms, to ensure any company or person that we pass your personal information to is required to treat your information with an adequate level of protection.

14. SECURITY AND INTEGRITY

- 14.1. We will take appropriate and reasonable technical and organisational steps to protect all personal information 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:
- (a) keeping systems secure (such as monitoring access and usage);
 - (b) storing records securely;
 - (c) controlling the access to our premises, systems and records;
 - (d) safely destroying or deleting records;
 - (e) encrypting and/or password protecting sensitive data;
 - (f) protecting our servers using firewalls and limiting access to information on a strictly need to know basis;
 - (g) testing the security of our website and IT systems;
 - (h) 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.

- 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 information 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 information 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 information, we will destroy such information 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.
- 15.5. Our professional code of conduct and rules require that we retain all information and records concerning client matters for 7 years.

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 information is accurate, complete, not misleading and up to date.
- 16.2. Anyone about whom we maintain personal information may request to inspect and, if appropriate, correct the personal information held by us. It is your responsibility to inform us should your personal information be incorrect, incomplete, misleading or out-of-date by contacting us. We may require additional information 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 information, we will adjust our information or records accordingly.
- 16.3. A request for correction/deletion of personal information or destruction/deletion of a record of personal information must be submitted using the prescribed form which is available in our Access to Information (PAIA) Manual on our website.

17. REDUCING THE COLLECTION OF UNNECESSARY INFORMATION

- 17.1. We have service level agreements or engagement terms with third parties who send us personal information (either in our capacity as a Responsible Party or Operator).
- 17.2. These state that only relevant and necessary information is to be provided as it relates to the processing activity we are carrying out.
- 17.3. 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. ELECTRONIC DIRECT MARKETING

- 18.1. Our Firm may send clients information about our products and services that we believe may interest to you.
- 18.2. Marketing materials may be sent to clients' email addresses if:
 - (a) Your contact details were obtained during your engagement with us.
 - (b) We contact you to market similar products or services.
 - (c) You can opt-out at any time for free by unsubscribing or emailing marketing@straussdaly.co.za.

- 18.3. If clients opt-out of receiving direct marketing emails, then we will cease direct marketing communication, except for non-marketing regulatory matters.
- 18.4. Non-customers will only receive marketing materials if they provide express "opt-in" consent through preferred electronic channels, with the ability to opt-out.

19. DATA SUBJECT RIGHTS (“DSRs”)

19.1. Your rights include:

- (a) Request access to your personal information - obtain a copy of the retained information.
 - (b) Request correction of your personal information - rectify any incomplete or inaccurate information.
 - (c) Request erasure of your personal information - delete your information if there is no legal basis for retention or processing.
 - (d) Object to processing based on legitimate interest - object when it affects your fundamental rights and freedoms.
 - (e) Request restriction of processing - limit the processing of your information in specific circumstances.
 - (f) Withdraw consent for processing at any time - withdrawal does not affect prior processing, but may not impact processing where consent is not required.
- 19.2. If you wish to exercise any of these rights, please contact us at the email address provided in the ‘Contact Us’ section of this Notice.. We will respond within 30 calendar days.

20. THIRD PARTY SUB-PROCESSORS / OPERATORS

- 20.1. We utilize Operators for specific processing activities and to support the provision of our Services. We have the right to change our Operators without prior notice. However, we ensure that our Operators adhere to our Privacy Notices and Data Protection Policy or similar terms that provide an equal or higher level of protection. These external processing activities may include, but are not limited to:
- (a) IT systems and infrastructure;
 - (b) Couriers, agents, and correspondent attorneys;
 - (c) Debt collection services;
 - (d) Hosting and email infrastructure;
 - (e) Credit reference agencies;
 - (f) Direct marketing/mailing services.

20.2.

- 20.3. Before establishing a business relationship, we perform due diligence on our external Operators. We obtain company documents and references to verify their suitability, appropriateness, and effectiveness for the assigned tasks.

21. COOKIES

- 21.1. We may place small text files called “cookies” on your device when you visit our website. Cookies do not hold personal information, but they do contain a personal identifier allowing us to affiliate your personal information with a certain device. Cookies serve useful purposes for you, including:
- 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”);
 - allowing our website to perform their essential functions. Without these cookies, some parts of our website would stop working (“essential cookies”). For example, data on error messages displayed to Users will be collected and the developer team will assess and solve it;
 - monitoring how our website are performing, and how you interact with it to understand how to improve our website or Services (“site analytics”).
- 21.2. Refer to our Cookie Statement for more information on our use of cookies.
- 21.3. 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.
- 21.4. As cookies are stored in the web browser used to access our website, to disable cookies you need to change the settings on that browser. Many websites use cookies and more information is available at: www.allaboutcookies.org.

22. LINKS TO THIRD PARTY WEBSITES

- 22.1. While we try to link only to sites that share our high standards and respect for privacy, we are not responsible for the content, or the security or privacy practices employed by other sites. We recommend that you always read the privacy and security statements on such sites.

23. GOVERNING LAW

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

24. CHANGES TO THIS POLICY

- 24.1. We may amend this Privacy Notice from time-to-time, and we will take reasonably practicable steps to inform you when changes are made. Without limiting the way we may inform you, we may notify you by email, or by posting an updated notice on our website.

25. QUERIES, COMPLAINTS, AND INFORMATION REGULATOR

- 25.1. If you have any questions or complaints about your privacy rights or this Privacy Notice, 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, www.inforegulator.org.za
- 25.2. If you are located outside of South Africa, you may contact the appropriate regulatory authority in your country of domicile