



Clientèle

CLIENTÈLE GROUP PRIVACY POLICY



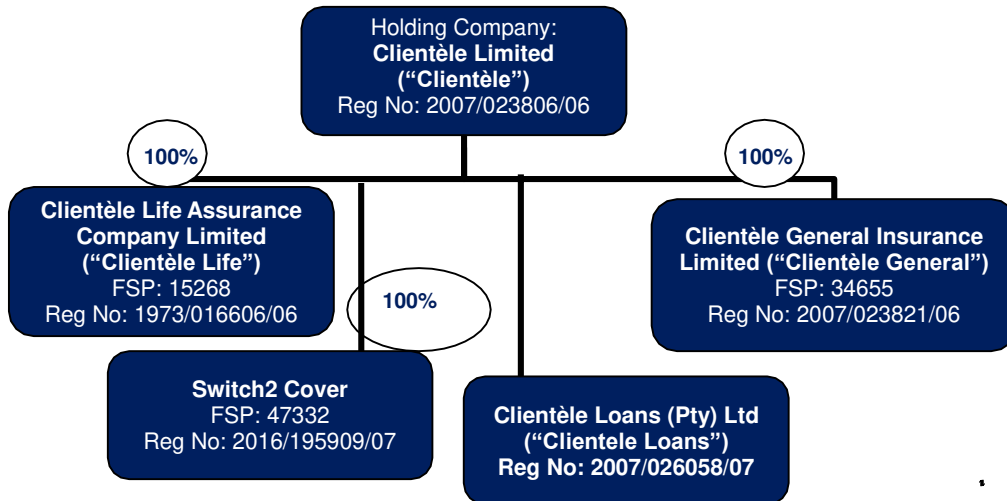
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1. Introduction

The Clientèle Group (Clientèle) respects the right to privacy and confidentiality of our potential and existing client’s personal information. This policy extends to all entities and divisions that form part of the Clientèle Group of companies as set out in the Group Organogram below:



The Protection of Personal Information Act describes personal information as information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person. This includes name, contact details, nationality and identity number.

This policy complies with the principles contained in the Electronic Communications and Transaction Act 25 of 2002 (ECT), for electronically collecting personal information and the right to notify data subjects how we handle personal information given to Clientèle as per the Protection of Personal Information Act 4 of 2013 (POPIA).



2. Objective

The objective of this policy is to ensure compliance with the Electronic Communications and Transaction Act 25 of 2002 and the Protection of Personal Information Act 4 of 2013 by:

- Setting out our strategy to uphold the rights to privacy and confidentiality of your personal information.
- Notifying data subjects how we will handle personal information which we obtain on our website or a website linked to Clientèle.

3. Policy Application

3.3.1 Consent

By submitting your details and/or using the website you accept the terms and conditions of the policy and explicitly consent to the collection, use and disclosure of your personal information in the manner described below.

3.3.2 Security and Confidentiality

We understand the value of your personal information and therefore will take all reasonable steps to protect your personal information from loss, misuse or unauthorised alteration, access or disclosure, by the following:

- a. Your personal information is stored in databases that have built-in safeguards and firewalls to ensure the privacy and confidentiality of your information.
- b. Clientèle uses SSL Web Server Certificates to offer secure communications. At each point where information is captured the secure padlock symbol will appear in your browser showing that all communication is encrypted.
- c. We constantly monitor the latest internet developments to ensure our systems evolve as required. We also test our systems regularly to ensure that our security mechanisms are up to date.
- d. Clientèle does not make any warranties or representations that content shall be entirely safe or secure. We are subject to the Protection of Personal Information Act 4 of 2013, which we comply with.



3.3.3 Use of Information Collected

- a) We may process, transfer and disclose your personal information for the purposes of:
 - Providing you with products or services, and complying with your instructions.
 - Assisting in improving Group entities' services, and providing you with information via mail, telephone or other means about Group entities services. Note that, as permitted by the ECT Act, this website may use personal information collected to compile profiles for statistical purposes and trade in these profiles. No information contained in the profiles or statistics will be able to be linked to any specific user.
- b) You consent that Group entities may share your personal information with third parties for purposes of management and administration of this Website.
- c) In line with the POPI Act, all personal information collected on this website will be only be used for the purpose agreed.
- d) Personal information will only be retained for as long as necessary for the purpose it was collected and in line with regulations governing the duration information should be kept.

3.3.4 Data Collection

- a) In addition to the personal information you submit, we may collect information about your computer including, where available, your IP address, operating system and browser type for system administration.
- b) We collect aggregated site-visitation statistics using cookies. We do not track individuals' use of the site. When someone visits the site, a cookie is placed on the customer's machine (if the customer accepts cookies) or is read if the customer has visited the site previously.

3.3.5 Sharing Your Data for Service Provision

- a) We may share the personal data you submit or that we collect with third parties involved in the process of providing the products and services you may request.
- b) All service providers are bound by contract to maintain the confidentiality and security of your personal information and are restricted in their use thereof as per this policy.



3.3.6 Electronic Communications and Transactions Act

We subscribe to the principles, outlined in Section 51 of the ECT Act and POPI Act, which govern your right to having your personal information kept private. We briefly outline these principles below:

- We shall only collect, collate, process and store ('use') your personal information with your written permission as set out in this policy, unless legally required to do so, and will only use such information for the lawful purpose for which it is required as set out in this policy.
- We shall disclose in writing, upon request, the specific purpose for which we use, collect and store your personal information. We will also keep a record of that personal information and the specific purpose for which we have used it.

We will not use your personal information for any purpose, other than that which we disclosed to you herein, unless you give us your express written permission to do so, or unless we are permitted/required to do so, by law.

3.3.7 Disclosure of Personal Information

In accordance with the ECT Act and the POPI Act, we will disclose your personal information without your consent if:

- We are required to do so by law or a court order; or
- If it is in public interest.

3.3.8 Third Party Links

The website may contain links to third party websites or you may be directed to Clientèle through a third party website. If you follow a link to any of these websites, please note that these websites have their own terms and privacy policies and that we do not accept any responsibility or liability for them.

We are not responsible for any representations, information, warranties or content on any website of any third party, we do not exercise control over third parties' privacy policies and you should refer to the policy of any such third party to see how they protect your privacy.



4. Changes to Policy

- a) We reserve the right, in our sole and absolute discretion, to update, modify or amend (including without limitation, by the addition of new terms and conditions) this policy from time to time with or without notice or justification.
- b) You therefore agree to review the policy whenever you visit the website for any such change. Save as expressly provided to the contrary in this policy, the amended version of the policy shall supersede and replace all previous versions thereof.