



Privacy Notice:

The Gawie Le Roux Institute of Law

1. Introduction

This Privacy Policy sets out the basis on which any personal information we collect from you, or that you provide to us, will be used, stored and processed by us ("Collect" or "Collection"). Please read the following carefully to understand our views and practices regarding your Personal Information (as defined below) and how we will treat it.

In adopting this Privacy Policy, we wish to ensure that the use of your Personal Information is lawful, reasonable, and relevant to our activities, with the ultimate goal of improving the services we offer and to your experience with us. We will take reasonable steps to prevent unauthorised access to, or disclosure of your Personal Information. However, we do not guarantee that your Personal Information shall be 100% secure.

By continuing to use the Website, you agree to the terms and conditions set out in this Privacy Policy. You agree at we may Collect Personal Information for the purposes of providing you with access to our Website and for any of the purposes listed at paragraph 3 below.

You consent to the Collection of your Personal Information on the terms and conditions set out in this Privacy Policy if you continue to use the Website.

We are serious about the privacy of the personal information of our clients and third parties that deal with us and therefore treat it in the most secure way as reasonably possible and in a way that is aligned to the requirements of the Protection of Personal Information Act 4 of 2013 ("POPIA").



Below we explain how and when we collect and use personal information. If at any time you have enquiries that are not dealt with in this document, please visit our website at www.gawielerox.co.za, or contact us on 012 361 1715. You can also contact our Information Officer, Johan van Stade at johan@gawielerox.co.za

2. The information we collect and record

- 2.1 When we receive an enquiry, request or order, we may request, receive, store and record many details that are defined as personal information in POPIA. We collect and record only the minimum personal information that is required for us to attend to the request, enquiry or order. In doing so, we comply with POPIA in that we implement reasonable practices to ensure the private information is protected.
- 2.2 In addition, if you are not a client of us as explained in 2.1 above, but approach us via our website, we will collect and retain your email address and additional details you provided when visiting our website. We will collect only so much information as is required for us to be able to respond to you.
- 2.3 If you browse our website and/or download any information, we will not record any of your personal details. We do collect a record of the visit for our own information purposes, but the personal information collected in this way is de-personalised and we will not be able to trace you as a result.

3. Your personal information will be used or shared in the following ways:

- 3.1 We keep your personal information confidential and only use, process, share, record or delete it as is required by POPIA, other legislation and/or the requirements of the service that we are providing for you or that you request from us.
- 3.2 We may share certain information with service providers as part of our business operations and market research and only if these service providers have undertaken to protect the personal information that we share with them for

a particular purpose. We only share such personal information as are required for purposes of performing the tasks lawfully following from and required by the task(s) we are mandated to perform.

4. Other interaction with your personal information

- 4.1 POPIA requires us to ensure that we hold correct and updated personal information and, hence, we may need to update your personal information from time to time, and request your assistance in doing so. The request will be sent via email or otherwise, whatever is most reasonable in the circumstances.
- 4.2 We use cloud storage. This means that some of your personal information may be stored outside our national borders. We have obtained undertakings from these service providers that they will keep the personal information confidential but cannot be held liable should they breach their undertakings.
- 4.3 We will:
 - 4.3.1 not sell or give your personal information away, use it, other than in terms of this policy;
 - 4.3.2 retain the personal information only for as long as we are required by law to do so.

5. Your rights

- 5.1 You may at any time request us to confirm what personal information we have relating to you and by whom it was accessed. We may charge a fee for the latter.
- 5.2 You may ask us to update or delete your information or to refrain from using it. Note that if the information you ask us to delete is required by us for purposes of a transaction that we are legitimately processing, it may result in us being unable to complete the transaction on your behalf or in which you are involved. Should any damage arise from your request in these circumstances, you indemnify us against any claim for damages that may follow as a result hereof.
- 5.3 Also, if we are by law required to retain the information, we will only delete the information once we have complied with the regulatory period for retaining the information.

- 5.4 You may further unsubscribe from any of our electronic material by simply clicking on the unsubscribe option provided. In that event we will remove your details from our database, in a secure way.
- 5.5 You may otherwise ask us to delete any information we have about you but we might refuse if we need your personal information to protect our rights, or if the law obliges us to keep it. In these circumstances, if we refuse to delete your personal information, we will advise you of the fact that we did not delete the personal information and provide you with a reason therefor.
- 5.6 You may enquire from us about your personal information that we have, and how, if at all, it was used.

6. Security breach

- 6.1 We have specialised and strict measures in place to make sure that our information systems are not breached.
- 6.2 However, should this occur, we will ascertain how and where the breach occurred and make sure that the exposed area is addressed immediately.
- 6.3 We will ascertain which data has become vulnerable as a result and notify you if the breach may affect you and assist you to minimize any potential damages that you may suffer as a result, where possible. Such notification may take place by way of email to you, or by way of notice on our website, or otherwise.

7. Types of personal information we collect

- 7.1 The types of personal information that we may collect includes information necessary to provide our services. This may include personal information which contains identifiable information such as (amongst other things) your first and last name, screen name, email address, postal address, telephone number, details about your telephone device (e.g. mobile phone) and your telephone service provider ("personal information").

- 7.2 We may on occasion combine personal information we receive online with other records (such as those from telephone or completion of membership application forms) to develop a membership profile relating to you.
- 7.3 We will attempt to limit the types of personal information we collect to only that to which you consent (for example, in the context of online membership registration, message boards, surveys, polls, receiving newsletters, SMS and other mobile services).
- 7.4 When you visit our website, our web server also automatically records the name of your ISP (Internet Service Provider), the website from which you visit us, the pages on our sites you visit and in what sequence, and the date and length of your visit. This information is aggregate and anonymous data and does not identify you specifically.
- 7.5 We, our third party service providers and our partners, may send "cookies" to your computer or use similar technologies to enhance your online experience at our website and across the internet. "Cookies" are files that can identify you as a unique customer and store your personal preferences as product preferences to tell us which site pages you have visited and in what order. We use cookies and other technical information to personalise your visit to the website, to analyse traffic on the website and to track user trends, patterns and selections for authorised download and for technical reasons connected with your use of our site. Cookies can either be permanent (i.e., they remain on your computer until you delete them) or temporary (i.e. they last only until you close your browser).
- 7.6 We may also use "web beacons" that monitor your use of our sites. Web beacons (or web bugs) are small strings of code that provide a method for delivering a graphic image on a web page for the purpose of transferring data, such as the IP (Internet Protocol) address of the computer that downloaded the page on which the web beacon appears, the URL (Uniform Resource Locator) of the page on which the web beacons appear, the time the page containing the web beacon was viewed, the types of browser that fetched the web beacon and the identification number of any cookie on the computer previously placed by that server. When corresponding with you via HTML capable e-mail, web beacons let us know whether you received and opened our email. On their

own, cookies or web beacons do not contain or reveal any personal information. However, if you choose to provide us with personal information, it can be linked to the anonymous data stored in the cookies and/or web beacons. Most browsers are initially set to accept cookies. However, if you prefer, you may adjust your browser to reject cookies from us or from any other website. Additionally, by setting your web browser to display HTML emails as text only, you may be able to prevent the use of some web beacons. However, please note that certain areas of our sites can only be accessed in conjunction with cookies or similar devices.

- 7.7 We may passively collect some of your personal information from the mobile device which you use to access and navigate through our website, using various technological means, for instance, using server logs to collect and maintain log information. The information which we may passively collect from your mobile device may include your identifying information, contact details, device and device event information, site activity information, log information, telephony log information, location information, unique application numbers and any other information which you permit us, from time to time, to passively collect from your device.

8. How your personal information may be used

We may use your personal information to:

- 8.1 provide services you request (e.g. send you by email or other electronic means our newsletters or other services in which you express an interest);
- 8.2 allow you to participate in recreational activities on the website (e.g. participate in our message boards), to organize or carry out promotional activities, games or promotional events;
- 8.3 inform you of changes made to our website;
- 8.4 inform you of content, services, promotions, offers and competitions which you may find interesting;
- 8.5 respond to any queries you may have;
- 8.6 develop a more direct relationship with you for the purposes described in this section;

- 8.7 understand general trends and patterns so we can develop and support existing and ongoing strategies for our services and educational content; and
- 8.8 for security, administrative and legal purposes.

9. Personal information used for marketing purposes

If we obtain your prior tacit consent, we may use your personal information for the purposes of:

- 9.1 promoting our services;
- 9.2 marketing upcoming events and services on behalf of selected third parties which are in accordance with our vision and goals and provided that you have agreed to your details being passed onto third parties.
- 9.3 You are entitled to request that we desist from using your personal information for the purposes of marketing, and we will provide you with the necessary functionality for you to do so with ease, each time we market to you.

10. Security measures to protect your personal information

- 10.1 Although absolute security cannot be guaranteed on the internet, we have in place up-to-date, reasonable technical and organisational security measures to protect your personal information against accidental or intentional manipulation, loss, misuse, destruction or against unauthorised disclosure or access to the information we collect online.
- 10.2 While we cannot ensure or warrant the security of any personal information you provide us, we will continue to maintain and improve these security measures over time in line with legal and technological developments.

11. Storing your personal information

- 11.1 We store your personal information in South Africa. We may also or alternatively store your personal information on and transfer your personal information to a central database located in South Africa. If the location of the central database is located in a country that does not have substantially similar laws which provide for the protection of personal data, we will take the

necessary steps to ensure that your personal information is adequately protected in that jurisdiction.

11.2 Your information will not be stored for longer than is necessary for the purposes described in this privacy policy.

12. Will my personal information be shared with anyone else?

12.1 Third parties: We may disclose personal information about you to other third parties to comply with applicable laws and regulations. We also reserve the right to disclose such personal information to third parties where a complaint arises concerning your use of our website and where we believe, in our sole discretion, that your use of our website is inconsistent with the privacy policy. We also share information about users of this website in an anonymous or aggregate form with third parties including advertisers and business partners, to understand customer trends and patterns and manage and improve our business relationships. We provide your personal information to third party processors to administer and process for the purposes notified to you in this privacy policy, and we may also share such details with third parties (such as auditors or legal advisors) to obtain professional advice. Any such processing will be governed by an agreement in the form required by law, preserving any and all of your statutory data protection rights.

12.2 Links, advertisers, third party sponsors & ad-servers: Our website may contain links to other websites that are not covered by this privacy policy and where information practices may be different from ours. We encourage you to consult the other sites' privacy policies on such third party sites before submitting any personal information, as we are not responsible for and have no control over personal information that is submitted to, or collected by, these third party websites. On this website, we sometimes offer content or programmes that are sponsored by or co-branded with identified third parties (e.g., educational events or promotions). These third parties can obtain personal information that you voluntarily submit to them to make use of the offer. We are not responsible for the collection and use of your personal information by these third parties. However, you should be informed, at the point of collection of such personally identifiable information, if these third parties will obtain such information, how it

will be processed and to whom it will be transferred. On our website, third parties may present or serve advertisements, provide us with data collection, reporting and ad response measurement, as well as assist with delivery of relevant marketing messages and advertisements. These third parties may view, edit, or set their own cookies.

The use of these technologies by such third parties is subject to their own privacy policies and is not covered by this privacy policy.

13. Mobile application and use of facebook user data

Our Facebook page may access information from your Facebook accounts once you give us permission to do so. Once permission is granted, the application accesses a user's name, gender, birthday, locale, email address and spice result.

14. Changes to this privacy policy

14.1 From time to time, we may revise this privacy policy to reflect company initiatives, changes in the law or technology or changes in our practices regarding the collection and use of personal information. If we decide to change this privacy policy, the changes will be posted on this Website so that you are always informed of the latest version.

14.2 We will not use or disclose personal information provided to us pursuant to this Privacy Policy in ways other than the ones described above, without informing you and providing you with the opportunity to consent to such modified conditions concerning the use and disclosure of your personal information.

15. Copyright

Copyright and all other immaterial property law, including the lay-out, design, tokens, graphics and multimedia works appearing on it, belong to the Gawie Le Roux unless such rights are expressly reserved by the author before they are published on the website.