



RYAN HALL

ATTORNEYS

**RYAN HALL AND ASSOCIATES INC. t/a RYAN HALL ATTORNEYS
(REGISTRATION NUMBER: 2018/197906/21)**

PRIVACY POLICY

1. INTRODUCTION

Ryan Hall Attorneys (hereafter "*RHLAW*") acknowledges the importance of privacy, which itself is a constitutional right, and consequently the need for protection of personal information furnished to it. RHLAW is committed to the safeguarding of such information.

This privacy policy explains how RHLAW collects and uses personal information. It also provides details of the rights of persons (natural and juristic) to whom the personal information relates (data subjects, as defined in the Protection of Personal Information Act 4 of 2013).

RHLAW reserves the right to amend this privacy policy at any time by publishing an updated version on its website.

2. COLLECTION OF PERSONAL INFORMATION AND THE CATEGORIES OF PERSONAL INFORMATION COLLECTED

RHLAW collects personal information in various instances, including when:

- 2.1. persons use RHLAW's website;

- 2.2. persons / data subjects complete and submit contact requests on RHLAW's website;
- 2.3. persons / data subjects complete and submit client registration forms on RHLAW's website;
- 2.4. data subjects contact RHLAW or request information or services;
- 2.5. RHLAW provides services to data subjects; and / or
- 2.6. persons apply for employment at RHLAW.

RHLAW may collect the information directly from the data subject or from third parties, such as state institutions, regulators, databases and search platforms (such as SearchWorks or WinDeed), registries, or legal practitioners representing our clients' or the data subject's counterparties.

The data subject's interaction with the firm on RHLAW's website will result in the collection of information regarding that person's activities on the website. This information includes, but is not limited to, the person's name, contact details, and information regarding the matter with which they need assistance and the parties involved therein.

Furthermore, in the ordinary course and scope of engaging with clients on matters and / or providing them with legal advice, RHLAW will be provided with and will collect personal information which includes the data subject's name, contact details, financial information as well as information regarding the matter with which they are being assisted and the parties involved therein.

RHLAW's employees are obligated to respect the confidentiality of any personal information held by them.

Moreover, as part of its recruitment processes, RHLAW collects information from graduates and candidates who unilaterally submit their applications and CVs to the firm's electronic mailbox or in response to advertisements posted by RHLAW from time to time. This information includes identity numbers, residential addresses, contact details, educational information and grades, as well as employment history. By enquiring regarding employment opportunities at RHLAW or applying for employment, applicants are deemed to provide their consent to RHLAW to process their personal information for recruitment purposes, which may include screening as well as background and reference checks.

3. GROUNDS FOR AND PURPOSE OF THE PROCESSING OF PERSONAL INFORMATION

RHLAW is entitled to process personal information:

- 3.1. to provide services and legal advice to its clients;
- 3.2. to comply with legal or regulatory obligations;
- 3.3. if a data subject has provided his / her / its consent, whether expressly or tacitly; or
- 3.4. if the processing is permitted by law.

The purposes for which RHLAW processes personal information include, without limitation:

- 3.5. for security, legal and administrative purposes, including compliance with FICA

- legislation and requirements;
- 3.6. to comply with any regulatory reporting obligations;
 - 3.7. pertaining to matter-related documents and information, for legal research, referencing, drafting and the provision of legal advice to clients;
 - 3.8. exercising and defending legal rights;
 - 3.9. providing and improving service delivery to its clients;
 - 3.10. (to give effect to instructions) to invest funds on behalf of its clients;
 - 3.11. to maintain and update its client- or potential client databases;
 - 3.12. to establish and verify persons' identities;
 - 3.13. to retain and make information available to persons;
 - 3.14. improving the user-experience when using its website;
 - 3.15. communicating with persons for its internal purposes;
 - 3.16. enabling its internal operations; and
 - 3.17. the marketing and promotion of its services.

4. DISCLOSURE OF PERSONAL INFORMATION

RHLAW may release personal information or disclose it to third parties in certain instances. These include, without limitation:

- 4.1. in order for RHLAW to provide services and legal advice to its clients;
- 4.2. if RHLAW is required or authorised to do so by law or court order or a ruling by an authorised body such as the Information Regulator; and
- 4.3. in order for RHLAW to enforce its rights.

The third parties to whom RHLAW discloses personal information include, without limitation:

- 4.4. advocates, opposing attorneys and other parties involved in the provision of legal services;
- 4.5. government authorities and registries, organs of state, regulators, courts, tribunals and law enforcement agencies;
- 4.6. third party service providers to RHLAW or its clients;
- 4.7. third parties who provide research services or search-engine functionalities to RHLAW or its clients.

5. RETENTION OF PERSONAL INFORMATION

RHLAW retains personal information for as long as may be reasonably necessary in accordance with applicable laws and / or the retention period of client files as stipulated by the Legal Practice Act and its Regulations.

6. COOKIES

RHLAW's website makes use of so-called cookies. Cookies store information regarding visitors to the website, and perform various other functions, such as improving the visitor's experience on the website and facilitating his / her use of the website.

A visitor to RHLAW's website may disable or decline the website's use of cookies. If the visitor elects to disable cookies, his / her user experience on the site may be diminished or affected.

7. DIRECT MARKETING

RHLAW may send marketing and promotional communications and material to persons. Recipients may opt out from receiving such communications by contacting RHLAW at the details provided below or by clicking on the opt-out link that will be contained in the relevant electronic communication.

RHLAW hereby confirms that it is not currently conducting any direct marketing.

8. SECURITY

RHLAW takes all reasonable steps to protect and avoid unauthorised access to a data subject's personal information. It has implemented various policies, procedures and software to safeguard personal information and routinely reviews its operations in order to ensure that personal information is adequately protected.

9. TRANSFER OF PERSONAL INFORMATION

Personal information collected by RHLAW may be transferred to persons in other countries. Those countries' laws might not protect personal information in the

same manner or to the same degree as the law in the Republic of South Africa. RHLAW will, however, take reasonable steps to ensure that recipients in other countries have appropriate privacy measures in place.

10. GENERAL

You agree that this Privacy Policy, your relationship with RHLAW and any dispute of whatsoever nature relating to or arising out of this Privacy Policy, whether directly or indirectly, is governed by the law of the Republic of South Africa, without giving effect to any principle of conflict of laws.

You agree that RHLAW may, at any time, transfer, cede, delegate or assign any or all of its rights and obligations under this Privacy Policy without your permission. We will notify you if we transfer, cede, delegate or assign any rights or obligations to a third party, but we do not have to notify you if we transfer, cede, delegate or assign any rights or obligations to any person which acquires all or part of our business operations. RHLAW may in certain instances also sub-contract its obligations, for example, engaging with external IT service providers. Where we engage such sub-contractors, we will do so without your permission, and we do not have to notify you if we sub-contract any of our obligations.

Subject to the above, this Privacy Policy shall apply for the benefit of and be binding on each party's successors and assigns.

Our failure to exercise or enforce any right or provision of this Privacy Policy shall not be construed as an implied consent or a waiver or novation of such right or provision.

Each of the provisions of this Privacy Policy shall be considered as separate terms and provisions. If any term or provision or part thereof ("the offending provision")

contained in this Privacy Policy shall for any reason whatsoever be declared or become unenforceable, invalid, or illegal by, including, but without derogating from the generality of the aforementioned, a decision by any court, an Act of Parliament or any statutory or other by-laws or regulations or any other requirements having the force of law, the other terms and provisions of this Privacy Policy shall remain in full force and effect as if this Privacy Policy had been executed without the offending provision appearing therein.

11. DATA SUBJECT'S RIGHTS

The Protection of Personal Information Act provides data subjects with the right to access, amend or delete personal information that is in the possession of RHLAW. To the extent applicable, a data subject may also have the right to object to RHLAW processing his / her / its personal information or to file a complaint with the Information Regulator. RHLAW may in certain instances legally refuse or decline such requests.

If a data subject wishes to exercise his / her / its rights as aforesaid, they can contact RHLAW at the details provided below. RHLAW may charge data subjects a fee for accessing, amending or deleting their personal information.

Data subjects are encouraged to contact RHLAW in order to update their personal information as and when required.

12. CONTACT DETAILS

In order to contact RHLAW for purposes relating to this Privacy Policy and / or in order to exercise a data subject's rights contemplated in paragraph 11 above, please contact us using these contact details:

For Attention: The Information Officer
Ryan Hall and Associates Inc. t/a Ryan Hall Attorneys

Unit 17 San Domenico
10 Church Street
Durbanville
Western Cape Province
7550

Telephone: +27 21 205 5320

E-mail: info@rhlaw.co.za

PO Box 2589, Durbanville, 7551

Reference: [full names of the data subject and, if applicable, the matter to which
the query relates]