

CHARLES SHERMAN, KRUGER & PROSSER

[Registration No: 1977/000613/21]

[Hereinafter also referred to as an Accountable Institution or the Organisation]

PRIVACY NOTICE – PROTECTION OF PERSONAL INFORMATION ACT (“POPI Act”)

The purpose of this “Privacy Notice” is to explain to you the key elements of the POPI Act, which finally came into effect on 01 July 2021 and our obligation and commitment to be compliant with its requirements applicable to us at all times

We understand that your personal information is important to you. Your privacy is just as important to us and we are committed to safeguarding and processing your information in a lawful manner.

We also want to make sure that you understand how and for what purpose we process your information. If for any reason you think that your information is not processed in a correct manner, or that your information is being used for a purpose other than that for what it was originally intended, you can contact our Information Officer. Details of our Information Officer, which is also registered with the Information Regulator are as follows:

- Name Mr. Richardt Lubbe
- Contact Number 011- 812 1440 or 079 511 0072
- Email Address rlubbe@cslp.co.za

The sources of collection of personal information:

In general, we collect personal information from the following data subjects *[a data subject is the owner of the personal information such as yourself]*:

- Prospective clients who enquire about our services
- Clients who have appointed CARLES SHERMAN, KRUGER & PROSSER to execute an agreed upon service
- Through the completion of any internal CARLES SHERMAN, KRUGER & PROSSER form *[e.g. Interview Form, etc.]*

Safeguarding and Securing the Data

CARLES SHERMAN, KRUGER & PROSSER is committed to securing client’s data and keeping it confidential. CARLES SHERMAN, KRUGER & PROSSER will do all in its power to prevent data theft, unauthorized access, and disclosure by implementing the latest technologies and software, which help us safeguard all the information we collect from clients.

Despite our best efforts in this regard safeguarding and securing data can never be 100% guaranteed, therefore it is important that you always take note of the CARLES SHERMAN, KRUGER & PROSSER disclaimer on all CARLES SHERMAN, KRUGER & PROSSER emails and financial reports generated by us.

Law authorising or requiring collecting of the personal information:

As an accountable institution, we are obligated in terms of the following legislation to collect your personal information insofar as it relates to the rendering of the relevant services to you:

- Financial Intelligence Centre Act 38 of 2001;
- Protection of Personal Information (POPI) Act 4 of 2013

Purpose for Processing your Information:

We collect, hold, use and disclose your personal information mainly to provide you with access to the services and products that we provide. We will only process your information for a purpose you would reasonably expect, including:

- Complying with the obligations contained in the contract concluded between yourself and the Organization
- To execute your service requests
- To confirm, verify and update your details
- To comply with any legal and regulatory requirements to which we as an organisation must comply

Some of your information that we hold may include, your first and last name, email address, a home, postal or other physical address, other contact information, your title, birth date, gender, occupation, qualifications, past employment, residency status, and your banking details.

Primarily the aforementioned personal information is mandatory to provide within the context of our service requirements and disclosures.

Failing to provide compulsory information may lead to our organisation's inability to carry out the functions necessary to perform as an Accountable Institution.

Third parties and your personal information

We may need to share your information to third parties. Where we share your information, we will take all precautions to ensure that the third party will treat your information with the same level of protection as required by us.

These third parties may include:

- The Compliance Officer of our organisation.
- Analytics and search engine providers assisting in the enhancement of our websites;
- Information Technology specialists assisting us with data storage, security, processing, analytics, etc;
- Auditors of the Organisation;
- Regulatory or governmental authorities;

The Transfer of your personal information outside of the Republic of South Africa

Currently the Organisation has no processing locations outside the borders of South Africa.

Complaints and objections

As a data subject, you have the right to –

- Request that we confirm, free of charge, whether or not we hold personal information about you;
- Request that we provide you with a description of the personal information we hold about you, and to explain why and how it is being processed;
- Lodge a complaint with our Information Officer (please complete Annexure A).

The Information Regulator

In the event that your personal information has not been processed in accordance with the POPI Act and the principles set out above, you have the right to lodge a complaint with the Information Regulator.

For further information regarding the complaints process, please visit the website of the Information Regulator, as indicated below.

Alternatively, you may contact the Information Regulator for further assistance:

The Information Regulator: Adv Pansy Tlakula

Physical Address: JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

Email: complaints.IR@justice.gov.za

Website: <https://www.justice.gov.za/infoereg/index.html>

ANNEXURE A

POPI COMPLAINT FORM

We are committed to safeguarding your privacy and the confidentiality of your personal information and are bound by the Protection of Personal Information Act.

Please submit your complaint to the Information Officer:	
Name	Mr. Richardt Lubbe
Contact Number	011- 812 1440 or 079 511 0072
Email Address:	rlubbe@cslp.co.za

Where we are unable to resolve your complaint, to your satisfaction you have the right to complaint to the Information Regulator.

The Information Regulator: Adv Pansy Tlakula

Physical Address: JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

Email: complaints.IR@justice.gov.za

Website: <https://www.justice.gov.za/inforeg/index.html>

A. Particulars of Complainant	
Name & Surname	
Identity Number:	
Postal Address:	
Contact Number:	
Email Address:	
B. Details of Complaint	
C. Desired Outcome	
D. Signature Page	
Signature:	Date: