

## PRIVACY NOTICE FOR CLIENTS

### 1. INTRODUCTION

Hulisani Ravele <sup>TM</sup> recognises the importance of privacy and the protection of personal information provided to it and is committed to the safeguarding of such information.

This privacy notice explains how Hulisani Ravele <sup>TM</sup> collects and uses your personal information. It contains information regarding the rights of natural persons (and juristic persons, where applicable) to whom personal information relates (“data subjects” or “you”).

Hulisani Ravele <sup>TM</sup> reserves the right to amend this Privacy Notice or add provisions to it at any time by publishing an updated version on our website.

### 2. COLLECTION OF INFORMATION

Hulisani Ravele <sup>TM</sup> collects personal information in various instances, including when:

- a) you contact Hulisani Ravele <sup>TM</sup> or request information or services;
- b) Hulisani Ravele <sup>TM</sup> provides services to you;
- c) when you use Hulisani Ravele’s <sup>TM</sup> websites or engage with Hulisani Ravele <sup>TM</sup> through social media.
- d) Hulisani Ravele <sup>TM</sup> does not engage in any automated decision-making.

Hulisani Ravele <sup>TM</sup> may collect the information directly from you or from third parties (such as regulators, government authorities and registries, or attorneys representing our clients’ counterparties). In some instances, it is necessary for you to provide us with the information, so that we can provide services to you. In other instances, providing the information is optional, such as choosing to subscribe to or opt out from a newsletter. If you do not provide the information when it is necessary, we will not be able to provide services to you. If you do not provide the information when it is optional, you will not receive the benefit of providing the information (e.g., the newsletter).

Your interaction with the agency on the Hulisani Ravele <sup>TM</sup> website will result in the collection of information regarding your activities on the website. Similarly, when you engage with the agency via any one of Hulisani Ravele <sup>TM</sup> ’s social media platforms. This information includes, but is not limited to, your name, contact details and information regarding the matter with which you need assistance.

While engaging with clients on matters, Hulisani Ravele <sup>TM</sup> will naturally be exposed to and collect personal information which includes your name, contact details, financial information as well as information regarding the matters that the firm assists you with. In the course of providing services to you, we rely on the determination that we are acting in your legitimate interests, as we are following your instruction(s) in providing our services.

As with all service entities and/or agencies, we may need to collect your information in terms of various laws. Some examples of such laws include the Legal Practice Act 28 of 2014, , the Broad-Based Black Economic Empowerment Act 53 of 2003, the Companies Act 71 of 2008, the Consumer Protection Act 68 of 2008, the Copyright Act 98 of 1978, the Financial Intelligence Centre Act 38 of 2001, the Patents Act 57 of 1978, and the Trade Marks Act 194 of 1993. And any other additional acts, where such are applicable.

### 3. BASIS AND PURPOSE FOR PROCESSING PERSONAL INFORMATION

The bases on which Hulisani Ravele <sup>TM</sup> processes personal information include (but are not limited to):

- a) to provide services to clients (i.e., we are relying on a verbal or written contract with you);
- b) in your legitimate interests (i.e., we are acting on your instructions);
- c) in our legitimate interests (e.g., to bill you for our services);
- d) to comply with legal or regulatory obligations;
- e) if you have provided your explicit consent; or
- f) if the processing is allowed by law.

The purposes for which Hulisani Ravele™ processes personal information include, but are not limited to:

- g) marketing and promotion of Hulisani Ravele™'s services;
- h) providing and improving services to clients;
- i) improving users' experience when using Hulisani Ravele™'s websites;
- j) communicating with persons for Hulisani Ravele™'s internal purposes;
- k) enabling Hulisani Ravele™'s internal operations; and
- l) exercising and defending legal rights.

#### **4. DISCLOSURE OF PERSONAL INFORMATION**

Hulisani Ravele™ may release personal information or disclose it to third parties in certain circumstances. These include, but are not limited to:

- a) if Hulisani Ravele™ is required or authorised to do so by law or a court order;
- b) in order for Hulisani Ravele™ to enforce its rights; or
- c) in order for Hulisani Ravele™ to provide services to its clients.

The third parties to whom we disclose personal information include, but are not limited to:

- a) advocates and other parties involved in legal services;
- b) third party service providers to Hulisani Ravele™ or its clients (sometimes in other countries);
- c) third parties who provide research services to Hulisani Ravele™ or its clients; and
- d) government authorities and registries, organs of state, regulators, courts, tribunals and law enforcement agencies.

#### **5. TRANSFER OF PERSONAL INFORMATION**

Personal information collected by Hulisani Ravele™ may be transferred to natural or juristic persons in other countries. We would do so to provide services to you and would only transfer the information necessary for that service. We may do so to provide services to you, as some of our service providers are cloud-based depending on the services we provide to you, this may include some or all of your information. Those countries' laws might not protect personal information in the same way or on the same level as the law in your country. However, Hulisani Ravele™ will take reasonable steps to ensure that recipients in other countries have appropriate privacy measures in place, for example, by entering into a contract with the recipient.

#### **6. RETENTION OF PERSONAL INFORMATION**

Hulisani Ravele™ retains personal information for as long as may be reasonably necessary in accordance with applicable law, and/or in order to provide services to you. It is impractical for us to tell you in this document how long we may keep your information, however, our first obligation is to keep it as long as may be required by law. Thereafter, we would only keep information in order to provide services to you, or for specific business purposes.

## **7. COOKIES**

Hulisani Ravele™ 's websites makes use of cookies. Cookies store information regarding website visitors. Cookies have various purposes, such as improving the visitor's experience on the website and facilitating their use of the website.

A website visitor may disable or decline cookies. However, if the visitor does so, their user experience on the site may be diminished.

## **8. DIRECT MARKETING**

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

## **9. SECURITY**

Hulisani Ravele™ takes all reasonable steps to protect and avoid unauthorised access to personal information. We have implemented various policies, procedures, hardware and software to safeguard personal information, and routinely review our operations in order to ensure that personal information is adequately protected.

## **10. YOUR (DATA SUBJECT) RIGHTS**

The law might provide you with rights to access, amend or delete personal information that is in the possession of Hulisani Ravele™. However, Hulisani Ravele™ may, in certain instances, legally refuse or decline such requests. If applicable, you might also have the right to object to Hulisani Ravele™'s processing of their personal information or to file a complaint with a regulator, however we encourage you to address your complaint to us first. In South Africa, the Information Regulator can be contacted at:

JD House  
27 Stiemens Street  
Braamfontein  
Johannesburg  
2001  
Email: [inforeg@justice.gov.za](mailto:inforeg@justice.gov.za)

In some cases, you may withdraw your consent for processing - this withdrawal has no effect on lawful processing conducted up to that point. If you wish to exercise your rights, you can contact Hulisani Ravele™ at the details provided below. Hulisani Ravele™ may charge you a fee for accessing, amending or deleting your personal information. You will be advised of this fee in advance, if applicable.

You are encouraged to contact Hulisani Ravele™ in order to update your personal information as and when necessary.

## 11. CONTACT DETAILS

In order to contact Hulisani Ravele™ for purposes relating to this privacy policy, please use these contact details:

Email: [reagile@hulisaniravele.com](mailto:reagile@hulisaniravele.com)