



## DELBERG ATTORNEYS INCORPORATED PRIVACY POLICY

### APPROVAL

<b>POLICY OWNER:</b>	Delberg Attorneys Inc
<b>APPROVED BY:</b>	Directors of Delberg Attorneys Inc.
<b>DATE APPROVED:</b>	28 February 2024
<b>NAME:</b>	Francois van den Berg
<b>DESIGNATION:</b>	Director
<b>RISK AND COMPLIANCE OFFICER:</b>	Lindy Buitendach

### 1. INTRODUCTION

- 1.1 Delberg Attorneys Incorporated ("**Delberg, we, us, our**") recognises the importance of privacy and the protection of personal information provided and is committed to protect of such information. This privacy policy ("**Policy**") describes how DELBERG will stive to safeguard personal information, whether provided to us by clients, or collected by us.
- 1.2 The privacy policy explains the rights in relation with natural and juristic persons ("**data subjects**"). We have appointed an information officer to oversee over questions in relation to data privacy and rights. The information officer can be contacted via email: [lindy@delberg.co.za](mailto:lindy@delberg.co.za).

### 2. COLLECTION OF INFORMATION

- 2.1 We collect, process and use personal information for various purposes, but is not limited to:
- data subjects contacting us or request information or services;
  - when we provide services to data subjects;
  - persons apply for employment at DELBERG;
  - when persons use our websites or engage with us through social media.
- 2.2 We may collect the information directly from a data subject or from third parties (such as regulators, government authorities and registries, or attorneys representing our clients' counterparties).

- 2.3 The interaction with the firm on the DELBERG website will result in the collection of information regarding the person's activities on the website. Similarly, when anyone engages with the firm via any one of our social media platforms. This information includes, but is not limited to, the person's name, contact details and information regarding the matter with which they need assistance.
- 2.4 In the course of engaging with clients on matters, DELBERG will naturally be exposed to and collect personal information which includes the data subject's name, contact details, financial information as well as information regarding the matters that the firm assists them with.
- 2.5 As part of its recruitment processes, DELBERG collects information from graduates and employment applicants. This information includes educational information as well as employment history. By enquiring regarding employment opportunities at DELBERG or applying for employment, applicants are deemed to provide their consent to DELBERG's processing of their personal information for recruitment purposes, which may include screening as well as background and reference checks.

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

3.1 We may process personal information:

- to provide legal services to clients;
- to comply with legal or regulatory obligations;
- if a data subject has provided their consent; or
- if the processing is allowed by law.

3.2 The purposes for which we process personal information include, but are not limited to:

- marketing and promotion of DELBERG's services;
- providing and improving services to clients; improving users' experience when using our website;
- communicating with persons for our internal purposes;
- enabling our internal operations;
- exercising and defending legal rights.

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

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

- if we are required or authorised to do so by law or a court order;
- in order for us to enforce its rights;
- in order for us to provide services to its clients.

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

- advocates and other parties involved in legal services;
- third party service providers to DELBERG or its clients;
- third parties who provide research services to DELBERG or its clients;
- government authorities and registries, organs of state, regulators, courts, tribunals and law enforcement agencies.

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

5.1 Personal information collected by us may be transferred to persons in other countries. Those countries' laws might not protect personal information in the same way or on the same level as the law in the data subject's country.

5.2 We will take reasonable steps to ensure that recipients in other countries have appropriate privacy measures in place.

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

We retain personal information for as long as may be reasonably necessary in accordance with applicable law.

## **7. COOKIES**

7.1 We may Process your Personal Information by our use of Cookies and similar technologies.

7.2 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.

7.3 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**

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

## 9. SECURITY

- 9.1 We take all reasonable steps to protect and avoid unauthorised access to personal information.
- 9.2 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.

## 10. DATA SUBJECT RIGHTS

As a Data Subject, you also have a right to lodge a complaint to the Information Regulator of South Africa if you are unsatisfied with the manner in which we addressed any complaint with regard to our processing of your personal information, the contact details of the Information Regulator are as follows:

Website: Home - Information Regulator ([info regulator.org.za](http://info regulator.org.za))

Tel: +27 12 406 4818

Fax: +27 86 500 3351

General enquiries: [enquiries@info regulator.org.za](mailto:enquiries@info regulator.org.za)

Complaints: [AIAComplaints@info regulator.org.za](mailto:AIAComplaints@info regulator.org.za)

POPIAComplaints@info regulator.org.za

## 11. CONTACT DETAILS

In order to contact information officer for purposes relating to this privacy policy, please contact us using these contact details:

Delberg Attorneys Incorporated

Summit Place Office Park

Building 2

221 Garsfontein Road

Menlyn

Pretoria

Telephone: +27 12 361 5001

E-mail: [lindy@delberg.co.za](mailto:lindy@delberg.co.za)