

## Privacy Policy

### INTRODUCTION

We highly value our clients' trust and confidence in us and want to assure them that their personal information is treated as confidential and stored safely and securely. As an Accounting firm, we adhere to the highest level of professional standards and ethical behaviour and take responsibility for protecting the confidentiality of client information.

Where we refer to "personal information", it means "personal information" as defined in the Protection of Personal Information Act 4 of 2013 (POPIA) and "personal data" as per the General Data Protection Regulation 2016/679 (the GDPR). Personal information includes any information about a person (natural or juristic) that can be used to identify a person directly or indirectly.

This privacy policy describes how and why we collect and use personal data and provides information about our clients' rights in relation to personal data. It applies to personal data provided to us, both by individuals themselves and/or by others. We may use personal data provided to us for any of the purposes described in this privacy policy or as otherwise stated at the point of collection.

This Privacy Policy further summarises what information we collect, the limited times when we may share it with others, and how we protect our clients' privacy.

## PERSONAL INFORMATION WE COLLECT

We collect, amongst others, the following personal information:

- personal details, such as your name, email address or telephone number;
- billing information, such as relevant payment information and VAT registration number; and
- legally required information.

In order to meet our clients' needs during tax preparation, tax and financial planning and tax compliance engagements, we collect various types of personal information about our clients from the following sources:

- During meetings (in person or telephonically) with our clients, when our clients send us information by mail or email, on tax preparation worksheets or other documents used in preparing our clients' tax returns or in providing other services to our clients. Such information may include, for example, name, address, date of birth, income and investment sources and amounts and other tax and financial attributes.
- Information about our client's transactions with us, our affiliates, or others. Such information may include, for example, investment allocations and performance, investment objectives, parties to transactions, account balances and payment history.
- Information we receive directly from our clients or send to our clients, at the client's request, if contacted online. We will retain the information provided to us to deliver email messages to our clients. We may retain the content of clients' email messages, email addresses and our subsequent responses to the client.

## USE OF PERSONAL INFORMATION

We may use client personal information for any legitimate business purposes relating to our professional services and/or business activities. The purposes of collecting and processing clients' personal information may include:

- responding to client queries posted on our website or emailed to us;
- onboarding a client and verifying their identity (as required by law);
- providing the client with professional services;
- referring the client to other service providers with the clients' consent;
- improving our website and services by analysing certain information collected, including cookies and other related information;
- sending clients information (in the form of our newsletter) and inviting clients to events; and/or
- complying with our regulatory or other obligations.

## PARTIES TO WHOM WE DISCLOSE INFORMATION

We may share personal information with our affiliates to assist in our contact with clients and to aid in providing tax and financial planning solutions and opportunities. Where required for our business operations, we may share your personal information with our service providers. We have service agreements in place with all service providers with whom we share personal information, which regulate how personal information is processed. We do not share personal information with unaffiliated third parties without the client's express consent, except as permitted by law and as described below.

We will only share personal information for the purpose of providing professional services to you or any other legitimate business purpose relating to our business activities, including but not limited to the protection of our or your rights, complaints, marketing or enforcing any agreement between us.

Where the law requires us to do so, we may also share personal information with third-party service providers, agents, contractors, employees, law enforcement agencies or business affiliates. We will only share personal information in these instances where it is necessary for us to do so and only to the extent that the personal information is needed for such third parties to perform their services or obligations.

We may disclose personal information under the following circumstances:

- with professional advisers, for example, law firms, as necessary to establish, exercise or defend our legal rights and obtain advice in connection with the running of our business. Personal data may be shared with these advisers as necessary in connection with the services they have been engaged to provide;
- when explicitly requested by you;
- when required to deliver publications or reference materials requested by you;
- when required to facilitate conferences or events hosted by a third party;
- To law enforcement, regulatory and other government agencies and professional bodies, as required by and/or in accordance with applicable laws and regulations.

## TRANSBORDER

Client information may be transferred cross border for legitimate business purposes, such as for cloud storage and for billing practices. All information transfers will comply with the applicable laws.

## MARKETING

When you become a client, you are added to our mailing list. We use this mailing list to send you essential information about our business, our services, developments, news, and event invitations. You can also add yourself to our mailing list on our website.

You can unsubscribe from our mailing list at any time, which will result in us no longer sending you marketing communications. We include a subscription link in every marketing communication, which allows you to unsubscribe from marketing communications. You can also request us to remove you from our mailing list via email.

If you unsubscribe from our mailing list, we may still contact you in other instances, such as providing professional services or collecting outstanding fees. In these instances, the relevant practitioner will contact you directly, not through the mailing list.

## PROTECTING THE CONFIDENTIALITY AND SECURITY OF YOUR PERSONAL INFORMATION

Keeping your information confidential and secure is of utmost importance to us. We maintain physical, electronic and procedural safeguards to guard your personal information. In doing so, we restrict your personal information to those employees who need access to that information to provide services to you and our support service companies. Those companies are, in turn, legally and contractually bound to maintain the privacy of any information shared with them. Our employees are bound by internal confidentiality policies and are subject to disciplinary action for any policy violations.

We have implemented generally accepted standards of technology and operational security in order to protect personal information from loss, misuse, alteration or destruction. Only authorised persons are given access to personal information; such individuals have agreed to maintain the confidentiality of this information.

Although we use appropriate security measures upon collection of your personal data, the transmission of data over the internet (including by email) is never

completely secure. We endeavour to protect personal data, but we cannot guarantee the security of data transmitted to or by us.

Should your status become inactive or should our relationship end, we will continue to protect the confidentiality and security of your personal information in accordance with this privacy policy.

## CLIENTS' LEGAL RIGHTS IN RELATION TO PERSONAL DATA

As a client, you have a legal right to:

- Obtain confirmation as to whether we process your personal data, receive a copy of your personal data and obtain certain other information about how and why we process your personal data.
- The right to request that your personal data be amended or rectified where it is inaccurate and to have incomplete personal data completed.
- The right to have your personal data deleted in the following cases:
  - the personal data is no longer necessary in relation to the purpose for which it was collected and processed;
  - our legal basis for processing your personal information is based upon your consent given to us, and if you withdraw consent, there will no longer be a legal basis for us to process your personal information, subject to any other legislation to the contrary
  - our legal ground for processing is that the processing is necessary for legitimate interests pursued by a third party or us, you object to the processing, and we do not have overriding legitimate grounds;

- you object to processing for direct marketing purposes;
- your data has been unlawfully processed; or
- your personal data must be erased to comply with a legal obligation to which we are subject.
- The right to restrict personal data processing in the following cases:
  - for a period enabling us to verify the accuracy of personal data where you contested the accuracy of the personal data;
  - your personal data have been unlawfully processed, and you request the restriction of processing instead of deletion;
  - your personal data is no longer necessary in relation to the purpose for which it was collected and processed, but the personal data is required by us to establish, exercise or defend legal claims; or
  - for a period enabling us to verify whether the legitimate grounds relied on by us override their interests where you have objected to processing based on it being necessary for the pursuit of a legitimate interest identified by us.
- The right to object to the processing of your personal data in the following cases:
  - our legal ground for processing is that the processing is necessary for a legitimate interest pursued by a third party or us; or
  - our processing is for direct marketing purposes.
- The right to data portability
  - The right to receive your data provided to us and the right to send the data to another organisation (or ask us to do so if technically feasible) where our lawful basis for processing the personal data is consent or necessity for the performance of our contract with you and the processing is carried out by automated means.
- The right to withdraw consent
  - Where we process personal data based on consent, individuals have a right to withdraw consent at any time. However, doing so could result in us no longer being able to render professional services to you.

## LINKS ON OUR WEBSITE

We may include links to other third-party websites which do not fall under our supervision. Of course, we cannot accept any responsibility for your privacy or the content of these websites. Still, we display these links to make finding information about specific subjects easier for you.

## RETENTION OF INFORMATION

We retain personal information by the required retention periods in law or for legitimate business purposes. In addition, we may keep personal information indefinitely in a de-identified format for statistical purposes. This privacy policy also applies when we retain your personal information.

## OUR PROMISE

Our professional, ethical obligations and responsibilities demand the highest regard and duty toward the confidentiality and security of your personal information and privacy. We will report any security breach to the Information

Regulator and the individuals or companies involved. Furthermore, we will protect your personal information, use it appropriately, and accomplish our engagements with you in such a manner as to always maintain your trust and confidence.

## CONTACT US

Please submit a request on our CONTACT US page to exercise a legal right about your personal data or an enquiry if you have a question or complaint about the handling of your personal data.

### CHANGES TO THIS POLICY

We may update this privacy policy at any time. When we make changes to this privacy policy, we will amend the revision. The new modified or amended privacy policy will apply from that revision date. Therefore, we encourage you to review this privacy policy periodically to be informed about how we protect your personal information.

This privacy policy was last updated on **3 January 2022**.