



PRIVACY STATEMENT POPI (PROTECTION OF PERSONAL INFORMATION)

Reference:	Privacy Statement POPI 07-09-2022
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What is the POPI Act

Personal information is defined in POPIA and means information relating to an identifiable, living natural person, and where it is applicable, an identifiable, existing juristic person. We “process” your personal information if we collect, use, store, make available, destroy, update, disclose, receive or otherwise deal with your personal information.

What information will we collect?

We respect your right to privacy and therefore aim to ensure that we comply with the legal requirement of the POPI Act which regulates the manner in which we collect, process, store, share and destroy any personal information which you have provided to us.

Depending on the type of business we conduct with you or the relationship you have with us, we may process the following types of personal information:

- name
- race (for employment purposes or as otherwise required by applicable law)
- gender
- marital status
- nationality
- age
- language preference
- date of birth
- information relating to education, financial, criminal or employment history of a person
- identifying numbers such as identity or passport number, tax identification numbers or tax reference numbers
- e-mail address

We collect information directly from you where you provide us with your personal details. Where possible, we will inform you what information you are required to provide to us and what information is optional.

You agree to provide accurate and complete personal information. Should you fail to provide accurate Personal Information: we may refuse to process your request for services.

Why do we collect Personal Information

We collect personal information in order to liaise with you telephonically, via our website or email so that we may:

1. Respond to any query or comment received from you;
2. Inform you of new services;
3. Enable us to process, validate and verify information and requests for the supply of services;
4. For the purposes for which you specifically provided the information; and
5. Generally to improve your experience on our website.

We may further process your information if it is compatible with the purpose for which it was collected, for instance to:

- Evaluate your application form or mandate;
- Evaluate your current and future needs and to suggest further services to you;
- Evaluate and improve the effectiveness of our services and offerings;



- Process your marketing preferences (where you have unsubscribed from certain direct marketing communications, keeping a record of your information and request to ensure that we do not send such direct marketing to you again);
- For operational purposes, e.g. to conclude offers to lease and / or lease agreements;
- Verify your identity for security purposes;
- Meet legal and regulatory requirements or industry codes to which we may be subject, for example comply with a lawful request for information received from a local or foreign law enforcement agency, court, government or tax collection agency;
- Use in connection with legal proceedings;
- Conduct our internal audit (including security) functions which allow us to monitor our systems and processes. This protects us and you from fraud, identity theft and unauthorised access;
- Conduct statistical and any operational, marketing, auditing, legal and record-keeping requirements;
- Detect and prevent any fraud and money laundering and/or in the interest of security and crime prevention (which includes ongoing due diligence and sanction screening against any sanction list we may determine in our sole discretion);
- Assess and resolve any complaint;
- Perform any risk analysis or for purposes of risk management to you or our business in general;
- Trace your contact information through a tracing agent if you are uncontactable and/or to comply with any regulation or conduct standard relating to unclaimed assets; and
- Prevent or control the spread of any disease.

Minors

If you are under 18 years of age (minor), we will require the consent of your parent/guardian/competent person before we process such personal information.

Processing of Information

We will share your personal information:

1. In order to comply with applicable law or with legal process served on our company;
2. In order to protect and defend the rights or property of our company; and
3. With employees and/or third parties who assist us in providing services to you and thus require your personal information in order to render a proper and efficient service. We will ensure that all such employees and third party service providers, having access to your personal information, are bound by confidentiality agreements.

Security Measures

We will:

1. Treat your personal information as strictly confidential;
2. Take appropriate technical and organisational measures to ensure that your personal information is kept secure and is protected against unauthorised or unlawful processing, accidental loss, destruction or damage, alteration, disclosure or access;
3. Promptly notify you if we become aware of any unauthorised use, disclosure or processing of your personal information;
4. Provide you with reasonable evidence of our compliance with our obligations under this policy on reasonable request; and
5. We will not retain your personal information longer than the period for which it was originally required, unless we are required by law to do so, or you consent to us retaining such information for a longer period.

ALTHOUGH WE TAKE THE AFOREMENTIONED PRECAUTIONS IN PROTECTING YOUR PERSONAL INFORMATION, WE SHALL HOWEVER NOT BE LIABLE FOR ANY LOSS OR DAMAGE, HOWSOEVER ARISING, SUFFERED AS A RESULT OF THE DISCLOSURE OF SUCH INFORMATION IF BEYOND OUR REASONABLE CONTROL.



Collection of Information by “Cookies”

You are aware that information and data is automatically collected through the standard operation of the Internet servers and through the use of "cookies." "Cookies" are small text files a website can use to recognise repeat users, facilitate the user's ongoing access to and use of the website and allow a website to track usage behaviour and compile aggregate data that will allow content improvements and targeted advertising. Cookies are not programs that come onto your system and damage files. Generally, cookies work by assigning a unique number to you that has no meaning outside the assigning site. If you do not want information collected through the use of cookies, there is a simple procedure in most browsers that allows you to deny or accept the cookie feature; however, you should note that cookies may be necessary to provide you with certain features (e.g., customized delivery of information) available on our Websites.

Your rights

You have the right at any time to:

1. Rectify the Personal Information collected by us;
2. Object to the processing of Personal Information (subject to legislation);
3. Request the return or destruction of Personal Information (subject to legislation);
4. Lodge a complaint with the company.

Personal Information processed by us will not be routed/transferred to a third party in a foreign country or International organization.

All enquiries must be addressed to the information officer: William Clifton, who can be contacted via email at admin@wacle.co.za or via telephone on (021) 556 8190.

In compliance with the provisions of the Promotion of Access to Information 2 of 2002 (PAIA), a copy of our manual is available for your perusal on our website.

If you are not satisfied with our response to your query, you may approach the following regulatory body for further assistance:

The Information Regulator (South Africa)
JD House
27 Stiemens Street
Braamfontein
Johannesburg
2001
Complaints email: POPIAComplaints@info regulator.org.za