

# **Information Usage Policy**

## **1. Our Business**

Ismail-Khan Soobramoney & Associates (the Practice) is a law firm that provides legal and risk services within the Republic of South Africa.

## **2. Application**

This policy applies to the personal information that the Practice collects information relating but not limited to:

- 2.1 Our legal and professional services.
- 2.2 events.
- 2.3 The Practice's website (<https://perspiring.github.io/IKS-associates/>)
- 2.4 marketing; publications or marketing database.
- 2.5 Third party service providers.
- 2.6 payment and delivery services.
- 2.7 request for tenders, proposals and quotations.
- 2.8 advertising networks.
- 2.9 supply of services to the Practice.
- 2.10 online and/or offline business interactions.
- 2.11 information searches.

## **3. Purpose of this Policy**

- 3.1 The Practice respects the privacy of an individual and is committed to protecting your personal information, as stipulated by the relevant data protection legislations.
- 3.2 This Policy is applicable to the Practice's entire business.
- 3.3 You warrant that any personal information provided by you on behalf of another party is lawfully provided to our Practice.
- 3.4 You indemnify the Practice against any loss, liability, damage or expense (or any other costs) arising as a result of you sharing personal information of another party to the Practice unlawfully.

## **4. How to contact our Information Officer**

The Practice has an Information Officer that oversees the compliance of data protection.

Details: Rani Soobramoney

Address: 3669 Pepper Close Road, Amberfield Valley Estate, Rooihuiskraal

Email Address: rani.soob@gmail.com

Telephone number: 0820412321

## **5. Privacy and Security**

- 5.1 The Practice has implemented measures to secure personal information in line with data protection laws.
- 5.2 You indemnify the Practice from any loss, damages, injury that you may incur because of personal information being disclosed by you to unauthorised persons during the course of providing information to the Practice.

## **6. Personal Information which the Practice may collect**

- 6.1 The Practice may collect but not limited to the following information
  - 6.1.1 address, name, proof of address, email, telephone number, gender, marital status, nationality, place of birth
  - 6.1.2 details of employer, job title, employment history, details of family and their relationship with you, financial records
  - 6.1.3 Identity number, passport number, tax number, drivers licence details, business address, information relating to the provision our services from suppliers
  - 6.1.4 bank account details, payment card details, financial information,
  - 6.1.5 special and or sensitive information as stipulated in the data protection laws.
  - 6.1.6 health, ethnicity, racial, religious beliefs, political views, trade union membership, genetic and biometric information, onboarding of client information, source of funds proof, information relating to dietary requirements.
  - 6.1.7 specific information collected by the Practice and/or supplier to screen for anti-money laundering purposes.

## **7. Information Quality and Accuracy**

- 7.1 The Practice endeavours to keep personal information accurate.

7.2 We encourage you inform us of information changes/amendments.

**8. Why do we process your personal information?**

8.1 comply with the provision of relevant legislations

8.2 register you as our client

8.3 sanctions screening

8.4 Legal services

8.5 payments of fees

8.6 any applicable information that you may provide for any other services from the Practice.

8.7 Complaints

8.8 Requests

8.9 Fees

8.10 retention of work products such as opinions, agreements and any other documents drafted or received by the Practice.

8.11 verifying identification

8.12 government and tax collection agencies

8.13 correspondences and communication

8.14 Telephone and online communication

8.15 evidence in any form

8.16 data analysis, marketing, auditing, legal and record keeping

**9. Direct Marketing**

9.1 The Practice processes information for the purpose of directing marketing through electronic communication. The Practice will only send you marketing materials if you have opted to receive such materials.

9.2 It is your right to object to direct marketing.

## **10. Disclosure of Personal Information**

The practice may share information for the purposes as set out in the policy with the parties below:

- 10.1 Other partners or employees in the Practice
- 10.2 External third parties
- 10.3 Information collected by the Practice from entities outside of the country
- 10.4 to entities which may not have data protection laws
- 10.5 sheriffs, tracing agents, banks, consultancies, insurance entities, auditors, lawyers, accounting and other services,
- 10.6 Third parties that conduct screening on the Practices clients
- 10.7 Regulators as requested by law, suppliers for money-laundering purposes
- 10.8 Proposals, quotations, tenders

## **11. Transborder Transfers**

The Practice may operate in the future across various African jurisdictions to provide legal and advisory services. This means that personal information may be transferred across borders, and to countries that do not have data protectional laws. The Practice commits to ensuring compliance with relevant data laws when transferring your personal information.

## **12. Access correction and deletion of personal information**

The following may apply to you:

- 12.1 Request access to personal information
- 12.2 Request deletion of personal information that is not applicable
- 12.3 Request to receive a copy of personal information
- 12.4 Make corrections to inaccurate personal information
- 12.5 Withdraw your consent which means the Practice is unable to provide the services you requested
- 12.6 Restriction of processing whilst a complaint is being investigated

### **13. Storage and Transfer of your Personal Information**

13.1 The Practice will store your information:

13.1.1 In our offices in the form of hard copies.

13.1.2 with third party service providers, if applicable.

13.1.3 our servers or servers of third-party service providers, if applicable.

13.2 The Practice will enter into written agreements with third party services providers requiring them to take appropriate measures to safeguard your personal information.

13.3 Should your Personal Information be transferred outside the borders of South Africa, where there are no data protection laws, the Practice will ensure that your data is protected in that jurisdiction.

### **14. Security**

14.1 We take reasonable technical and organisational measures to secure the integrity of your personal information, preventing unauthorised access to your Personal Information.

14.2 We shall protect your information in accordance with the requirements of the law, we will not be liable for any loss, claim, damage arising from any unauthorised access, disclosure, misuse, loss, alteration or destruction of your Personal Information and/or Special Personal Information.

### **15. Retention of your Personal Information**

15.1 We may keep your personal information if you engage with us until you request us to destroy it.

15.2 There may be instances where we are required to retain your Personal Information as required by law or any undertaking that we may have with you.

15.3 We will retain your Personal Information in accordance with our internal Retention Policy.

### **16. Consumer Protection Act, POPIA and other Laws**

All provisions of this Privacy Policy must be treated as being qualified, to the extent necessary, to ensure that the provisions of the Consumer Protection Act, POPIA and other laws are complied with.

## **17. Complaints**

Should you be dissatisfied with the Practice's use of your information, you may contact our Information Officer, details reflected above. Should you remain dissatisfied, you may send a complain to the relevant regulatory authority.

## **18. Approval**

This Information Privacy Policy was recommended and approved by the partners of the Practice.