PRIVACY POLICY

1. INTRODUCTION

1.1 LionRock Labour ("LionRock Labour, we, us, our") is sensitive to the personal nature of the information you provide to us.

1.2 This privacy policy ("this Policy") explains how we protect and use your Personal Information.

1.3 By providing us with your Personal Information, you –

1.3.1 agree to this Policy and authorise us to process such information as set out herein; and

1.3.2 authorise LionRock Labour, its Associates, our Service Providers and other third parties to Process your Personal Information for the purposes stated in this Policy.

1.4 We will not use your Personal Information for any other purpose than that set out in this Policy and will endeavour to protect your Personal Information that is in our possession from unauthorised alteration, loss, disclosure or access.

1.5 Please note that we may review and update this Policy from time-to-time. The latest version of this Policy is available on request.

1.6 This Policy applies to all external parties with whom we interact, including but not limited to individual clients, representatives of client organisations, visitors to our offices, and other users of our legal and related services ("you"). Defined terms used in this Policy are explained in Annexure A.

2. COLLECTION OF PERSONAL INFORMATION

2.1 We may collect or obtain Personal Information about you –

2.1.1 directly from you;

2.1.2 in the course of our relationship with you;

2.1.3 in the course of providing legal services to you or your organisation;

2.1.4 when you make your Personal Information public;

2.1.5 when you visit and/or interact with our Website or our various social media platforms;

2.1.6 when you register to use any of our legal and related services including but not limited to newsletters, seminars and legal updates;

2.1.7 when you interact with any third party content or advertising on our Website; or

2.1.8 when you visit our offices.

2.2 We may also receive Personal Information about you from third parties (e.g. law enforcement authorities).

2.3 In addition to the above, we may create Personal Information about you such as records of your communications and interactions with us, including, but not limited to, your attendance at events or at interviews in the course of applying for a job with us, subscription to our newsletters and other mailings and interactions with you during the course of our digital marketing campaigns.

3. CATEGORIES OF PERSONAL INFORMATION WE MAY PROCESS

We may process the following categories of Personal Information about you –

3.1 personal details: name; and photograph;

3.2 demographic information: gender; date of birth / age; nationality; salutation; title; and language preferences;

3.3 identifier information: passport or national identity number; utility provider details; bank statements; tenancy agreements;

3.4 contact details: correspondence address; telephone number; email address; and details of your public social media profile(s);

3.5 instruction details: details of individuals instructing LionRock Labour; Personal Information included in correspondence, documents, evidence or other materials that we Process in the course of providing legal services;

3.6 attendance records: details of meetings and other events organised by or on behalf of LionRock Labour that you have attended;

3.7 consent records: records of any consents you may have given, together with the date and time, means of consent and any related information;

3.8 payment details: billing address; payment method; bank account number or credit card number; invoice records; payment records; SWIFT details; IBAN details; payment amount; payment date; and records of cheques;

3.9 data relating to your visits to our Website: your device type; operating system; browser type; browser settings; IP address; language settings; dates and times of connecting to a Website; and other technical communications information;

3.10 employer details: where you interact with us in your capacity as an employee of an organisation, the name, address, telephone number and email address of your employer, to the extent relevant; and

3.11 content and advertising data: records of your interactions with our online advertising and content, records of advertising and content displayed on pages displayed to you, and any interaction you may have had with such content or advertising (including, but not limited to, mouse hover, mouse clicks and any forms you complete).

4. SENSITIVE PERSONAL INFORMATION

Where we need to Process your Sensitive Personal Information, we will do so in the ordinary course of our business, for a legitimate purpose, and in accordance with applicable law.

5. PURPOSES OF PROCESSING AND LEGAL BASES FOR PROCESSING

5.1 We will process your Personal Information in the ordinary course of the business of providing legal and related services. We will primarily use your Personal Information only for the purpose for which it was originally or primarily collected. We will use your Personal Information for a secondary purpose only if such purpose constitutes a legitimate interest and is closely related to the original or primary purpose for which the Personal Information was collected. We may subject your Personal Information to Processing during the course of various activities, including, without limitation, the following –

5.1.1 operating our business;

5.1.2 analysis, evaluation, review and collation of information in order to determine legal issues and potential disputes, provide legal advice and prepare or comment on opinions, memoranda, agreements, correspondence, reports, publications, documents relating to legal proceedings and other documents

and records (whether in electronic or any other medium whatsoever) –

5.1.3 compliance with applicable law and fraud prevention;

5.1.4 transfer of information to our Service Providers and other third parties or

5.1.5 recruitment.

5.2 We may process your Personal Information for relationship management and marketing purposes in relation to our services (including, but not limited to, Processing that is necessary for the development and improvement of our legal and related services), for accounts management, and for marketing activities in order to establish, maintain and/or improve our relationship with you and with our Service Providers. We may also analyse your Personal Information for statistical purposes.

5.3 We may process your Personal Information for internal management and management reporting purposes, including but not limited to: conducting internal audits, conducting internal investigations, implementing internal business controls, providing central processing facilities, for insurance purposes and for management reporting analysis.

5.4 We may process your Personal Information for safety and security purposes.

6. DISCLOSURE OF PERSONAL INFORMATION TO THIRD PARTIES

6.1 We may disclose your Personal Information to our Associates and Service Providers, for legitimate business purposes, in accordance with applicable law and subject to applicable professional and regulatory requirements regarding confidentiality. In addition, we may disclose your Personal Information –

6.1.1 if required by law;

6.1.2 legal and regulatory authorities, upon request, or for the purposes of reporting any actual or suspected breach of applicable law or regulation;

6.1.3 third party Operators (including, but not limited to, data processors such as providers of data hosting services and document review technology and services), located anywhere in the world, subject to 6.2;

6.1.4 where it is necessary for the purposes of, or in connection with, actual or threatened legal proceedings or establishment, exercise or defence of legal rights;

6.1.5 to any relevant party for the purposes of the prevention, investigation, detection or prosecution of criminal offences or

the execution of criminal penalties, including, but not limited to, safeguarding against, and the prevention of threats to, public security;

6.1.6 to any relevant third party acquirer(s), in the event that we sell or transfer all or any portion of our business or assets (including, but not limited to, in the event of a reorganization, dissolution or liquidation); and

6.1.7 to any relevant third party provider, where our Website uses third party advertising, plugins or content.

6.2 If we engage a third party Operator to Process any of your Personal Information, we recognise that any Operator who is in a foreign country must be subject to a law, binding corporate rules or binding agreements which provide an adequate level of protection similar to POPIA. We will review our relationships with Operators we engage and, to the extent required by any applicable law if force, we will require such Operators to be bound by contractual obligations to –

6.2.1 only Process such Personal Information in accordance with our prior written instructions; and

6.2.2 use appropriate measures to protect the confidentiality and security of such Personal Information.

7. INTERNATIONAL TRANSFER OF PERSONAL INFORMATION

7.1 We may transfer your Personal Information to recipients outside of the Republic of South Africa.

7.2 Subject to 6.2, Personal Information may be transferred outside of the Republic of South Africa provided that the country to which the data is transferred has adopted a law that provides for an adequate level of protection substantially similar to POPIA, the Operator/third party undertakes to protect the Personal Information in line with applicable data protection legislation and the transfer is necessary in order to provide the legal and other related services that are required by LionRock Labour' clients.

8. DATA SECURITY

8.1 We implement appropriate technical and organisational security measures to protect your Personal Information that is in our possession against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, unauthorised access, in accordance with applicable law.

8.2 Where there are reasonable grounds to believe that your Personal Information that is in our possession has been accessed or acquired by any unauthorised person, we will notify the relevant regulator and you, unless a public body responsible for detection, prevention or investigation of offences or the relevant regulator informs us that notifying you will impede a criminal investigation.

8.3 Because the internet is an open system, the transmission of information via the internet is not completely secure. Although we will implement all reasonable measures to protect your Personal Information that is in our possession, we cannot guarantee the security of any information transmitted using the internet and we cannot be held liable for any loss of privacy occurring during the course of such transmission.

9. DATA ACCURACY

The Personal Information provided to LionRock Labour should be accurate, complete and up-to-date. Should Personal Information change, the onus is on the provider of such data to notify LionRock Labour of the change and provide LionRock Labour with the accurate data.

10. DATA MINIMISATION

LionRock Labour will restrict its processing of Personal Information to data which is sufficient for the fulfilment of the primary purpose and applicable legitimate purpose for which it was collected.

11. DATA RETENTION

LionRock Labour shall only retain and store Personal Information for the period for which the data is required to serve its primary purpose or a legitimate interest or for the period required to comply with an applicable legal requirement, whichever is longer.

12. YOUR LEGAL RIGHTS

You may have rights under the South African and other laws to have access to your Personal Information and to ask us to rectify, erase and restrict use of, your Personal Information. You may also have rights to object to your Personal Information being used, to ask for the transfer of Personal Information you have made available to us and to withdraw consent to the use of your Personal Information.

13. COOKIES AND SIMILAR TECHNOLOGIES

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

13.2 When you visit our Website we may place Cookies onto your device, or read Cookies already on your device, subject always to obtaining your consent, where required, in accordance with applicable law. We use Cookies to record information about your device, your browser and, in some cases, your preferences and browsing habits. We may Process your Personal Information through Cookies and similar technologies, in accordance with our Cookie Policy.

14. DIRECT MARKETING

14.1 We may Process your Personal Information for the purposes of providing you with information regarding services that may be of interest to you. You may unsubscribe for free at any time.

14.2 If you currently receive marketing information from us which you would prefer not to receive in the future please email us at info@lionrocklabour.com.

15. CONTACT DETAILS

You may contact us at
LionRock Labour
Attention: Petra Cooper
Telephone: (011) 568 1895
Email: petra.cooper@lionrocklabour.com
Date: 9 April 2020

ANNEXURE A –

DEFINITIONS

"Associates" means LionRock Labour' shareholders, LionRock Labour' subsidiaries and the directors, employees and consultants of LionRock Labour or of any of its subsidiaries.

"Cookie" means a small file that is placed on your device when you visit a website. In this Policy, a reference to a "Cookie" includes analogous technologies such as web beacons and clear Graphic Interchange Format files ("GIFs").

"Operator" means any person or entity that Processes Personal Information on behalf of the Responsible Party.

"Personal Information" means information that is about any individual, or from which any individual is directly or indirectly identifiable, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that individual.

"POPIA" means the Protection of Personal Information Act 4 of 2013.

"Process", "Processing" or "Processed" means anything that is done with any Personal Information, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

"Responsible Party" means the entity that decides how and why Personal Information is Processed.

"Sensitive Personal Information" means Personal Information about race or ethnicity, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health, sexual life, any actual or alleged criminal offences or penalties, national identification number, or any other information that may be deemed to be sensitive under applicable law.

"Service Provider" – third party providers of various services whom we engage, including, but not limited to, providers of information technology, communication, file storage, data storage, copying, printing, accounting or auditing services, counsel, experts, investigators, correspondent attorneys, translators, taxation consultants and our insurers and professional advisors;

"Website" means any website operated, or maintained, by us or on our behalf.