

PAGDENS ATTORNEYS

WEBSITE PRIVACY POLICY

between (i) Pagdens Inc (“Pagdens”) and (ii) you.

1. Introduction

- 1.1. This Privacy Policy applies to all users of our Website which is used to access our legal services.
- 1.2. This Policy describes how Pagdens receives, uses and discloses your personal information, in accordance with the Protection of Personal Information Act, 4 of 2013 (POPI Act) and the Promotion of Access to Information Act, 2 of 2000 (PAIA).
- 1.3. Pagdens is committed to protecting your privacy and to ensuring that your personal information is collected and used appropriately, lawfully and transparently.
- 1.4. Whilst every effort has been made to explain the measures we have taken to protect your personal information; the content of this Policy is not exhaustive of all of the substantive and practical measures taken by Pagdens to protect all personal information processed.
- 1.5. This Privacy Policy describes how Pagdens handles the Personal Information collected and received from you.
- 1.6. By using the Pagdens Website, you agree to the processing of your Personal Information as set out in this Privacy Policy.

2. Personal Information

- 2.1. Personal Information refers to any information that identifies you or specifically relates to you. Personal information includes, but is not limited to, the following information:

Name	Date of Birth	Race	Gender
Nationality	Identity Number	Contact Number	Passport Number
Email Address	Physical Address	Language	Biometric information
Billing Information	Location Information	Online identifier	Click patterns
IP Address	Non-personal browsing habits	Identifying Number	Financial Information

- 2.2. You acknowledge that, when accessing and utilising this Website, Pagdens will gain access to your personal information.
- 2.3. All information gathered on this website is used to personally identify you, to inform you of legal services offered and to ensure that you receive the requested legal services.

- 2.4. You acknowledge that Pagdens will own and retain all rights to non-personal statistical information collected and compiled through your utilisation of this Website, which may incorporate de-identified personal information (information that (a) identifies the data subject, (b) can be used or manipulated by a reasonably foreseeable method to identify the data subject, or (c) can be linked by a reasonably foreseeable method to other information that identifies the data subject).
- 2.5. You furthermore consent to your personal information being used or disclosed to third parties for communication purposes; statistical and data analysis; to improve and develop this Website and/or our services; to analyse the effectiveness of this Website and our services; for marketing and/or promotions; or if required by law.
- 2.6. Despite the fact that Pagdens will take reasonable steps to protect your personal information, there is no absolute secure transmission of data on the internet. Pagdens accordingly does not warrant the absolute security of any information that you may transmit to Pagdens or which Pagdens may submit to you.
- 2.7. Pagdens respects your privacy and will take all reasonable measures to protect it.

3. Collection and processing of Personal Information

- 3.1. You consent to Pagdens collecting personal information about you from the following sources:
 - 3.1.1. personal information collected directly from you;
 - 3.1.2. personal information collected from public records;
 - 3.1.3. personal information collected from a public domain, where you have disclosed the personal information;
 - 3.1.4. personal information collected based on your use of Pagdens legal services;
 - 3.1.5. personal information based on how you engage or interact with Pagdens via our support desk, emails, letters, telephone calls and surveys;
 - 3.1.6. personal information collected from third parties; and
 - 3.1.7. personal information collected from any other source with your written consent.
- 3.2. If required by law, the necessary consent will be obtained before the collection of your personal information from third parties.
- 3.3. Personal information will be collected, to:
 - 3.3.1. provide you with legal services;
 - 3.3.2. market our legal services to you;
 - 3.3.3. respond to enquires and/or complaints;

- 3.3.4. comply with legislative, regulatory, risk and compliance requirements (including directives, sanctions and rules), codes of conduct and industry agreements or to fulfil reporting requirements and information requests;
 - 3.3.5. enter into contracts and to satisfy any obligations as per Pagdens contracts;
 - 3.3.6. directly market products and services to you, where you have consented and opted to receive content through direct marketing;
 - 3.3.7. for security purposes and identity verification, as well as to check the accuracy of your information;
 - 3.3.8. provide a browsing experience which suits your needs through displaying content compatible with your device which you will most likely be interested in and allowing access to interactive features; and/or
 - 3.3.9. pursue and protect your interests or the interest of a third party with whom the information is being shared.
- 3.4. Pagdens undertakes to process the personal information lawfully and in a reasonable manner, so as not to infringe on your privacy. The information collected will only be processed for the aforesaid purposes.

4. The sharing of Personal Information

- 4.1. Pagdens will only share your personal information if:
- 4.1.1. you have consented to the sharing of your personal information;
 - 4.1.2. it is necessary for the conclusion or performance under a contract;
 - 4.1.3. it is required for the proper performance of a public law duty by a public body;
 - 4.1.4. if required by law; and/or
 - 4.1.5. it is to protect or pursue your, Pagdens, or a third party's legitimate interest.
- 4.2. Pagdens may share certain information with third party operators who perform certain processing activities on their behalf.
- 4.3. Pagdens Website may, from time to time, contain links to and from websites of Pagdens partner networks, advertisers and/or affiliates. Pagdens accepts no liability and/or responsibility for the privacy and cookie policies contained on these sites.
- 4.4. Pagdens will not, without consent, sell any personal information to a third party.

5. Trans-Border Information

- 5.1. Pagdens may transfer and store information outside of South Africa or the country of your location. This transfer of information may only be done if:
 - 5.1.1. you have consented to the transfer;
 - 5.1.2. transfer is necessary for the fulfilment of a contract between Pagdens and yourself; and/or
 - 5.1.3. the third party in the foreign country is subject to similar data protection laws as those in South Africa.
- 5.2. The transfer will happen within the requirements and safeguards of the law.
- 5.3. Where possible, the party processing your personal information in the other country will agree to apply the same level of protection as available by law in your country or if the other country's laws provide better protection, the other country's laws would be agreed to and applied.

6. Duration

- 6.1. Pagdens shall keep your personal information for as long as:
 - 6.1.1. required by law;
 - 6.1.2. a contract between yourself and Pagdens stipulates the time frame for the information to be kept;
 - 6.1.3. you have consent to the personal information being kept;
 - 6.1.4. we require the personal information to achieve the purposes listed in this Privacy Policy;
 - 6.1.5. Pagdens requires it for statistical or research purposes;
 - 6.1.6. a code of conduct requires the information to be kept; and/or
 - 6.1.7. Pagdens requires it for lawful business operations.
- 6.2. Pagdens may keep your personal information even after termination of the relationship, for historical data, statistical and/or research purposes.

7. Duties and Rights

- 7.1. It is your responsibility to ensure that that the personal information given to Pagdens is up-to-date, accurate and complete.
- 7.2. It is your responsibility to inform Pagdens of any changes to the personal information.

- 7.3. You have the right to access your personal information held by Pagdens, and to request confirmation as to:
- 7.3.1. the personal information held by Pagdens;
 - 7.3.2. a copy or description of the record kept by Pagdens in relation to your personal information; and
 - 7.3.3. the identity or categories of third parties who have access to your personal information.
- 7.4. Your right to access information may be limited by law.
- 7.5. You have the right to request Pagdens to correct or delete any personal information stored in relation to you if it is inaccurate, irrelevant, excessive, outdated, misleading, incomplete, obtained unlawfully or your consent has been withdrawn.
- 7.6. In the event that the personal information is inaccurate, irrelevant, excessive, outdated, misleading, or incomplete, an email is to be addressed to cindy@pagdens.co.za to request the information to be corrected, deleted or updated.
- 7.7. Should you wish to withdraw any consent previously given, you may send an e-mail to cindy@pagdens.co.za.
- 7.8. Pagdens shall destroy the information once the purpose of collection has been fulfilled, unless required by law to keep the information for a longer period.
- 7.9. Any further processing of information by Pagdens must be:
- 7.9.1. linked to or compatible with the original purpose; and/or
 - 7.9.2. necessary for meeting legal obligations.
- 7.10. You shall be notified of any further processing of your personal information and of any possible consequences which may arise due to the further processing.

8. Security Breaches

- 8.1. Pagdens undertakes to notify and contact you as soon as reasonably possible in the event of an unlawful breach by an unauthorized party which results in the party accessing your information held by Pagdens.
- 8.2. Pagdens undertakes to provide you with as much information, as reasonably possible, to allow you to take the necessary steps in mitigating the risk.

9. Amendment to Privacy Policy

Pagdens reserves the right to change, update, add, remove and/or amend any of the provisions of this Privacy Policy from time to time. Such changes, updates, additions, removals or amendments will become effective from the date of their publication on this Website.

10. Our Cookie Policy

- 10.1. By using this Website you consent to the use of cookies, and that they may be forwarded from the Website to your computer or device.
- 10.2. You consent to Pagdens collecting information about your computer, including, where available, your IP address, operating system, and browser type, for purposes of system administration and to report aggregate information to our service providers. This is statistical data about our users' browsing actions and patterns and cannot be linked to an individual.
- 10.3. For the same reason, we may obtain information about your general internet usage by using a cookie file which is stored on the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. They help us to improve our site and to deliver a better and more personalized service. They enable us to:
- 10.3.1. estimate our audience size and usage pattern;
 - 10.3.2. store information about your preferences, and so allow us to customize our site according to your individual interests;
 - 10.3.3. speed up your searches; and/or
 - 10.3.4. recognize you when you return to our site.
- 10.4. You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting, you may be unable to access certain parts of our website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to this Website.

11. Get in Touch

- 11.1. For any queries in relation to this Privacy Policy or the processing of your personal information, kindly reach out to us by email on cindy@pagdens.co.za.
- 11.2. You may at any time request confirmation of your personal information that is held by us, or the processing activities carried out by us on cindy@pagdens.co.za.

12. Complaints

Any complaints in regard to the processing of your personal information can be lodged with the Information Regulator:

Email:	Complaints.IR@justice.gov.za
Postal Address:	PO Box 31533, Braamfontein, Johannesburg, 2017
Physical Address:	JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001