PRIVACY NOTICE FOR CLIENTS

1. INTRODUCTION

Duma Collective (Pty) Ltd (“Duma Collective”) recognises the importance of privacy and the protection of personal information provided to it and is committed to the safeguarding of such information.

This privacy notice explains how Duma Collective collects and uses your personal information. It contains information regarding the rights of natural persons (and juristic persons, where applicable) to whom personal information relates (“data subjects” or “you”).

Duma Collective reserves the right to amend this Privacy Notice or add provisions to it at any time by publishing an updated version on our website.

2. COLLECTION OF INFORMATION

Duma Collective collects personal information in various instances, including when:

a) you contact Duma Collective or request information or services;

b) Duma Collective provides services to you;

c) when you use Duma Collective’s websites or engage with Duma Collective through social media.

Duma Collective does not engage in any automated decision-making.

Duma Collective may collect the information directly from you or from third parties (such as regulators, government authorities and registries, or attorneys representing our clients’ counterparties). In some instances, it is necessary for you to provide us with the information, so that we can provide services to you. In other instances, providing the information is optional, such as choosing to subscribe to or opt out from a newsletter. If you do not provide the information when it is necessary, we will not be able to provide services to you. If you do not provide the information when it is optional, you will not receive the benefit of providing the information (e.g., the newsletter).

Your interaction with the agency on the Duma Collective website will result in the collection of information regarding your activities on the website. Similarly, when you engage with the agency via any one of Duma Collective’s social media platforms. This information includes, but is not limited to,
your name, contact details and information regarding the matter with which you need assistance.

While engaging with clients on matters, Duma Collective will naturally be exposed to and collect personal information which includes your name, contact details, financial information as well as information regarding the matters that the firm assists you with. In the course of providing services to you, we rely on the determination that we are acting in your legitimate interests, as we are following your instruction(s) in providing our services.

As with all service entities and/or agencies, we may need to collect your information in terms of various laws. Some examples of such laws include the Legal Practice Act 28 of 2014, the Broad-Based Black Economic Empowerment Act 53 of 2003, the Companies Act 71 of 2008, the Consumer Protection Act 68 of 2008, the Copyright Act 98 of 1978, the Financial Intelligence Centre Act 38 of 2001, the Patents Act 57 of 1978, and the Trade Marks Act 194 of 1993. And any other additional acts, where such are applicable.

3. **BASIS AND PURPOSE FOR PROCESSING PERSONAL INFORMATION**

The bases on which Duma Collective processes personal information include (but are not limited to):

a) to provide services to clients (i.e., we are relying on a verbal or written contract with you);
b) in your legitimate interests (i.e., we are acting on your instructions);
c) in our legitimate interests (e.g., to bill you for our services);
d) to comply with legal or regulatory obligations;
e) if you have provided your explicit consent; or
f) if the processing is allowed by law.

The purposes for which Duma Collective processes personal information include, but are not limited to:

- g) marketing and promotion of Duma Collective’s services;
- h) providing and improving services to clients;
- i) improving users’ experience when using Duma Collective’s websites;
- j) communicating with persons for Duma Collective’s internal purposes;
- k) enabling Duma Collective’s internal operations; and
- l) exercising and defending legal rights.
4. DISCLOSURE OF PERSONAL INFORMATION

Duma Collective may release personal information or disclose it to third parties in certain circumstances. These include, but are not limited to:

a) if Duma Collective is required or authorised to do so by law or a court order;
b) in order for Duma Collective to enforce its rights; or
c) in order for Duma Collective to provide services to its clients.

The third parties to whom we disclose personal information include, but are not limited to:

a) advocates and other parties involved in legal services;
b) third party service providers to Duma Collective or its clients (sometimes in other countries);
c) third parties who provide research services to Duma Collective or its clients; and
d) government authorities and registries, organs of state, regulators, courts, tribunals and law enforcement agencies.

5. TRANSFER OF PERSONAL INFORMATION

Personal information collected by Duma Collective may be transferred to natural or juristic persons in other countries. We would do so to provide services to you and would only transfer the information necessary for that service. We may do so to provide services to you, as some of our service providers are cloud-based depending on the services we provide to you, this may include some or all of your information. Those countries’ laws might not protect personal information in the same way or on the same level as the law in your country. However, Duma Collective will take reasonable steps to ensure that recipients in other countries have appropriate privacy measures in place, for example, by entering into a contract with the recipient.

6. RETENTION OF PERSONAL INFORMATION

Duma Collective retains personal information for as long as may be reasonably necessary in accordance with applicable law, and/or in order to provide services to you. It is impractical for us to tell you in this document how long we may keep your information, however, our first obligation is to keep it as long as may be required by law. Thereafter, we would only keep information in order to provide services to you, or for specific business purposes.
7. **COOKIES**

Duma Collective’s websites make use of cookies. Cookies store information regarding website visitors. Cookies have various purposes, such as improving the visitor’s experience on the website and facilitating their use of the website.

A website visitor may disable or decline cookies. However, if the visitor does so, their user experience on the site may be diminished.

8. **DIRECT MARKETING**

Duma Collective may distribute marketing and promotional communications and material. Recipients may opt out from receiving such communications by contacting Duma Collective at the details provided below or by clicking on the opt-out link that will be contained in the relevant electronic communication.

9. **SECURITY**

Duma Collective takes all reasonable steps to protect and avoid unauthorised access to personal information. We have implemented various policies, procedures, hardware and software to safeguard personal information, and routinely review our operations in order to ensure that personal information is adequately protected.

10. **YOUR (DATA SUBJECT) RIGHTS**

The law might provide you with rights to access, amend or delete personal information that is in the possession of Duma Collective. However, Duma Collective may, in certain instances, legally refuse or decline such requests. If applicable, you might also have the right to object to Duma Collective’s processing of their personal information or to file a complaint with a regulator, however we encourage you to address your complaint to us first. In South Africa, the Information Regulator can be contacted at:

JD House  
27 Stiemens Street  
Braamfontein  
Johannesburg  
2001
In some cases, you may withdraw your consent for processing - this withdrawal has no effect on lawful processing conducted up to that point. If you wish to exercise your rights, you can contact Duma Collective at the details provided below. Duma Collective may charge you a fee for accessing, amending or deleting your personal information. You will be advised of this fee in advance, if applicable.

You are encouraged to contact Duma Collective in order to update your personal information as and when necessary.

11. CONTACT DETAILS

In order to contact Duma Collective for purposes relating to this privacy policy, please use these contact details:

Office 283, Dunkeld West Centre
Cnr Jan Smuts & Bompas Road
Dunkeld,
Johannesburg

Telephone: +27 010 330 0200
E-mail: sibu@dumacollective.com // audrey@dumacollective.com