



PRIVACY POLICY

Last updated 19 May 2021

This Privacy Policy describes our policies and procedures on the collection, use and disclosure of your information when you use the Service and tells you about your privacy rights and how the law protects you.

We use your Personal data to provide and improve the services. By using the service, you agree to the collection and use of information in accordance with this Privacy Policy.

SCOPE

This Privacy Policy applies to the personal information we collect related to our:

- websites, including www.rwafrica.com, and our other websites that display this Privacy Policy, and the services available through our websites (together, our "Sites").
- mobile apps ("Apps") and social media properties
- events, marketing and business development activities
- business communications and other online and offline business interactions
- legal and professional services

Collectively, we refer to the above as our "Services." Additional or different privacy notices may apply to certain of our Services. If a different or supplemental privacy notice applies, this will be clearly disclosed to you.

INTERPRETATION AND DEFINITIONS

Interpretation

The following definitions shall have the same meaning regardless of whether they appear in singular or in plural.

Definitions

For the purposes of this Privacy Policy:

Account means a unique account created for you to access our Service or parts of our Service.

Company (referred to as either "the Company", "We", "Us" or "Ours" in this Agreement) refers to RW Africa, 90 Florence Ribeiro Avenue, Muckleneuk, Pretoria.

Cookies are small files that are placed on your computer, mobile device or any other device by a website, containing the details of your browsing history on that website among its many uses.

Country refers to: South Africa

Device means any device that can access the Service such as a computer, a cell phone or a digital tablet.

Personal Data is any information that relates to an identified or identifiable individual.

Service Provider means any natural or legal person who processes the data on behalf of the Company. It refers to third-party companies or individuals employed by the Company to facilitate the Service, to provide the Service on behalf of the Company, to perform services related to the Service or to assist the Company in analysing how the Service is used.

Usage Data refers to data collected either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).

Website refers to RW Africa accessible from <http://www.rwafrica.com>

You means the individual accessing or using the Service, or the company, or other legal entity on behalf of which such individual is accessing or using the Service, as applicable.

COLLECTING AND USING YOUR PERSONAL DATA

Types of Data Collected

Personal Data

While using Our Services, We may ask you to provide us with certain personally identifiable information that can be used to contact or identify you.

Information collected directly
we may collect personal information about you directly from you. For example, personal information may be collected when you fill out a 'Contact Us' form, sign up for our mailing lists, register for events we host or sponsor, submit information as part of certain online services, post comments on our blogs, or otherwise provide us personal information through the Sites and Services. Personally identifiable information may include, but is not limited to:

- Email address
- First name and last name
- Phone number
- Identification number
- Address, State, Province, ZIP/Postal code, City
- Information provided in conjunction with our Client Services.
- Other information related to your request or inquiry, or that you provide when you communicate, engage or otherwise interact with us or the Services.
- Usage Data

Usage Data

Usage Data is collected automatically when using the services.

Usage Data may include information such as your Device's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When you access the Services by or through a mobile device, We may collect certain information automatically, including, but not limited to, the type of mobile device you use, your mobile device unique ID, the IP address of your mobile device, your mobile operating system, the type of mobile Internet browser you use, unique device identifiers and other diagnostic data.

We may also collect information that your browser sends whenever you visit our Services or when you access the Services by or through a mobile device.

Information collected from third party

We may collect or receive information about individuals from service providers, and other third parties, such as our clients, representatives and professional advisers, content providers, social networks, government authorities and public sources and records.

Categories of third parties listed above:

- Service providers: includes vendors, service providers, and content providers, as well as our professional advisors (such as lawyers and accountants) and our professional indemnity insurers.
- Judicial and quasi-judicial bodies: such as courts, arbitral bodies and tribunals.
- Regulatory and government entities: government, administrative, law enforcement and regulatory agencies; tax authorities; corporate registries; and other public agencies or authorities.
- Affiliates: our affiliates and subsidiaries, as well as other RW Africa member and relationship firms.
- Legal support firms: other law firms, consultants and professional advisors that we work with to provide our legal services to a particular client.
- Clients: our clients, with respect to, the relevant legal services we provide to them.
- Parties and related parties in legal matters: other parties in legal matters for which we have been engaged as legal counsel, to the extent required or necessary for our provision of legal services.

TRACKING TECHNOLOGIES AND COOKIES

We use Cookies and similar tracking technologies to track the activity on our service and store certain information. Tracking technologies used are beacons, tags, and scripts to collect and track information and to improve and analyze our services. The technologies we use may include:

Cookies or Browser Cookies.

A cookie is a small file placed on your Device. You can instruct your browser to refuse all Cookies or to indicate when a Cookie is being sent. However, if you do not accept Cookies, You may not be able to use some parts of our Service. Unless you have adjusted your browser setting so that it will refuse Cookies, our Service may use Cookies.

Flash Cookies.

Certain features of our services may use local stored objects (or Flash Cookies) to collect and store information about your preferences or your activity on our services. Flash Cookies are not managed by the same browser settings as those used for Browser Cookies.

Web Beacons. Certain sections of our services and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of a certain section and verifying system and server integrity).

Cookies can be Persistent or Session Cookies. Persistent Cookies remain on your personal computer or mobile device when you go offline, while Session Cookies are deleted as soon as you close Your web browser.

We use both Session and Persistent Cookies for the purposes set out below:

Necessary / Essential Cookies

Type: Session Cookies

Administered by: Us

Purpose: These Cookies are essential to provide you with services available through the Website and to enable you to use some of its features. They help to authenticate users and prevent fraudulent use of user accounts. Without these Cookies, the services that you have asked for cannot be provided, and we only use these Cookies to provide you with those services.

Cookies Policy / Notice Acceptance Cookies

Type: Persistent Cookies

Administered by: Us

Purpose: These Cookies identify if users have accepted the use of cookies on the Website.

Functionality Cookies

Type: Persistent Cookies

Administered by: Us

Purpose: These Cookies allow us to remember choices you make when you use the Website, such as remembering your login details or language preference. The purpose of these Cookies is to provide you with a more personal experience and to avoid you having to re-enter your preferences every time you use the Website.

For more information about the cookies we use and your choices regarding cookies, please visit the Cookies section of our Privacy Policy

USE OF YOUR PERSONAL DATA

The Company may use Personal Data for the following purposes:

- **General business operations:** Where necessary, for the administration of our general business, accounting, recordkeeping, audit, compliance and legal functions.
- **To manage your Account:** to manage your registration as a user of the services. The Personal Data you provide can give you access to different functionalities of the services that are available to you as a registered user
- **Providing support and services:** to operate our Sites, provide our Services, communicate with you about your use of the Sites or Services, provide troubleshooting and technical support, respond to your inquiries, fulfil your orders and requests, process your payments, communicate with you, and for similar service and support purposes.
- **To contact You:** To contact you by email, telephone calls, SMS, or other equivalent forms of electronic communication, such as a mobile application's push notifications regarding updates or informative communications related to the functionalities, products or contracted services, including the security updates, when necessary or reasonable for their implementation
- **To manage your requests:** To attend and manage your requests to us.
- **Newsletters, mailing lists and direct marketing:** For direct marketing purposes, including to send you newsletters, client alerts and information we think may interest you. If you are located in a jurisdiction that requires opt-in consent to receive electronic marketing messages, we will only send you such messages if you opt-in to receive them.
- **Protect legal rights and prevent misuse:** To protect the Sites, Services and our business operations; to prevent and detect fraud, unauthorized activities and access, and other misuse; where we believe necessary to investigate, prevent or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety or legal rights of us or any person or third party, or violations of our Terms of Use or other agreements; and to respond to actual or potential legal claims against us.
- **Analytics and improvement:** To better understand how users access and use our Sites and other Services, and for other research and analytical purposes, such as to evaluate and improve our Services and business operations and to develop services and features.

We may share your personal information in the following situations:

- Third party service providers that provide services to us or to whom we outsource certain services, such as data hosting or software or technology services.
- Content providers that we partner with to make available training and other content or resources. We do not share your information with them for their own independent

use; however, if you register for an account with one of these third parties they will use the information you provide to them subject to their own privacy policy and terms.

- Our professional advisers, such as lawyers and accountants.
- Government and/or regulatory authorities.
- Professional indemnity insurers.
- Regulators, tax authorities and/or corporate registries.
- For business transfers: We may share or transfer your personal information in connection with, or during negotiations of, any merger, sale of Company assets, financing, or acquisition of all or a portion of our business to another company.
- Performance of legal services to the extent required or necessary for our provision of legal services.

We will not rent or sell your personal information, nor will we share it with third parties, outside of RW Africa for their own marketing purposes.

RETENTION OF PERSONAL INFORMATION

The Company will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

The Company will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of Our Service, or we are legally obligated to retain this data for longer time periods.

TRANSFER OF YOUR PERSONAL DATA

Your information, including Personal Data, is processed at the Company's operating offices and in any other places where the parties involved in the processing are located. It means that this information may be transferred to — and maintained on — computers located outside of Your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from Your jurisdiction.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

The Company will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

DISCLOSURE OF YOUR PERSONAL DATA

Business Transactions

If the Company is involved in a merger, acquisition or asset sale, your Personal Data may be transferred. We will provide notice before your Personal Data is transferred and becomes subject to a different Privacy Policy.

Law enforcement

Under certain circumstances, the Company may be required to disclose your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

Other legal requirements

The Company may disclose your Personal Data in the good faith belief that such action is necessary to:

- Comply with a legal obligation
- Protect and defend the rights or property of the Company
- Prevent or investigate possible wrongdoing in connection with the Service
- Protect the personal safety of Users of the Service or the public
- Protect against legal liability

SECURITY OF YOUR PERSONAL DATA

The security of your Personal Data is important to us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

CHILDREN'S PRIVACY

Our Services does not address anyone under the age of 13. We do not knowingly collect personally identifiable information from anyone under the age of 13. If you are a parent or guardian and you are aware that your child has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from anyone under the age of 13 without verification of parental consent, we take steps to remove that information from our servers.

If we need to rely on consent as a legal basis for processing your information and your country requires consent from a parent, we may require your parent's consent before we collect and use that information.

LINKS TO OTHER WEBSITES

Our Service may contain links to other websites that are not operated by us. If you click on a third party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

CHANGES TO THIS PRIVACY POLICY

We may update Our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

We will let you know via email and/or a prominent notice on our Services, prior to the change becoming effective and update the Last updated date at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

Contact Us:

If you have any questions about this Privacy Policy, you can contact us:

- By email: hr@rwafrica.com
- By phone number: 012 452 4000