

PRIVACY NOTICE: CLINTON RAS INC

1. INTRODUCTION

This privacy policy sets out the basis on which any personal information we, CLINTON RAS INC, collect from you, or that you provide to us, will be used, stored and processed by us (hereinafter referred to as "collect" or "collection"). Read the following carefully to understand our practices regarding your personal information (as defined below) and how we will process it.

In adopting this privacy policy, we wish to ensure you that the use of your personal information is lawful, reasonable, and relevant to our business activities, with the ultimate goal of improving the services we offer and to your experience with us. We will take reasonable steps to prevent unauthorised access to, or disclosure of your personal information. However, we cannot guarantee that your personal information shall be secure, despite our best efforts to protect it as required in law.

By continuing to interact with us and use our services, you agree to the terms and conditions set out in this privacy policy.

Below we explain how and when we collect and use personal information. **If at any time you have enquiries that are not dealt with in this document, please contact us at admin@raslawsa.com.**

2. THE INFORMATION WE COLLECT AND RECORD

2.1 When we receive an enquiry, request or instruction, we may request, receive, store and record many details that are defined as 'personal information' in POPIA. We collect and record only the minimum personal information that is required for us to attend to the request, enquiry or order. In doing so, we comply with POPIA in that we implement reasonable practices to ensure the private information is protected.

3. YOUR PERSONAL INFORMATION WILL BE USED OR SHARED IN THE FOLLOWING WAYS

- 3.1 We keep your personal information confidential and only use, process, share, record or delete it as is required by POPIA, other legislation and/or the requirements of the service that we are providing for you.
- 3.2 We may share certain information with service providers as part of our business operations and only if these service providers have undertaken to protect the personal information that we share with them for a particular purpose. We only share such personal information as are required for purposes of performing the tasks lawfully following from and required by the task(s) we are mandated to perform.

4. OTHER INTERACTION WITH YOUR PERSONAL INFORMATION

- 4.1 POPIA requires us to ensure that we hold correct and updated personal information and, hence, we may need to update your personal information from time to time, and request your assistance in doing so. The request will be sent via email or otherwise, whatever is most reasonable in the circumstances.
- 4.2 We will:
 - 4.2.1 not sell or give your personal information away, use it, other than in terms of this policy;
 - 4.2.2 retain the personal information only for as long as we are required by law to do so.

5. YOUR RIGHTS

- 5.1 You may at any time request us to confirm what personal information we have relating to you and by whom it was accessed. We may charge a fee for the latter.
- 5.2 You may ask us to update or delete your information or to refrain from using it. Note that if the information you ask us to delete is required by us for purposes of a transaction that we are legitimately processing, it may result in us being unable to complete the transaction on your behalf or in which you are involved. Should any damage arise from your request in these circumstances, you indemnify us against any claim for damages that may follow as a result hereof.
- 5.3 Also, if we are by law required to retain the information, we will only delete the information once we have complied with the regulatory period for retaining the information.
- 5.4 You may further unsubscribe from any of our electronic material by simply clicking on the unsubscribe option provided. In that event we will remove your details from our database, in a secure way.

- 5.5 You may enquire from us about your personal information that we have, and how, if at all, it was used.
- 5.6 For assistance to exercise your rights as explained in this paragraph, contact our Information Officer whose details appear in paragraph 1 hereof.

6. SECURITY BREACH

- 6.1 We have strict measures in place to make sure that our information systems are not breached.
- 6.2 However, should this occur, we will ascertain how and where the breach occurred and make sure that the exposed area is addressed immediately.
- 6.3 We will ascertain which data has become vulnerable as a result and notify you if the breach may affect you and assist you to minimize any potential damages that you may suffer as a result, where possible. Such notification may take place by way of email to you, or otherwise.

7. TYPES OF PERSONAL INFORMATION WE COLLECT

- 7.1 The types of personal information that we may collect includes information necessary to provide our services. This may include personal information which contains identifiable information such as (amongst other things) your first and last name, screen name, email address, postal address, telephone number, details about your telephone device (e.g. mobile phone) and your telephone service provider ("personal information"). If you are an entity, this may include your entity registration number, VAT number, business address and contact person's details.

8. STORING YOUR PERSONAL INFORMATION

- 8.1 We store your personal information in South Africa.
- 8.2 Your information will not be stored for longer than is necessary for the purposes described in this privacy policy.

9. CHANGES TO THIS PRIVACY POLICY

- 9.1 From time to time, we may revise this privacy policy to reflect company initiatives, changes in the law or technology or changes in our practices regarding the collection and use of personal information.

9.2 We will not use or disclose personal information provided to us pursuant to this Privacy Policy in ways other than the ones described above, without informing you and providing you with the opportunity to consent to such modified conditions concerning the use and disclosure of your personal information.
