



## PRIVACY POLICY

### 1. The information we collect and how we collect it (PERSONAL INFORMATION PROCESSING)

We collect personal information from data subjects in several ways, including but not limited to:

- Data subjects contact VR Attorneys for services and/or request information;
- VR Attorneys provides services to data subjects;
- Individuals apply for employment at VR Attorneys.

Website usage information is collected using “cookies,” which allows us to collect standard internet visitor usage information. A website visitor may disable or decline cookies. However, if the visitor does so, their user experience on the site may be diminished.

VR Attorneys may collect personal information directly from a data subject or third parties such as registries and government authorities, regulators, and other legal practitioner firms. When a data subject engages with the firm via our website or through our social media platforms, we will collect information that includes but is not limited to the data subject’s name, contact details, and information regarding the matter in which they need assistance.

While engaging with the data subject on the services we render, VR Attorneys will be exposed to and collect personal information, which includes the data subject’s name, contact details, financial information, as well as information regarding the data subject’s matter/inquiry/case.

As part of VR Attorneys' recruitment processes, we collect information from prospective applicants. This information includes educational information and employment history. By applying for employment opportunities at VR Attorneys, applicants are deemed to have consented to the processing of their personal information for recruitment purposes, which may include:

- Screening of the applicant;
- Background checks; and
- Reference checks

## **2. How we use your information**

We will use personal information for the purposes for which it was collected and consented to by the client.

VR Attorneys may process personal information for the following purposes, but not limited to:

- To provide legal services to clients;
- To comply with legal and statutory obligations;
- If a data subject has provided their consent; and the processing is allowed in terms of law;
- Marketing and promotion of VR Attorneys' services;
- Providing and improving services to clients;
- Improving data subjects' experience when utilizing VR Attorneys' websites;
- Communicating with data subjects for VR Attorneys' internal purposes;
- Enabling VR Attorneys' internal operations;
- To gather contact information;
- To confirm and verify the client's identity as required by the Financial Intelligence Centre Act;
- For audit and record-keeping purposes;
- In connection with legal proceedings.

## **3. Disclosure of personal information**

VR Attorneys may disclose your personal information or release it to our service providers and third parties in certain circumstances. These include, but are not limited to:

- Where we have a duty or a right to disclose in terms of law or industry codes;
- Where we believe it is necessary to protect our rights;

- For VR Attorneys to provide services to its clients

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

- Advocates and other legal entities providing legal services;
- Third-party service providers to VR Attorneys or its clients;
- Third parties who provide research services to VR Attorneys or its clients
- Government authorities and registries, organs of state, regulators, courts, tribunals, and law enforcement agencies.

#### **4. Personal Information Security**

We are legally obliged to provide satisfactory protection of the personal information we have obtained and to prevent unauthorized access to such personal information. We will, on an ongoing basis, continue to review our security controls and related processes to ensure that your personal information remains secure in accordance with the Protection of Personal Information Act.

Our security policies and procedures cover, but are not limited to:

- Physical security;
- Cybersecurity;
- Access to personal information;
- Secure communications;
- Security in contracting out activities or functions;
- Retention and disposal of information;
- Acceptable usage of personal information;
- Governance and regulatory issues;
- Monitoring access and usage of private information;
- Investigating and reacting to security incidents.

#### **5. Access and Correction of your personal information**

Data subjects have the right to request that they access, update, amend, or delete their personal information;

VR Attorneys may, in certain circumstances, refuse such requests;

If applicable, a data subject may also have the right to object to VR Attorneys' processing of their personal information or to file a complaint with the Information Regulator.

If a data subject wishes to exercise their rights, they can contact the Chief Information Regulator. VR Attorneys and Data subjects are urged to contact the Chief Information Regulator in order to update their personal information when necessary.

## **6. Direct marketing**

VR Attorneys may send marketing and promotional communications to data subjects if such consent has been obtained from the client. Recipients may opt out of receiving such communication by contacting VR Attorneys at the details provided below or by clicking on the opt-out link that will be included in the relevant communication.

Should you wish to be removed from our mailing list, you may forward your request to the Chief Information Officer.

## **7. Transfer of personal information**

Personal information collected by VR Attorneys may be transferred to persons in other countries. Those countries' laws might not protect personal information in the same way or on the same level as the law in our country. However, VR Attorneys will take reasonable steps to ensure that recipients in other countries have appropriate privacy measures in place.

## **8. Retention of personal information**

VR Attorneys retains personal information for as long as may be reasonably necessary in accordance with the applicable law.

## **9. Contact us**

Any questions relating to our privacy policy or the treatment of data subjects personal information should be addressed to:

Information Regulator

You have the right to complain to the Information Regulator, whose contact details are:

<http://www.justice.gov.za/inforeg/index.html>

Information Regulator Tel: 012 406 4818 or +27

(0) 10 023 5207

## **10. Updates to this Policy**

We may update this Privacy Policy from time to time to reflect changes within the law or our business practices. Updates will be published on our website.