

PRIVACY POLICY

BY ACCESSING AND USING THIS WEBSITE, AND/OR MAKING USES OF OUR SERVICES, THE WEBSITE USER OR CLIENT IS PROVIDING THEIR EXPRESS AND VOLUNTARY CONSENT TO THE PROCESSING OF THEIR PERSONAL INFORMATION BY VAN ZYL KRUGER INC ON THE BASIS SET OUT IN THIS PRIVACY POLICY. IF THE WEBSITE USER OR CLIENT DOES NOT CONSENT, THE WEBSITE USER OR CLIENT MUST IMMEDIATELY STOP ACCESSING AND/OR USING THIS WEBSITE AND OUR SERVICES.

1. INTRODUCTION

- 1.1 Van Zyl Kruger Inc processes personal information and other confidential information of individuals and juristic persons to deliver legal services to our clients. The nature of the personal information which we process, depends on the legal service we render in each matter, as well as the legislative requirements to be adhered to by us.
- 1.2 Van Zyl Kruger Inc. collects, uses and, in some circumstances, shares the personal information of Website users or Clients in and through this website and during the provision of services to you.
- 1.3 Van Zyl Kruger Inc is sensitive to the personal nature of the information you provide to us and respects the rights of Website users or Client whose personal information is collected and used by it, including their right to protection against the unlawful collection, retention, sharing and use of such personal information.
- 1.4 This privacy policy ("the Policy") explains how we protect and use your Personal Information.
- 1.5 By providing us with your Personal Information, you-
 - 1.5.1 agree to this Policy and authorise us to process such information as set out herein; and
 - 1.5.2 authorise Van Zyl Kruger Inc its Associates, our Service Providers and other third parties to Process your Personal Information for the purposes stated in this Policy.
- 1.6 Van Zyl Kruger Inc will not use your Personal information for any other purpose than that set out in this Policy and will endeavour to protect your Personal Information that is in our possession from unauthorised alteration, loss, disclosure or access.
- 1.7 This Policy applies to all external parties with whom we interact, including but not limited to individual clients, representatives of client's organisations, visitors to our offices, and other users of our legal and related services ("you").
- 1.8 Van Zyl Kruger Inc may amend the provisions of this Privacy Policy to comply with any changes in the law, and/or pursuant to any changes to its information processing activities or privacy practices. Such amendments will be published on the website and will become operable from the date of such publication.
- 1.9 The provisions of this Privacy Policy are, as far as possible, incorporated into any agreement between Van Zyl Kruger Inc and Website Users or Clients.

2. DEFINITIONS AND INTERPRETATION

2.1 In this Privacy Policy, the following words bear the following meanings:

- 2.1.1 “**consent**” means any voluntary, specific and informed expression of will in terms of which permission is given by or on behalf of a Website user or Client for the processing of their personal information;
- 2.1.2 “**direct marketing**” means to approach a data subject, either in person or by mail or electronic communication, for the direct or indirect purpose of promoting or offering to supply any goods or services to the data subject;
- 2.1.3 “**information officer**” means the head of Van Zyl Kruger Inc. from time to time.
- 2.1.4 “**operator**” means an outside third party who processes personal information for or on behalf of Van Zyl Kruger Inc. in terms of a contract or mandate;
- 2.1.5 “**personal information**” means information that is about any individual, or from which any individual is directly or indirectly identifiable, in particular by reference to an identifier such as a name, and identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that individual.
- 2.1.6 “**POPIA**” means the Protection of Personal Information Act of 2013, including any regulations or codes of conduct promulgated under it;
- 2.1.7 “**PAIA**” means the Promotion of Access to Information Act 2 of 2000;
- 2.1.8 “**Process**”, “**Processing**” or “**Processed**” means anything that is done with any Personal Information, whether or not automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- 2.1.9 “**Special personal information**” means Personal Information about race or ethnicity, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health, sexual life, any actual or alleged criminal offences or penalties, national identification number, or any other information that may be deemed to be sensitive under applicable law.
- 2.1.10 “**services**” means the services provided to any Website user or Client by Van Zyl Kruger Inc;
- 2.1.11 “**Service Provider**” -third party providers of various services whom we engage, including, but not limited to, providers of information technology, communication, file storage, data storage, copying, printing, accounting or auditing services, counsel, experts, investigators, correspondent attorneys, translators, taxation consultants and our insurers and professional advisors;
- 2.1.12 “**Website user**” means a visitor or user of this website, or any of the content or services associated with this website; and

- 2.1.13 "the website" means the website or any part thereof which is accessible from <https://vzk.co.za>
- 2.1.14 "Client" means individual clients, representatives of client's organisations, visitors to our offices and any person we obtain personal information from.
- 2.2 A requirement that any Policy, request, demand or other communication made in terms of this Privacy Policy must be in writing will be met if it is in the form of a data message as defined in the Electronic Communications and Transactions Act, No. 25 of 2002, and is accessible in a manner usable for subsequent reference, provided that this policy may not be amended as such.

3. RESPONSIBLE PARTY

- 3.1 Van Zyl Kruger Inc will be the party who will be collecting and processing a website user's or Clients personal information and as such is designated as the "responsible party" for the purposes of this Policy.
- 3.2 Our contact details are as follows:
- 3.2.1 Email address: dataprotection@vzk.co.za
- 3.2.2 Website address: <https://vzk.co.za>
- 3.3 Van Zyl Kruger Inc may instruct third party operators from time to time to undertake certain processing activities relating to the User's personal information.

4. WHAT PERSONAL INFORMATION IS COLLECTED

- 4.1 Van Zyl Kruger Inc. may collect the following personal information from the Website user or Client:
- 4.1.1 Personal details: Initials, first name, surname;
- 4.1.2 Demographic information: gender, date of birth/age, nationality, salutation, title and language preferences
- 4.1.3 Identifier information: passport or national identity numbers, utility provider details, bank statements, tenancy agreements
- 4.1.4 Contact details: correspondence address, telephone number, email address and details of your public social media profile(s);
- 4.1.5 Instruction details: details of individuals instructing Van Zyl Kruger, personal information included in correspondence, documents, evidence or other materials that we Process in the course of providing legal services;
- 4.1.6 Attendance records: records of any consents you may have given, together with the date and time, means of consent and any related information;
- 4.1.7 Payment details: billing address, payment method; banking details, invoice records, payment records, payment amount and payment date;
- 4.1.8 Employment details;
- 4.1.9 Company registration and VAT number;
- 4.1.10 Data relating to your visits to our Website: your device type, operating system, browser type, browser settings, IP address, language settings, dates and times of connecting to a Website and other technical communications information;

- 4.2 The supply of personal information by the Website User or Client to Van Zyl Kruger Inc is voluntary and not mandatory. However, if the Website User or Client refuses to supply any personal information, certain consequences may naturally flow from such a refusal, such as preventing Van Zyl Kruger Inc from concluding or performing any contract with the Website user or Client or preventing Van Zyl Kruger Inc from complying with one or more of its obligations in law.
- 4.3 There is an applicable law which directly requires or authorises Van Zyl Kruger Inc to collect a client's personal information, namely the Financial Intelligence Centre Act.

5. PURPOSE/S FOR COLLECTION AND PROCESSING OF PERSONAL INFORMATION

- 5.1 Van Zyl Kruger Inc shall only collect a Website user's or Clients personal information for a specific, explicitly defined and lawful purpose relating to a function or activity of Van Zyl Kruger Inc business.
- 5.2 Such purposes may include the following:
- 5.2.1 to enter into a contract with a User;
 - 5.2.2 to perform any obligations under a contract with a User;
 - 5.2.3 to comply with a legal obligation;
 - 5.2.4 to protect a legitimate interest of the Website user or Client (unless the Website user or Client has specifically objected in writing to all or some of the processing activities on reasonable grounds);
 - 5.2.5 to pursue its own legitimate interests or the legitimate interests of a third party who it is sharing the information with (unless the Website user or Client has specifically objected in writing to all or some of the processing activities on reasonable grounds);
 - 5.2.6 to process personal information for direct marketing purposes (only if the Website user or Client has opted in to receiving any direct marketing material);
 - 5.2.7 to customise and display content to the Website user or Client in a way that Van Zyl Kruger Inc feels may interest the Website user or Client or be most beneficial to them;
 - 5.2.8 to send content including, but not limited to products, articles, listings and advertisement content to the Website user or Client via email or other electronic media, where the Website user or client has consented to be contacted by Van Zyl Kruger Inc with such content;
 - 5.2.9 to enable the Website user to voluntarily participate in interactive features;
 - 5.2.10 to notify the User about changes to the website or services.
- 5.3 If Van Zyl Kruger Inc intends to process the Website user's or Clients personal information for any other purpose not listed in clause 5.2 or which is otherwise not automatically permitted by law, it shall ensure that it obtains the Website user's or Clients written consent to do so.

6. COLLECTION OF PERSONAL INFORMATION

- 6.1 Van Zyl Kruger Inc shall, as far as possible, always collect personal information about a Client directly from the Client, except in the following circumstances:
 - 6.1.1 Where personal information is collected from a public record, or from another source if the information has already been made public by the User;
 - 6.1.2 where the User has given their written consent to Van Zyl Kruger Inc to collect their information from another source;
 - 6.1.3 where the collection of a User's personal information from another source will not prejudice any of the User's legitimate interests;
 - 6.1.4 where the collection of personal information from another source is necessary to maintain Van Zyl Kruger Inc legitimate interests or those of any third party it intends sharing the information with;
 - 6.1.5 where the collection of personal information directly from the User would prejudice the purpose for the collection;
 - 6.1.6 where the collection of personal information directly from the User is not reasonably practicable in the circumstances.
- 6.2 If Van Zyl Kruger Inc collects personal information from a source other than the Client, it shall record in writing the details of that source, including the full names and contact details of that source where applicable.
- 6.3 Personal information may be collected from or supplied by the Website user in any of the following ways:
 - 6.3.1 when subscribing to a service;
 - 6.3.2 when requesting further services or information from Van Zyl Kruger Inc;
 - 6.3.3 when contacting Van Zyl Kruger Inc to report a problem with the website or the services or for any other reason;
 - 6.3.4 when completing any forms on the website.
- 6.4 The Website user may visit the website without providing any personal information. However, the website's servers may still collect technical information regarding the use of the website, which is aggregated for analytical purposes, technical maintenance and for improving the content offered on the website. Such information may include details of the Website user's visit, information about the Website user's computer, including IP (Internet Protocol) address, operating system and browser type, the Website user's location, and usage information. An individual Website user will not be identified from or by this information and Van Zyl Kruger Inc is entitled to copy, distribute or otherwise use such information without limitation.

7. **COOKIES**

- 7.1 “**Cookies**” are small text files transferred by a webserver to a User’s hard drive and thereafter stored on their computer. The types of information a Cookie collects includes a User’s username, the date and time of their visits to the website, their browsing history and preferences.
- 7.2 Van Zyl Kruger Inc may use Cookies on this website to:
- 7.2.1 distinguish one User from another on the website;
 - 7.2.2 remember the User’s last session when they return to the website;
 - 7.2.3 estimate the website’s audience size and usage patterns;
 - 7.2.4 store information about the Website user’s preferences, which allows Van Zyl Kruger Inc to customize the website and content according to the Website users individual preferences; and
 - 7.2.5 speed up searches on the website.
- 7.3 The provisions of this clause are only applicable to Cookies used by Van Zyl Kruger Inc. In some instances, third-party service providers may use Cookies on the website. Van Zyl Kruger Inc cannot and does not control or access Cookies used by third party service providers and takes no responsibility therefor.
- 7.4 The Website user has the right and ability to either accept or decline the use of Cookies on their computer’s web browser, whether they are logged in as a member, or simply casually visiting the website. However, declining the use of Cookies may limit a website user’s access to certain features on the website.

8. **GENERAL CONDITIONS FOR PROCESSING PERSONAL INFORMATION**

- 8.1 Van Zyl Kruger Inc shall comply with all laws, contracts or regulations when it processes a Website user’s or Clients personal information.
- 8.2 Van Zyl Kruger Inc shall not act unreasonably when processing a Website user’s or Clients personal information. This means that it will collect and process a website user’s or client’s personal information in a way that the Website user or Client can reasonably expect and in a way that is fair.
- 8.3 Van Zyl Kruger Inc shall respect the Website user’s or Clients right to privacy at all times. If there is another way in which it can achieve the same goal without posing any risk of harm to the privacy rights of the Website user or Client, then it will choose that option.
- 8.4 Similarly, if Van Zyl Kruger Inc needs to process personal information but there are less privacy-invasive methods of collecting, using and sharing that information, then it will use those methods.
- 8.5 Van Zyl Kruger Inc shall ensure that the personal information that is collected and processed is and remains relevant to the identified purpose/s for such processing, and

that such information is and remains adequate, but not excessive, for achieving the identified purpose/s.

- 8.6 If there are any alternative ways to achieve the identified purpose/s without processing personal information, Van Zyl Kruger Inc shall not process that personal information.
- 8.7 Van Zyl Kruger Inc shall ensure that the processing activities it chooses to apply are proportionate to achieving the identified purpose/s and that no less privacy invasive measures are available to achieve the same purpose/s.
- 8.8 Van Zyl Kruger Inc shall ensure that, regardless of the stated purpose/s for processing personal information, the rights and interests of Website users or Clients will not be unnecessarily prejudiced or infringed, unless it cannot be avoided, and then in such cases, it shall ensure that its own rights and/or interests justify such prejudice or infringement taking place.
- 8.9 Van Zyl Kruger Inc shall be entitled to store the personal information of Website users or Clients indefinitely unless the Website user objects thereto. In the event a Website user objects to the indefinite storage, once Van Zyl Kruger Inc has achieved the purpose for the collection of the Website user's personal information, it will destroy or delete such information, unless the Website user has directed otherwise in writing, or Van Zyl Kruger Inc is required by law to retain the information for a longer period of time.
- 8.10 If Van Zyl Kruger Inc no longer needs to process personal information to achieve the purpose originally specified, it will stop using that information.

9. DISCLOSURE AND SHARING OF PERSONAL INFORMATION

- 9.1 Van Zyl Kruger Inc may, in the course of providing any content or services on this website, or for the purposes of concluding or performing any other services or transaction with a website user or client, share certain personal information with third party operators who perform certain processing activities on behalf of Van Zyl Kruger Inc.
- 9.2 The information shared and the categories of third party operators with whom it is shared will always be notified to you prior to being shared other than if we share with:
 - 9.2.1 Regulators or government departments;
 - 9.2.2 Employees or consultants; and
 - 9.2.3 Professional advisers.
- 9.3 Van Zyl Kruger Inc may also share aggregated information about Website users of this website and their usage patterns. Van Zyl Kruger Inc may also use such aggregated information to help advertisers target specific audiences. Such aggregated information will be de-identified and the Website user's personal information will not be disclosed.
- 9.4 Other than as stated in clause 9.1 and 9.3, Van Zyl Kruger Inc shall not share a Website user's personal information with any third parties unless it has the Website user's express consent to do so.

10. USER'S RIGHTS IN RELATION TO THE PROCESSING OF THEIR PERSONAL INFORMATION

10.1 Website users or Clients shall have the following rights in relation to the processing of their personal information:

10.1.1 to access and correct any personal information held by Van Zyl Kruger Inc about them;

10.1.2 to object to the processing of their information; and

10.1.3 to lodge a complaint with the Information Regulator.

10.2 Users may make a request in terms of clause 10.1.1 by following the process for making such a request as set out in Van Zyl Kruger Inc POPIA compliant PAIA manual.

11. FURTHER PROCESSING

11.1 Van Zyl Kruger Inc shall not process a Website user's or Clients personal information for any purpose not previously specified except in the following circumstances:

11.1.1 where the Website user or Client has consented to such further processing;

11.1.2 where the further processing is necessary for the exercise of any contractual rights or the fulfillment of any obligations between Van Zyl Kruger Inc and the Website user or Client;

11.1.3 where the further processing activities are linked to or compatible with the original purpose;

11.1.4 where the further processing is necessary for the prevention, detection, investigation, prosecution and punishment of an offence;

11.1.5 where the further processing is necessary to enforce any law;

11.1.6 where the further processing is necessary for the conduct of legal proceedings in any court or tribunal that have commenced or are reasonably contemplated;

11.1.7 where the further processing is necessary to prevent or mitigate a serious and imminent threat to the life or health of the User or another individual;

11.1.8 where the further processing is necessary for historical, statistical or research purposes.

11.2 Van Zyl Kruger Inc shall ensure that if it intends processing personal information for other purposes not previously specified, it shall notify the Website user or Client of such further purposes and the possible consequences of the intended further processing for the User.

12. ACCURACY, CORRECTNESS AND COMPLETENESS OF PERSONAL INFORMATION

12.1 Van Zyl Kruger Inc shall take reasonably practicable steps to ensure that the personal information kept by it about Website users or Client is complete, accurate, not misleading and is updated when necessary.

- 12.2 However, if a Website user or Client is aware of any personal information in Van Zyl Kruger Inc custody that is incorrect, inaccurate or which needs to be updated, the Website user or Client must make a written request to Van Zyl Kruger Inc information officer atdataprotection@vzk.co.za to update or correct the relevant information.
- 12.3 If a Website user or Client has contested the accuracy of any personal information being used by Van Zyl Kruger Inc, it shall immediately stop using that information until its accuracy has been verified.
- 12.4 Van Zyl Kruger Inc reserves its right to only adhere to a request from a website user or Client in terms of clause 12.2 if the correction or updating of that information will result in the personal information being correct and accurate.
- 12.5 Where personal information that has been shared by Van Zyl Kruger Inc with a third party is subsequently updated or corrected, Van Zyl Kruger Inc shall ensure that all third parties, with whom that information was shared, receives the updated and/or corrected version of the information as soon as it has been updated and/or corrected.

13. SECURITY SAFEGUARDS

- 13.1 Van Zyl Kruger Inc is committed to protecting the personal information in its custody against any loss of, damage to or unauthorised destruction of that information, and to prevent any unauthorised parties from accessing that information.
- 13.2 Van Zyl Kruger Inc takes steps to continually identify and document any risks to the personal information it has in its possession or under its control and that appropriate security safeguards are in place against those risks.
- 13.3 Van Zyl Kruger Inc shall ensure that in any contracts entered into with third party operators who process personal information on Van Zyl Kruger Inc behalf, include the following obligations:
- 13.3.1 the operator shall not process any personal information without Van Zyl Kruger Inc knowledge and authority;
 - 13.3.2 the operator shall treat all personal information given to it as confidential and shall not disclose it to any unauthorised third parties;
 - 13.3.3 the operator shall establish and maintain adequate security measures which are the same or offer similar protection over the personal information as that employed by Van Zyl Kruger Inc ;
 - 13.3.4 the operator shall notify Van Zyl Kruger Inc immediately where there are reasonable grounds to believe that any personal information has been leaked to or accessed by any unauthorised person;
 - 13.3.5 if the operator is situated in another country, it must comply with the data protection laws in that country and be able to provide verification that it is so compliant;
 - 13.3.6 if an operator is legally obliged to disclose any personal information processed by them on Van Zyl Kruger Inc. behalf to other parties, it must notify Van Zyl

Kruger Inc beforehand to enable Van Zyl Kruger Inc and/or individual Website users or Clients to protect their rights if necessary.

- 13.4 Van Zyl Kruger Inc shall ensure that all personal information on its systems is properly backed-up and that back-up copies are stored separately from the live files.

14. NOTIFICATION OF BREACH OF SECURITY

- 14.1 If personal information about a Website user is inadvertently leaked or Van Zyl Kruger Inc security has been unlawfully breached by any unauthorised party, Van Zyl Kruger Inc shall immediately identify the relevant Users who may be affected by the security breach and shall contact them at their last known email address or contact details or by the quickest means possible.
- 14.2 Van Zyl Kruger Inc shall provide sufficient information to the User to allow him or her to take the necessary protective measures against the potential consequences of the compromise or shall advise Users of the steps to be taken by them and the possible consequences that may ensue from the breach for them.

15. DECISIONS BASED ON PERSONAL INFORMATION PROCESSED

- 15.1 If Van Zyl Kruger Inc is required to make a decision about a Website user or Client using any personal information that has been obtained, it shall ensure that a record of such information and the decision made is kept for a reasonable period of time to give the Website user or Client an opportunity to request access to that record.
- 15.2 Van Zyl Kruger Inc shall allow a Website user or Client a reasonable opportunity to make representations before any decision is made solely on the basis of the personal information processed, if that decision will affect the legal position of the Website user or Client or will otherwise adversely affect them in some manner or form.
- 15.3 Van Zyl Kruger Inc shall always ensure that the underlying logic behind any decision made pursuant to the automated processing of personal information is sound and that this underlying logic can be communicated to the Website user or Client to enable them to make representations.
- 15.4 If Van Zyl Kruger Inc has made a decision based on incorrect personal information, it shall immediately revisit that decision as soon as it receive Policy or becomes aware of the error or inaccuracy of that information.

16. LINKED THIRD PARTY WEBSITES

- 16.1 This website may contain links or references to other websites, including those of advertisers ("**third party websites**") which are not under Van Zyl Kruger Inc control.
- 16.2 The provisions of this Privacy Policy are not applicable to third party websites and Van Zyl Kruger Inc shall not responsible for the information processing practices and/or privacy policies of those third party websites, or the cookies that those websites may use.

17. DIRECT MARKETING

- 17.1 The Website user or Client hereby consents to the processing of their personal information for the purpose of direct marketing by means of electronic communications including automatic calling machines, facsimile machines, SMS's or electronic mail.

- 17.2 Van Zyl Kruger Inc will only send electronic communications to the Website user or Client for the purpose of marketing similar products or services offered by Van Zyl Kruger Inc , with the Website user's or Clients consent.
- 17.3 The Website user or Client may object, free of charge, and without unnecessary formality, to the use of their details either when the information was first collected from them or when each subsequent electronic communication is sent to them by Van Zyl Kruger Inc.
- 17.4 The Website user or Client can opt out of receiving further marketing communications by contacting Van Zyl Kruger Inc at dataprotection@vzk.co.za .

18. CHILDREN'S PERSONAL INFORMATION

Van Zyl Kruger Inc shall not process any personal information relating to a person under the age of 18 years unless it has obtained consent from that person's parent or legal guardian.

19. CROSS BORDER TRANSFERS OF PERSONAL INFORMATION

- 19.1 Van Zyl Kruger Inc may transfer personal information to another country in the following circumstances:
- 19.1.1 the transfer is necessary for the performance of a contract that Van Zyl Kruger Inc has with their Clients;
 - 19.1.2 the transfer is necessary for the conclusion or performance of a contract with a third party which is for the benefit of or in the interest of their Clients;
 - 19.1.3 the transfer is otherwise for the benefit of their Clients;
 - 19.1.4 the transfer is for research purposes to prevent or curb the spread of COVID-19 or another viral outbreak; or
 - 19.1.5 the Client has consented to the transfer of their information.
- 19.2 If Van Zyl Kruger Inc is required to transfer personal information from South Africa to a third party in a foreign country, such foreign country may not have data protection laws with a similar or adequate level of protection as POPIA.

20. RETENTION OF INFORMATION

- 20.1 Van Zyl Kruger Inc will keep a record of any personal information collected for no longer than agreed by the Website user or Client , or as is necessary to achieve the specific purpose for which it collected such information in the first place unless:
- 20.1.1 It is required by law to keep a record of such information for a longer period of time; or
 - 20.1.2 It needs to keep a record of such information for another lawful purpose; or
 - 20.1.3 It has a contractual obligation to keep a record of such information; or

20.1.4 The Website user or Client has consented to their information being kept for a longer period.

20.2 Van Zyl Kruger Inc may, if it has de-identified personal information, kept such information for historical, statistical or research purposes. Van Zyl Kruger Inc shall ensure that appropriate safeguards are in place to prevent those records from being used for any other purposes, or against the information being re-identified.

21. RETURNING, DESTROYING OR DELETING PERSONAL INFORMATION

21.1 Where Van Zyl Kruger Inc is no longer authorised to retain a record of any personal information, it shall either:

21.1.1 ensure that the information is permanently destroyed or deleted as soon as reasonably practicable; or

21.1.2 return the information to the Client or transfer it to a third party, if requested by the Client in writing to do so.

22. CONSENT

22.1 The Website user or Client hereby consents to the processing of their personal information in terms of the provisions of this Privacy Policy.

22.2 The Website user or Client acknowledges and agrees that such consent has been given voluntarily after the Website user or Client has read and understood the provisions of this Privacy Policy, in particular, regarding the following:

22.2.1 the types of personal information to be processed, including specifically special personal information;

22.2.2 the specific processing activities to be undertaken;

22.2.3 the specific purpose/s for such processing; and

22.2.4 the possible consequences for the User that may arise from such processing.

22.3 Should a website user or Client wish to withdraw any consent previously given by them, they must notify Van Zyl Kruger Inc information officer in writing.

23. LODGING AN OBJECTION

23.1 A Website user may or client, on reasonable grounds, object to the processing of their personal information at any time after that processing has started.

23.2 If a website user or Client wishes to object to the processing of their personal information, they must send written request of their objection to Van Zyl Kruger Inc information officer, together with their reasons for doing so.

24. CHOICE OF LAW

This Privacy Policy shall be governed and interpreted in accordance with the laws of the Republic of South Africa.

25. AMENDMENT OF THIS PRIVACY POLICY

- 25.1 Van Zyl Kruger Inc 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.
- 25.2 It is the Website user's or client's obligation to periodically check the provisions of this Privacy Policy for any such changes, updates, additions, removals or amendments.
- 25.3 The Website user's continued use of this website following any changes, updates, additions, removals or amendments to this Privacy Policy will be considered Policy of the Website user's acceptance to abide by and be bound by this Privacy Policy, as amended.

Contact Details

For more information on your rights to privacy over your information, or the information processing activities of Van Zyl Kruger Inc please do not hesitate to contact us directly:

The Information Officer

Van Zyl Kruger Inc

Attention: Eberhard Kruger

Telephone: +27 21 180 4550

Email: dataprotection@vzk.co.za

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