



Privacy Notice - GDPR

CW Malan Jeffreys Bay Inc. (The Firm) undertakes, as part of its business activities and in accordance with the legislation in force in Europe, to ensure the privacy, confidentiality and security of the personal data of the users of its services, as well as to respect their privacy. This Personal Data Policy defines the principles for the processing of the personal data that The Firm collects from you, and which you provide to The Firm.

We invite you to read this Personal Data Policy carefully to understand The Firm's practices concerning the processing of your personal data. By using this application and/or by using the services offered by The Firm, you acknowledge having read the provisions of this Personal Data Policy (hereinafter the "Charter"), and you authorize us to collect, use and transfer your Personal Data and your User Data in accordance with these provisions. If you do not accept the terms of this Charter, you can decide not to use this application, and you must not share any personal data on this application. This Charter forms an integral part of the Terms and Conditions of Use of The Firm's website. It is governed by European laws and must be interpreted in accordance with these laws.

ARTICLE 1 – DEFINITIONS

"Consent": means the agreement of a user to add their email address to a Mailing List to receive email messages or emails from The Firm. Consent is collected by a legal mechanism located on "Get in touch with us" page. By using this service and by entering your personal contact information, you agree to receive emails from the company. You have a right of access, modification, objection and deletion of this information.

"Personal data": means data directly or indirectly allowing the identification of the individual to whom it applies and processed in any form whatsoever, either by a natural person or a legal entity.

"Opt-in": means a person supplied personal data and agreed that the entity may use this data to send promotional or commercial messages to the person concerned.

ARTICLE 2 - COLLECTION OF PERSONAL DATA

The Firm's business activities require the submission of certain personal information. The procedures for collecting and processing your personal data should accordingly respect certain fundamental rights in a spirit of loyalty and transparency. The information collected includes your name, business name, title, address, telephone and/or fax number or email address and other similar information that you may submit when you send comments, ask questions or request information from The Firm. This request for information is completely optional and you have the option to refuse to provide such information. However, in this case, The Firm will not be able to respond to your request.

Your personal data is collected:

- When you make contact or communicate with us,
- When you use or are billed for fee-based services,
- When you agree to voluntarily participate or accept to subscribe to The Firm's Newsletter.

In case of dispute, The Firm is also required to collect, as part of its management and for the proper use of its Website, the following impersonal data:

- IP addresses with an indication of the time,
- Cookies, local Flash data,
- The type of browser, the operating system, the destination URL that directed you to our application, the date, time and the history of your use of our application.

The Firm undertakes to:

- Collect, process or store your personal data for the sole purpose of achieving specific, legitimate and relevant purposes for which you have given us your consent,
- Keep your personal data for a period of time that is strictly in line with the purpose and the nature of our processing,
- Ensure the confidentiality of your data by allowing its disclosure only to the recipients designated for its processing or, to the extent permitted or required by law, to comply with a legal, regulatory or judicial obligation or any other demand of a State authority, to detect, prevent or deal with fraudulent activities, security breaches or any technical problem, or to protect against imminent harm to the rights, property or security of The Firm, its users or the public,
- Ensure your right to obtain information by responding to your questions about the processing of your data and by respecting your rights of access, correction, deletion or objection,
- Keep you informed about technical measures taken to secure your personal data.

ARTICLE 3 - IP ADDRESSES AND COOKIES

The Firm hosted web server automatically collects IP addresses and information relating to the use of this Website (as well as certain other information such as the type of browser used and operating system) from its users. The Firm can also monitor the user's use to measure the Website's general activity, to analyse and make improvements to it and to disclose cumulative statistics on the number of users.

The Firm may use cookies to record Website activity to manage it more effectively and to improve it for your use. Cookies are small text files sent and stored in your computer that allow Web servers to recognize users' habits, facilitate their access to Websites, and allow Websites to compile aggregate data that will improve the Website and its content. Cookies do not damage computers or files.

Cookies by themselves cannot be used to discover the user's identity. If you do not want The Firm to have access to the cookies, your web browser allows you to deny or disable the use of cookies by setting your browser accordingly. As every browser has different capabilities, please refer to the "Help" section in your browser for more information on how to deny or disable the use of cookies. However, please note that cookies may be necessary to allow The Firm's website to function properly. Should you refuse these cookies, The Firm will not be able to guarantee the proper functioning of all the website's features.

ARTICLE 4 - STORAGE AND PROCESSING OF DATA

Your data is processed in confidential ways and is not communicated to any third party without your consent. It is particularly possible that we may be required by law, in specific cases, to disclose your data to the authorities responsible for investigations. The transfer and disclosure of your data is carried out in accordance with the legislation in force.

Personal information collected on the Website may also be transferred to and stored in a country outside the European Economic Area ("EEA"), for the purposes of data conservation and the operation and maintenance of the Website. These countries may not provide the same level of data protection as that conferred by the laws of your country. The transfer of data to countries not providing protection similar to that of your local law is protected by standard contractual clauses signed between The Firm and the recipients of the data located in these countries.

The Firm will take all steps reasonably necessary to ensure that your data is processed securely and in accordance with this Personal Data Protection Charter. Unfortunately, the transmission of information via the Internet is not completely secure. Although The Firm takes all reasonable precautions to protect your personal data, the security of data transmitted on the Website cannot be guaranteed and any transmission is at your own risk. Upon receipt of your information, The Firm will use strict procedures and security features to try to prevent unauthorized access.

ARTICLE 5 - USE OF THE PERSONAL INFORMATION COLLECTED

The use of your data is also required for communication purposes to thus make a support service available that meets your expectations. Subject to your consent, we use your data to keep you regularly informed, by email only, about our news, events and special activities. In any case, The Firm uses the personal identification information provided by you only for the purposes for which you have provided it.

The Firm will not sell or disclose the personal identification information provided by you to any third party outside of its related and partner companies, or its respective agents or consultants, who act in the name of or on behalf of The Firm and are subject to confidentiality obligations.

In addition, The Firm may share or transfer personal data to comply with laws or legal obligations, to establish or exercise rights recognized by law, or property rights, or to defend itself against legal redress, or in the case of a merger, acquisition, reorganization or a similar fact.

ARTICLE 6 – YOUR RIGHTS TO ACCESS AND CORRECT YOUR DATA

You have the right to exercise your right to object to The Firm's use of your personal data for commercial purposes. You can exercise your right to prevent this processing by checking certain boxes on the forms we use to collect your data. You can also exercise your right to object at any time by contacting The Firm (see our contact details below).

The Firm may at any time display links to or from the websites of our partners, advertisers and affiliated networks. If you follow a link to one of these websites, please note that these websites have their own Personal Data Protection Charters, and we disclaim any responsibility related thereto. Please consult these Personal Data Protection Charters before transmitting any personal data to these websites.

In accordance with the GDPR, participants supplying their personal data via the Website have a right of objection, access and correction of such data (if the request for deletion of information concerns items necessary for the proper functioning of the Participant's account, the account would be deleted).

As a result, any such participant has the right to require that the information concerning him/her be corrected, supplemented, updated or deleted. This right may be exercised by mail via the following address: rencke@comalan.co.za. Any access request may be subject to a commission limited to the costs incurred to transmit to you the details of the information we hold concerning you.

ARTICLE 7 - PROTECTION OF CHILDREN

The Firm's website users under the age of eighteen (18) are not allowed to disclose personal information without the consent of their parents or guardians. If your children disclose personal data on the website, they may potentially receive unsolicited messages from third parties.

Accordingly, you are responsible for making sure that they comply with the applicable Terms and Conditions of Use, warning them about sharing personal data and controlling their use of the Website. If you are worried about your children's activities or respect for their confidentiality on our Website, we encourage you to send us an email.

ARTICLE 8 - AMENDMENT TO THIS CHARTER

The Firm may update this Personal Data Protection Charter at any time. The Firm will notify you of significant changes regarding the processing of personal identification information by posting a notice on the website.

The Firm encourages you to regularly consult this Personal Data Protection Charter. Amendments to this Charter will take effect immediately upon publication on the Website homepage.

However, changes to the purpose of collection, use and disclosure of your personal data may be implemented only with your express permission, or only to the extent authorized or prescribed by law.